



January 21, 2026

Chair Perks and Members of the Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto, ON
M5H 2N2

Sent via email to: phc@toronto.ca

RE: PH27.9 – Rental Housing and Dwelling Room Replacement – Supporting Tenants with Additional Housing Barriers

Dear Chair Perks and Members of the Planning and Housing Committee,

On behalf of the BILD Rental Replacement Working Group, thank you for the opportunity to provide written feedback on the proposed updates to the Rental Housing and Dwelling Room Replacement Policy – Supporting Tenants with Additional Housing Barriers.

BILD appreciates the city's ongoing engagement with industry stakeholders and recognizes the important objective of ensuring that vulnerable residents are appropriately supported through the rental replacement process. Our members share this objective and are committed to working collaboratively with the city to achieve positive outcomes for tenants.

We would also like to take this opportunity to share with the Committee, the broader market context in which any policy or process changes are being contemplated. The residential development industry is currently facing significant challenges as follows:

- In 2025, new home sales across the province declined sharply from historic levels of 65,000–85,000 homes annually to approximately 15,000.
- This decline is expected to translate into fewer housing starts. By 2030, starts are projected to fall to approximately 40,000 units annually (including 22,000 purpose-built rental units), down from roughly 80,000 today. This would result in the loss of approximately 100,000 jobs province-wide and a substantial reduction in the sector's contribution to GDP.
- Correspondingly, it is expected to reduce annual government revenues by approximately \$8.5 billion across provincial and municipal sources.

With this context in mind, we respectfully submit the following comments for the Committee's consideration.

BILD members have participated in extensive consultations with City staff and have consistently expressed their willingness to support tenants facing additional housing barriers. In many cases, members have implemented tailored and innovative approaches to assist tenants beyond what may be formally required. Our interest is in ensuring that enhanced supports are clearly targeted to those who genuinely require them, while maintaining clarity and predictability in their application and are carried out by the experts/correct parties (which may not be developers/landlords).

We note that the proposals in the report introduce multiple definitions and criteria for “vulnerable populations,” which may create unintended administrative complexity and uncertainty for both tenants and housing providers. Additionally, BILD has heard that the scope and associated costs of some proposed requirements—such as the provision of alternative units, moving and hoarding services, and transportation arrangements—may extend beyond what is reasonably anticipated within the landlord's role, particularly in the current economic environment. More broadly, BILD has heard concerns from its members that elements of the recommendations go beyond the existing legislative framework governing landlord responsibilities and may unintentionally act as a barrier to housing supply, reinvestment, and the expansion of purpose-built rental housing.

In terms of transition, our members also seek clarity and certainty that projects that have already received approvals negotiated with City staff and local councillors, in consultation with tenants and approved by Council will stand. We encourage the City to ensure that appropriate transition measures are in place so that previous Council approvals are respected and not inadvertently altered by this reporting.

Finally, not specific to the vulnerable tenant's aspect of this work but the overall Rental Replacement Policy, BILD respectfully requests that a new rent gap analysis be undertaken to reflect current market conditions and to better understand the level of support required to address the gap.

In closing, we appreciate the opportunity to contribute to this discussion. We value our ongoing collaboration with City staff and look forward to continued dialogue as this work evolves.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Danielle Binder', with a stylized flourish at the end.

Danielle Binder, MCIP RPP
Vice President, Policy and Advocacy
BILD