



April 10th 2024.

Ms. Olivia Chow
Mayor
Toronto City Hall
100 Queen St. W.
Toronto, ON M5H 2N2
mayor_chow@toronto.ca

RE: Deputation to the Planning and Housing Committee – Support for PH20.2 – Implementation Guidelines for Rental Replacement

Dear Mayor Chow and Members of the Planning and Housing Committee,

On behalf of **Neighbourhood Pods TO**, a collective of grassroots organizations, community workers, and advocates committed to addressing Toronto's housing crisis and advancing equitable, community-informed solutions, we write in strong support of **Item PH20.2 – Implementation Guidelines for Rental Replacement**.

We commend City staff for their continued efforts to ensure that renters facing displacement due to redevelopment are protected. However, given the scale of the housing crisis and systemic barriers affecting tenants—particularly Black, Indigenous, and racialized low-income renters—it is critical that the implementation of these guidelines includes robust enhancements to ensure equitable outcomes.

We specifically support the adoption of the Rental Replacement Handbook and urge the Committee to incorporate the following improvements, as raised by community advocates and supported in the recent stakeholder meeting (April 7, 2025):

1. Strengthening Enforcement, Monitoring & Transparency:

- **Tenant outcomes reporting:** The City must collect and publish data on tenant reallocation, including the success of returns to replacement units and affordability impacts.
- **Staff capacity:** Allocate developer-funded resources to increase enforcement staff for effective monitoring of Section 111 agreements and compliance.
- **Transparency of agreements:** Ensure tenants can access their building's Section 111 agreement freely and without delay or cost.

2. Meaningful Tenant Support & Consultation:

- **Third-party support services:** Implement a developer-funded model to provide tenants with legal, housing, and mental health support via non-profit service providers, ensuring door-to-door engagement and personalized assessments.
- **Mandatory working groups:** Establish at least three required tenant consultation meetings for each application to embed tenant feedback in the planning and implementation process.

3. Equity in Compensation & Replacement:

- **Post-application tenant rights:** Minimize the exclusion period and extend right-of-return and compensation protections to post-application tenants.
- **Apply RentSafeTO to replacement units:** Ensure all rental replacement units are subject to this inspection regime to guarantee ongoing maintenance and safety.
- **Amenity loss and square footage:** Provide fair rent reductions when tenants lose access to space or amenities.
- **Full rent gap coverage:** Ensure gap payments reflect the full difference in rent during relocation, including annual provincial rent increases.

4. Appreciation for Community Leadership:

We would also like to thank the [No Demovictions](#) group for its ongoing leadership, research, and mobilization around the Implementation Guidelines for Rental Replacement. Their advocacy has been instrumental in raising awareness and ensuring that the needs of displaced tenants are prioritized in the policy process.

We further urge the Committee to coordinate with the Confronting Anti-Black Racism Unit and relevant tenant advocates to address how displacement disproportionately impacts Black and Indigenous tenants. These steps are crucial in fulfilling the City's equity and human rights commitments.

We thank you for your leadership and commitment to tenant protection. We encourage you to vote in favour of PH20.2 and support motions that advance the above recommendations.

Sincerely,



Walied Khogali Ali

On behalf of **Neighbourhood Pods TO**

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The Neighbourhood Pods TO (NPTO) embodies a consortium of grassroots organizations, community workers, and advocates, all rallying under a unified mission to bolster the economic livelihoods and enhance the overall well-being of low-income individuals and communities across Toronto.
