

Responses to gentrification, displacement,
and the loss of low end of market (LEM)
rental housing in the City of Toronto:
From creating to contesting displaceability

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Land Acknowledgement

As a Housing Consultant working for the City of Toronto, I have adopted the encouraged practice of starting meetings and accompanying each email message that I send with an acknowledgement that the land I am standing on is the traditional territory of many nations including the Mississaugas of the Credit, the Anishnabeg, the Chippewa, the Haudenosaunee and the Wendat peoples and is now home to many diverse First Nations, Inuit and Métis peoples. I also acknowledge that Toronto is covered by Treaty 13 with the Mississaugas of the Credit and the Williams Treaty signed with multiple Mississaugas and Chippewa bands. To make this acknowledgement is to be confronted with how the dispossession of Indigenous peoples is central to the extractive colonial project that has shaped and continues to shape our society.

In researching and writing this paper, I was made to reflect on this acknowledgement as I met with and heard the stories of tenants who had been displaced from their homes. Some had been violently and unlawfully evicted, others had been forced to move through an owner's exercising of slower but inexorable rights granted them by the state. Regardless of the process, the outcomes were the same and the resulting dispossession no less traumatic and destabilizing. What was common to all their stories was that they were people that our society has devalued, and so too the places that they live are seen to have little value. Almost any other use of these sites was considered better or more productive and the replacement of the displaced with those with higher incomes and greater status is synonymous with improvement.

Absent from the land acknowledgement used by the City but common to others is reference to the Dish With One Spoon Treaty, an agreement to share and care for the land of the Southern Great Lakes Region so that it can continue to sustain all those who live there in peace. To also acknowledge this agreement, which had existed for generations before European settlers were invited to join it, is to acknowledge that there are alternatives to our current systems of land use and ownership that were also displaced by settler colonialism and need to be recovered if we are to end the destructive practices of wealth accumulation by dispossession that remain central to our city building processes.

Abstract

Government efforts to respond to the current crisis in housing affordability have centred on efforts to create new supply with comparatively little attention to preservation of existing affordable, or Low End of Market (LEM), rental housing in the private market. Decades of state policies that have prioritized developer and real estate interests over tenant rights and protections have facilitated various forms of gentrification resulting in widespread erosion of affordability and losses of LEM rental housing leading to displacement of low-income tenants. Efforts to measure and define these losses have been challenged by a lack of data but there is evidence that they are outstripping gains in housing affordability made by government housing strategies.

This portfolio of work explores the loss of LEM housing and displacement in the City of Toronto including the ways in which these losses are occurring, the role of state policy in both facilitating and framing the responses to these losses, and efforts by the third sector to contest them. A key element of this exploration is the role of data in these responses. The first section of the portfolio is a review of state policy, both historical and current, and how they have shaped new forms of gentrification and displacement and what are the influences on policy preference formation in the area of housing supply. The role of data is considered in relation to understanding housing options available to the low-income renter, policy and program development and supporting advocacy for the preservation of affordable housing and efforts to contest displacement.

The second section mixes both quantitative and qualitative methods to review how the loss of LEM housing is being tracked in the City of Toronto and how the impact of the related displacement is being responded to and contested. A collection of datasets documenting both physical and economic losses and displacement responses are presented and analyzed accompanied by case studies of three multi-tenant housing sites of displacement involving interviews with former tenants, advocates and agency staff involved. The implications of the findings on program and policy development and community practice to preserve affordable housing and contest displacement are discussed in this section's conclusion.

The final section outlines a project funded by the Canada Mortgage and Housing Corporation (CMHC) Housing Supply Challenge to develop a data solution with the capacity to monitor the

supply and location of LEM rental housing in urban areas that could inform and support preservation-based approaches to housing supply decisions.

Foreword

In many ways, my time in the MES program has been a learning journey that has taken me both forward and backward. My first experiences in the field of housing were as a young activist with a strong but not fully formed sense of social justice. We joined with others and formed a community in South Parkdale, renting a collection of houses in various states of disrepair from a large corporate health institution and offering hospitality to people in different forms of crisis and transition to come and live with us. People came and went over the decades that followed leaving a diverse and close group of friends and neighbours with a rich shared history and strong connections to South Parkdale and its struggles.

To support myself and my family, I worked in a number of roles with non-profit housing providers before taking a position with the City of Toronto as a Housing Consultant where much of my work was with new affordable housing developments. During the first ten years that I was there, what was being referred to as the housing crisis deepened. My time away to join the MES program was intended to be an opportunity to step back and critically re-examine my practice in order to return with new perspectives and understanding to the task of supporting housing stability for all.

After years of working at the City on developing new supply, my initial research proposal involved a focus on the loss of affordable housing in the City of Toronto. While it points to an important imbalance in the City's approach to increasing the supply of affordable housing, it retained the perspective of supply and of housing as a number of units. As my research progressed, I came to see the displacement caused by these losses as the much more central issue.

Following years of our community pressing the owner of the properties to make better use of the houses to provide much needed affordable housing in Parkdale (three houses have been left vacant and deteriorating, one to the point of requiring demolition), a planning application to expand on another area of the site provided the leverage to push for action on these demands. Supported by the local Councillor and a Community Benefits Framework brought forward by the Parkdale People's Economy, the owner accepted the demands made to be included in a Section 37 agreement. Unbeknownst to us, the negotiations had gone further and in a press release of October 13, 2020, we learned of the plan to demolish

our houses and replace them with a new and extensive 'campus of care' that would include up to 300 units of supportive housing (Vincent, 2020).

Despite the many positive aspects of the new proposed development, the threat of imminent displacement and erasure of the community that we had built over the years was devastating news. I found myself experiencing many of the signs of grieving and one of our neighbours shared that he had more than once had suicidal ideations. Another senior neighbour called 911 on two occasions for an apparent heart attack that proved to be symptoms of extreme anxiety. This was a powerful and deeply felt lesson on the human impact of displacement that takes place when low end of market units are lost.

Studies of the loss of low end of market housing in neighbourhoods falls within the broad field of gentrification research which is inextricably linked to displacement (Elliott Cooper et al, 2020). Within the very broad field of gentrification research and debate, the issue of displacement receives considerably less attention, reflecting a general prioritization of the exchange value of housing over its use value (Atkinson, 2000). This omission is also indicative of the challenges relating to observing it and measuring it, which itself may be an indicator of the politics of how displacement is acknowledged (Bernt and Holm, 2009). My own experience made clear that beyond a measure of neighbourhood change, displacement is also a deeply personally experienced form of violence that removes agency and severs belonging to both a home and a community (Atkinson, 2015). As Peter Marcuse noted, "if the pain of displacement is not a central component of what we are dealing with in studying gentrification...we are not just missing one factor in a multi-factorial equation; we are missing the central point that needs to be addressed" (Marcuse, 2010, p. 187).

This does not mean that responses to displacement should be focused on the individual. To do so in isolation would be to neglect the systemic elements of displacement that are driving growing social inequality and the racialization and spatial concentration of poverty in our city. Centring the 'pain of displacement' in both research and professional practice related to gentrification and neighbourhood change can reinstate a sense of social justice (Slater, 2009) challenging the fallacy that there is a neutral position that can be maintained and demanding the development of a professional ethic (Bernt and Holm, 2009).

To be clear, my own imminent displacement is not related to gentrification. Our intentional community was able to live and thrive as it did for decades in large part because of the economic abandonment of the houses practiced by a disinterested corporate landlord intent on their ultimate demolition and expansion. But after all the years of uncertainty and instability that the arrangement imposed, the redevelopment now proposed is to intensify the properties to provide new affordable and supportive housing. I am cautiously in favour of the plan pending more details of the project, its development process, and funding model, and willingly accept my own displacement and the loss of the very close community that we share in South Parkdale. But the very heavy heart it has left me with that at times has made working on this paper a challenge, was a constant reminder of the very real human impact of what I was researching.

Acknowledgements

I have enjoyed my time in the Masters in Environmental Studies Planning program tremendously. The experience has been full of inspiration, challenge and growth that was supported and made possible by the program's unique design and committed faculty members and staff. I would like to express my gratitude to Professor Luisa Sotomayor for her leadership in the program and for her continuous support, enthusiastic encouragement and thoughtful guidance as my instructor, supervisor and advisor. For all my other professors in the program I am also grateful both for their shared insights and knowledge but also for their facilitation of a communal learning environment that connected me with my fellow students from whom I learned so much.

Early in the program I was fortunate enough to receive a place in Professor Ute Lehrer's Critical Urban Planning Workshop that went to New York City. This proved to be a very formative experience and I am grateful for the work that Professor Lehrer and her assistant Lucy Lynch put into organizing those jam-packed days and the wonderful group of students that I shared them with. Thanks to all for your open welcome of my participation.

Throughout the program I was in touch with many community organizations, developers, municipal staff, advocates and key informants. Their willingness to share with me their time, their knowledge, and their insights with the faith that I would use these well has inspired me to be deserving of that trust. Most notably, I would like to thank and acknowledge those tenants that I spoke with who were willing to share their personal and traumatic stories of displacement. Their contribution to this writing was central to its purpose.

The opportunity to study in this program has been a great privilege and I am aware of the many who have supported me to complete it. Thanks to my colleagues at the City of Toronto who kept the work going in my absence in the midst of a pandemic, my friends and community members for their support, my family for sustaining me and my wife and partner in lifelong learning, critical thinking and practice, Madeline.

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Portfolio Structure

Through a portfolio of work, I will explore the impact of the loss of LEM housing in Toronto, how it is being tracked and what is being done to respond to and contest the related displacement of lower income tenants. The first element of the portfolio will explore the role of state policy both in facilitating new forms of gentrification leading to losses of affordable housing but also in framing the responses. The connection between these losses of low end of market housing not only as a supply issue but as an agent of displacement of low-income tenants will also be explored in this element along with how these displacements are being responded to and contested.

The second element involves a form of convergent mixed methods design (Creswell & Creswell, 2018) including quantitative and qualitative research. The quantitative research included identifying data sources for the number of LEM housing units lost in Toronto over the past 5 years and the number of tenants affected, noting the source of the data and the purpose of its collection. Representative case studies were selected from sites identified in the quantitative research. Using a narrative research approach, the qualitative research involved interviews with displaced tenants, agency staff and community organizers regarding their experience of the displacement event in the case studies, as well as key informants.

Finally, through my involvement in a project to develop a data solution that will integrate several datasets to estimate the supply and location of deeply affordable rental housing in urban areas and monitor changes, the final element will explore how an interactive, map-based tool could inform and support preservation-based approaches to housing supply decisions.

The various forms of LEM housing are being lost in Toronto in a number of ways, many of them local manifestations of larger, even global, structural dynamics (Kamizaki, 2013). Addressing this challenge will ultimately require broader systemic change. It is my hope that the research findings will inform a conversation about the implications for community action and policy and program development to effectively preserve affordable housing and resist the displacement of lower income residents.

Toronto's affordable housing crisis and the role of state policy: Why we continue to lose ground.

Introduction

The term housing crisis is once again being used to describe the situation facing Toronto and many other large urban centres. Rapidly increasing rents, historically low vacancy rates (Canadian Centre for Economic Analysis and Canadian Urban Institute, 2019) and persistent challenges with homelessness are leading to calls for a government response to housing affordability. These responses have predominantly centred on efforts to increase the supply of affordable rental housing. Comparatively little attention has been paid to the preservation of existing affordable housing, particularly within the private rental market which is where the majority of tenants find their housing. In a simple analysis of the number of new affordable units created through government programs in Canada over a five-year period from 2011 to 2016 compared to the number of affordable (rents below \$750) units lost in the private rental market, Steve Pomeroy (2020) estimates that for every one new affordable unit created at public expense, fifteen existing private affordable rental units were lost. Clearly, if a general response to housing affordability is going to be a stated concern of local governments, there will need to be a better understanding of this stock of affordable housing in the private rental market and the ways in which it is being 'lost'.

Of central importance is the fact that for every unit of rental housing lost at the low end of market (LEM) a low-income renter is displaced. Because of a prevailing prioritization of the exchange value of housing over its use value, relatively little attention is paid to the issue of displacement. Within gentrification research that does include displacement, there is a lack of information about where the displaced end up (Atkinson, 2000). For those living in rooming houses and single room occupancy hotels (SROs), the most deeply affordable housing available on the market, displacement into homelessness is a likely outcome. More

generally, losses of affordable housing in the private market and the resulting displacement create pressure on the social welfare system including the City's housing and homelessness system. While a lack of specific information makes it difficult to quantify, there are significant social impacts when LEM housing is lost. No less significant are the devastating personal impacts of displacement that accompany these losses, but here also, many of these histories go unremarked. Whether from the perspective of local governments struggling with an overburdened housing and homelessness system, agencies attempting to respond to increasing demands for social services or community organizers fighting for tenant rights or a more just housing system, addressing the loss of LEM housing and the resulting displacement must be considered a high priority.

Toronto's current 'housing crisis' – how did we get here?

The role of state policy and government restructuring

For policy makers seeking to manage urban growth, decline, and redevelopment, 'how low-income renters get by in urban housing markets is an enduring question' (Suttor, 2016, p. 5). When looking at the current situation of the lack of affordable housing in the City of Toronto, it is helpful to be able to position it within historical policy decisions. While the effects of housing issues are experienced locally and most often as urban issues, these issues are affected by demographic, social, and economic factors that extend beyond municipal boundaries. Additionally, the constitutional framing of local government in Canada means that policy decisions that impact housing issues take place at the regional, provincial, and federal level. This makes for a complex framework for policy formation to respond to the current situation. In the same way that it is helpful to understand how policy decisions led to where we are now, it is important to open the conversations about the policy decisions needed at all levels of government for an effective response to the diminishing number of options for low-income renters.

In his research, Greg Suttor (2016) makes the point that Canadian social housing policy has been driven by shifts in broader social policy and relations between levels of government rather than the actual issues confronting low-income renters. In the postwar era, in Canada, as in many Western nations, a reconstruction imperative supported an expansion of the

liberal welfare state. In this political environment, state social rental housing was seen as the answer for low-income renters. For a period of almost three decades, from the mid 1960s to the mid 1990s, the significant production of social housing was able to accommodate approximately half of low-income renters (Suttor, 2016). A boom in the construction of private sector rental apartment buildings facilitated by favourable tax incentives that took place between 1955 and 1975, was able to absorb much of the remaining demand.

'Common Sense', the end of social housing and tenant protections, and the download

In Ontario, the 'heyday of social housing' as Suttor (2016) refers to it, ended abruptly with the onset of Premier Mike Harris' 'common sense revolution' with his election in 1995. The Harris government ushered in neoliberal austerity as the dominant political agenda marked by reduced taxes, reliance on market processes, a diminished welfare state and adoption of new public management policies (Evans and Smith, 2015). In addition to ending the construction of new social housing, the Harris government also enacted the downloading of responsibilities for social housing from the Province to municipalities but without a commensurate provision of resources and authorities. Local governments were left with very few tools other than planning mechanisms for responding to complex issues of social inequality (Ranasinghe & Valverde, 2006). The result was that for low-income renters there was an increasing reliance on a shrinking private rental market while at the same time local governments were left increasingly dependent on development revenues.

Concurrent with these sudden changes in social housing policy were the systematic dismantling of tenant protections and rent regulations under the so-called *Tenant Protections Act* including the introduction of vacancy decontrol which allows private landlords to increase rents without restriction once a tenant vacates a unit. This policy was amended briefly by the Kathleen Wynne Liberal government in 2017 before being restored when the Conservatives regained power under Doug Ford in 2018. The stated intention of these policy changes was to create incentive for private developers to build new purpose-built rental housing, however, they have failed to do so. In the years following, the construction of purpose-built rental fell dramatically to less than 9% of all housing built, largely in favour of condominium development (Hale, 2018). Between 2011 and 2018, purpose-built rental made up less than 6% of total new housing construction (Canadian Centre for Economic Analysis and Canadian Urban Institute, 2019).

This series of state policies that have withdrawn from social housing provision and reduced tenant protections, combined with other policy decisions that have prioritized opportunities for diverse investors at the expense of lower income tenants have enabled and facilitated processes of gentrification and displacement that have deepened the crisis (August & Walks, 2018). These processes will be discussed in a later section.

Options for the low-income renter

The percentage of City of Toronto residents that are renters has been growing and has reached almost one half (47%) of the total population (City of Toronto, 2018). At the same time, rent increases have continued to outstrip increases in income over the past several years such that currently half of all renters (again 47%) spend more than 30% of their income on rent (City of Toronto, 2018), the standard threshold for what is considered affordable. In the absence of an adequate supply of social housing, the majority of low-income renters must seek housing in the “low end” of the private rental market. But this segment of the rental market is poorly studied and understood and often operates under the least oversight and regulation, making access to even these units challenging and driving greater vulnerability.

What do we know about LEM housing in Toronto?

In both 2017 and 2018 City Planning and the Shelter Support and Housing Administration Division commissioned rental market studies (Prism Consulting, 2017) (Canadian Urban Institute, 2018) that created a profile of the low end of Toronto’s private rental market. Using similar methodologies that involved web scraping technology to create a large data set of rental listings, the two studies had consistent findings. What was clear was that the information generated in these studies was an important supplement to the highly influential Rental Market Survey (RMS), produced annually by the Canadian Mortgage and Housing Corporation (CMHC), which is the basis of much of the housing policy developed at every level of government. The RMS publishes Average Market Rents (AMR) for all of Canada’s larger Census Metropolitan Areas (CMA) and for geographic zones within cities.

The 2017 and 2018 commissioned studies highlighted several key limitations of the CMHC survey figures, particularly, as they relate to issues of affordability for households with the lowest income seeking rental housing. The first is that the AMRs are based on 'prevailing rents', rents being paid by current sitting tenants that are subject to rent controls and significantly lower than 'asking rents', the rents that landlords are charging for vacant units that are not subject to controls. Asking rents were found to be between 40% and 85% higher than the published AMRs depending on the unit type.

A second, is that CMHC's data references only the primary rental market; purpose built rental buildings with 3 or more units, which makes up just less than half (49%) of Toronto's total rental stock. The secondary rental market, which makes up the other half, is made up of rental units in buildings initially constructed for owner occupation (excluding social housing), or less than 3 accessory units in a building that is non-residential in nature (for example a commercial property). The omission of these units from CMHC data is significant not only because they make up half of the rental market but also because they include both the highest and the lowest rents available. When the rental market studies divided the secondary rental market into condominium and non-condominium, they found that the condominium secondary market consistently had the highest rental rates for all unit types, while the non-condo secondary market was where the lowest rental rates were found for all unit types.

