

councilmeeting

From: Melissa Wong <mwong@socialplanningtoronto.org>
Sent: April 22, 2025 5:21 PM
To: councilmeeting
Cc: Jin Huh; Tahmid Rouf; Anna Fitzpatrick
Subject: [External Sender] My comments for 2025.PH20.2 on April 23, 2025 City Council

Categories: Communication (New)

To the City Clerk:

Please add the comments below (sent on behalf of Social Planning Toronto) to the agenda for the April 23, 2025 City Council meeting on item 2025.PH20.2, Implementation Guidelines for Rental Replacement

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.

Comments:

April, 22, 2025

Dear Mayor Chow and Members of Council,

Re: PH20.2 - Implementation Guidelines for Rental Replacement

We at Social Planning Toronto (SPT) are writing to express our concerns about the proposed rental replacement policy and the need to address several shortcomings regarding tenant rights and protections in its enforcement.

SPT has actively supported and collaborated with tenant groups across Toronto facing housing insecurity, particularly in inner-suburban neighbourhoods such as Thorncliffe Park, Flemingdon Park, and Jane-Finch. These areas have a high concentration of racialized residents and newcomers residing primarily in privately-owned rental towers.

We are at a critical juncture for municipalities to leverage all available powers to protect tenants from forced displacement. The rental replacement policy has the potential to set a significant precedent for municipal action, and these new regulations should pose a deterrent to landlords from exploiting vulnerable tenants.

Regrettably, due to poor vacancy decontrol policies and insufficient provincial protections for renters, renovations and demovictions have become a convenient method for landlords to evict tenants and increase profits through financial speculation.

We agree with the critical suggestions to improve the rental replacement policy and its enforcement made by the grassroots tenant organization: No Demovictions. They have published a detailed and well-researched report that can help strengthen the policy and its implementation.

This report notes that Toronto currently has relatively strong rental replacement policies in comparison to other Ontario cities, including mandated unit replacement and rent-control provisions for returning tenants. To the City's credit, Toronto requires 6 months' notice (instead of the provincially required 4 months), offering better preparation time for tenants.

However, there are notable shortcomings that the policy and its implementation must address. These shortcomings often result in tenants facing significant challenges due to unclear information about their legal rights, relocation assistance, and timelines, compounded by inadequate compensation that fails to cover true displacement costs. Enforcement gaps could allow developers to disregard rental replacement agreements. Section 111 of the City of Toronto Act, 2006, grants the City Council the power to regulate the demolition and conversion of residential rental units. It outlines requirements for housing developers to preserve and replace rental units when redeveloping or demolishing existing buildings. These measures aim to ensure displaced tenants can return to the new development at similar rents, protecting affordable housing stock and tenant security. Without proper enforcement, developers could side-step Section 111 agreements without accountability, while leasing agents offer insufficient help securing affordable temporary housing, especially for low income and disabled tenants.

Given these shortcomings, the following steps are recommended by No Demovictions, which Social Planning Toronto supports, and we believe the City should consider seriously.

1. **Collect and Share Data:** The City of Toronto should gather and publish clear, accessible data about demovictions, tenant impacts, demographics, and housing replacement progress.
2. **Increase City Staff:** Use developer fees to hire additional city staff that can closely monitor developer compliance and support tenants..
3. **Free and Easy Access to Agreements:** Section 111 agreements must be freely available online in multiple languages for all tenants.
4. **Tenant Support Program:** Developers must fund trusted local nonprofits to provide tenants with free, door-to-door help, legal assistance, housing relocation, mental health support, and multilingual service
5. **Tenant Input Meetings:** Require at least three tenant meetings where tenants have a meaningful say in redevelopment plans and can have concerns directly addressed.
6. **Include All Tenants:** End exclusion of post-application tenants. Ensure they have the same rights, support, and compensation as other tenants.
7. **Full Rent Coverage:** Adjust rent gap payments to cover rent increases, including annual guideline increases fully. Eliminate extra charges like the 4% new-build rent hike. Fully cover tenant moving expenses.
8. **Replace Amenities and Space:** Replacement units must match or improve original amenities (parking, storage, balconies) and be at least the same size. Rent should be reduced if these standards aren't met.
9. **Long-term Affordability:** Replacement units must remain affordable for at least 20 years, ideally with rent control lasting 50 years or permanently.
10. **Safe and Maintained Homes:** All replacement units must follow RentSafeTO standards for consistent maintenance and tenant safety.
11. **Stronger Enforcement:** Establish clear penalties for developers who break Section 111 agreements. Regularly publish enforcement outcomes and compliance status online for transparency.

SPT joins the many community partners who have expressed support for No Demovictions recommendations. We ask that City Council heed these recommendations and enact thoughtful and progressive changes to ensure tenant rights and protections are respected across Toronto.

Signed,

MELISSA WONG (she/her)

Director, Engagement & Strategic Initiatives

Social Planning Toronto

2 Carlton Street, Suite 1720

Toronto, ON M5B 1J3

416 728 2778 (cell)

mwong@socialplanningtoronto.org

As a registered charity, [Social Planning Toronto](#) relies on the generosity of our donors, funders and friends to help make our work possible. Would you consider [making a donation](#)?

[Visit our website](#) | [Like us on Facebook](#) | [Follow us on Twitter](#)