



July 5th, 2022

Deputy Mayor Ana Bailão
Chair of the Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of the Planning and Housing Committee

Re: PH35.18 Renovation Policy - Creating a Framework to Protect Affordable and Mid-range Rental Homes and Deter Renovictions

We are writing to you on the matter of the City's proposed policy framework on renovations. We are representatives of the Right to Housing Toronto (R2HTO), a network of organizations and individuals working to support the implementation of the right to housing by the City of Toronto.

As the housing affordability crisis persists in our city, we have been working with our networks and communities advocating for the City to use all its available tools and resources to protect Toronto's limited affordable housing stock and prevent evictions. We are therefore pleased to see the City propose a wide variety of recommendations to prevent renovations and preserve affordable rental homes. We are supportive of the City's efforts to also cover mid-range homes in this policy. In addition, we are pleased to see that the City has explicitly adopted a rights-based and equity-based lens to formulate the initial details of its renovation by-law. Moving forward, consistently taking this approach can help to effectively deter renovations.

Many of the recommendations highlight how the province, and to a lesser extent, the federal government can contribute to eviction prevention and preservation of affordable housing. It is at the provincial level that the rules governing landlords and tenants are written. It makes sense then to propose filling the many gaps in the laws and operations of the province to mitigate negative outcomes. For example, [past Rights Reviews](#) that we produced have called out barriers that many lower income households face in accessing justice through the Landlord and Tenant Board. We have also advocated for the closure of loopholes in rent regulations that enable landlords to drastically increase rents which lead to the displacement of tenants. The role of the federal government in combatting the financialization of housing and encouraging the creation of affordable housing is equally important. These examples point to how the entire housing ecosystem needs to function more coherently, embedded in rights-based principles, so that people can live in safer, more secure and adequate homes.

The City of Toronto's role is just as crucial. To this end, the proposal to introduce a by-law and set up a Housing at Risk Table to make better sense of and combat renovictions is a significant development. We agree with some elements of the proposal including provisions to build awareness and capacity of landlords and tenants about their rights and obligations. We encourage the City to work with the wide network of human rights experts, housing advocates and related organizations to contribute to informing and empowering tenants. Indeed, we encourage you to involve us meaningfully throughout the development of this policy, for example, through inviting our coalition to work with the Housing at Risk Table.

Finally, while we recognize that the by-law will be developed in more detail over the coming months, we encourage the City to think more proactively about enforcement and compliance. As of now, the proposed policy framework has alluded to the possibility of taking "appropriate action" in cases of "non-compliance" but is driven primarily by an education first approach that entails voluntary participation by landlords. This approach may not effectively end bad faith evictions. The City should therefore utilize all available policy options that can prevent renovictions, for example by detailing conditions for withholding building permits. Indeed, this approach to securing tenure is in line with the City's stated commitment to applying a rights-based approach to housing.

We congratulate staff for taking important steps towards addressing renovictions in Toronto and hope that City Council will provide the resources necessary to ensure their success.

On behalf of the Right to Housing Toronto