Finally, the CMHC survey data does not include shared accommodations, units for rent that are not fully self-contained, of any type. In the 2018 study, shared units were found to make up just under 30% of all rental listings and were by far the most affordable rents in every part of the City. When LEM thresholds were set for asking rents of each unit type at AMR (using 80% AMR for a Bachelor unit as the shared accommodation threshold), only 7% of self-contained rental listings had rents below that marker whereas just over 70% of the shared accommodation listings fell below this threshold for LEM.

These two commissioned rental market studies identified that LEM rental housing options in Toronto are found almost entirely in the segment of the rental market that is the least well monitored and with the least available data. This has significant implications on efforts to track losses in the supply of LEM housing as will be explored in the second element of this portfolio.

The most deeply affordable housing: shared accommodations, dwelling rooms, and multi-tenant housing

Units in shared accommodations, go by a range of names and definitions but in the City of Toronto are identified as dwelling rooms and are defined as rooms used as living accommodation that are rented individually and are not self-contained. They may contain private sanitary facilities or cooking facilities but not both. These units are to be found in what are commonly referred to as rooming houses or multi-tenant housing and single-room occupancy (SRO) hotels. In many cities in Canada and across North America, these remain the only deeply affordable rental option on the private market. Often, the rental arrangements are less formal, making them a particularly low barrier option for more vulnerable populations most at risk of homelessness. This association of rooming houses and SROs with poverty has led to their stigmatization and persistent discrimination by communities and local governments (Durning, 2012). In the City of Toronto, one of the ways in which this has manifested itself is through the regulatory frameworks that they are subject to. Twenty years after the amalgamation of the City of Toronto, repeated efforts to harmonize the zoning bylaws related to rooming houses have failed due largely to local political resistance, leaving a patchwork of where rooming houses are officially permitted and showing a stubborn holding to what Valverde (2011) refers to as premodern land use tools based on notions of offensiveness, nuisance and 'natural' differentiations by class.

Evidence of LEM losses and challenges of access

In addition to the quantitative analysis, the Prism Consulting 2017 rental market study also included interviews and focus groups with both housing help professionals and individuals with lived experience of seeking to access LEM housing. Both groups agreed that rents had been rapidly increasing and that finding and accessing LEM units had never been more difficult. The 2018 study confirmed this. Comparison between the 2017 and 2018 studies shows that the overall number of rental listings that are considered LEM declined significantly between the two years, from 20% in 2017 to just 7% in 2018. The rapidly increasing rents and increasingly tight rental market at LEM were also seen to have increased landlord screening practices, pushing more vulnerable tenants to lower quality and lower barrier options in locations that were less serviced and less desirable.

‘Naturally occurring affordable housing’?

Toronto’s challenges with housing affordability are not unique but are common to other cities in Canada and North America. Interest in identifying private rental market housing that is accessible to low-income renters without subsidy has led to common use of the recently coined term “naturally occurring affordable housing”, with the catchy acronym NOAH, to reference this segment of the rental market. While it makes for an easy and simple reference to a more complicated concept, critics have pointed out that the term is misleading. Including the word “natural” gives the impression that the affordability of this housing is the result of a benign process that simply happens, and minimizes the critical influence of policies, investment, and local land use decisions (King, 2017), and the inherent risk of market driven displacement associated with this housing (Cortright, 2017).

Toronto responds to the crisis: Ten-year housing plans and focus on new supply

At the level of local government, Toronto City Council has for years shown unusually consistent unanimity in committing publicly to addressing the issue of housing affordability. These commitments are outlined in the City’s ten-year housing and homelessness plans; the first, [Housing Opportunities Toronto Action Plan, 2010 – 2020](#), and the second, [Housing TO 2020 – 2030 Action Plan](#). In both plans the proposed actions are predominantly centred around initiatives to increase the supply of new affordable rental housing with considerably less attention paid to preservation of existing affordable housing, particularly in the private rental market.

In the [Housing Opportunities Toronto Action Plan, 2010 – 2020](#), funding allocations for new affordable rental housing initiatives (\$369M/year) were more than three times greater than those associated with preservation initiatives (\$115M/year). Of the preservation initiatives cited, over half of the units identified for funding for improvement and repair to maintain viability are existing social housing units (90,000 or 54%, including funding for ‘revitalization’ of social housing developments). Of the remaining half, almost 30% of the units identified were for repairs to owned homes (47,000).

By the end of the ten-year term of Toronto's first housing and homelessness plan, it was clear that completed projects in all categories would fall well below the plan's targets. In 2019, less than half of the goal of 10,000 new affordable rental homes had been completed (4,093 or 41%). The number for new affordable ownership homes completed was a little over half (1,533 or 55%) of the 2,800 target. For repairs and modifications completed, the total number of units was also just over half (8,575 or 57%) of the 15,000 target. These shortfalls were largely attributed to a lack of funding that was expected to come from the two other levels of government, highlighting the challenges that local governments face in responding to local housing issues under Canadian Federalism.

At the same time, there was growing awareness that the crisis in housing affordability was deepening. The Toronto Housing Market Analysis Report (Canadian Urban Institute, 2019) commissioned by the City in 2019 outlined the challenges faced by residents of Toronto to meet their housing needs. Increases in wait times for supportive and social housing and growing homelessness are cited as evidence that the City's housing and homelessness system is not keeping up with the demand. A dramatic decrease in the development of purpose-built rental compared to condominium and ownership tenure developments has resulted in an aging rental building stock. Between 2011 and 2016, only 6% of the developments approved in Toronto were for purpose built rental. That is a trend that has persisted for several decades now such that 93% of the City's purpose-built rental housing was constructed over 40 years ago with 60% at least 50 years old (Canadian Urban Institute, 2019). The report also projected how the demands for affordable housing are expected to continue to increase in the future.

Toronto's current ten-year housing and homelessness plan, [Housing TO 2020 – 2030 Action Plan](#) is more broadly based than its predecessor, with 13 Key Strategic Actions rather than the previous 8 Strategic Themes, but there are similar patterns. This plan calls for a significant increase in targets for new supply of affordable housing at 4,000 units per year including 1,800 supportive housing units per year. This accounts for over 70% of the total projected spending of \$5.5B over ten years. Of the remaining 30% committed to preservation of existing affordable housing, it is almost entirely (98%) committed to repairs to Toronto Community Housing. While the report acknowledges that the majority of Toronto tenants will continue to be housed in the private rental market over the next decade and that "it is crucial that this existing stock of rental homes be appropriately maintained and

preserved” (p.66) less than 1% of total preservation-oriented funding is allocated to the private rental market and that is to maintain a good state of repair.

What are we missing? The loss of affordable housing and losing ground: New forms of gentrification and displacement in Toronto

In a simple analysis of trends between 2011 and 2016, housing consultant Steve Pomeroy noted that the loss of the most affordable private rental units (affordable to households earning \$30,000 or less) was outstripping the production of new affordable housing units during that same period by a ratio of 15 existing affordable units lost for every 1 new affordable unit created (Pomeroy, 2020). Pomeroy concludes that the “the erosion of ‘naturally occurring affordable housing’ (NOAH) units is the most serious threat to Canada’s supply of affordable housing” (p.1) but that initiatives to address it remain largely missing from government housing strategies as demonstrated by the Toronto housing plans outlined above.

The losses of low end of market housing that the City of Toronto has been experiencing over the past few decades has been driven by a number of gentrification processes, largely facilitated by the policies under the prevailing neoliberal political economy. I have outlined some of them below. But it is important to be mindful that the loss of a low end of market rental unit is also the displacement of a low-income tenant. While the field of gentrification research has expanded greatly since Ruth Glass first coined the term in 1964 and debates on the subject abound, the essential definition of gentrification remains; it is the replacement of lower income tenants with higher income tenants.

Reurbanization, Globalization, the Rise of Real Estate and the Condo Boom

Like many North American urban areas, Toronto’s inner city experienced a steady decline in manufacturing starting in the 1970s and a corresponding growth in the economic (and political) importance of the service economy, in particular the FIRE sector (Finance, Insurance and Real Estate). These processes of deindustrialization have led to the revaluing of previous sites of industrial infrastructure and a re-urbanization of the city centre that continues today.

In addition to the sudden end to social housing production that took place in Ontario in the mid 90s, beginning in this period, successive municipal administrations, regardless of their political leanings, all pursued Toronto's status as a "global city" (Joy and Vogel, 2015), seeking to attract global capital by "internationalizing the local economy through competitive austerity" (Fanelli, 2016. p. 28). Through a rewriting of planning policies and statements, this accelerated a boom of condominium development in the inner city that was facilitated by both levels of government. This in turn drove up real estate values and dramatically changed the socio-economic composition of inner-city neighbourhoods, named as a new form of 'new build gentrification' and 'condoification' by Lehrer and Wiedetz (2009). These patterns have continued to the present time. A bulletin published by Toronto's Planning Division acknowledges that condominium development from 2002 to 2018 in Toronto has been exceptional in the North American context for its "sustained magnitude of intensification over the past two decades" (p. 1, City of Toronto, 2020). 72% of these new condominium developments were in the central City.

Financialization of rental housing

Later in the 90s, Provincial policies that on the one hand enabled new means of financial investment in real estate, and on the other deregulated tenant protections and rent control, set the conditions for the 'financialization' of rental housing. Financialization refers to a change in the normal operations of capitalism such that the generation of profits is primarily through financial vehicles rather than through production/provision of goods and services (Krippner, 2005). In the field of housing, financialization is most often associated with the securitization of mortgages for owner occupied housing (Aalbers, 2008) that played a central role in the 2008 Global Financial Crisis (GFC), but the treatment of multi-family rental housing as a financial asset has become a growing global phenomenon as recently exposed by the 2019 documentary film directed by Fredrik Gertten, [PUSH](#).

August and Walks (2018) documented the practice in Toronto as a "new form of rental tenure gentrification" that involves "financialized landlords" which include corporate investors and Real Estate Investment Trusts (REIT) purchasing older apartment buildings and extracting value from them for investors. Strategies identified include 'squeezing' profits through decreasing maintenance and operating costs while increasing rents through

strategic investments to justify Above Guideline Increase (AGI) applications, while others aggressively 'reposition' affordable apartment buildings to more upscale buildings through upgrades to building appearances and vacant apartments to replace lower income tenants with higher income tenants.

Sharing platforms and short-term rentals

More recently, the rapid rise of the practice known as "home sharing", enabled by advanced internet platforms has created the phenomenon of a "short term rental" market which occupies a space between conventional rental housing (long term rental) and hotel accommodations. Although there are a number of these platforms, Airbnb is the dominant player. The practice was originally promoted as part of the "sharing economy", allowing homeowners and tenants to generate revenue by renting out a room or an entire unit during periods when not being used through direct peer to peer exchange.

In Toronto as in many cities around the world the proliferation of Airbnb listings in many of the city's neighbourhoods soon led to concerns about their impact on local housing affordability. Between 2014 and 2016 the number of Airbnb rentals in Toronto tripled to a total of 10,800 properties (City of Toronto, 2017). In a departure from the nominal "home sharing" that Airbnb claims to facilitate, there was growing evidence that commercial operators were permanently removing entire units from the long-term rental market, often at multiple sites, (Combs, Kerrigan & Wachsmuth, 2020) adding pressure to already historically low vacancy rates. As part of a review carried out by City staff in 2017 to develop a regulatory framework for short term rentals, it was estimated that 3,200 units had been removed from the long-term housing market by commercial operators (City of Toronto, 2017). One year after the City's regulations for short term rentals was approved, a report by the Fairbnb Coalition estimated that this number had since doubled to 6,479 units (Wieditz, 2019).

Because Airbnb sites tend to concentrate in neighbourhoods with strong extra local tourism demand or cultural attraction, the impacts on the long-term rental market are uneven. In addition to the overall impact of reducing housing supply, there is also evidence that short-term rental activity contributes to gentrification of high demand areas by creating a classic rent gap between long term rental revenues and higher potential short term rental revenues.

Of particular note is that unlike previous models of gentrification, Airbnb induced gentrification can take place with little or no additional capital investment or redevelopment. As Wachsmuth and Weisler (2018) point out, “the only necessary step for converting a long-term rental to a short-term rental is to remove the existing tenant” (p. 1153). In the case of this form of gentrification the lower income tenant is displaced by a temporary visitor or possibly another higher income tenant or owner who can pay more.

Despite the widespread concern about the impacts of short-term rental on housing markets, they are not well understood for two reasons. The first is that there has been little academic research on the subject and the other is that the main provider, Airbnb, goes to great lengths to obscure and guard the data that would shed light on its operations (Wachsmuth & Weisler, 2018). In the City of Toronto, regulations on short term rentals were drafted in 2017 and appealed to the LPAT by Airbnb and a number of hosts but were eventually upheld in November, 2019. An update by City staff in February 2021 identified that just over 3,200 short term rental operators had registered as required under the new rules (City of Toronto, 2021), under 14% of the estimated total number of listings (23,524) in the City (Inside Airbnb, 2021).

Gentrification and displacement

These various processes of gentrification are driving the loss of LEM housing in the City of Toronto and causing displacement of lower income tenants. While gentrification has been the subject of endless debate and theorizing, despite an overwhelming consensus that the two are linked (Elliott Cooper et al, 2020), comparatively little attention has been paid to displacement and its consequences for lower income households (Slater et al, 2004). In a seminal paper on gentrification and abandonment in New York City, Peter Marcuse (1986) thoroughly conceptualized displacement into five forms which differ both on a temporal scale (an immediate event or events over time) and by the focus on an individual (tenant) or collective (neighbourhood). Marcuse also differentiated between physical displacement (by demolition or unlivable building conditions) and economic displacement (unaffordable rents and rent increases). These conceptualizations are:

1. Physical displacement
2. Economic displacement
3. Last-resident displacement / chain displacement

4. Exclusionary displacement
5. Displacement pressure

What Marcuse's conceptualization of displacement makes clear is that there is no one set of figures that can demonstrate or measure displacement. It is this complexity that creates the risk of displacement becoming a 'chaotic concept': one that obscures as much as it reveals when the term is invoked without sufficient attention (Elliott Cooper et al, 2020). Additionally, because evidence of the displacement of lower income households from a gentrifying area is unlikely ever to be seen as an objective and neutral aspect of neighbourhood change, even which concept is used to identify and acknowledge displacement can become a topic of political struggle (Bernt and Holm, 2009).

It is because of this association with displacement that gentrification has always been a controversial issue. Even the term, with its allusion to the relation to class that Ruth Glass (1964) intended when she coined the term, is assiduously avoided by government and real estate interests in favour of terms such as revitalization, regeneration or renewal that emphasize instead the upgrading of neighbourhoods and tax bases and the countering of urban decay and property value declines. In contrast, there are those that hold that the term and the prevailing conceptualizations of displacement are insufficient to acknowledge the associated trauma and violence experienced by those who are involuntarily 'un-homed' (Atkinson, 2015), severing ties to communities of support and belonging (Elliott Cooper et al., 2019).

Why not preservation?: Accounting for the policy imbalance and lack of attention to losses of LEM housing and displacement.

Given the controversial nature of gentrification and displacement, it is understandable that the policy preference formation process around issues of losses of affordable housing in the private rental market and the resulting displacement is itself highly political. But given the pressures that these processes create on the social welfare system, including the City's housing and homelessness system, understanding what accounts for a general imbalance of overall government policies that support and facilitate the various forms of gentrification causing these losses over policies that support preservation of existing affordable housing

and resisting displacement could support efforts to bring forward more equitable policy alternatives.

As outlined above, in the City of Toronto there is a clear pattern of prioritizing programs and policies for the development of new supply of affordable housing over those that support preservation of the existing supply. This is in keeping with classic urban regime theory which proposes that the fragmentation of power between elected government and a market economy means that the governing capacity of an elected government requires a complex collaboration with nongovernmental actors. The most powerful among these actors are real estate developers and developer-related interests resulting in a “development regime”, with a primary focus on land use decisions that promote growth and new development. (Mossberger, 2009; Stone, 1993).

The neoliberal turn that has affected all levels of government and the City’s avid pursuit of global investors have meant a general retreat from welfarist policies and interventions in favour of a reliance on ‘natural’ market processes. Many urban scholars have noted that this has over time led to the normalization of gentrification as a characteristic of urban development (see Slater, 2006) and a limited acknowledgement of the related displacement. Under this framing, those policies that do respond to displacement will tend to focus on individuals at a point in time rather than the impacts on neighbourhoods and communities over a sustained period. Legal advice to tenants facing physical displacement or individual rent supports for tenants under threat of economic displacement will be the policy option preferred over wide scale rent control in response to exclusionary displacement or comprehensive zoning regulation to manage displacement pressure (Bernt & Holm, 2016).

In the City of Toronto, this tendency is compounded by the particular details of Canadian Federalism and the governmental restructuring that took place under Premier Harris’ ‘Common Sense Revolution’ that left Toronto with insufficient revenue and institutional authority to respond to many of the City’s most pressing problems. Following on from the examples above, not only are the policy options of rent control and zoning regulation considerably more costly and involved, but they are also largely under the jurisdiction of the Provincial government and outside of the municipal government’s immediate control. Local politicians inclined to promote these more robust policy options with their colleagues at the

City will additionally encounter the barrier of perceived achievability, another key influence in policy preference formation (Stone, 1993).

The role of data

The role of data in policy preference formation is often portrayed as an inherently neutral basis for objective and impartial analysis and decision making. Governments often defend and promote their policy making as evidence based or even data driven, but data availability is itself driven by resources and politics. This is particularly true in rental housing where data is predominantly collected and maintained in proprietary commercial databases that serve developer and real estate interests. Within this framework, housing data reinforces the conceptualization of housing as real estate and a commodity rather than a home (Porter et al., 2019).

As noted above, this is the case even with government-initiated housing data collections. The CMHC Rental Market Survey does not include those segments of the rental housing market that predominantly serve low-income households. The development of policy responses to the loss of low end of market units are limited by a lack of reliable data that document these changes and their impacts. This will be explored in more detail in the context of the City of Toronto in the next portfolio elements.

Data and Activism

Policy debates about regulatory changes that could preserve affordable housing and prevent displacement of low-income residents take place then on an uneven field in which private interests with powerful technologies and complex structures control large amounts of proprietary information in comparison to insufficient public data. Increasingly, community organizers and activists are working to address this disadvantage by engaging directly in the collection and analysis of data to document the impacts of the diverse forms of gentrification in support of sociopolitical action, a practice Desiree Fields (2015) terms strategic positivism.

In Toronto as in many cities throughout the world, for example, efforts to address and regulate the impact of the short-term rental market on the City's already critically low vacancy rate, became a struggle with the dominant home-sharing platform, Airbnb, over

access to their data. The Toronto based coalition [Fairbnb](#) and the Brooklyn based [Inside Airbnb](#) are examples of organizations working to use data to expose the impacts of the company's practice on local housing markets and inform the debate on meaningful regulatory policies.

