

Appendix 7 - Summary and Response to Public Comments

Below is a summary of the public comments received at the open house meetings conducted in March (in-person) and July 2020 (two virtual sessions), the statutory public meeting held in December 2020 and comments received through the Study's process.

Open House Meeting Comments

The following is a summary of the comments received at the three open house sessions. The first open house was held on March 11, 2020, in-person at City Hall prior to the lockdown and the following two sessions were held virtually on July 29, 2020, one session was held in the afternoon and the other in the evening.

Public Comments	Staff's Response
Parking, community safety and neighbourhood character being compromised with the additional residents.	<p>When properly planned and managed parking should not be an issue. Service providers have plans to manage parking and drop-offs if necessary. There is no reason this should be any different from a typical family with multiple residents and vehicles.</p> <p>Group homes should not compromise community safety and neighbourhood character with the additional residents, as they are regular family residences that meet the same zoning, building and fire code requirements as other homes in the neighbourhood.</p>
Group homes operating as a business in a residential area.	Group homes are considered residential homes. Who owns or operates it has no bearing on this any more than a family renting a home in a neighbourhood. The presence of paid staff is no different from a family hiring a personal care attendant.
Removing or lessening group home restrictions will create neighbourhoods full of group homes.	The proposed amendments will increase the number of group homes in the City to meet the needs of those requiring special housing. However, each operator is required to obtain a licence from the

Reference: Government of Ontario, 2012, *In the zone: Housing, human rights and municipal planning*, Ontario Human Rights Commission.

	<p>appropriate Ministry to operate and satisfy the City's requirements of Building and Fire Code compliance.</p> <p>The current provisions don't align with the intent of various provincial legislations including: Section 34 of the <i>Planning Act</i> which notes that any zoning requirements passed by municipalities are to regulate land use and not people; the 2020 Provincial Policy statement and the Growth Plan encourages communities to offer a mix of housing options to meet the social, health, economic well-being requirements of current and future residents, including those with special needs; the Regional Official Plan supports local municipalities permitting supportive housing in residential areas without restrictions such as, minimum separation or limits on the number per area. Implementing unnecessary restrictions goes against the recommendations of the Ontario Human Rights Commission.</p>
<p>Negative impact on neighbourhood character.</p>	<p>There is a false assumption that the group home will resemble an institution. Group homes are regular family residences that meet the same zoning, building and fire code requirements as other homes in the neighbourhood.</p>
<p>The right of residents to be notified when group homes open.</p>	<p>Staff recommend removing the requirement of notifying adjacent neighbours when a group home locates in an area, especially when the zoning permits the use. Creating additional unnecessary requirements is viewed as disproportionately affecting a Code-</p>

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	protected group, and potentially violates the Ontario Human Rights Code.
Maintaining the open houses as a requirement since it's beneficial to neighbouring residents.	The Ontario Human Rights Commission document "In the zone: Housing, human rights and municipal planning", notes the need to remove barriers for protected groups to find safe and adequate housing. This includes organizing public meetings that are unnecessary.
Group homes should be located in areas of the City where the infrastructure supports their opening and daily operations.	Group homes are no larger and have no more residents than many other homes, and are well within capacity of existing infrastructure. Since residents are properly housed and care for, they typically use health and emergency services at the same, or lower, rates than other neighbourhood residents.
Certain areas already have enough group homes and don't need more.	Group homes are an essential form of housing for many people with disabilities, both physical and psychological. The international community has long recognized that housing is a fundamental and universal human right that must be protected in law. Therefore, limiting the number of group homes per area has been ruled by the courts as discriminatory because it restricts the location of dwellings based on the characteristics of the users.
Decrease in property value.	In a review of 26 studies of supportive housing across North America, the HomeComing Community Choice Coalition found that 25 of the studies showed no impact on property values. The City of Toronto found the values of property surrounding the group home increased in pace with the values across the City (de Wolff 2008). There is no

Reference: Government of Ontario, 2012, *In the zone: Housing, human rights and municipal planning*, Ontario Human Rights Commission.

