



June 12, 2024

Reply To: Karly Wilson
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To: City of Toronto Planning and Housing Committee

Re: PH13. 7 – Renovictions Policy Implementation: Review of Hamilton Renovation License and Tenant Relocation By-Law and developing a Toronto Renovictions By-Law

Don Valley Community Legal Services is a community legal clinic funded by Legal Aid Ontario. Our catchment area includes Wards 14, 15, 16 and 19, and sections of Wards 11 and 12. We serve many diverse communities and our clients are lower-income, racialized, and primarily renters.

The housing crisis continues to worsen and we see this through the cases at our legal clinic. Building more affordable housing is extremely important, but so is protecting the affordable housing we already have. We need protections and programs in place to help tenants stay in their homes, which will prevent evictions and homelessness.

Our clinic has been involved in consultations regarding a renoviction by-law for the City of Toronto since 2019. We have ardently supported this concept since its inception, and we are pleased to see the Planning and Housing Committee engaged in this effort once again. We have reviewed the recommendations and background documents, and we applaud the efforts made here to take the necessary steps towards preserving affordable housing and mid-range housing in the city.

Our concern predominantly lies with the timeline outlined in the report. Since 2021, our clinic has seen a 35% increase in calls regarding renovictions and demovictions, and we anticipate that increase growing to 40% by the end of this year. This is just the tip of the iceberg: the only statistics we can collect are from those tenants that actively contact us for assistance. Countless do not. Renovictions remain a growing concern for the tenants in our catchment area and across the city. Each affordable unit lost to renoviction is replaced with a market rate unit, usually double or triple in rent, and that changes the demographics and character of our neighbourhoods. Accordingly, we urge this committee to take steps to speed up the timeline for implementing this by-law.

To do so, we recommend the committee direct staff to focus consultations on the implementation of the by-law rather than its design. The recently-passed City of Hamilton

by-law regarding renovictions has already set out a creative and effective framework that fits squarely within municipal jurisdiction. It is our opinion that there is no need to “reinvent the wheel” by drafting a by-law from scratch, and that the City could accelerate the process by focusing on how to implement a Hamilton-style by-law, saving countless of tenancies by avoiding further delay.

When looking at how to apply this by-law to Toronto, we urge the City to maximize its impact by implementing a licensing system like Hamilton, rather than a registration system. A licensing system would give the by-law the checks and balances it needs to be an effective tenant protection tool. A registration system is effectively just another box to tick whereas a licensing system gives the City the power to monitor renoviction activity, and to take action against those nefarious landlords trying to exploit legislative loopholes.

We further urge the committee to ensure rooming houses are covered by this by-law once the transition period of their legalization has passed. To exclude rooming houses would be to create a two-tiered system of tenant rights, and would reverse much of the great work done to create protections for the most vulnerable members of our community.

Lastly, we seek to remind the committee that the power to make this change is absolutely in the hands of councillors. The City of Toronto Act gives councillors the ability to pass by-laws respecting the health, safety and well-being of the constituents. A by-law to protect the stock of affordable and mid-range rental housing and preserve the rights of tenants facing eviction certainly fits that description. Further, the *Residential Tenancies Act* has left space for municipalities to pass complementary by-laws. Toronto has availed itself of this power on multiple occasions before – most notably by passing rental replacement by-laws for tenants facing demovictions, creating protections far beyond what the province requires at great benefit to the City’s tenants.

Accordingly, we hope that this committee seriously understands the cost of delaying implementation of this by-law any further. We ask that this committee direct City staff to avail itself of the framework Hamilton created, work towards implementing this by-law as quickly and expeditiously as possible, keep in mind the importance of tools for enforcement, and include of the City’s tenants.

Sincerely,
Don Valley Community Legal Services

Per: 
Karly Wilson
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