As a further example that also affects many large urban areas, the efforts of community organizations to prevent losses of deeply affordable housing such as rooming houses and Single Room Occupancy (SRO) hotels are challenged by a lack of data about the stock that is reliable, high quality, current and detailed. In many large urban areas including Montreal and Vancouver, tenant and community organizers are taking it on themselves to generate this information through community-based research drawing on local knowledge (Paradis, 2018). In Toronto, this approach was used to produce the Parkdale Rooming House Study, a comprehensive study undertaken by the Parkdale Neighbourhood Land Trust (PNLT). The project engaged community-based research to document the number and condition of rooming houses in Parkdale and to assess the impact of gentrification and real estate speculation on rooming house loss (Parkdale Neighbourhood Land Trust, 2017).

A significant factor in intensifying financialization in the field of housing and rental housing has been technological and digital change, which has greatly expanded the scale and the speed of the commodification of housing (Porter et al, 2019). Many activists have recognized the need to be able to engage with data in more complex ways to effectively contest the displacement being driven by these processes. For more examples, please see the Appendix in Section 3 of the portfolio.

Contesting displacement or supporting relocation? The role of nonprofits, social agencies and community organizers

The threats to low-end of market housing brought about by financialization are increasingly complex and systemic in nature, often operating at a global level, and pose new challenges to community organizations working to contest these losses and the associated displacement of low-income tenants. Activists and advocates must not only respond to the immediate impacts but must also work to expose and challenge the injustice of the

underlying and normalized market logic (Field, 2015) and advocate for effective policy change.

But the neoliberal turn has not only set the conditions which open lower-income neighbourhoods and rental buildings to capital accumulation that displaces the poor for profit (Fields, 2014), it has also impacted the capacity of community organizations in the third sector, to contest the associated social costs. Shifts in funding models from core funding to project funding have facilitated the downloading of social service delivery to non-profit community organizations. Under this funding model, how organizations allocate their resources and the activities they engage in is now dictated largely by government funders. An emphasis on a business and outcomes-oriented approach imposed new and onerous accountability requirements and competitive funding processes that further restrict organization's flexibility (Evans, Richmond & Shields, 2005). Finally, for many years the restrictions of the *Income Tax Act* that limit registered charitable organizations to using not more than 10% of their resources for advocacy completed a decisive shift towards service delivery and away from community organizing and political advocacy (Kamizaki, 2013). These provisions were softened by the Federal government in 2019, but dependence on government funding has continued what has been called an 'advocacy chill' (Scott, 2003) for many non-profits fearful of placing their funding at risk.

In the second element of this portfolio, I explore the roles that non-profit and community organizations take in responding to and contesting the displacement associated with the loss of low-end of market housing in Toronto. For organizations receiving funding from the City or other levels of government, roles were found to be typically individually focused on the provision of services to mitigate the immediate impacts of displacement. This includes assistance with tenant relocation through housing search assistance and access to housing allowances. Efforts to contest displacement are typically based on individual casework and education of the tenant of their legal rights. Funding requirements and the sheer volume of this work preclude a larger role in advocacy for systemic change or community organizing despite the desire to engage in these activities and an acknowledgement of the need for it. (WoodGreen staff, 2021, personal communication), (Community Legal Worker, 2021, personal communication), (August & Webber, 2019).

The Right to Housing, the Right to the City: Common language, different understandings – government, progressive agencies, and activists

For many tenant advocates, the framing of the current situation as a housing crisis is part of the problem, perpetuating the focus on the exchange value of housing and the interests of those who benefit from that perspective. Reframing the crisis as a tenants' rights crisis places the emphasis on people and issues of power (Rosenthal, 2019). In the same way, a focus on losses of low-end of market housing strictly as a supply issue risks missing the very real human costs of the displacement that results (Elliott-Cooper, Hubbard and Lees, 2019). Drawing on the perspectives of the urban experience in the global 'southeast', Oren Yiftachel (2020) encourages a focus that goes beyond acts of displacement to the expanding condition of *displaceability* within the range of experiences of contemporary urban citizenship.

Historically, for those under greatest threat of displacement effective resistance has always involved the collective power of housing's inhabitants organized as a movement (Marcuse and Madden, 2016). Increasingly, for those organizing to collectively push back against the condition of displaceability and to assert full urban citizenship this has included demands for rights to housing and more broadly a right to the city. Calls for the 'right to the city' have their origins in the scholarship of Henri Lefebvre and have inspired activists and social movements for decades, demanding broadly that cities be built for people and not profit (August & Webber, 2019). The related but more specific demand for right to housing is based on the principle that everyone deserves adequate housing which, it is argued, is foundational to the pursuit of the right to the city and other basic rights (Munoz, 2018).

In a review of case studies of three different groups that have approached organizing using a right to housing / right to the city agenda to fight displacements, evictions and rent increases, Martine August and Cole Webber (2019) have drawn insights into best practices for effective community organizing and recommendations for how these efforts can be supported by non-profits and social agencies. One of the principles that was common to all three groups was organizing that was independent of both government-funded agencies and state actors. Working independently allowed community organizers to centre member priorities and to engage in more radical direct action and extra-legal activities, such as rent

strikes, that were deemed necessary to confront structural inequality in legal and political systems.

For agencies and government bodies that also embrace the concept of the right to housing, these types of actions are the point where support for the organizers and activists was often withdrawn or the actions even opposed (August & Webber, 2019). Clearly, despite sharing some common goals, different organizations have different understandings of the concept of the right to housing and how it should be pursued. The language of the right to housing is increasingly making its way into legal and government policy documents. In 2019 Canada passed the National Housing Strategy Act and committed to the human right to housing. At a recent consultation on the City of Toronto's new Framework for Multi-Tenant Housing, it was noted that this was the first housing policy review that was using a 'right to housing lens' (Toronto, 2021). But as was pointed out at a webinar on the Right to Housing by Ruth Goba, then the Executive Director of the Black Legal Action Centre (BLAC), these rights are recognized by governments at various levels, but they are violated at very local levels and that it is imperative that local knowledge and leadership be engaged if they are going to be implemented where they count most, in people's lives (Goba, 2020). According to Marcuse and Madden (2016) the right to housing must go beyond formal rights to expose the incompatibility of the current housing system with those rights and lead to transformative change.

Conclusion

Expectations that governments at different levels should respond to a growing lack of housing affordability in Toronto and many urban centres has led to well publicized plans and strategies that predominantly focus on developing new supply of affordable housing with little attention to preservation. At the same time state policy has for decades been facilitating new forms of gentrification leading to greater losses of affordable housing and displacement of low-income renters such that the crisis continues to deepen. The capacity of the third sector to respond to and contest these losses and displacements has also been eroded by state policy, leaving community organizations consumed by the struggle to simply meet the resulting social demands. While there is commonality in using the language of the right to housing as part of the solution, governments and community leaders have different understandings of what implementation of that right must involve.

Bibliography

- Aalbers, M., (2008). The financialization of home and the mortgage market crisis. *Compet. Change* 12 (2), 148-166.
- Atkinson, R. (2000) The Hidden Costs of Gentrification: Displacement in Central London. *Journal of housing and the built environment* 15.4 : 307–326.
- Atkinson, R. (2015). Losing one's place: Narratives of neighbourhood change, market injustice and symbolic displacement. *Housing, Theory and Society* 32: 373-388.
- August, M. & Walks, A, (2018). Gentrification, suburban decline, and the financialization of multi-family rental housing: The case of Toronto. *Geoforum* 89 (2018) 124-136.
- August, M. & Webber, C. (2019). Demanding the Right to the City and the right to Housing (R2C/R2H): Best practices for community organizing. Parkdale Community Legal Services. <https://www.parkdalelegal.org/news/demanding-the-right-to-the-city/>
- Bernt, M., & Holm, A. (2009). Is it, or is not? The conceptualisation of gentrification and displacement and its political implications in the case of Berlin-Prenzlauer Berg. *City*, 13(2–3), 312–324.
- Canadian Centre for Economic Analysis and Canadian Urban Institute. (2019). Toronto housing market analysis: From insight to action. <https://www.toronto.ca/legdocs/mmis/2019/ph/bgrd/backgroundfile-124480.pdf>
- Canadian Urban Institute. (2018). Rental Market Listing Analysis for the City of Toronto: for City of Toronto Planning and Shelter, Support and Housing Administration.
- Canadian Urban Institute. (2019). Toronto Housing Market Analysis: From Insight to Action. For City of Toronto Affordable Housing Office, January 2019. <https://www.toronto.ca/legdocs/mmis/2019/ph/bgrd/backgroundfile-124480.pdf>
- City of Toronto (2017), Toronto's Short-term Rental Review, Fact Sheet November 28, 2017 <https://www.toronto.ca/news/torontos-short-term-rental-review/>
- City of Toronto (2017). Proposed Regulations for Short-term Rentals for Consultation. Toronto, Municipal Licensing & Standards and City Planning <https://www.toronto.ca/legdocs/mmis/2017/ex/bgrd/backgroundfile-104802.pdf>
- City of Toronto (2018). 2018 Rental Housing Market Conditions in Toronto. Tenant Issues Committee, February 9, 2018. <https://www.toronto.ca/legdocs/mmis/2018/td/bgrd/backgroundfile-112710.pdf>
- City of Toronto (2019), Affordable Housing Office 2019 Q1 Report https://www.toronto.ca/wp-content/uploads/2019/04/8dfa-access_AHO-Summary-for-HOT-TargetsCompletions-Q1-2019-Final.pdf

City of Toronto (2020), Condominiums: Two decades of New Housing. Profile TO, May, 2020. <https://www.toronto.ca/wp-content/uploads/2020/05/8f4f-City-Planning-Condominiums-Two-Decades-of-New-Housing.pdf>

Combs, J., Kerrigan, D., & Wachsmuth, D. (2020). Short-term rentals in Canada: Uneven growth, uneven impacts. *Canadian Journal of Urban Research*, 29(1), 119–134.

Cortright, J. (2017). The myth of naturally occurring affordable housing. *City Commentary*, October 10, 2017. <https://cityobservatory.org/the-myth-of-naturally-occurring-affordable-housing/>.

Creswell, J. W. and Creswell, J. D. (2018). *Research Design: Qualitative, Quantitative, and Mixed Methods Approaches*, 5th edition. Thousand Oaks, CA: Sage Publications.

Durning, Alan. 2012. Rooming Houses: History's Affordable Quarters. Sightline Institute. <https://www.sightline.org/2012/11/14/rooming-houses-historys-affordable-quarters/>
East York East Toronto Family Resources. "RENT Training." RENT Program. <http://www.housingworkers.ca/rent/training/intro.cfm>

Elliott-Cooper, A., Hubbard, P., and Lees, L. (2020). Moving beyond Marcuse: Gentrification, displacement and the violence of un-homing." *Progress in human geography* 44.3 (2020): 492–509.

Fields, Desiree. Contesting the Financialization of Urban Space: Community Organizations and the Struggle to Preserve Affordable Rental Housing in New York City. *Journal of urban affairs* 37.2 (2015): 144–165.

Glass, R. (1964) *London: Aspects of Change*. London: Centre for Urban Studies and MacGibbon and Kee.

Goba, R. (2020) in Different futures: How do we (re)imagine housing in a pandemic world? Canadian Urban Institute, July 29, 2020. <https://canurb.org/citytalk-news/different-futures-how-do-we-reimagine-housing-in-a-pandemic-world/>

Hale, K. (2018). Ontario goes back to failed rent control policy. ACTO website. <https://www.acto.ca/ontario-government-goes-back-to-failed-rent-control-policy/>

Joy, M., and Vogel, R. (2015). Toronto's governance crisis: A global city under pressure." *Cities* 49 (2015): 35–52. Web.

Kamizaki, K. (2013). Linking community organizing with policy change initiatives: Implications for future community practice in Toronto. Social Planning Toronto.

King, S. (2017). Thoughts on the unnatural occurrence of cheap housing. *Shelterforce* April 25, 2017. <https://shelterforce.org/2017/04/25/thoughts-unnatural-occurrence-cheap-housing/>

Krippner, G. (2005). The financialization of the American Economy. *Socio-Econ. Rev.* 3, 173-208.

- Lehrer, U. and Wieditz, T. (2009). Condominium development and gentrification: The relationship between policies, building activities and socio-economic development in Toronto. *Canadian Journal of Urban Research* 18:1 (2009) 140-161.
- Marcuse, P. (1986). Abandonment, gentrification and displacement: The linkages in New York City. in N. Smith and P. Williams (eds) *Gentrification of the City*, pp. 153-177. London: Unwin Hyman.
- Marcuse, P. (2010). "A Note from Peter Marcuse." *City* (London, England) 14.1-2: 187–188. Web.
- Metro Vancouver (2018). *Metro Vancouver Housing Data Book: Revised February 2018*.
- Mossberger, Karen, (2009). Urban Regime Analysis. Jonathan S Davies and David L Imbroscio eds. *Theories of Urban Politics Second Edition*, Los Angeles: SAGE, 40-54.
- Muñoz, S. (2018). Urban precarity and home: There is no "right to the city. *Annals of the American Association of Geographers*, 108(2), 370–379.
- Paradis, E. (2018). Saving room: Community action and municipal policy to protect dwelling room stock in North American cities.
http://www.pnlt.ca/wpcontent/uploads/2018/11/Saving_room.pdf
- Parkdale Neighbourhood Land Trust. (2017). No room for unkept promises: Parkdale Rooming House Study. http://www.pnlt.ca/wp-content/uploads/2017/05/Parkdale-Rooming-House-Study_Full-Report_V1.pdf
- Pomeroy, S., Focus Consulting (2020). Why Canada needs a non-market rental acquisition strategy. <http://www.focus-consult.com/why-canada-needs-a-non-market-rental-acquisition-strategy/>
- Porter, L., Fields, D., Landau-Ward, A., Rogers, D., Sadowski, J., Maalsen, S., Kitchin, R., Dawkins, O., Young, G., & Bates, L. K. (2019). Planning, Land and Housing in the Digital Data Revolution/The Politics of Digital Transformations of Housing/Digital Innovations, PropTech and Housing – the View from Melbourne/Digital Housing and Renters: Disrupting the Australian Rental Bond System and Tenant Advocacy/Prospects for an Intelligent Planning System/What are the Prospects for a Politically Intelligent Planning System? *Planning Theory & Practice*, 20(4), 575–603.
<https://doi.org/10.1080/14649357.2019.1651997>
- Prism Consulting. (2017). City of Toronto low end of rental market study: Final report. Prism Economics and Analysis: September 20, 2017.
- Ranasinghe, P., and Valverde, M. (2006). Governing homelessness through land-use: A sociolegal study of the Toronto shelter zoning by-law. *Canadian journal of sociology* 31.3: 325–349. Web.
- Scott, K., (2003) Funding Matters: The impact of Canada's new funding regime on non-profit and voluntary organizations. Canadian Centre for Social Development.

Slater, Tom. (2009). Missing Marcuse: On gentrification and displacement. *City* (London, England) 13.2-3 (2009): 292–311.

Slater, T. (2006). The Eviction of Critical Perspectives from Gentrification Research. *International Journal of Urban and Regional Research*, 30(4), 737–757.

Slater, T., Curran, W. and Lees, L. (2004). Gentrification research: New directions and critical scholarship. *Environment and Planning A* 36:1141-1150.

Stein, S. (2019). *Capital City: Gentrification and the real estate state*. London: Verso.

Stone, Clarence, (1993). Urban regimes and the capacity to govern: A political economy Approach. *Journal of Urban Affairs* 15 (1), 1-28.

Valverde, M. (2011). Seeing Like a City: The Dialectic of Modern and Premodern Ways of Seeing in Urban Governance. *Law & Society Review*, 45(2), 277–312.

Vincent, D. (2020). 'Campus of care' proposed for Parkdale properties includes hundreds of affordable housing units. *Toronto Star*, October 13, 2020.

<https://www.thestar.com/news/gta/2020/10/13/campus-of-care-proposed-for-parkdale-properties-includes-hundreds-of-affordable-housing-units.html>

Wachsmuth, D. and Weisler, A. (2018). Airbnb and the rent gap: Gentrification through the sharing economy". *Environment and Planning A: Economy and Space* 50 (6): 1147-1170.

Wieditz, T. (2019). Addressing Toronto's housing crisis?. *Fairbnb update report*. January 9, 2019. https://fairbnb.ca/wp-content/uploads/2019/07/Final_Fairbnb-Update-Report_Jan_9_2019.pdf

Yiftachel, O. (2020). From displacement to displaceability. *City*, 24:1-2, 151-165.

The loss of low end of market (LEM) housing and displacement in Toronto: Who's tracking it, who's responding to it and who's contesting it?

Introduction

Government responses to a critical and growing lack of affordable housing have focused primarily on development of new supply, with relatively little attention to preservation of the existing stock of low end of market (LEM) rental housing in the private market. In the City of Toronto this policy imbalance has persisted despite growing evidence that the number of affordable housing units being lost are greater than the number of new units being built. These losses are being driven by the processes outlined in the first element and are taking place both as physical losses and economic losses. Physical losses include demolition and redevelopment, conversion to non-rental and closure due to fire damage or code violations. Economic losses are through significant rent increases achieved through Above Guideline Increases or removal of tenants through eviction processes to exploit a rent gap made possible by the policy of vacancy decontrol.

Efforts to address this policy imbalance and to draw attention to the impacts of the resulting displacement of lower income tenants are made difficult by a lack of available data on the extent and location of these losses and missing knowledge of what happens to the displaced tenants. What data is collected, organized, and made available is determined by resources and politics and a prioritization of what is deemed valuable by government funders and decision makers. In the absence of a coordinated system for tracking this information and due to the limited capacity of community organizations closest to the affected sites and tenants to document LEM loss and displacement events, these losses and the impacts of the displacement are made invisible and do not factor into policy and planning decisions.

In this element of the portfolio, I explore how the loss of low end of market housing in Toronto is currently being tracked; what are the municipal divisions, programs, and key institutions involved; and what is being done to respond to and contest the related displacement of lower income tenants. I do so through a mixed methods approach, including quantitative and qualitative research methods. I am using both methods to emphasize that the loss of LEM housing is not only a housing supply issue but includes a significant social impact for those displaced in the process. The quantitative analysis identifies data sets that indicate the number of low-end market housing units lost or at risk in Toronto over the past 5 years, the cause of displacement, and the number of tenants affected, noting the source of the data and the purpose of collection. The qualitative element involves interviews with displaced tenants, staff from agencies, and organizations that were involved in responding to or contesting tenant displacement, as well as key informants involved in housing advocacy, service provision and community and tenant organizing. Three case studies are presented through the life narratives of displaced tenants and individuals involved in responding to or contesting their displacement. These case studies provide a crucial perspective of the human impact of LEM housing loss.

