

March 28, 2024

To: Mayor Olivia Chow, Planning & Housing Committee Members

RE: Report on motions by Saxe and Moise for tenants facing demoviction

Dear Mayor Chow and Members of Toronto Planning & Housing Committee:

We are writing in support of the following motions: [MM11.16 - Rental Demolition Permits and Market Rentals - by Councillor Dianne Saxe, seconded by Mayor Olivia Chow](#)

In summary, these motions direct the City Planning department to:

1. When considering rental demolition applications for large rental buildings, to double rental space in replacement buildings by requiring new purpose-built market-rental units within the development, in addition to rental replacement units, as a condition of any permit (Councillor Saxe).
2. Report to the Planning and Housing Committee by the end of the first quarter of 2024, on the feasibility of including secondary market rental data in the rent-gap calculations, as part of the City of Toronto's Tenant Relocation and Assistance Package (Councillor Moise).
3. Have City Council request the Province of Ontario to amend the Planning Act and/or the City of Toronto Act, 2006, to authorize the City of Toronto to require that any development benefiting from government incentives for the **development of purpose-built rental units maintain their rental tenure for the life of the building** and remind the Province of the City's request for inclusionary zoning in order to increase the supply of affordable rental housing.
4. City Council reiterate the importance of the right to return for **all renters** impacted by demolition and redevelopment of rental buildings.

Social Planning Toronto has spent over 60 years providing critical social research and reporting, community capacity building and engagement, and evidence-based advocacy for Toronto and its communities. We are also a publicly-appointed member of the City of Toronto's Housing Rights Advisory Committee, in which we provide advice to City Council on strategies and actions

required to achieve the City's commitment to progressive realization of the right to adequate housing.

With this in mind, our city is losing our affordable rental stock faster than it's building it; one way this is occurring is through the demolition of purpose-built rental apartment buildings where many tenants have established their lives for years. There has been a significant rise in rental buildings undergoing demolition in Toronto - this trend should not continue in the name of profit-driven development. A huge step in realizing the right to housing for all in Toronto is preserving the affordable rental stock we already have.

The tenants in buildings slated for demolition come from all walks of life, many of them are from equity-deserving communities, such as Indigenous, seniors and people on fixed incomes. We have met with elderly tenants from these buildings, and have heard how devastated and fearful they are of having to move from their long-established homes.

Requiring developers to double the rental space and rental units in replacement buildings would enable the city to increase its affordable rental stock at a faster pace, and disincentivize developers from engaging in demolitions in the first place. It is imperative that all replacement rental units maintain their rental tenure for the life of the building.

Moreover, when making rent-gap calculations for the Tenant Relocation Assistance Program, a robust qualitative analysis considering secondary rental market data should be conducted, taking into account that displaced tenants deserve to live in the neighbourhood they currently reside in. No Demovictions' research indicates that CMHC data largely underestimates the average market rent in downtown Toronto, which would result in tenants being undercompensated through rent gap payments. Rent gap payments should be based on actual average market rental rates in their neighbourhood, and should be determined based on rental rates across a wide-range of rental platforms (rather than solely on CMHC data).

Currently low vacancy rates means that it will be even more difficult for tenants to find rent-protected units at a monthly rent similar to their current rates, especially for those living in the downtown core. With the current rental replacement policy based on CMHC data only, rent gap payments will not be sufficient; people on fixed incomes would most likely have to move far away from their neighbourhoods, local amenities and support networks, or in the worst case, resort to living in precarious housing.

Finally, we ask that City Council continue advocating to the Province of Ontario and the Minister of Municipal Affairs and Housing to provide final approvals for Protected Major Transit Station

Areas (PMTSAs) so that the City can move forward in implementing its inclusionary zoning policy and increase the supply of affordable rental housing.

As an organization with a long history of producing evidence-based research and analysis on homelessness and affordable rental housing, has worked alongside coalitions, community groups and tenants for improved housing policies, and is committed to building an equitable, inclusive and accessible Toronto for all residents, Social Planning Toronto encourages City Council and staff to align its rental replacement policies with the City's Housing Charter.

Regardless of the threat of Provincial intervention, the City of Toronto needs to take stronger steps to protect and preserve affordable purpose built-rental units and tenants, which means preventing demovictions to the greatest extent possible and providing displaced tenants with sufficient support throughout the relocation process.

If we truly want to realize the progressive right to housing as a city, this is our chance to lead by example. As the City of Toronto has "committed to advancing the right to adequate housing and recognizes that housing is essential to the inherent dignity and well-being of the person and to building sustainable and inclusive communities", we ask City Council and City of Toronto staff to prioritize the lives of renters currently facing demoviction in all of its plans and policies.

Thanks for your consideration,

A handwritten signature in black ink, appearing to read "Melissa Wong".

Melissa Wong,
on behalf of Social Planning Toronto

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