

**From:** [Michelle Pang](#)  
**To:** [Planning and Housing](#)  
**Cc:** [Councillor Perks](#); [Councillor Matlow](#); [Councillor Myers](#); [Councillor Nunziata](#); [Councillor Crisanti](#); [Councillor Bradford](#)  
**Subject:** [External Sender] Letter of Support – PH20.2 Implementation Guidelines for Rental Replacement  
**Date:** April 14, 2025 10:10:33 AM  
**Attachments:** [image001.png](#)  
[Apr 10 Nellie's Letter of Support - PHC 20.2 Implementation Guidelines for Rental Replacement.pdf](#)

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Dear Members of the Planning and Housing Committee,

Please find attached a letter of support from **Nellie's** regarding **PH20.2 – Implementation Guidelines for Rental Replacement**.

As a community-based organization supporting women and gender-diverse people experiencing violence, poverty, and housing insecurity, we urge the City to adopt stronger protections for tenants impacted by development-driven evictions and to implement the recommendations outlined by the No Demovictions campaign.

Thank you for your attention and commitment to housing justice in Toronto.

Sincerely,  
Michelle Pang



**Michelle Pang** (she/her)  
TWA Housing Advocacy Coordinator  
[mpang@nellies.org](mailto:mpang@nellies.org)  
**416-333-0412**



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April 10, 2025

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

**Attention: Planning & Housing Committee Members**

**Re: PH 20.2 - Implementation Guidelines for Rental Replacement**

Dear Planning & Housing Committee Members,

Nellie's is a Toronto-based organization that supports women and gender-diverse people experiencing violence, poverty, and homelessness. Our work includes providing shelter, transitional housing, and advocacy for low-income and marginalized individuals — many of whom are renters at risk of displacement.

Through our housing support and advocacy work, we have seen firsthand the harms caused by demovictions. Many of the people we serve face complex barriers including trauma, language access issues, and lack of knowledge about their rights. Tenants often tell us they are confused by the process, unaware of their entitlements, and afraid to speak up.

Without clear, enforceable protections, demovictions often result in the permanent loss of deeply affordable housing and destabilize already vulnerable communities. We urge the City to take stronger action to ensure tenant rights are protected, and that meaningful supports are in place to prevent further displacement.

Therefore, we support the recommendations put forward by *No Demovictions* (the full list of recommendations can be found [here](#)), which calls on the City to implement the following:

**1. Strengthening Enforcement, Monitoring & Transparency:**

- a) **Data collection:** City of Toronto must collect and publish data on the outcomes of demovicted tenants, development milestones, and replacement unit affordability periods. This will help the City better understand the impact of demovictions on Toronto's housing supply.
- b) **Increased staff capacity:** City of Toronto must increase staff levels (funded by developer fees) to enable sufficient monitoring, enforcement, and ensure that the developer is compliant.
- c) **Section 111 (S.111) agreement transparency:** Every tenant should have easy access to a free copy of the Section 111 agreement for their building to better understand their rights. There is currently a fee and a lengthy application process to access this information.

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**2. Meaningful Tenant Support and Consultation:**

- a) **Tenant support:** Create a developer-fee-funded program to hire a third-party non-profit organization to provide integrated housing, legal (referrals), and social/mental health supports for all tenants facing demoviction. Includes door-to-door outreach and assessment to ensure that accessibility and requirements are considered and that *no tenant is left behind*.
- b) **Working groups:** Require at least 3 working group meetings, to ensure that tenants have meaningful input into the proposal, the process, and have any concerns addressed.

**3. Ensure equity and fairness in compensation and replacement units:**

- a) **Post-application tenants:** Advocate for reducing the period of ineligibility for post-application tenants, so that they have the right to return, receive rent gap payments, and the supports suggested in 2a.
- b) **RentSafeTO for all replacement units:** RentSafeTO provides essential maintenance enforcement for tenants and should apply to rental replacement units.
- c) **Loss of amenities:** Ensure that any loss of amenities and unit square footage are provided a commensurate rent reduction for tenants.
- d) **Annual guideline rent increases:** The City of Toronto should introduce a formula to ensure that rent gap payments cover the entire difference of the unit during the displacement period, including the Provincial annual guideline rent increases.

We strongly urge Councillors to vote in favour of any motions and/or amendments that would support the recommendations outlined above, and continue to work with and consult No Demovictions and other tenant organizations in the further development of practices and policies. These would help significantly improve outcomes for tenants facing demoviction across Toronto.

Sincerely,  
Nellie's

MAILING ADDRESS: 970 Queen St. E., P.O. Box 98118, Toronto, ON M4M 1J8



nellies.org



@nelliesshelter



@nelliesshelter



@nellies\_shelter



/nellie's-shelter

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