In the final section, I discuss the research findings to respond to questions about the implications of the findings for effective community action and policy and program development for preservation of affordable housing and resisting displacement.

Research questions

1. How is the loss of low end of market housing in the City of Toronto currently being tracked and responded to? What institutions, organizations and programs are currently involved?
2. How are the impacts of the resulting displacement being acknowledged and contested and by whom?
3. What are the implications of the loss of LEM housing and resulting displacement and how can policy and program development and community action effectively prevent future losses and displacement?

Defining LEM

Rent Level (Affordability)

Housing affordability is a measure of both housing costs and a household’s ability to meet these costs. As such it can be both an objective and a subjective measure which can lead to contentious debate about how affordability is defined. Market-based measures, such as the City’s current affordable rent definition of 80% of Average Market Rent (AMR), relate only to the rental market, reflecting market increases but not accounting for a relatively stagnant median renter income (Canadian Urban Institute, 2019). Efforts to define low end of market rental housing for the purposes of this research are intended to identify private rental market housing that is available to those with the lowest incomes in the absence of any subsidy.

The City of Toronto is currently in the process of a proposed Official Plan Amendment to redefine the City’s affordable and mid-range rent definitions using an income-based method (PH16.6). The new definition sets affordable rents for bachelor units at not more than 30% of gross household income for households earning between the 20th and 50th percentile income for one-person renter households. For all other unit types, the range is based on the 30th and 60th percentile income. Rents at the minimum end of this range are often referred to as “deeply affordable” (see Table 1 below).

Unit Type	Current Definition	Min Household Income (Affordable Rent)	Max Household Income (Affordable Rent)
Bachelor	\$45,920 (\$1,148)	\$15,269 (\$382)	\$32,232 (\$806)
1-bedroom	\$54,960 (\$1,374)	\$19,649 (\$491)	\$43,244 (\$1,081)
2-bedroom	\$63,640 (\$1,591)	\$36,871 (\$922)	\$63,640 (\$1,591)
3-bedroom	\$70,360 (\$1,759)	\$41,542 (\$1,038)	\$70,360 (\$1,759)

Table 1: City of Toronto proposed affordable rent definition. Source: City of Toronto, 2020 PH16.6.

For the purposes of this research, wherever it was possible to determine actual rent levels from the available data, LEM housing was defined as housing in the private rental market with rents at or below this new definition of affordable rent for the Maximum Household Income (right hand column).

Building Typology

Where specific data on rent levels were not available, housing typology was used as an indicator of LEM rental housing. As outlined in the first section, the 2017 (Prism Consulting, 2017) and 2018 (Canadian Urban Institute, 2018) Low End of Market Rental Studies undertaken by the City identified that in the private rental market the most deeply affordable units are those of the smallest size suitable for single or 'unattached households'; bachelor and bachelorette units (a unit type unique to Parkdale). Within these unit types, rents for secondary suites are on average lower than those in purpose built rental; however, the lowest rents are found in various forms of shared accommodation, commonly referred to as rooming houses or multi-tenant buildings and single-room occupancy (SRO) hotels. Additionally, there is a connection between low end of market rents and illegal or informal building uses contrary to zoning restrictions or building codes. Under Toronto's current zoning regulations, in most wards of the City, this includes multi-tenant buildings. The connections between LEM rents and these housing typologies are similar to those of rental market studies in other Canadian cities (MVHD, 2019).

Finally, supported by generous government incentives, Toronto experienced a boom in private sector high-rise rental apartment construction between 1955 and 1975 (Suttor, 2016). As these buildings have aged, they have become associated with lower rents. Rent regulations put in place towards the end of that boom have meant that longer term tenancies in these buildings represent some of the most affordable rents in the City (August, 2020)

For the purposes of this research the focus was primarily on the following housing typologies:

- Dwelling rooms (Rooming houses, SROs, Multi-tenant housing)
- Bachelorettes
- Informal or illegal residential uses.
- Older apartment buildings with longer term tenancies

Defining Loss

In defining what constitutes the loss of an LEM housing unit, I follow Marcuse's (1986) conceptualization of displacement into five forms which differ both on a temporal scale (an immediate event or events over time) and by the focus on an individual (tenant) or collective (neighbourhood). Marcuse also differentiated between physical displacement (by demolition or unlivable building conditions) and economic displacement (unaffordable rents and rent increases).

These conceptualizations are:

- Physical displacement
- Economic displacement
- Last-resident displacement / chain displacement
- Exclusionary displacement
- Displacement pressure

Physical Losses

Physical losses typically take place through a relatively immediate specific event displacing the tenant at the time of displacement (last resident displacement). LEM units lost in this way are almost always replaced with a less affordable option (exclusionary displacement).

These types of losses include:

- Demolition, redevelopment or conversion from rental
- Closure by a City authority e.g. City Fire, City Building, MLS, City Planning

Economic Losses

Economic losses typically take place through significant rent increases over a period of time, (displacement pressure), or more immediately on unit turnover, either voluntary or illegitimately coerced, when rents can be increased without control. Once increased, rents do not decrease (exclusionary displacement). These types of losses include:

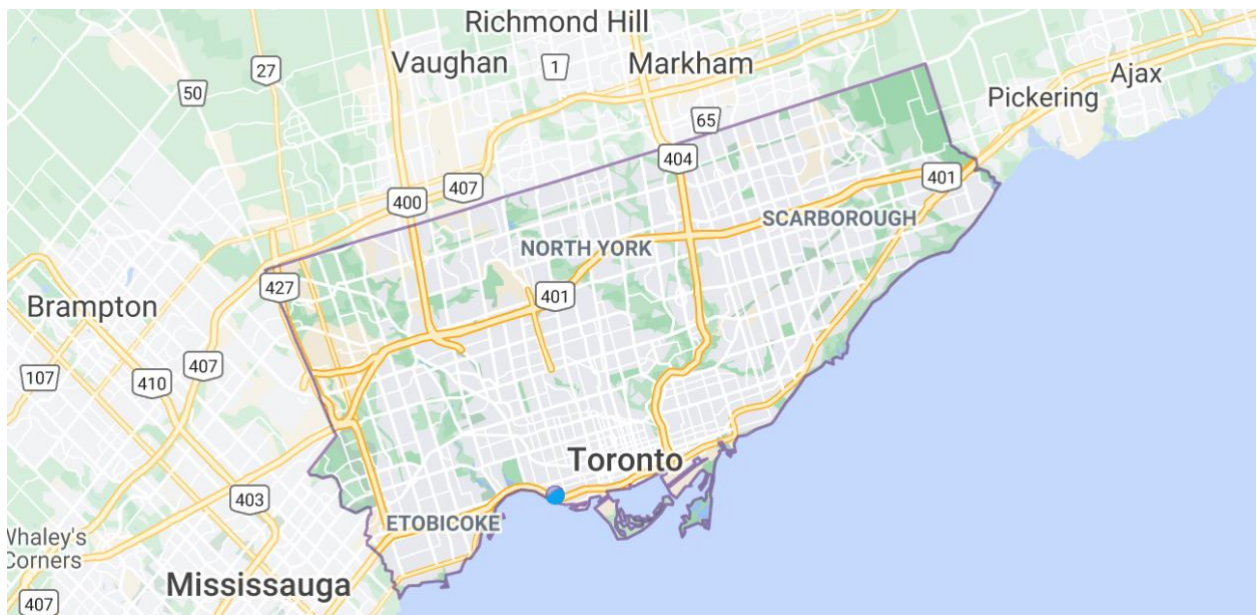
- Rent increases for all or the majority of units in a building
 - On unit turnover
 - Tenant move out

- Achieved by illegitimate evictions including tenant harassment or inducements
- Inappropriate use of legitimate eviction processes
- For sitting tenants
 - Above Guideline Increases (AGI)

Other parameters

Time period

- My research focused on the time period between 2015 and 2020
- Geography
 - The study was limited to within the official boundaries of the City of Toronto, see Map 1.



Map 1: City of Toronto official boundaries. Source: Google maps, 2021

Who is tracking losses of LEM housing and displacement and what is the picture?

Over the course of my research, I reached out to staff from a number of City Divisions, community agencies and advocacy groups and requested data that they had collected tracking losses of LEM housing, both physical and economic losses, and all data on the related displacement. My request was for information for the period from 2015 to 2020 but I made clear I was willing to accept whatever they had. For each contact, I also asked for recommendations of others who may have relevant data sets. Where I had questions about the data that I received, I followed up with a brief interview or email exchange. Summaries for responses for both types of losses are included at the start of each section.

Physical losses			
	Tracking losses of LEM and displacement	Responding to displacement and loss of LEM	Contesting displacement
Redevelopment of affordable rental units	City Planning	City Planning	City Planning
	<ul style="list-style-type: none"> Rental Demolition and Conversion by-law and application process 	<ul style="list-style-type: none"> Rental replacement Tenant Relocation Assistance Plan Rent gap payments Moving costs 	<ul style="list-style-type: none"> Right of return at original rents
Redevelopment of multi-tenant housing	City Planning	City Planning	City Planning
	<ul style="list-style-type: none"> Official Plan Amendment 453* application process 	<ul style="list-style-type: none"> Rental replacement Tenant Relocation Assistance Plan Rent gap payments Moving costs 	<ul style="list-style-type: none"> Right of return at original rents
	*Currently under appeal to LPAT		
	City Planning, SSHA, Roster of agencies	City Planning, SSHA, Roster of agencies	City planning
Closures of multi-tenant housing	Office of Emergency Management	Red Cross, WoodGreen Services, SSHA	
	<ul style="list-style-type: none"> Minimal record keeping 	<ul style="list-style-type: none"> Rooming House Emergency Response Plan Temporary <u>hotel</u> stay Housing help services Housing allowances where eligible 	N/A

Table 2: Physical losses of LEM housing and responses. Source: Developed by author with information from the City of Toronto.

Physical losses

Physical losses were defined as either the demolition of the building, typically due to redevelopment, or closure due to unlivable building conditions or code violations. Where the closure may have been temporary, for example due to damage from a fire, the buildings and units were considered lost if they resulted in the evacuation of the building. While there was no data to determine whether temporary closures of LEM units were returned to use at the same rent, anecdotal evidence from community organization staff was that fire-damaged LEM buildings were sold, upscaled or converted.

Redevelopment of affordable rental

In the City of Toronto as in many urban areas, new housing development in the central city area (see Map 2) often involves the redevelopment of older building sites resulting in the loss of existing private-market rental housing. To preserve the current stock of rental housing and its 'naturally occurring' affordability, in 2007 the City of Toronto put in place the Rental Housing Demolition and Conversion Bylaw.

Rental housing demolition and conversion bylaw

Under the bylaw a permit is required to demolish or convert six or more housing units where at least one is a rental unit. Details of the numbers of units affected, unit size, rent levels (classified as affordable, mid-range or high end) from a current rent roll and reason for the demolition are all required in the application. The permit application must also be accompanied by a Housing Issues Report, which provides details of existing tenants, rents paid and the impact of the proposal on them. All of this data is entered into the City's Integrated Business Management System (IBMS).

Complementing the rental housing demolition and conversion bylaw are Official Plan policies that require the replacement of rental units at affordable and mid-range rent levels on a one for one basis at similar rents in the new building or in close proximity to the original site. The policies also require the developer to provide a range of supports to the renters displaced by the demolition or conversion under an approved Tenant Relocation and

Assistance Plan (TRAP) negotiated between the developer and City Planning staff. TRAPs typically include variations of the following measures:

- Increases to the minimum requirements under the Residential Tenancies Act (RTA) on notice requirements and financial compensation (number of month's rent).
- "rent gap payments", compensation for an approximate difference between the rent of the occupied unit and the average market area rent by type for an average vacancy of the expected length of construction to aid with hardship.
- Moving allowances and additional supports where special needs have been identified.
- Right of return to a similar rental unit in the new development at a similar rent to those paid in their existing apartment.

In response to my request for data on units and tenancies that had engaged with the City's rental housing demolition and conversion bylaw and official plan policies, I was directed to a Planner with the Strategic Initiatives and Policy Analysis (SIPA) unit of the City of Toronto's Planning Division. Following a series of communications to clarify my request, I received a full dataset of all relevant applications that had been received and approved between January 1, 2015 and December 31, 2020. The dataset was comprehensive and included the following:

- Development address (IBMS)
- Details of the market and housing type of the existing rental units to be demolished
- Address(es) of existing/original rental units
- Type of new development
- Rental replacement address(es)
- Details of all units lost to demolition or conversion
- Details of units replaced (including extra and foregone units)
- Details of numbers of affected tenants
- Details of affected tenants eligible for tenant relocation assistance and a summary of assistance provided.

A summary is included below in Table 3.

	2015	2016	2017	2018	2019	2020	TOTAL
NUMBER OF RH APPLICATIONS							
Submitted (excludes Cancelled/Withdrawn but includes Not Approved/Refused)	21	26	26	23	36	40	172
Approved	22	12	20	15	35	16	120
6 or More Rental Units	12	7	11	6	20	12	68
Fewer than 6 Rental Units	10	5	9	9	15	4	52
Not Approved/Refused (by year of submission)	-	1	-	-	-	-	1
Cancelled/Withdrawn (by year of submission)	3	-	3	3	3	3	15
NUMBER OF RENTAL UNITS LOST (INC. 30 DWELLING ROOMS)							
Total	224	225	339	359	908	245	2,300
Demolition (Policy 3.2.1.6/7)							
Total	221	225	336	354	904	239	2,279
Private Rental (Policy 3.2.1.6)	221	91	336	354	825	107	1,934
6 or More Rental Units	169	78	320	332	791	95	1,785
Fewer than 6 Rental Units	52	13	16	22	34	12	149
Social Rental (Policy 3.2.1.7)	-	134	-	-	79	132	345
Condo Conversion (Policy 3.2.1.8)							
Total	-	-	-	5	-	-	5
6 or More Rental Units	-	-	-	-	-	-	-
Fewer than 6 Rental Units	-	-	-	5	-	-	5
Severance (Policy 3.2.1.8)							
Total	3	-	3	-	4	6	16
6 or More Rental Units	3	-	-	-	-	6	9
Fewer than 6 Rental Units	-	-	3	-	4	-	7
TOTAL NUMBER OF REPLACEMENT RENTAL UNITS (INCLUDES EXTRA RENTAL REPLACEMENT)							
Total	176	214	307	346	868	196	2,107
Private Rental	176	80	307	346	791	64	1,764
Affordable	66	49	189	150	350	11	815
Mid-Range	70	24	102	180	390	31	797
High-end	40	7	16	16	51	22	152
Social Rental	-	134	-	-	77	132	343
FORGONE RENTAL REPLACEMENT							
Total	48	12	32	19	38	44	193
Official Plan Amendment / Cash-in-Lieu	3	-	16	-	-	-	19
Delegated Applications (<6 Rental Units, # of Units Not Replaced)	29	12	16	19	28	11	115
All High-End Rents (6+ Rental Units)	16	-	-	-	10	17	43
Other (e.g. illegal demolition, non-compliance with zoning/building code)	-	-	-	-	-	16	16
EXTRA RENTAL REPLACEMENT UNITS (SECURED)							
Total	-	1	-	6	4	3	14

Table 3: Rental housing demolition and replacement statistics, 2015-2020. Source: City of Toronto Planning, Strategic Initiatives and Policy Analysis.

Unit replacement

Between January 1, 2015 and December 31, 2020 a total of 120 applications were approved that involved rental replacement requirements. 2,300 rental units were lost and 2,107 replaced. Of those replaced, 815 were at affordable rents (at or below AMR), 797 at mid-range rents and 343 were social rental units (subsidized).

All datapoints on rental replacement units are captured in the City's IBMS. Specific details related to tenant relocation assistance, and in some cases where negotiations to exchange numbers and unit sizes to generate a different unit mix in the replacement requirements, are captured in Section 37 agreements. In response to regular data requests on the subject from media, Councillors' offices and the public, the City Planner I contacted took on the task of collating all of the related data into one spreadsheet which he continues to maintain.

Units not replaced

The data set identified 193 foregone rental replacement units that were demolished and not replaced for the following reasons:

- (19) Cash in lieu was accepted. This practice was reported to me to have been discontinued at the City (City Planning staff interview, March 31, 2021).
- (N/A) The redevelopment was a priority project, for example a hospital site and the requirements were waived.
- (115) Less than 6 rental units demolished or converted
- (43) All of the units were high end rents
- (16) Units lost were illegal and not in compliance with zoning or building code.

Dwelling rooms

None of the protections and requirements of the City's Official Plan rental replacement policies and Municipal Code By-law for Rental Demolition and Conversion currently apply to the loss of rental housing units that are dwelling rooms. Between 2015 and 2020 there were 4 redevelopment applications approved with rental replacement requirements that also included a total of 30 dwelling rooms that were demolished. Units were replaced at only one site where 18 dwelling units, fully self-contained apartments, replaced the 18 dwelling rooms demolished under the terms of a Section 37 agreement.

Tenant relocation

1,962 tenant households were displaced by the demolition/conversion and 1,656 of these households received some form of relocation assistance.

More units were replaced (2,300) than the number of tenant households listed as affected (1,962) or supported by a TRAP (1,656). This indicates that rental units may have been left vacant in advance of submission of the development application or that tenants may have moved out prior to the implementation of the TRAP. The terms of a TRAP can represent a significant expense for a developer, creating an incentive for owners and developers to have tenants vacate rental units well in advance of applying for a permit to demolish them or

before the TRAP requirements are initiated (WoodGreen staff, personal communication, June 1, 2021).

Illegal Units

Units that are deemed to be illegal due to non-compliance with Building Code or Fire Code requirements are still required to be replaced under the by-law unless the current zoning does not allow residential. Between 2010 and 2015, there were 16 illegal units identified through a redevelopment application that involved the rental replacement by-law. These units were demolished and not replaced due to their non-residential zoning status. Illegal units are more often brought to the attention of City officials through Divisions other than City Planning such as Municipal Licensing and Standards (MLS). Currently, however, under any of the above circumstances, there is no requirement for a Tenant Relocation Assistance Plan and no mechanism to require the owner to provide support for tenants displaced from illegal units.

Enforcement and oversight

While the documentation of the requirement to provide rental replacement units is well administered as part of the development application process, City Planning staff that I spoke with acknowledged that ongoing administration and oversight of required rent levels on the replacement units, appropriate access to these units and right of return are not consistently applied (City Planning staff, personal communication, March 31, 2021). The preservation of rental affordability and the protections against displacement that are required under the City's Rental Replacement and Conversion By-law although robust, are limited both by the terms of the by-law and the implementation and oversight of those terms at every stage of the development process.

