



PO Box 19057, RPO Walmer  
Toronto, ON M5S 3C9  
[theara.org](http://theara.org)

April 2, 2024

Councillor Gord Perks  
Chair, Housing and Planning Committee  
100 Queen St W, A14  
Toronto, ON M5H 2N2  
(By email: [councillor\\_perks@toronto.ca](mailto:councillor_perks@toronto.ca) )

Dear Councillor Perks,

**Re: PH11.10 Response to Including New Approval Conditions for Rental Demoviction Applications**

The Annex Residents Association (ARA) asks that you to take action to protect tenants facing demoviction and to ensure the maintenance and growth of purpose-built rental units in our city. In particular we urge you to **reject the recommendations** in the confidential report from City staff to the Planning and Housing Committee referred to in item [PH11.10](#).

The report in question recommends rejecting three key changes to rental replacement implementation because “such changes could unintentionally negatively impact the City’s existing rental replacement policy framework.” The proposed changes the report suggests rejecting include:

1. Requiring additional purpose-built market rental units as a condition of approval for Rental Housing Demolition applications;
2. Feasibility of using secondary market (i.e., condominium) rental data to inform how financial compensation is calculated as part of Tenant Relocation and Assistance Plans for eligible tenants; and
3. Providing income-eligible post-application tenants the option to rent available replacement affordable rental units prior to eligible individuals who are on the Centralized Affordable Rental Housing Access System.

The ARA strongly supports all three of these changes for the following reasons:

1. Adding units would be a progressive move toward enhancing badly needed rental stock.

2. Secondary data could help correct flaws in the current rental data which relies on an insufficient pool of units due to the low vacancy rates.

The CMHC rating system itself recognizes that this data is far from ideal. Therefore, rent gap payments made on this data would be unrealistic and unfair. Indeed, in the case of 2-bedroom units it would be impossible to calculate. Relying on such admittedly flawed data would yield unacceptable consequences for demovicted tenants. In our view, the inclusion of secondary market data is a reasonable measure that could help to solve this shortcoming.

3. With respect to post-application tenants: the time between an application being filed and eviction notices being issued can be years. In that case, the post application tenants also deserve secure housing.

Contrary to common belief, 70% of our population in the Annex is comprised of tenants. We are proud that our area represents socio-economic diversity and different forms of residency. And we believe that all our neighbours should be safe and secure. We are distressed not only by the impending demovictions at 145 St George but by the prospect of even more demovictions in our community.

Recently Montreal developer Nicola Padula told Canadians: "If people can't afford it, they should not live in the city. The city is made for the privileged." This is a philosophy we utterly reject. ***We want our tenant neighbours to stay in the Annex, where they can thrive, fully enjoying their well-earned neighbourhood-specific capital and continuing to contribute to our civic fabric.***

There is a choice before you and your Committee: capitulation to the province and developers catering to the wealthy or **acting to keep residents in their neighbourhoods, protected from potentially life-changing displacement.** We strongly urge you to reject the Staff recommendations as these three changes are a grave matter of social justice.

Sincerely,



Rita Bilerman, Chair

CC: [mayor\\_chow@toronto.ca](mailto:mayor_chow@toronto.ca)  
[francis.kung@toronto.ca](mailto:francis.kung@toronto.ca)  
[Brendan.Iler@toronto.ca](mailto:Brendan.Iler@toronto.ca)  
[Jennifer.Chan23@toronto.ca](mailto:Jennifer.Chan23@toronto.ca)  
[Devon.Sissons@toronto.ca](mailto:Devon.Sissons@toronto.ca)  
[phc@toronto.ca](mailto:phc@toronto.ca)  
[councillor\\_bradford@toronto.ca](mailto:councillor_bradford@toronto.ca)  
[councillor\\_nunziata@toronto.ca](mailto:councillor_nunziata@toronto.ca)  
[Councillor\\_Kandavel@toronto.ca](mailto:Councillor_Kandavel@toronto.ca)  
[Councillor\\_Myers@toronto.ca](mailto:Councillor_Myers@toronto.ca)  
[councillor\\_matlow@toronto.ca](mailto:councillor_matlow@toronto.ca)  
[councillor\\_thompson@toronto.ca](mailto:councillor_thompson@toronto.ca)  
[clerk@toronto.ca](mailto:clerk@toronto.ca)