

From: [Lindsay Blackwell](#)
To: [Planning and Housing](#); [Councillor Perks](#); [Councillor Bradford](#); [Councillor Matlow](#); [Councillor Myers](#); [Councillor Nunziata](#); [Councillor Thompson](#)
Cc: [Mayor Chow](#); [Ombudsman](#); [No Demovictions Ontario](#); [Megan Kee](#); [Michael Whitehead](#); [Annette Gasher](#); [Charlotte Mickie](#); [David Steinman](#); [Rebecca Gimmi](#); [145 St. George Tenants" Committee](#); 135isabellast@gmail.com; [Patricia Johnston](#); pattipokorchak@gmail.com; [MARCELLA THOMPSON](#); geofforganizer@gmail.com
Subject: [External Sender] No Demovictions comments for 2023.PH8.16 on November 30, 2023 Planning and Housing Committee
Date: November 30, 2023 12:10:02 AM
Attachments: [Letter to Planning & Housing Committee - Nov 30 2023 - No Demovictions.pdf](#)

To the Planning & Housing Committee Members and City Clerk:

Please see attached letter sent on behalf of No Demovictions.

Please add my comments to the agenda for the November 30, 2023 Planning and Housing Committee meeting on item 2023.PH8.16, Amendments to Toronto Municipal Code Chapter 667: Rental Demolition and Conversion By-law

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

Many thanks,
Lindsay (on behalf of No Demovictions)

November 30, 2023

City of Toronto Planning & Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2



Attention: Toronto Planning & Housing Committee Members

Re: Item No. PH8.16 - Amendments to Toronto Municipal Code Chapter 667: Rental Demolition and Conversion By-law

We are a tenant collective representing the rights and interests of tenants facing rental demolition and conversion (i.e., demoviction) across Toronto. Our advocacy work includes affecting policy change at the city, provincial, and federal levels to fight profit-driven demovictions while advocating for affordable rental housing and responsible, sustainable development. You can learn more about our organization and mission here:

<https://www.nodemovictions.ca/mission>

We are writing today to raise concerns related to some of the proposed amendments to Toronto Municipal Code Chapter 667 (Rental Demolition and Conversion By-Law), and ***we strongly urge Planning & Housing Committee Members to defer this item until such time as we, as well as other local tenants organizations and groups can be meaningfully engaged on the proposed amendments.***

As it currently stands, the proposed amendments:

- Do not clearly articulate the City of Toronto's provisions of a tenant relocation and assistance plan related to tenant demoviction;
- Create confusion regarding situations where an approved proposals/projects are transferred to another party (e.g., a corporation, chargee, etc.);
- Confer a degree of power to the City Planner in making determinations related to demovictions at the expense of a transparent process accessible to the public; and, troublingly,
- Substantially impact tenants' and the community's rights to consultation on proposed rental demolitions.

We would also note that, while we are supportive in principle of an access plan for replacement rental units without returning tenants, we would strongly urge City Planning to work with tenant organizations, including our membership, to work through practical considerations. It is also our position that, while City Planning is opening an avenue for amendments to Chapter 667, there needs to be a broader undertaking of legislative and policy work (with potential additional amendments) on the issue of demovictions in Toronto that meaningfully engages with tenants who have, or are facing demoviction, as well as other local tenant advocacy and justice organizations.

Demovictions are a growing issue in Toronto - a recent Investigative Journalism Foundation (IJF) analysis of municipal and Toronto City Council meeting data between January 2017 and October 2023 found:

- That 100 buildings containing 4,392 rental units across Toronto have been approved for demolition. A third of these were approved in 2023 alone.
- Another 71 buildings (representing a further 4,124 rental units) are currently facing rental demolition applications.

This potentially represents **tens of thousands** of displaced tenants across the City of Toronto who are being displaced from their communities, not adequately compensated, and struggling to find suitable temporary housing due to extremely low vacancy rates. Moreover, this loss also represents a sharp loss of affordable rental housing for thousands of Torontonians - particularly in the downtown core, where housing insecurity has been particularly acute in recent years, and the population of people experiencing homelessness has reached a critical mass. Demovictions actively contribute to the housing affordability crisis in Toronto, rather than helping to solve it.

In regards to the proposed amendments, here are some of our key concerns and recommended revisions to the proposed amendments:

§ 667-11, Notice of Application:

This section can, and should be strengthened to ensure that notices to tenants are accessible, and provided in multiple languages (as appropriate). We have encountered instances where City Planning and the developer have either intentionally or unintentionally used language barriers to avoid clearly articulating the rental demolition and conversion process to tenants. In those situations, tenants were made unaware of the demolition application approval process, as well as their rights and entitlements under tenant relocation and assistance plans.