Preserving Affordability

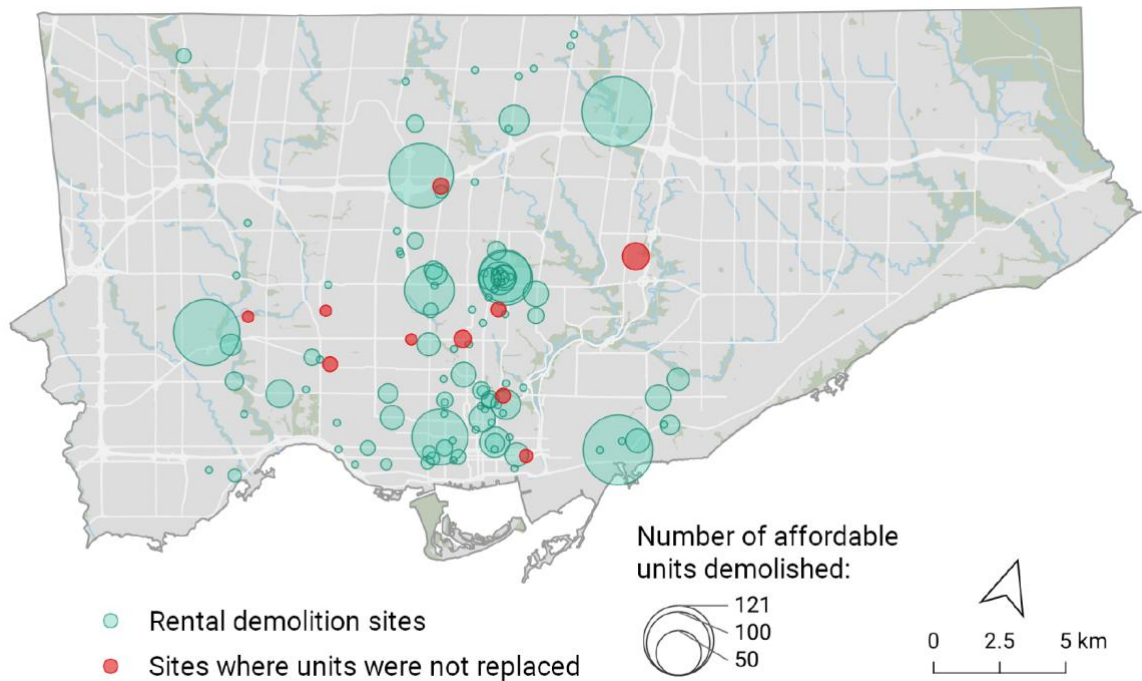
Negotiated levels of affordability are to be maintained in the replacement units for a minimum period of 10 years with annual increases of not more than the Provincially established annual Rent Increase Guideline (RIG). Income thresholds of not more than 4 times the annualized rental amount are to be applied to incoming households and vacant

units are to be marketed and filled in a fair, transparent and non-discriminatory manner. While some developments have been required to submit an Access Plan outlining how they will meet these requirements, others have not and there remains a lack of clarity on which Division of the City should be responsible for its oversight. A recent direction from City Council to create a centralized registry for all rent replacement units is intended to address these inconsistencies.

For displaced tenants that have been provided with 'rent gap payments' under the negotiated Tenant Relocation Assistance Plan (TRAP), these end with the completion of construction, or the lapse of the construction period specified in the (TRAP).

Right of Return

Right of return similarly is not currently well tracked or administered. Anecdotally, City Planning staff estimate that tenants who exercise this right do not typically exceed 20% of those that are deemed eligible (City Planning staff, personal communication, March 31, 2021). The significant time lapse, often 3 to 5 years, between tenants vacating their units and completion of construction and option to return means that many tenant households have already established themselves elsewhere or have lost contact with the process. Right of return was only introduced in 2006, and since that time, developers have not been consistently required to document their processes for monitoring and communicating rights of return. What this indicates, despite a lack of formal data, is that the vast majority of tenants that are displaced by a redevelopment remain displaced after the construction is completed, even where rental replacement and right of return obligations are required as part of the development application approval.



Map 2: Affordable rental sites demolished 2015 – 2020. Source: City of Toronto Planning, Strategic Initiatives and Policy Analysis. Mapping by Purpose Analytics.

Redevelopment of Multi-Tenant Housing

Official Plan Amendment 453

As mentioned above, dwelling rooms are the most affordable housing option available on the private rental market, representing a significant portion of the entire low end of market stock. For many of the most vulnerable, including those on social assistance, seniors on fixed incomes, newcomers and low-income households, these units are the only affordable housing option in the absence of some form of government subsidy. In recognition of the importance of dwelling rooms in the “provision of a full range of housing types and affordability” as required under the Provincial Policy framework and the City’s Official Plan, and in response to increases in the number of dwelling rooms lost to redevelopment, in 2019 City Council voted unanimously to approve Official Plan Amendment (OPA) 453. This amendment would extend the policies for the replacement of rental units lost to redevelopment and supports for displaced tenants to include dwelling rooms.

The amendment was almost immediately appealed to the Local Planning Appeal Tribunal (LPAT) by a group of developers and currently remains unresolved in part due to delays in the process related to COVID-19. Notwithstanding the appeal, given that it was unanimously adopted by City Council, City Planning staff continue to enforce the policies in OPA 453 when processing redevelopment applications that involve the demolition of dwelling rooms.

In the absence of resolution of OPA 453, redevelopment applications involving the demolition of dwelling rooms do not require a permit to do so and are not tracked as part of the City's official rental replacement units. Details of replacement requirements negotiated with the developer of the site have been documented in staff reports. The City Planning staff that I contacted identified four current redevelopment sites which involve the demolition of dwelling rooms and have not yet been approved where the intent of OPA 453 is being applied despite not being in full force.

Address	950 King Street (Palace Arms)	48 Annette Street	1521 Queen St. W. (the Queen's Hotel)	295 Jarvis Street (Inglewood Arms)
Original units	91 dwelling rooms	9 dwelling rooms	27 dwelling rooms and 8 dwelling units	96 dwelling rooms
Rent levels (approximate)	\$600	N/A	\$850	\$800 - \$1,300
Requirements proposed by City				
Replacement requirements	60 Bachelor units (same GFA)	6 Bachelor units (same GFA)	8 dwelling units	TBD
Rent levels	90% AMR (\$1,009)	Rents restricted in 3 units for 15 years	TBD	TBD
TRAP	4 tenants	N/A	N/A	TBD
Right of Return	4 tenants	N/A	N/A	TBD
Development application status	In process	Approved	Appealed to LPAT	Appealed to LPAT

Table 4: Development applications engaging Official Plan Amendment (OPA) 453 between 2015 and 2020. Source: City of Toronto Planning, Strategic Initiatives and Policy Analysis (SIPA).

Preservation of units, unit types and affordability

In the two applications that have not been appealed to the LPAT, the replacement of the demolished units will take place on an equivalent GFA basis and will involve conversion of

the previous dwelling rooms to dwelling units (bachelor apartments). This will involve both a reduction in the number of units, (in both cases a reduction by approximately one third or 33%) and an increase in rent, despite required rent restrictions, to 90% AMR (\$1,090/month for a bachelor unit). The exact increase in rents is not possible to determine as there are no formal records of the previous rents of these units, however, anecdotal evidence from former tenants of the Palace Arms is that the rents were closer to \$600 per month, or the equivalent of 50% AMR for a bachelor unit (Vincent, 2021).

Responding to displacement

In all cases except the Inglewood Arms application, which remains under appeal, the issue of responding to displacement through a Tenant Relocation Assistance Plan and Right of Return has been minimized or nullified by the fact that none, or very few, of the original tenants were still in the units at the time of the current application. For both the Palace Arms and the Queen's Hotel, there is both anecdotal and documented evidence that the existing tenants were removed through illegal eviction that included harassment, intimidation and illegitimate process that took place either prior to or immediately following sale to the current developer (see Queen's Hotel case study and CBC, Aug. 7, 2015). Delays in the application process at Palace Arms meant a further attrition of tenants from 17 when the process was initiated in 2018 to only 4 when the TRAP was finalized in 2021.

Tenant Relocation Support Services (TRSS) Program

Prior to the drafting and approval of the OPA 453 by City Council, the Tenant Relocation Support Services Program (TRSS) was a City Manager Award-winning program implemented by the City to respond to a number of redevelopments of rooming houses and single room occupancy hotels (Paradis & Connelly, 2018). Existing City funded services to support relocation of dwelling room tenants displaced by emergency events or closures, including the Rooming House Emergency Response Program contracted to WoodGreen Community Services, were insufficient to respond to the demands from the redevelopment sites. A roster of four community agencies was established to provide extensive services to support the relocation of displaced tenants to stable housing.

The TRSS program evaluation report

Between January, 2016 and September, 2017, the TRSS program was implemented at 4 different sites. In July of 2018, the City commissioned two experts in the field, Joy Connelly and Emily Paradis, to evaluate the program’s effectiveness and make recommendations for improving the program (Paradis & Connelly, 2018). Although agency staff faced challenges collecting and recording information under difficult outreach conditions, tracking sheets were used by agency staff at all sites. The program evaluation report consolidated all the collected data to provide a very complete summary of the units lost to redevelopment, including building condition and rent levels and the impacts on the affected tenants including outcomes of the relocations. An important component of the evaluation was a determination of the costs of delivering the program and whether they were borne by the developer or the City.

Details of the TRSS Program sites are listed below.

	Project			
	235 Jarvis	77 Mutual Street	Waverly Hotel	295 Brunswick
Built form	Hotel	Single-room occupancy	Hotel	Rooming house
Dates of from SSHA’s first involvement to conclusion of TRSS project	Jan 2016 – Jan 2017	Nov 2016 – July 2017	Aug 2016 - June 2017	Oct 2016 – Sep 2017
Name of support agency	Albion	HOTT	WoodGreen	WoodGreen
Estimated number of units / rooms	49	22	54 - 60	25
Estimated number of tenants originally on site	45	25	48	24
Number of tenants onsite upon arrival of support agency	14	22	39	16
<i>Source:</i> City and agency staff. There are no reliable records of the numbers of units or tenants originally on the site. These estimates should be understood as reflecting the scale of displacement rather than firm numbers.				

Table 5: Tenant Relocation Support Services (TRSS) Program outcomes. Source: Paradis & Connelly, 2018

Preservation of units, unit types and affordability

Only one of the four site applications included rental replacement requirements and right of return obligations. In two other sites, some replacement units were negotiated as part of the Section 37 Agreement. Affordability for the displaced tenants was preserved through a

combination of developer funded 3-year rent gap payments and City funded housing allowances. Average reported rent increases for relocated tenants was \$308 per month including utilities, supporting the report's conclusion that the relocations would not have been possible without some form of housing allowance. (Paradis & Connelly, 2018)

Responding to displacement

Despite the best efforts of the TRSS program's coordinated response to these redevelopments, 36% of all affected tenants, or 51 in total, were displaced before they could receive the program's services. Based on the consultant's interviews with affected tenants and staff from supporting agencies and City Planning, delays between the initiation of a redevelopment by the owner and City staff being made aware of the potential displacement of vulnerable tenants meant that tenants unaware of their legal rights were subject to pressures to leave and susceptible to illegal evictions. 81% of the displaced tenants that did receive TRSS program services, or 56 in total, were successfully relocated with the support of housing allowances to provide affordability and follow up supports to ensure housing stability.

Evaluation of costs of service

The evaluation determined that the costs of responding to the displacements of tenants in the four building sites was \$1.29 Million over three years, or \$18,648 per person supported. These costs do not include City staff time or projected costs for the 51 displaced tenants that did not receive the program's services, some of whom became homeless. Of these costs just over half (\$652,560) were covered by the City with the remainder covered by the developers (\$634,148).

Following the expiry of the developer funded 3-year rent gap payments, it was estimated that it would cost the City and additional \$294,000 per year to maintain the housing allowances that were required to keep the displaced tenants stably housed. Also included in the evaluation was an estimate of the projected costs of not delivering the program. Using current data on shelter use costs and information from agency staff on the number of displaced tenants from all four sites at risk of homelessness, the evaluation placed the cost of not providing the services of TRSS at over \$1.4 Million over the same three-year period.

Status of the TRSS Program

On January 31, 2019, the roster of support agencies for the TRSS program that had been assembled through a Request for Proposal (RFP) process lapsed and was not re-established. In the absence of alternative agencies, demands for supports for the relocation of vulnerable tenants are currently being directed primarily to WoodGreen Community Services under the Rooming House Emergency Response contract with the City (see following section).

Closures of Multi-tenant housing

Many of the features and typologies of Low End of Market housing that contribute to its deeper affordability and low barrier access also make them more susceptible to closure and loss than other segments of the rental market. The economics of multi-tenant housing in the private rental market operate on very narrow margins. To maintain profitability landlords often reduce capital, operating and maintenance costs in ways that place the buildings in contravention of zoning, building, licensing, and fire safety regulations. This in turn places these units at higher risk of closure by City authorities due to a code violation or damage by fire or major event. (Connelly & Connelly, 2021).

Office of Emergency Management (OEM)

Within an overall responsibility for responding to coordination of major emergency and disaster planning and management, the City of Toronto's Office of Emergency Management (OEM) is one of the principal actors in responding to sudden or imminent closures of multi-tenant housing resulting in the displacement of vulnerable tenants under what is referred to as the Rooming House Emergency Response Plan. Also involved under contract with the City are the Canadian Red Cross for the provision of immediate emergency lodging and services and WoodGreen Community Services, or in some cases another local agency, for the provision of relocation supports and housing help.

The coordination of efforts and the exchange of situational and tenant information among all these organizations and agencies under the pressures of emergency situations has presented challenges. The involvement of other City Divisions such as Toronto Fire

Services and Municipal Licensing and Standards and Shelter, Support and Housing Administration (SSHA) often introduces additional complexities. In reviewing and comparing data from OEM, WoodGreen and SSHA, it was identified that a standard communication and activation protocol was not always followed leading to differences in records of incidents and responses. OEM's response to my initial request for data from their responses to rooming house fires or closures between 2015 and 2020 was that they did not track details and would not be able to provide the requested data. A short time later, with the return of a staff member from maternity leave, a simple dataset was located and shared for the period between January 2016 and July of 2019.

The data set recorded the date of the emergency displacement event and the address, whether it was a fire or an evacuation, the number of tenants affected and the number of tenants that required support services, and finally whether the event required OEM to stand by or to initiate emergency social services (ESS). Between 2016 and July 26, 2019, OEM was contacted for 56 incidents involving rooming houses and was required to respond to 37. In total 319 tenants were affected by the incidents and 202 (63%) of the affected tenants required emergency social services. According to the summary, 18 of the responses were listed as related to 'fire', 38 were listed as related to 'evacuation'. The distinction between fire and evacuation was not clarified and may include overlap. In 2017 for example, all incidents were identified as 'evacuation' and none as 'fire'. OEM staff that provided the dataset emphasized that their unit's role is the coordination of the initial emergency response and does not involve any 'case management' of affected tenants or follow up on the status of the rooming house.

The OEM dataset was one of the few records of losses of illegal multi-tenant housing (see Map 3). Emergency responses are one of the only ways that these sites come to the attention of city authorities.

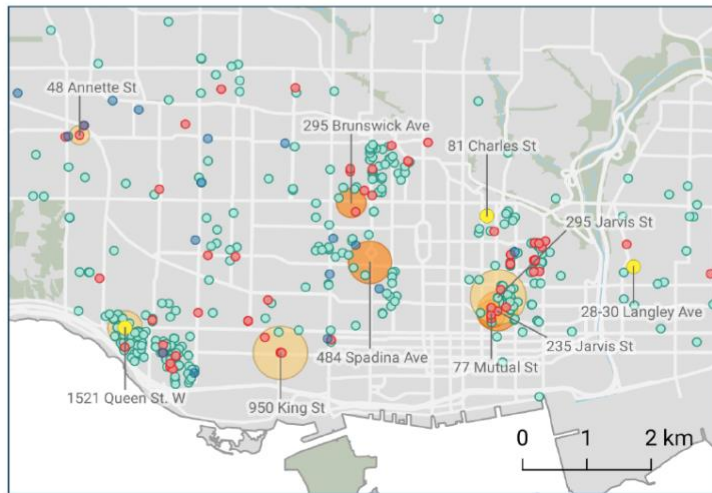
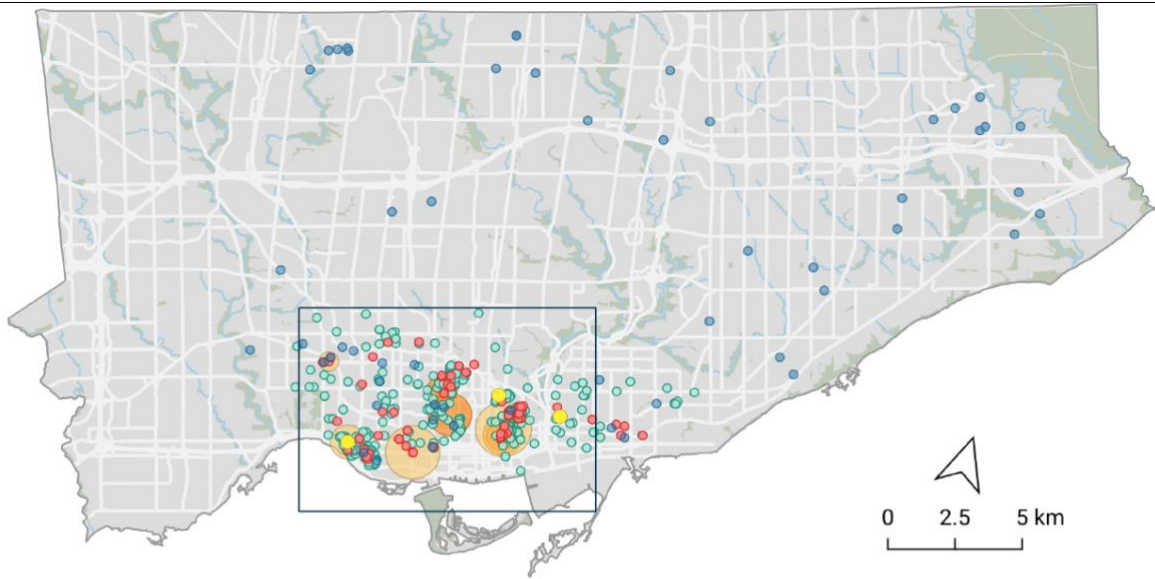
	Total # of Rooming House related Stand By Calls	Total # of calls requiring response	Total # of tenants affected	Total # of tenants requiring assistance	# of Fire	# of Evacuations
2016	8	5	41	20	5	3
2017	18	13	96	51	0	18
2018	20	10	104	58	7	13
2019*	10	9	78	73	6	4
Total	56	37	319	202	18	38

* to July 26, 2019

Table 6: Office of Emergency Management Rooming (OEM) house response incidents 2016 – 2019. Source: city of Toronto, Office of Emergency Management (OEM).