	evidence to suggest a group home has an impact on the value of adjacent properties.
Public should have a say whether a group home is able to open.	It's important that governments remove barriers to inclusion, and not reinforce or build new ones. Zoning that restricts housing for people with disabilities, without a legitimate land-use rationale, is a form of systemic discrimination, and is prohibited under the Ontario Human Rights Code. Individuals do not have the right to choose who lives in their neighbourhood.
Group homes make residential neighbourhoods undesirable because they change the neighbourhood character.	This is usually on the false assumption that the home will resemble an institution. Group homes are regular family residences that meet the same zoning, building and fire code requirements as other homes in the neighbourhood. As part of the group home registration process the City will continue to conduct annual property standards and fire code inspections to address any violations.
Not enough community/public engagement is done and the lack of sufficient public notice.	Under the <i>Planning Act</i> public consultation is only required when considering an Official Plan and Zoning By-Law amendment. If the use is a permitted-use, a public meeting is not required and often gives voice to discriminatory discussion.
Consider permitting group homes in other housing forms besides single family detached.	Staff are recommending that group homes be permitted in other housing forms besides just single detached.
Revising the group home provisions to allow the opening of additional group homes.	Staff are recommending removal of some current provisions such as, minimum separation distance and limits per

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	planning area that would allow for additional group homes to operate across the City.
Agree with removing separation distance to lessen restrictions.	Staff are recommending the removal of separation distances to align with the Ontario Human Rights recommendations and current best practices.

Virtual Statutory Public Meeting Comments

The following is a summary of the comments received during the Statutory Public Meeting held on December 7, 2020. There were eleven (11) delegates and one piece of correspondence that was received in respect to the proposed Official Plan and Zoning By-Law amendments. A number of comments received were similar in nature to the comments noted at the open houses. Below is a summary of the comments received:

Public Comments	Staff's Response
Parking, community safety and neighbourhood character being compromised with the additional residents.	When properly planned and managed parking should not be an issue. Service providers have plans to manage parking and drop-offs if necessary. There is no reason this should be any different from a typical family with multiple residents and vehicles. Group homes should not compromise community safety and neighbourhood character with the additional residents. Group homes are regular family residences that meet the same zoning, building and fire code requirements as other homes in the neighbourhood.
Group homes operating as a business in a residential area.	Group homes are considered residential homes. Who owns or operates it has no bearing on this any more than a family renting a home in a neighbourhood. The

Reference: Government of Ontario, 2012, *In the zone: Housing, human rights and municipal planning*, Ontario Human Rights Commission.

	<p>presence of paid staff is no different from a family hiring a personal care attendant.</p>
<p>Removing or lessening group home restrictions will create neighbourhoods full of group homes.</p>	<p>The proposed amendments will increase the number of group homes in the City to meet the needs of those requiring special housing. However, each operator is required to obtain a licence from the Ministry to operate and satisfy the City's requirements of Building and Fire Code compliance.</p> <p>The current provisions don't align with the intent of various provincial legislations including: Section 34 of the <i>Planning Act</i> which notes that any zoning requirements passed by municipalities are to regulate land use and not people; the 2020 Provincial Policy statement and Growth Plan encourages communities to offer a mix of housing options to meet the social, health, economic well-being requirements of current and future residents, including those with special needs; the Regional Official Plan supports local municipalities permitting supportive housing in residential areas without restrictions such as, minimum separation or limits on the number per area.</p> <p>The proposed amendments would align with the recommendations of the Ontario Human Rights Commission.</p>
<p>Negative impact on neighbourhood character.</p>	<p>There is a false assumption that the group home will resemble an institution. Group homes are regular family residences that meet the same zoning, building and fire code requirements as other homes in the neighbourhood.</p>

Reference: Government of Ontario, 2012, *In the zone: Housing, human rights and municipal planning*, Ontario Human Rights Commission.

<p>Neighbourhood safety is a concern – some areas have poor lighting, no sidewalks, increased traffic and parking issues which don't support group homes.</p>	<p>Resident safety is an important concern in all communities across the City. This includes the safety of children, adults and seniors of all abilities. Concerns regarding poor lighting can be investigated by our Public Works Department and assessed whether lighting improvements can be made in an area. When there are no sidewalks in a community, improvements to lighting and reduction in speed can (i.e. speed bumps) improve the safety of residents. The additional traffic and issues with parking are typically not associated with the operation of a group home because service providers have plans to manage parking and drop-off if necessary. There is no reason this should be any different from a typical family with multiple residents and vehicles.</p>
<p>Concern about existing infrastructure supporting the opening of group homes.</p>	<p>Group homes are no larger and have no more residents than many other homes, and are well within capacity of existing infrastructure. Since residents are properly housed and care for, they typically use health and emergency services at the same, or lower, rates than other neighbourhood residents.</p>
<p>Group home applications should be reviewed by the Committee of Adjustment to determine whether appropriate to operate in an area.</p>	<p>The <i>Planning Act</i> grants authority to Municipal Councils to appoint committees to approve a number of minor applications. Section 45 of the <i>Planning Act</i> permits the Committee of Adjustment to make decisions on minor variances from the Zoning By-law and to grant permission for altering or changing a lawful non-conforming use of land, buildings or structures. Section 53 of the <i>Planning Act</i> permits the Committee of Adjustment to make decisions on</p>

