



April 23, 2025

**SENT VIA EMAIL**

To: Toronto City Council Members

**RE: PH20.2 - Implementation Guidelines for Rental Replacement**

We are writing today to urge our City Councillors to ***take decisive action*** to protect the residents at risk of, and experiencing, demoviction. While the Staff Report recommendations are marked improvements to the existing rental replacement policy, we believe there is more that can be done to support tenants facing demoviction across Toronto - particularly for post-application tenants, as well as tenants who stand to lose significant living space in their rental replacement units while being expected to pay the same rent prices.

First and foremost, we want to thank Councillor Matlow and his team for their efforts in developing [motions to amend the Staff Report recommendations to Planning & Housing Committee on April 10th](#), and for Committee members for voting to approve these amendments. We feel it is critically important that the resource implications of potential improvements to the City's rental replacement policy be reported into City Council ***in advance of the next budget cycle***, to ensure City Planning and other agencies are adequately resourced to undertake the work of supporting tenants facing demoviction.

Secondly, we are encouraged by a number of proposed improvements to the City's Rental Replacement policies detailed in the Staff Report. In particular, we commend the City for a) the proposal to work with partners, including No Demovictions, to develop a policy to better support vulnerable tenants facing demoviction; and b) updating the Special Needs Compensation. Both of these actions will help to ensure that those most vulnerable— seniors, people with disabilities, low-income families, and more— will be better supported. We are also in support of the City's recommendation to maintain the new Rent Gap Payment assistance calculations that Council approved in April 2024. Finally, we are encouraged that City Planning has developed a resource for tenants facing demoviction. As you may be aware, No Demovictions volunteers [published such a resource for tenants](#) in July 2024 to fill the gap that previously existed, and we are committed to providing feedback and working collaboratively with City Planning partners.

No Demovictions [submitted its own report](#) to City Planning in December 2024 with recommendations to support improved rental replacement policy and practice in Toronto. These recommendations are based on the experiences of tenants displaced and facing

displacement by demoviction across Toronto. Broadly, we are calling on the City to:

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

- a. Fund City Planning to monitor and ensure developers' compliance with Section 111 agreements so tenants are protected throughout the demoviction process.
- b. Collect and publish key data on replacement units, displaced tenants, their outcomes, and development timelines/milestones to facilitate continuous improvement for the City's Rental Replacement Program.
- c. Provide all tenants with free copies of their Section 111 Agreements (**note**: this is part of the amendments adopted at Planning & Housing Committee).

**2. Provide Meaningful Tenant Support:**

- a. Contract with a third party non-profit to coordinate legal support, support tenants throughout displacement process with housing support and referrals, and track tenant outcomes (in lieu of the current Leasing Agent model)

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

- a. Prevent abuse of "post-application tenant loophole" by developers.
- b. Rent adjustments for all tenants who lose liveable and/or storage space in replacement units.
- c. Maintain the current Rent Gap Payment baseline calculation, but amend to include annual guideline increases.

Our proposed recommendations aim to address shortfalls in the City's current and proposed rental replacement policies and practices, which we have advocated on for a number of years. More broadly, our recommendations also support maintaining affordable rental housing across Toronto by monitoring speculative practices in housing development, and ensuring that all tenants have safe, adequate housing while they are displaced. We are immensely grateful to all of our community partners who have amplified our calls to action and continue to push for better protections for tenants facing demoviction.

We are acutely aware that the City is constrained by provincial and federal legislation/policies and has limited impact on policies that affect the rental housing market – which is why we continue to advocate at different levels of government. However, where it's possible for the City to take steps to address the challenges tenants face during demoviction, it should do so. In that spirit, we encourage Council members to put forward motions and/or amendments that would direct City Planning (and other departments, as required) to support our recommendations.

We look forward to our continued collaboration with City Planning and Committee members.

Many thanks,  
The No Demovictions Team