Emergency Social Services

For events which displace vulnerable rooming house tenants without alternative housing options, emergency social service (ESS) is provided. Lead by the Canadian Red Cross, a hotel stay is provided along with basic needs for up to two weeks. Volunteers carry out a simple vulnerability assessment based on the Statistics Canada Low Income Cut Off (LICO). During this two-week period WoodGreen Community Services is contacted to provide housing help and tenant relocation supports to the displaced tenants under the Rooming House System Support contract with the City of Toronto. Both agencies provide these services under contract with the City of Toronto. Despite working closely with displaced tenants, the terms of the contracts do not require the collection or reporting of client level data, including details of services provided or tenant outcomes.



- Current Rooming House License as of Jan 1, 2020
 - Lapsed Rooming House License as of Jan 1, 2020
 - Rooming House Evacuated by the OEM (2016 to 2019)
 - Case Study Sites
 - OPA 453 Engaged Site
 - TRSS Program Site
- Dwelling rooms/units: 100
50

Map 3: Multi-tenant housing and losses, 2015 – 2020. Sources: City of Toronto Planning (SIPA), Office of Emergency Management (OEM), City of Toronto Municipal Licensing and Standards (MLS). Mapping by Purpose Analytics.

Economic Losses

LEM units were considered to be 'lost' through the economic removal of the unit's rental affordability to the point where it no longer qualifies as an LEM rental unit. Conversion to other forms of tenure, for example short term rental or to residential ownership, are also included in this section. Unlike the physical losses outlined above, economic losses and

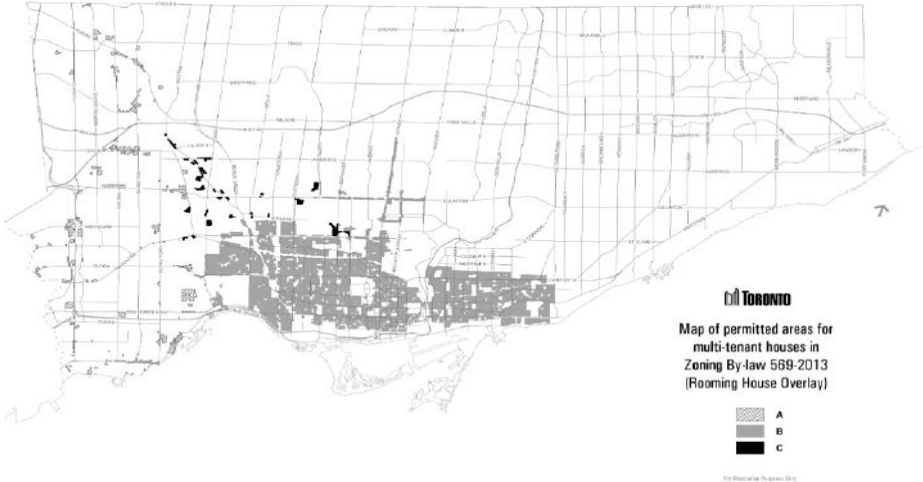
their related displacement are considerably more difficult to measure as they typically happen over time, the units remain in place and the cause of tenant movements cannot be definitively attributed to these types of losses.

Economic Losses			
	Tracking losses of LEM and displacement	Responding to displacement and loss of LEM	Contesting displacement
Upscaling and conversions of multi-tenant housing	Municipal Licensing and Standards	Municipal Licensing and Standards	Municipal Licensing and Standards
	<ul style="list-style-type: none"> Rooming House licensing process tracks current licenses 	<ul style="list-style-type: none"> Inspections to maintain standards 	N/A
	WoodGreen Community Services	WoodGreen Community Services	WoodGreen Community Services
	<ul style="list-style-type: none"> Rooming House System Support Minimal record keeping 	<ul style="list-style-type: none"> Rooming House System Support Housing help services 	N/A
	Parkdale Neighbourhood Land Trust	Parkdale Neighbourhood Land Trust	Parkdale Neighbourhood Land Trust
<ul style="list-style-type: none"> Parkdale Rooming House Study 	<ul style="list-style-type: none"> Rooming House Acquisition and Rehabilitation Pilot 	<ul style="list-style-type: none"> Proactive Eviction Prevention Pilot 	
Above Guideline Increases (AGI)	Landlord and Tenant Board (LTB)	SSHA, Federation of Metro Tenant's Association (FMTA)	SSHA, Federation of Metro Tenant's Association (FMTA)
	<ul style="list-style-type: none"> Application records 	<ul style="list-style-type: none"> Outreach and Organizing Program 	<ul style="list-style-type: none"> Tenant Defence Fund
	RenovictionsTO	RenovictionsTO	RenovictionTO
<ul style="list-style-type: none"> Identifies building owner in LTB data Maps locations 	<ul style="list-style-type: none"> Community legal information and education 	<ul style="list-style-type: none"> Examples of successful extra-legal actions 	
No Fault Evictions	Landlord and Tenant Board (LTB)	Community Legal Clinics	Community Legal Clinics
	<ul style="list-style-type: none"> Application records 	<ul style="list-style-type: none"> Legal advice 	<ul style="list-style-type: none"> Representation at LTB
	RenovictionsTO	RenovictionsTO	RenovictionsTO
<ul style="list-style-type: none"> Identifies building owner in LTB data Maps locations 	<ul style="list-style-type: none"> Community legal information and education 	<ul style="list-style-type: none"> Examples of successful extra-legal actions 	
Illegal evictions	WoodGreen Community Services	WoodGreen Community Services	WoodGreen Community Services
	<ul style="list-style-type: none"> Minimal records 	<ul style="list-style-type: none"> Housing help services 	N/A

Table 6: Economic losses of LEM housing and responses. Source: Developed by author with information from the City of Toronto, Landlord and Tenant Board and RenovictionsTO.

Upscaling and (de)conversions of Multi-tenant housing (rooming houses)

In addition to physical losses due to redevelopment, rooming houses are lost economically through (de)conversion to single family homes or short-term rentals or ‘upscaling’ to higher rent units. While advocates have been drawing attention to anecdotal evidence of these losses of multi-tenant housing units for some time (Campsie, 1994, 2018) (Goldstein, 2020), there is a lack of reliable data to confirm these losses. Due to failed attempts to harmonize zoning bylaws following amalgamation in 1998, multi-tenant housing is only legal in the city’s central core and a few other small areas (see Map 4). In all other parts of the city, the existence of multi-tenant housing is technically illegal and so operate in secret outside of any acknowledged regulatory framework. The following sections identify some of the ways that attention is being paid to what is happening to rooming houses and their tenants in the City of Toronto.



Map 4: Permitted areas for multi-tenant housing, Zoning By-law 569-2013. Source City of Toronto

Declines in City licensed rooming houses

For multi-tenant housing that does operate in areas where they are permitted, the City requires them to be licensed and tracks data on the number of rooming houses licensed annually.

Licence Type	2016	2017	2018	2019	2020
Home Licences	392	368	381	325	343
Total	392	368	381	325	343

Table 7: Rooming house licenses in the City of Toronto 2016 – 2020. Source: City of Toronto Municipal Licensing and Standards

I obtained lists of all licensed rooming houses from each of the past 5 years from the City's Municipal Licensing and Standards under a Freedom of Information request. These lists showed that the number of licensed rooming houses has decreased from 392 in 2016 to 343 in 2020, a decrease of 49 rooming houses (see Map 3). A closer review of the data by specific addresses raises questions about what these figures actually represent. Individual addresses are often missing from one year and reappear the next year or two years following, indicating that some operators do not renew their licenses consistently. What is not clear is whether these figures represent a decline in the number of operating rooming houses or the number of operators obtaining licenses or some combination of both.

Despite these uncertainties, and the limited nature of the dataset, when compared to the number of licensed rooming houses from previous years, there is a clear trend of decline in numbers.

- 1986 – 603
- 1993 – 457
- 2012 – 412 (all figures from Campsie, 2018)

Habitat Services

Habitat Services has been operating in licensed rooming houses since 1987 to improve the quality of life for tenants through funding contracts with landlords to upgrade building standards and services provided. For monthly funding of \$1,601, landlords are required to provide 24/7 staffing, 3 meals a day and submit to weekly inspections. Tenants pay a rental amount of \$543 per month. Habitat Services currently operates in 45 boarding homes providing permanent and affordable housing to 931 adults. I spoke to a member of the management staff about Habitat Services' experience of changes in rooming house stock (Habitat Services staff, interview, February 25, 2021). While Habitat Services does not

formally track changes in the stock, the staff person that I spoke to identified a number of distinct trends.

There has been a constant decline in the number of private rooming house operators partnering with Habitat. Increasingly new operators working with Habitat are non-profits often operating in new purpose-built buildings. Many long-time rooming houses are now considered valuable real estate and because “private rooming houses are not a money-making business”, as ‘mom and pop’ operators retire or pass away, their families are choosing to sell to a buyer wishing to convert it to a single-family home or to a developer. In situations where operators choose to end their contract with Habitat, staff support the affected tenants by connecting them with Community Legal Clinics and priority transfers to other Habitat serviced units.

Unlicensed rooming houses

Rooming houses that are not licensed are not tracked by the City. This includes rooming houses with operators that fail to comply with the requirement to obtain a license in areas where municipal by-laws permit rooming houses, but also the many rooming houses operated in the majority of the City where they are not permitted. In both cases they are technically operating illegally and will likely seek to remain hidden from authorities. Housing workers and advocates attest to high numbers of illegal rooming houses operating throughout the city and particularly in the inner suburbs but there is no definitive data available (Freeman, 2014).

I spoke to a community legal worker in Scarborough (Scarborough Community Legal Services staff, interview, February 25, 2021) who confirmed that there is evidence of a large number of rooming houses operating illegally in Scarborough but that the organization does not have the resources to try to track them. Given the volume of work that they encounter, their work with rooming house tenants is limited almost exclusively to representing them in eviction hearings. While they do provide some support with filing applications against landlords for maintenance and health and safety issues, this is done with reluctance out of fear of having the Municipal Licensing and Standards shut down the building. In situations where rooming houses are shut down, their staff focus solely on rehousing the displaced tenants, estimating that about half of them end up in shelters or homeless. Staff produce a

weekly listing of advertised LEM units to assist with housing search, many of them clearly in rooming houses.

In Scarborough as in other inner suburban areas, low-income renters have few other options but rooming houses despite being illegal. This creates a very vulnerable situation for rooming house tenants who rightly fear that asserting their rights will place their housing at risk. This risk is in addition to other pre-existing vulnerabilities. The rooming house tenant population in the inner suburbs are typically more diverse with a higher proportion of newcomers and international students (Freeman, 2014). The community legal worker I spoke with (Community legal worker, interview, February 25, 2021) expressed support for the current efforts by the City to extend regulations and licensing to rooming houses throughout Toronto but emphasized that the implementation must focus on tenant protections and carefully balance the rights of tenants with incentives for landlords to provide this type of critically important housing.

Parkdale Rooming House Study

ROOMING HOUSES IN PARKDALE

March 2017



Map 5: Rooming houses in Parkdale, March 2017
Source: Parkdale Rooming House Study, 2018.

Starting in 2016 the Parkdale Neighbourhood Land Trust (PNLT) led a comprehensive six-month community-based research study to make a definitive count of the number of rooming houses in Parkdale, to assess the impacts of neighbourhood change and real estate speculation on that supply and the displacement of tenants and identify proactive measures to preserve rooming houses and their ongoing affordability (PNLT, 2017).

The study identified 198 rooming houses housing an estimated 2,715 residents. This included an additional 86 rooming houses beyond the 112 licensed rooming houses identified by the City in that same year. 86% were privately owned. In addition to the current number, the study determined that in the prior 10 years a total of 28 private rooming houses had been lost through conversion to other uses

including single family homes, short term rentals or higher priced rental apartments displacing an estimated 347 low-income residents.

Summary of All Rooming Houses, Bachelorettes, Community Non-Profit Buildings and Possible Rooming Houses				
Type of Building	Number of Buildings	Number of Residents Confirmed	Sites Without Resident Data	Total Population, Rooming Houses, Bachelorettes, Community Non-Profits and Possible Rooming Houses*
Rooming House	87	696	41	1,253
Bachelorette Rooming House	75	738	16	955
Community Non-Profit Building	28	384	5	452
Possible Rooming House	8	14	3	55
Total	198	1,832	-	2,715

Converted Rooming Houses				
Type of Building	Number of Buildings	Number of Residents Confirmed	Sites Without Resident Data	Total Former Population of Converted Rooming Houses*
Total	28	170	13	347

Notes	
*Sites without resident numbers times average number of residents in confirmed buildings plus the number of confirmed residents	
Average Number of Residents	13.58

Table 8: Rooming Houses in Parkdale and losses through conversion, March 2017. Source Parkdale Rooming House Study, 2018.

Considering a number of factors that placed existing rooming houses at risk, the study team identified that 59 or 28% of the existing rooming houses were threatened with loss through upscaling or conversion, placing 818 residents at risk of displacement.

Rent Increases

Low end of market housing can be economically lost through significant rent increases for all or a majority of a building's units. The following sections outline the different means that landlords can use to achieve such increases and how they are being recorded and contested.

Above Guideline Increases (AGI)

For sitting tenants (in buildings built before November 15, 2018), rents are controlled by an annual Provincial rent increase guideline. As part of the changes brought in under the *Tenant Protection Act* in 1997, landlords can apply for an additional rent increase beyond

the annual guideline to cover eligible capital and security expenditures or significant increases in property tax. Above guideline increases (AGI) allow landlords to transfer these costs to tenants through rent increases of up to an additional 3% per year for three successive years. AGIs must first be reviewed and approved by the Landlord and Tenant Board (LTB) under an L5 application, but if approved the increases are permanent, and can lead to significant additional rental costs over time. Landlords can and do apply for more than one AGI consecutively for a building. For the many tenants already spending more than 30% of their income on rent, an AGI could price them out of the building and neighbourhood. In a series of interviews with tenants who had experienced AGIs, Zigman and August (2021) documented numerous incidents of displacement caused by AGIs or repeated AGIs including situations where a large number of tenants left en masse.

Increases in AGI applications

The number of L5 applications to the Landlord and Tenant Board for AGIs show a 150% increase in Toronto from 117 in the 2012-2013 fiscal year (April 1 to March 31) to 294 in 2019-2020 (Zigman & August, 2021) (see figure 1). According to their review of the practice, Zigman and August (2021) found the vast majority of these applications, involving 84% of affected tenants, have been brought forward by financialized and corporate landlords as part of a business model to maximize returns for investors directly at the expense of tenants. For financialized and corporate landlords, older affordable rental apartment buildings in ‘improving’ market areas, with tenant rents well below current asking rents have been their main target of acquisition (August & Walks, 2018).

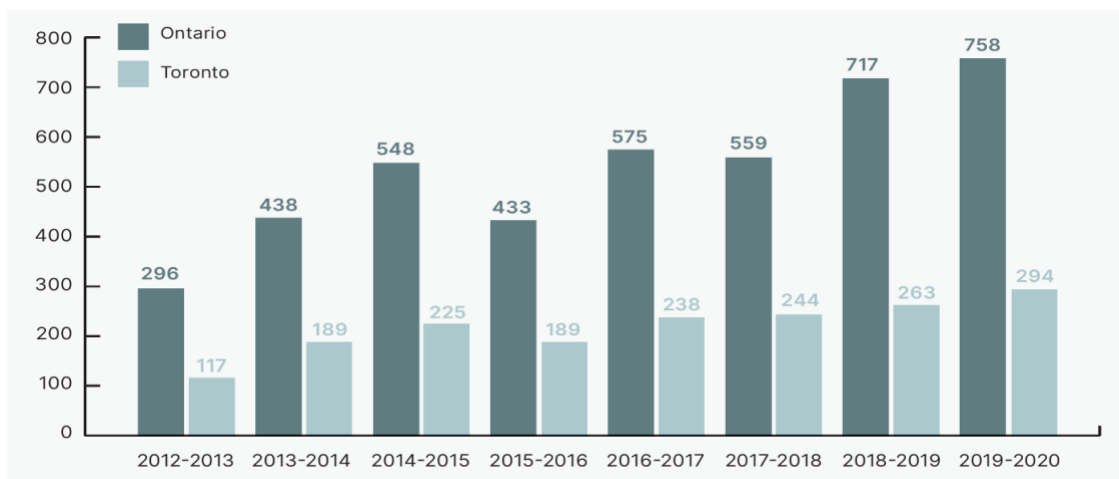


Figure 1: Above Guideline Increase (AGI) applications by fiscal year. Source: Zigman & August, 2021