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	<p>applications for changes to land configuration in the form of consents.</p> <p>Staff do not agree with this recommendation as it is not the role of the Committee of Adjustment to assess whether permitted uses such as, group homes, should be allowed. This would be viewed as discriminatory because a particular demographic group (the vulnerable population) is being targeted with additional requirements and public scrutiny which is not legislatively required and the same process/evaluation is not being applied to all other permitted uses.</p> <p>Introducing unnecessary requirements to register group homes creates additional barriers for individuals requiring special housing, going against the recommendations of the Ontario Human Rights Code and does not align with provincial legislation encouraging communities to create additional supportive housing opportunities.</p> <p>Staff do not support this recommendation as it goes against creating complete and inclusive communities.</p>
<p>Inconsistent with the Planning Act</p>	<p>Staff do not view the proposed amendments being inconsistent with the <i>Planning Act</i>. Part 1, Section 2 of the <i>Planning Act</i> states that council of a municipality shall have regard to matters of provincial interest such as, (h) “the orderly development of safe and healthy communities”; and, (j) “the adequate provision of a full range of housing, including affordable housing”</p>

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	<p>The proposed recommendations also align with the Provincial Policy Statement 2020 to offer a range and mix of housing options, including affordable housing, to meet the needs of current and future residents as described in the report.</p>
<p>Senior group homes should not be located in low density residential areas because of the issues associated with their use. Retirement homes serve to house seniors and there are several located within the City.</p>	<p>Staff are recommending that group homes be permitted in all residential communities and that there should be no distinction regarding the clients being served as this would be discriminatory amongst a certain demographic group. All group homes are licenced by the Ministry to ensure they are operated safety.</p> <p>The Region of Peel’s Housing and Homelessness Plan (2018 to 2028) has identified the need of providing supportive housing as one of their strategic initiatives because of the 50% unmet demand. This is important as the senior population will continue increasing.</p>
<p>Certain areas already have group homes and don’t need more.</p>	<p>Group homes are an essential form of housing for many people with disabilities, both physical and psychological. The international community has long recognized that housing is a fundamental and universal human right that must be protected in law. Therefore, limiting the number of group homes per area has been ruled by the courts as discriminatory because it restricts the location of dwellings based on the characteristics of the users.</p>
<p>Decrease in property value.</p>	<p>In a review of 26 studies of supportive housing across North America, the HomeComing Community Choice Coalition found that 25 of the studies showed no impact on property values.</p>

Reference: Government of Ontario, 2012, *In the zone: Housing, human rights and municipal planning*, Ontario Human Rights Commission.

	<p>The City of Toronto found the values of property surrounding the group home increased in pace with the values across the City (de Wolff 2008). There is no evidence to suggest a group home has an impact on the value of adjacent properties.</p>
<p>Public should have a say whether a group home is able to open.</p>	<p>It's important that governments remove housing barriers to be more inclusive, and not reinforce or build new ones. Zoning that restricts housing for people with disabilities, without a legitimate land-use rationale, is a form of systemic discrimination, and is prohibited under the Ontario Human Rights Code. Individuals do not have the right to choose who lives in their neighbourhood.</p>
<p>Group homes make residential neighbourhoods undesirable because they change the neighbourhood character.</p>	<p>There is a false assumption that the group home will resemble an institution. Group homes are regular family residences that meet the same zoning, building and fire code requirements as other homes in the neighbourhood.</p>
<p>Not enough community/public engagement is done and the lack of sufficient public notice.</p>	<p>Under the <i>Planning Act</i> public consultation is required when considering an Official Plan and Zoning By-Law amendment. If the use is a permitted-use a public meeting is not legislatively required and often gives voice to discriminatory discussion.</p>

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