§667-12, Approval by Chief Planner under delegated authority:

- (D)(1) Should be amended so that the requirement of the owner of the residential rental property to notify tenants of relevant provisions of the *Residential Tenancies Act, 2006* **also includes** notifying tenants of the relevant provisions under Chapter 667 of the Toronto Municipal Code.
- (D)(3) Regarding the requirement for the owner to provide tenant relocation and other assistance, requires further articulation. While tenant relocation and assistance plans have been an evolving practice of the City Planning department, **there is much room for improvement** to ensure that temporarily displaced tenants during a demoviction do not become homeless. We strongly urge Councillors to direct City Planning to work with No Demovictions and other tenant advocacy organizations to ameliorate gaps and standardize an appropriate tenant relocation and assistance plan across Toronto.
- (D)(4) Regarding conditions secured through agreement with the City - the proposed amendments do not provide clarity or guidance in circumstances where a property with an approved demolition proposal changes ownership. Given ownership change and property speculation **has become standard practice for demoviction projects**, it would benefit tenants to understand how/if their relocation and assistance plan entitlements may (or may not) change with new building ownership (as well as in situations where projects fail, corporations go into receivership, etc.)

§ 667-14, Approval by Council:

- (A) Regarding the requirement for the Chief Planner to submit a report regarding a demolition application to one (or more) community council if the proposal is of “City-wide interest” - it is unclear as to how, and under what circumstances, a proposal would be determined to be of City-wide interest. We would recommend that City Planning articulate the criteria that would need to be met to make the determination that a proposal is of City-wide interest.
- (B) Regarding the amendment to the following language (proposed changes in bold; previous language in strikethrough):
 - “Before submitting a report required under Subsection A, City Planning Division staff ~~shall~~ **may** hold a ~~community~~ **tenant** consultation meeting...”
 - In the strongest possible terms, **No Demovictions does not support this proposed amendment**, which would remove City Planning’s responsibilities to consult with impacted tenants, community members, and the broader public. Tenants must be given the opportunity to voice their concerns, advice, and feedback on what happens to their homes. This amendment would remove a critical opportunity for tenants and the broader community to participate in the planning process. Moreover, given the City is also seeking to recommend/request that the province of Ontario consult with them on provincial rental replacement bylaw regulations, it is utterly hypocritical and egregious that the City would then remove any opportunities for tenant consultation regarding demoviction proposals.

§ 667-15 (C), Conditions re: Centralized Affordable Housing Access System:

As noted above, the proposed centralized affordable housing access system for rental replacement units with no returning tenants requires further operational considerations. While we applaud the City’s efforts to enhance affordable rental housing stock, we are concerned that a system without input from those with lived experience will potentially overlook loopholes that corporate landlords/developers currently use, in abundance, to maximize profits. The City has already engaged with the corporate landlord/developer organizations on this matter, and as a point of equity, it would be fair practice to solicit feedback from those on the other side of the equation. We strongly recommend that City Planning engage with No Demovictions and other key tenant organizations to outline how this system would work with respect to rental replacement units.

In addition to the proposed amendments above, we would strongly recommend that the City use this opportunity to look at amendments in regards to:

- Ensuring sustained engagement and consultation through a Demoviction Committee that can advise on key challenges faced by tenants facing demoviction;
- Improving data collection and public reporting on rental demolition applications and approvals;
- Strengthening the policies and practices related to tenant relocation and assistance plans to ensure that tenants are not unduly forced to subsidize the costs associated with their displacement;
- Lengthening the span/lifetime of affordable rental replacement units beyond the standard practice of 10 or 20 years that includes vacancy and rent control provisions;

- Ensuring tenants are provided a first right of refusal to purchase the rental property for the purposes of conversion to co-operative housing, in advance of any demolition application being considered; and
- Ensuring that demolition and construction timelines are reasonable and known to tenants who are being displaced, and that provisions/penalties exist in circumstances where a developer/owner demolishes the rental building but does not initiate the construction project in a reasonable or timely manner (i.e., the land remains fallow).

We welcome the opportunity to work with the Planning and Housing Committee, City Planning, and other key stakeholders to address these key issues and to help shape affordable rental housing and demoviction policy in Toronto.

Many thanks for the work that you do.

Sincerely,

The No Demovictions Team

cc: Olivia Chow, Mayor of Toronto
Reema Patel, City of Toronto Deputy Ombudsman (Housing)