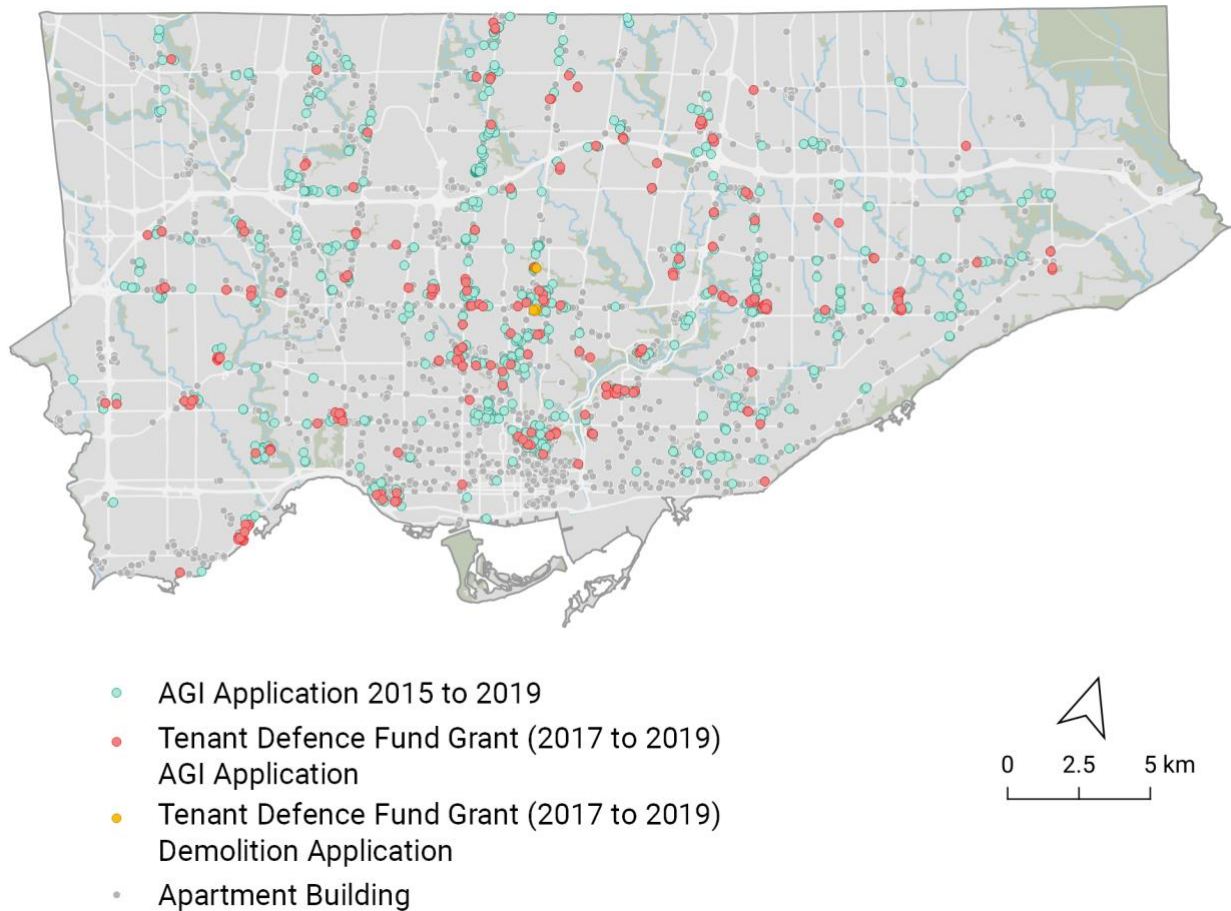
Contesting AGIs

Tenant Defence Fund

The City of Toronto established the Tenant Defence Fund (TDF) in 2000 (City of Toronto, 2020) in response to the new provisions of the *Tenant Protection Act, 1997*. The TDF supports a Tenant Support Grant Program for tenants to access legal representation to contest AGIs at the LTB and an Outreach and Organizing Program operated by the Federation of Metro Tenants Association (FMTA) to assist tenant groups seeking to access a Tenant Support Grant to organize themselves and understand the process. To qualify to access the grant, average rents for the building must fall within a definition of affordability that is set each year by the City and tenants must demonstrate a collective application by submitting a petition including signatures from a minimum percentage of affected tenants. Grant amounts started at \$1,000 with possible increases for processes that were escalated to other review bodies. (FMTA, 2012)

Initially grants under the TDF were available only for contesting AGIs but the program was expanded to include groups challenging appeals to the Ontario Municipal Board (OMB) for building demolitions and conversion to condominiums and applications to the LTB regarding building maintenance issues. Currently there is a staff recommendation to expand the program further to include challenges at the LTB to N13 applications (notice to end your tenancy because the landlord wants to demolish the rental unit, repair it or convert it to another use).

Under its funding agreement with the City, FMTA provides regular reports on their activities including details of TDF funded challenges of AGIs and the outcomes. A review of reports obtained from the City's SSHA Division for the years from 2017 to 2019 provided the information in the table below. During this 3-year period 179 AGI applications were challenged by tenant associations supported by the Tenant Defence Fund and FMTA. This represents approximately 25% of the total AGI applications submitted by landlords during that same period (745 in total during the three overlapping fiscal years) meaning that the vast majority of AGI applications went uncontested.



Map 6: Above Guideline Increase (AGI) applications and Tenant Defence Fund Grants, 2017-2019. Source: Landlord and Tenant Board, City of Toronto, Shelter, Support and Housing Administration (SSHA), Federation of Metro Tenant’s Association (FMTA). Mapping by Purpose Analytics.

The average result of challenging an AGI at the LTB is to have it reduced by between 25% and 30% meaning that, even when contested, the average AGI increase during this period remained a little over 3%. In their reports, FMTA attempts to quantify the savings in rent that the decrease in AGI will achieve for tenants over the useful life of the capital repairs (typically 10 to 15 years). These figures are significant and demonstrate that small percentages over time add up to significant amounts of rent money when applied to thousands of units. The same is true for the impact of AGIs on tenant rents. Depending on the starting rent for a unit, even AGIs of 3% or less can add hundreds of dollars per year to a tenant’s rent and thousands of dollars when compounded over several years. (Zigman & August, 2021)

	2017	2018	2019	Total / Average
AGIs contested with TDF support	44	77	58	179
Settlements	43	73	56	172
Hearings	1	4	2	7
Total affected units	5,305	11,723	7,927	24,955
Average increase applied for	3.82%	5.12%	4.12%	4.35%
Average increase awarded	2.69%	3.56%	3.10%	3.12%
Average decrease	1.12%	1.56%	1.02%	1.23%
% decrease	29%	30%	25%	28.00%
Savings calculated *	\$1,071,166	\$4,807,257	\$1,843,313	\$2,573,912
<i>* Savings are calculated by multiplying the % decrease in AGI achieved by the challenge by the number of affected units and their respective rents over the useful life of the capital repairs (usually 10 to 15 years). Most tenants, however, don't know they are entitled to remove the AGI after the useful life expires and many will continue to pay the inflated rent, or they move out before the expiry and the landlord can then set the rent at whatever the market will bear.</i>				

Table 9: Tenant Defence Fund figures, 2017 – 2019. Source: City of Toronto, Shelter, Support and Housing Administration (SSHA), Federation of Metro Tenant's Association (FMTA).

Eviction Processes

Under current Provincial legislation, rent control in the form of the annual rent increase guideline applies only to a tenancy. Upon turnover, when a tenant vacates a unit, landlords are free to raise the rent to whatever the market will bear. This is what is often referred to as 'vacancy decontrol' which has been in place since the late 90s in Toronto. This situation has contributed to the creation of significant 'rent gaps'; where longstanding tenants are paying much lower rents than could be charged to a new tenant. For landlords seeking to capitalize on this rent gap, the most lucrative option is to replace the sitting tenant with a higher income tenant capable of paying the new rent. As noted in the first section, this results in both the permanent loss of a low end of market rental unit, but also the displacement of lower income tenant.

Tenant advocates often make the point that landlords cannot evict tenants; only the Landlord and Tenant Board (LTB) can do that. Landlords must apply to the LTB on one of several grounds using the appropriate form. These include the following processes,

collectively referred to as 'no fault' evictions indicating that the eviction process was initiated by the landlord in instances where the tenant has done nothing wrong:

- N11- Agreement to end the tenancy
- N12 – Notice to end your tenancy because the landlord, a purchaser or a family member requires the rental unit.
- N13 – Notice to end your tenancy because the landlord wants to demolish the rental unit, repair it, or convert it to another use.

Increases in 'No Fault' Evictions

Increasing numbers of these types of applications have led to a consensus among housing and tenant advocates that landlords are increasingly using 'no fault' eviction processes illegitimately to displace tenants (ACTO, 2019). Agreements to end tenancies (N11) have been pursued aggressively by some landlords using intimidation, harassment and misinformation on vulnerable tenants unaware of their rights or inducing N11 agreements with cash payments. The use of N12s and the lack of any means of enforcement has come under scrutiny for situations of landlords using them in bad faith only to replace the tenant with a higher paying one rather than using the unit for themselves or a family member. Similarly the use of N13s as a means of unnecessarily removing standing tenants under the pretense of major renovations has coined the term 'renoviction'. From 2015 to 2018 the number of N12 applications (own use) in Toronto increased by 74% from 1,480 to 2,572.

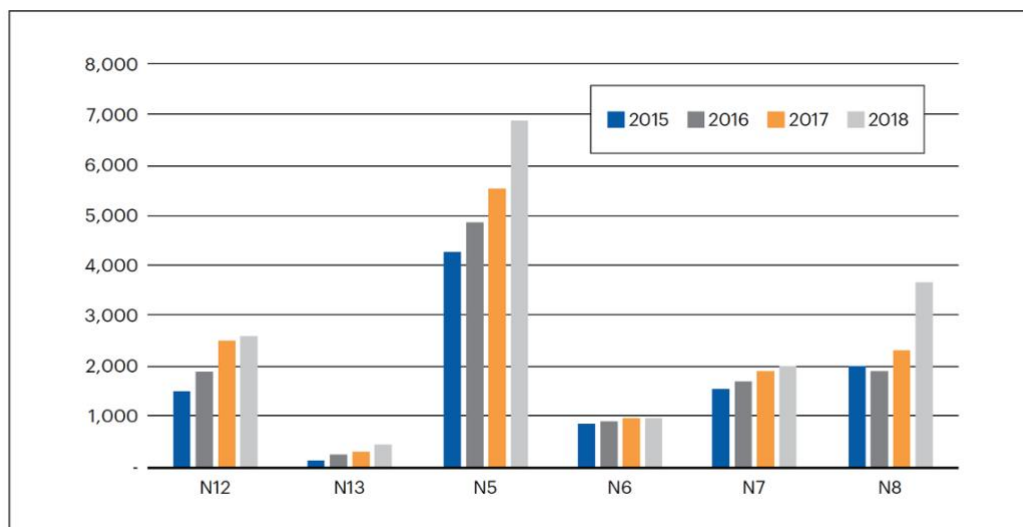


Figure 2: Reasons for non-arrears related eviction applications in Toronto (2015 – 2018). Source: Leon, 2021.

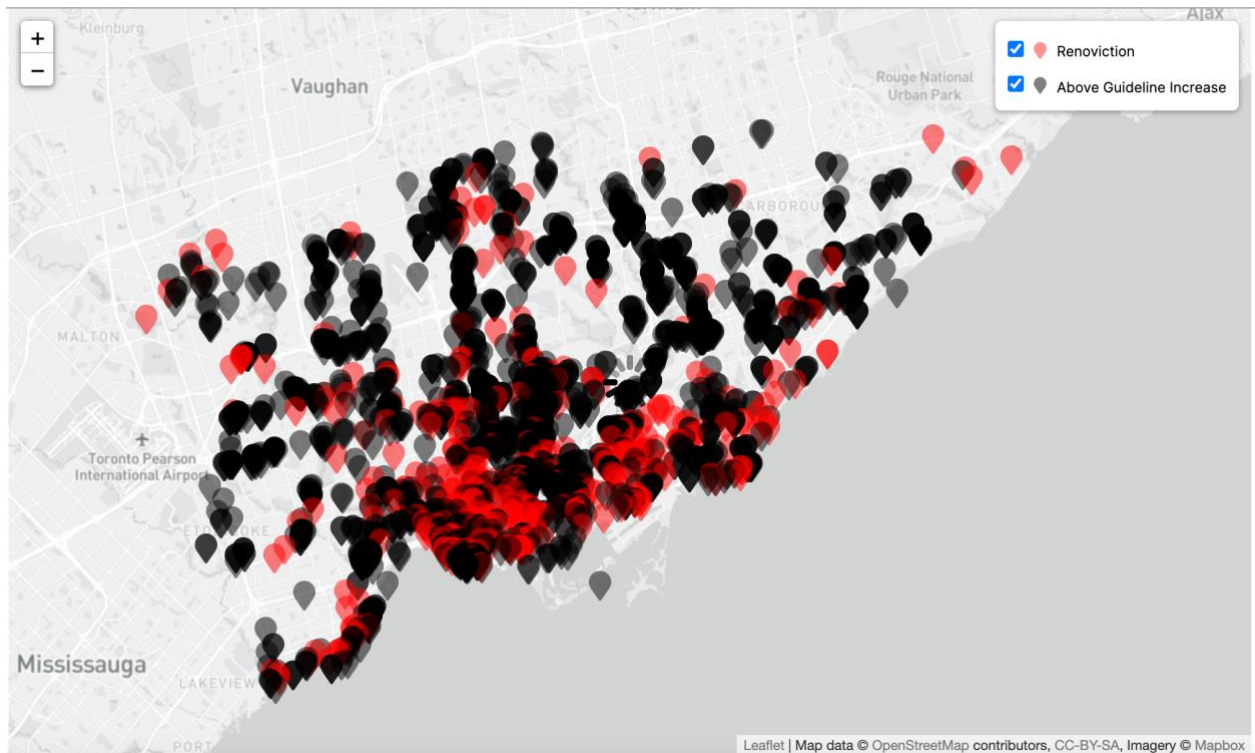
During that same period, N13 applications (renovictions) more than tripled from 121 to 386 (see figure 2) (Leon, 2021). The same trends were observed throughout the Province of Ontario (ACTO, 2019).

Contesting ‘No Fault’ Evictions

In all cases, a lack of education and understanding of the above processes and their rights in the situation often leaves individual tenants with the sense that there is nothing to be done. There are means to contest these notices within the LTB process, however, in a 2018 study by ACTO it was found that fewer than half (42%) of tenants receiving eviction notices attended their hearing to contest it. For those that did only 2.6% had some form of legal representation in comparison to just under 80% for landlords (ACTO, 2019). In the face of these obstacles, power imbalances and what are seen as the limitations of the process to respond to their issues, some tenant groups are making the decision to organize to contest eviction and AGI applications outside of the LTB process (see section below).

RenovictionsTO

RenovictionsTO is a volunteer run project that collects and shares data on both L5 applications (Above Guideline Increases) and N13 applications (“renovictions”). Using a combination of LTB filing data and anonymous reports from tenants, incidents are recorded and tracked on both an interactive map and a “tracker”, a table that allows searches by different categories. Because LTB filings are based on information about the organization that made the actual application on behalf of the landlord, RenovictionsTO has taken the step to use other publicly available information to be able to include the identity of the landlord or building owner with the data. All are displayed and shared on their [website](#) along with a ‘Know Your Rights’ section with information about the LTB processes, how to contest these types of applications and information and resources including the nearest Community Legal Clinic, the Federation of Metro Tenants’ Association and news stories of tenant groups that have successfully challenged no fault eviction processes and AGIs.



Map 7: Above Guideline Increase (AGI) and N13 'Renoviction' applications City of Toronto. Source: RenovictionsTO, 2021

N12 Registry

The N12 Registry is an online crowd-sourced database, intended to be a neutral platform to collect and provide information about the history of N12 applications by address without identifying landlord information. The [website](#) provides some basic information about N12 applications, what is a bad faith application and outlines ways that tenants can use the site, either to report receipt of an N12 anonymously, search the history of their address or contact previously evicted tenants to inform them of the unit's rental status. I was unable to identify those responsible for establishing and maintaining the site. Representatives from landlord advocacy groups have expressed concern about the website's use of unverified data and the potential for tenants to misuse the site, possibly for retribution against a landlord, and expressed a preference to have the LTB take responsibility to maintain a more transparent database (Warren, 2019).

Responding to new modes of displacement

Following the lapse of the TRSS roster of agencies in 2019, WoodGreen was left as the pre-eminent agency in the City with the capacity and the reputation for providing tenant relocation services for displaced vulnerable tenants. Increasingly, this has meant that WoodGreen was being contacted for a wider range of events outside of redevelopment and emergency rooming house response, stretching their capacities and introducing new modes of displacement that had not been anticipated in their existing service contracts with the City. Some of those are included in the section below.

WoodGreen Community Services

As noted earlier, WoodGreen Community Services has over the years developed both the capacity and the reputation for the relocation of vulnerable tenants displaced from their homes. Increasingly, in recent years this has meant that displacement events involving vulnerable tenants that may be outside of their contracted roles with the City are being brought to the attention of WoodGreen staff by other community agencies, tenants, Councillor's offices and various Divisions within the City. These displacement events have included:

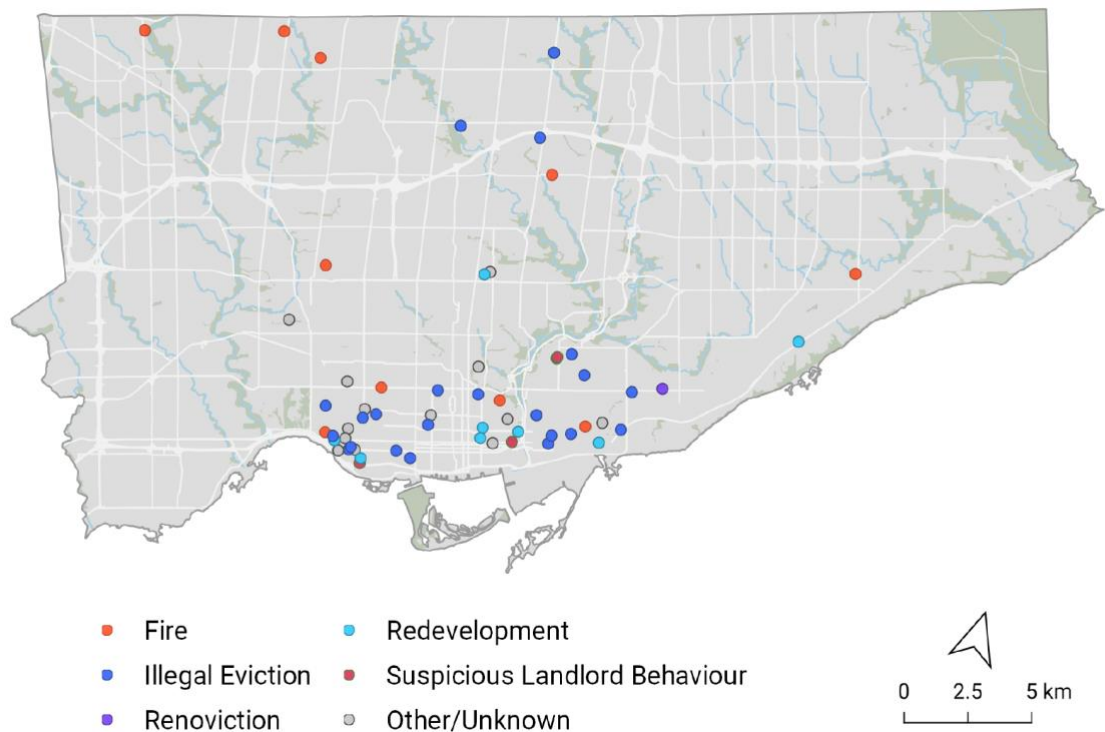
- illegal evictions
- illegitimate N11 evictions involving harassments, intimidations and inducements,
- N13 renovictions
- Redevelopment of sites not considered rental housing (e.g. long term residency motels).

