

January 21, 2026

Via email: [phc@toronto.ca](mailto:phc@toronto.ca)

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

**Re: PH27.9 - Rental Housing and Dwelling Room Replacement: Supporting Tenants with Additional Housing Barriers**

Dear Planning and Housing Committee Members,

The Advocacy Centre for Tenants Ontario (ACTO) is a legal clinic working to advance and protect the interests of low-income and moderate-income tenants. We strive for the advancement of human rights and justice in housing through legal advice and representation, law reform, community organizing, training and education.

Demovictions are stressful and overwhelming for *all* tenants, but disproportionately impact vulnerable tenants, increasing their risk of experiencing homelessness. While we appreciate the recommendations and hard work put forth by city staff, more needs to be done to ensure that all tenants remain housed.

ACTO supports the recommendations put forward by *No Demovictions* (the full list of recommendations can be found [here](#)), which calls on the City to do more for vulnerable tenants by implementing the following:

- 1. Retroactively apply changes for vulnerable tenants to demovictions that have not yet finalized their S111s.** Hundreds of demoviction applications that have been approved but have yet to finalize their S111 agreements need to be protected. These buildings represent potentially thousands of vulnerable tenants who will have zero protections or support when they are displaced.
- 2. Maintain the additional compensation (4-months average market rent) that is currently available to seniors and tenants with mental and/or physical health disabilities.**

The additional support provided to tenants considered vulnerable should be offered in addition to the compensation, not instead of it.

- 3. Post-application tenants who are considered vulnerable should be eligible for additional support.** Buildings with approved applications that have put their redevelopment plans on hold continue to accept new tenants, and it is critically important that when these vulnerable tenants are displaced, more is being done to ensure that they do not become homeless.
- 4. Assessment of need has to be done door-to-door, not through a survey.** Assessing individual needs requires an in-person approach. Surveys are not adequate or reliable in identifying tenant needs, especially vulnerable tenants.
- 5. Leasing agents need to be replaced by a housing worker or tenant support coordinator.** For-profit leasing agents who work on commission are not an appropriate support for helping vulnerable tenants find adequate, affordable, and accessible housing in their catchment area. Housing workers or tenant support coordinators, who have experience working with vulnerable and marginalized communities, will be able to better support and focus on tenants priorities beyond their own personal interests.
- 6. Tenants with accessibility requirements should be able to view their replacement units prior to signing a new lease.**

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* in the further development of practices and policies. These recommendations would significantly improve outcomes for vulnerable tenants facing demovictions across Toronto.

Sincerely,

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