I spoke to a member of the senior management at WoodGreen (interview, March 3, 2021) who confirmed that the number of these types of incidents had been noticeably increasing in the past few years. In many of these situations, WoodGreen staff are made aware and respond only after the displacement is already under way or the building has been largely de-tenanted. Because these are situations that WoodGreen is not directly funded by the City to respond to, staffing capacity is stretched so that they must prioritize simply mitigating the worst impacts of the displacement. Resources for tenant education and support for contesting the displacement are limited and record keeping is outside of the required reporting for their service contracts and is often informal and minimal. Still, as WoodGreen

may be one of the few organizations made aware of these incidents, their records contribute to knowledge of losses of LEM housing and displacement of low-income and vulnerable tenants that might otherwise have remained undocumented and invisible.

Incident Type	Number of sites
Illegal Eviction	23
Renoviction	12
Redevelopment (not under a City Planning negotiated TRAP)	5
Being watched for suspicious landlord behaviour	7
Total	47

Table 10: WoodGreen Community Services displacement incident responses (2016 – 2020). Source: WoodGreen Community Services



Map 8: WoodGreen Community Services displacement incident responses (2016 – 2020). Source: WoodGreen Community Services

Tenant organizing and contesting through non-LTB Processes

There is a significant administrative burden for tenants wishing to contest either an AGI or a no-fault eviction application through LTB processes. While landlords typically have the resources to be represented by lawyers and legal teams, tenants must make the effort to organize to be eligible to access even a small Tenant Defence Fund grant, currently \$1,000. Additionally, some tenant groups have reported that these organizing activities have been met with intimidating hostility by landlords (August & Webber, 2019). Finally, what can be achieved at the LTB is narrowly prescribed. For example, contesting AGIs through the LTB process is limited to tenants disputing particular costs that have been submitted by the landlord with a strong emphasis on settlement. There is no mechanism to challenge the logic of the AGI itself or whether the landlord's current rental revenues should be able to cover the capital expenses without an AGI. The most common result is only a modest reduction in the landlord's applied for AGI increase of approximately 25% to 30% (see Table 9).

Zigman and August's (2021) research leads them to conclude that for the majority of landlords accessing the AGI process, it is a financial and political calculation regarding the opportunity to maximize profits from increased tenant rents rather than an actual financial need to cover capital expenditures. In the current rental market and due to vacancy decontrol, any possibility that the increases will displace tenants from their building creates further incentive for the landlord rather than disincentive.

Because AGI applications uncontested by tenants are generally approved at the LTB, tenants must engage in the LTB process to prevent this but increasingly, some tenant organizations are choosing to also contest AGIs and no-fault evictions outside of the LTB processes. While the types of actions taken vary, the goals are to create sufficient pressure to alter the landlord's calculation, both financial and political, about pursuing these actions. In some cases, tenant groups choose to use more confrontational direct action such as demonstrations at owner's homes and even extra-legal methods such as rent strikes. Some examples are provided in the table below. As tenant groups see examples of successful actions taken by others in the same situation, they become aware that they are not limited only to accessing LTB processes and the prescribed outcomes possible through that channel.

Organizing to contest outside of the LTB processes requires building and maintaining strong cohesion within the tenant group to make demands from a collective position of strength. The decision to take extra-legal approaches can increase the risks of unsuccessful actions for the tenants and can isolate tenant groups from the support of social agencies who may be uncomfortable with these tactics (August & Webber, 2021).

Tenant organizing to contest AGIs and no-fault evictions						
Tenant Group	Address(es)	Landlord/Owner	Contested issue	Actions taken	Outcome	Sources / Media
	394 Dovercourt	AIPL Holdings	N13 application	multiple LTB hearings media campaign	In process	https://www.thestar.com/news/gta/2019/10/11/tenants-of-394-dovercourt-are-fighting-their-landlords-attempt-to-
Parkdale Organize	Cowan Avenue		N13 application	public protest personal appeal to commercial tenant in building	Withdrawn by landlord	https://www.vice.com/en/article/g5xym/this-guy-fought-two-eviction-notice-and-won-heres-what-he-did
Tenant association	Weston	3Gen	N13 application	local resident campaign media campaign	Withdrawn by landlord	
	2419 Keele	Riley Real Estate	N13 application	identified property owner protested at owner's home	Withdrawn by landlord	https://renovictionsto.com/know-your-rights/Renovictions-Newsletter-Final.pdf
Parkdale Organize	12 buildings	Metcap	AGI (L5 application)	3 month rent strike	Negotiated settlement	https://www.cbc.ca/news/canada/toronto/parkdale-rent-strike-ends-1.4245237
Keep Your Rent	1251 King St. W.	Nuspor Investments	AGI (L5 application)	Teacher supported demonstration Rent Strike	Withdrawn by landlord	https://ricochet.media/en/3004/calls-to-keepyourrent-on-april-1-grow-louder
	12 and 14 Rusholme Drive	Starlight Investments	AGI (L5 application)	Flyer campaign to other Starlight tenants Local postering	Withdrawn by landlord	https://www.parkdalelegal.org/news/a-talk-with-tenants-agi/
	Dupont/Lansdowne	Dupont Lansdowne Holdings	AGI (L5 application)	Letter writing campaign	Withdrawn by landlord	
Parkdale Organize	295 Dufferin	Starlight Investments	AGI	LTB process Protest at Starlight offices	AGI reduction	http://parkdaleorganize.ca/2019/11/06/dufferin-tenants-resolve-to-fight-rent-increase/

Table 11: Tenant organizing to contest AGIs and no-fault evictions. Source: from RenovictionsTO website and media outlets cited in table.

Case Studies

To reach a deeper understanding of the human impacts of the loss of LEM housing and related displacement and efforts to respond to and contest them, I conducted interviews with people that had been affected at three different case study sites. The sites were all rooming houses where the tenants had been displaced by the landlord following the sale of the building using different tactics and for different purposes. The landlord actions and the displacements were responded to and contested to differing degrees, all ultimately with the same outcome. For each sample site, interviews included, where possible, an affected tenant, a staff member of an agency or City Division that engaged with the site and, where applicable, a person that was active in contesting the displacement of tenants at the site. Also included were interviews with key informants to provide an overview perspective.

Participants were identified through agency and media records of the incidents and recruited by an initial email invitation. Willing participants were asked to provide referrals of others who were then also invited to participate. Where appropriate, an honorarium was provided to participants. The names of the interviewees have been changed to protect their privacy unless the interviewee expressly provided consent and a willingness to include their name. A list of the interviews and dates is provided in Table 13 at the end of the Case Study section.

Building Address	Building Description	# of units affected	# of tenants affected	Agencies, organizations, divisions, politicians involved											Supports provided						
				OEM	Red Cross	Toronto Fire	City Planning	MILS	WoodGreen	Community Legal Clinic	City Councillor's Office	MPP's office	Community Organization	Tenant Association	Media	Emergency Social Services	Housing Allowances	Community Legal Education	Tenant Meeting	Right of Return	
28 - 30 Langley	Multi - tenant building (licensed)	24	25 -30																		
81 Charles St. E.	Multi - tenant building (licensed)	25	25 -30																		
1521 Queen St. W. (Queen's Hotel)	SRO Hotel	27	27																		

Table 12: Case study site details (see also Map 3).

81 Charles St.

81 Charles St. was a 25-unit licensed rooming house in downtown Toronto that housed between 25 to 30 people. Rents were in the deeply affordable range, between \$550 to \$800 with a mix of long-term tenants (over 5 years) and shorter term (less than one year). The owner was a known rooming house owner and operator of many years who was about 70 years old. Both the former tenant and the social agency worker that I spoke to had generally positive things to say about him despite acknowledging that the conditions of the rooming houses that he operated were often very poor. There was the sense that he was a relatively engaged owner, had concern for his tenants' wellbeing and was trying to manage in a very marginal business.

At some point late in 2018, the owner sold the property to a numbered company. While there are differing accounts of the original owner's actual stake in the new company, he remained at least a partial owner; "it was like he sold it to himself" (WoodGreen staff, June 1, 2021). At some point after the sale, a pre-application meeting was held with City Planning staff to review a development proposal for the site that City Planning staff described as "crazy"; a very tall building on an extremely narrow site with little to no chance of being approved. Immediately following the sale, staff from WoodGreen began to be contacted by another social agency that was located very nearby to say that a number of their clients living at 81 Charles were receiving offers of cash payments and being "bullied" to leave.

When WoodGreen staff arrived on site to meet with tenants and review the situation, despite years of experience in the field, they were shocked by the condition of the building; "they were like, oh my God, get me out of here" (WoodGreen staff, June 1, 2021). Open drug use was prevalent in the building, pest infestation was in an extreme state and doors were left open with people coming and going. The tenants were "beyond vulnerable" and in some cases unit takeovers were taking place. Unlike other situations where WoodGreen had been notified of illegal or illegitimate evictions, when WoodGreen staff first arrived on the site, all but one or two of the tenants were still housed. WoodGreen supported a town hall meeting for the tenants that included staff from the local community legal aid clinic and from City Planning to educate tenants on the situation and their rights. The WoodGreen staff that I interviewed recalled that the local Councillor may have "made a phone call" at one point but was not involved in these efforts to support the tenants.

Things began to move quickly such that the second time WoodGreen staff arrived on site, more than half of the tenants had moved out. The cash offers were increasing in value and were accompanied by “thugs” intimidating tenants to accept the money, “leave now and hand in your keys” (WoodGreen staff, June 1, 2021). Tenants who had accepted the cash payments were then approaching WoodGreen staff for direction, asking “what do I do now?”.

There had been a tenant spokesperson that was initially working with WoodGreen but after receiving threats, he accepted a buy out and stopped connecting with staff. The front porch and balcony that were supported by three impressive Ionic columns was torn off the building, the columns sawed off, leaving only one useable entrance at the back of the building. At one point the water to the building was also shut off for an extended period. WoodGreen staff began to have concerns about the safety of the building and felt that if Municipal Licensing and Standards had become involved, the building would likely have been condemned. Initial goals of WoodGreen staff had been to prevent the illegal evictions but soon shifted to relocating displaced tenants with as much support as could be obtained. At a certain point, “tenants didn’t want to be there” (WoodGreen staff, June 1, 2021).



Figure 3: 81 Charles Street, (left to right) [July](#), 2018, May, 2019, October, 2020. Source Google maps.

WoodGreen staff had a complete tenant list provided from a rent roll required by City Planning as part of the development pre-application which gave them greater information about the tenants in the building than they are normally able to obtain. Despite this, the building was fully de-tenanted quickly through “horrific tactics”, many into homelessness. Because the displacement was caused by an illegal eviction, the tenants were not eligible for housing allowances under the City’s program guidelines making WoodGreen’s efforts to rehouse them difficult; “without housing allowances, you can’t do much” (WoodGreen staff, June 1, 2021). WoodGreen was able to provide housing for “two or three” tenants in their own housing. While staff attempted to continue to provide supports to other displaced tenants, after about six months of contact they “disappeared”.

A former tenant that I interviewed had been living at 81 Charles for 8 and 1/2 years. Like almost a quarter of the tenants, he was a single male senior. About ten years before moving in, Peter had left a maintenance job at the City to visit his father’s homeland in Eastern Europe to look for the house his father had grown up in. When he arrived at the town, he learned that the house was no longer there. On his return to Canada, Peter discovered that all his belongings, which he had entrusted to a friend, had been stolen. With nothing to fall back on, he spent ten months in an emergency shelter before a worker found Peter a place in a rooming house in Parkdale which he described as a “crazy house”. He left after being assaulted by another tenant and got a room at 81 Charles.

From the beginning, Peter described the building as, “not a place I liked. It was okay in my room”. When asked about anything that he did like about 81 Charles, Peter said “the rent was cheap, that was the only thing”. He described rampant drug activity and a toxic and unhealthy environment. One tenant was “cooking drugs” in his room and another was spray painting stolen bikes in his; the fumes went throughout the building. After a homicide in his 5th year there, Peter was ready to leave but the landlord asked him to stay and promised to put in security cameras. When he was approached with the offer of the equivalent of 2 month’s rent to move out in two weeks (less than what he was legally entitled to), Peter accepted it.

Peter was one of the fortunate tenants from 81 Charles that was relocated to a WoodGreen unit. After a first move to a very small bachelor that he found “claustrophobic”; “I felt like I was going to jump out of my window”, he was moved to another WoodGreen unit which he

is very pleased with. Peter noticed his health has improved after leaving 81 Charles including recovery from a serious illness which he didn't even know that he had. Despite the conditions at 81 Charles and the circumstances of his displacement, Peter continued to speak highly of the landlord who he thinks had "worked hard" but was taken advantage of by "some very bad people" in the building. Still, he expresses the wish that he had received more support to move from 81 Charles sooner. At one point staff from a nearby social agency where Peter spent most of his time put his name in for a random draw for new Toronto Community Housing affordable housing units in Regent Park. From among thousands of applicants for the units, his name was selected but when informed of this and the monthly rent of \$975 for a 1 bedroom, Peter's response was "what the hell is that?"; the unit was not affordable to him.

No development application was pursued for the site at 81 Charles. It remains vacated and boarded up. There were no repercussions for the landlord's illegal activities.

28-30 Langley

According to the local lore in this Riverdale neighbourhood, the castle-like building at 28-30 Langley was built over a century ago as a nurse's residence for the nearby cholera hospital at Broadview and Gerrard. At some point in the 1950s it became a boarding home for working women before eventually operating as a rooming house. For the neighbour, Kathryn, that I spoke to, who had lived next door to the building for over 30 years, they learned about it being a rooming house after they moved in and "were not always happy about it". Over the years the level of upkeep fluctuated as did incidents of drug-related activity or general disturbance. But since a new superintendent had moved in and started work in the building some years before, things had improved noticeably. The superintendent ran the building well, was friendly and even introduced one of the tenants, George, to Kathryn to do some gardening for her. It became "more of a neighbour situation" said Kathryn and she "was less afraid".

When George came to Kathryn with a copy of an N13 eviction notice and shared how it was causing him stress, Kathryn became first upset and then angry; "Now that she knew them all, they were getting kicked out". Because the N13 notice had been incorrectly addressed, another neighbour had also been served a copy in error and contacted Kathryn. They soon reached out to others that "knew about housing". Kathryn also raised the issue with the local Councillor at a walking tour event who, according to one of the advocates I spoke to, "became involved right away" (Joy Connelly, May 11, 2021). What became clear is that 4 young realtors had purchased the building and served the N13 notices with the presumed intention of converting it to either an Airbnb short term rental or student residence; both rental types that involve continual turnover and allow for much higher rents.

A town hall meeting was set up that included a presentation by a long-time activist for the preservation of rooming houses, the local community legal clinic and WoodGreen. The messaging to the tenants was that new protections for rooming houses in the form of Official Plan Amendment 453 and new regulations for short term rental were coming and that they should fight what was now being identified as a classic case of "renoviction". Interestingly, WoodGreen's presentation at the town hall was about the relocation supports that they could provide to the tenants, but other organizations that were present actively discouraged the tenants from accessing those services urging: "don't move, stay and fight". On March

16, 2019 a rally in support of the tenants was held at Queen’s Park supported by the local Councillor, the Association of Community Organizations for Reform Now (ACORN), a membership-based community union and the Fairbnb Coalition, a broad-based organization working for regulation of the short-term rental sector. Kathryn recalls that she baked chocolate chip cookies to share at the rally which was widely covered in the mainstream media. A lawn sign campaign “STOP the eviction of our neighbours from 28-30 Langley Ave” followed in the neighbourhood.



Figure 4: Lawn sign produced by neighbours to contest the ‘renoviction’ of 28-30 Langley.
Source: gift from neighbour Kathryn

The decision was made to contest the N13 application at the Landlord and Tenant Board (LTB). Kathryn, along with many other supporters attended and were pleased when the Board threw out the notice as improper, due largely to the errors that had been made in the initial application. The owners reissued the N13 application, correctly addressed, almost immediately. At this point, Kathryn noted that some of the tenants began to leave. One of the tenants who was “a natural leader” and had begun the process of organizing the tenants suffered an injury in a car accident and was unable to continue. While external support for the tenants remained strong, internal organization among the tenants was lacking. When the next LTB hearing in June, 2019 sided with the owners and the Board officer chided the

tenants for the hardship that they were causing the new owners, the remaining tenants began looking for other places and leaving.

At this point the supporters began to question their role in encouraging the tenants to resist eviction. Until the second LTB hearing the messaging had been “hang on as long as you can” and that new legal protections were on their way. One tenant told Kathryn that he felt, “he had already stayed too long”, which made the reality of the tenants clear to her. There was no further ability to contest the eviction: they were “going to lose in the end”. A short time later the building was fully de-tenanted except for a couple that remained in one of the units that the LTB had ruled a ‘dwelling unit’ rather than a ‘dwelling room’.

By the assessment of one of the supporters that I interviewed, their efforts held up the new owners’ intentions by about a year and a half after which time the pandemic hit and took the bottom out of whatever market they had intended to tap into. They had purchased the building for \$3.5M and it is estimated that they had to put considerable investments into the building before putting it back on the market for \$9M. When there were no takers, the owners unsuccessfully approached the City with an offer to sell or lease it to them to provide supportive housing by accessing available Federal government funding under the Rapid Housing Initiative. Still on the market but at the reduced price of \$7.5M, the current rumour



on the street is that it is being considered by the diplomatic corps of a foreign nation to house its junior staff.

For both the neighbour Kathryn and the advocate that I interviewed, their summation of the outcome of all the efforts to contest the evictions was, “we lost”. But Kathryn was also clear about what she had learned through her engagement with the process. After years of living next to 28-30 Langley, it was only

Figure 5: 28 – 30 Langley, May, 2021. Source: author photo

through these actions that Kathryn came to know many of the neighbours living there. She continues to stay in touch with a number of them even after they had moved away. Although Kathryn states that her involvement was somewhat guided by self-interest rather than a point of principle, as she was invested in these neighbours and friends staying, Kathryn also describes the process as “a real eye-opener”.

Prior to her involvement, Kathryn acknowledges that she knew little about housing issues but when I spoke with her, she was very aware of the range of threats to low end of market rental housing and fully up to date on the status of both the City’s efforts and local campaigns to improve protections. Kathryn’s concern based on her experience of 28 -30 Langley is that “there won’t be any left” by the time these protections are in place. At the same time, Kathryn is aware of the challenge that the economics of a building like 28 -30 Langley present; “it needed a lot of work, maybe \$300,000 to \$400,000, and the rents were very low. I don’t know the answer to that situation”.

For Kathryn, her involvement in contesting the displacement of the tenants at 28 – 30 Langley had originated from a concern for the well-being of the tenants as both neighbours and friends. The process continues to inform her responses to housing issues. Recently, when the possibility of creating supportive housing at 28-30 Langley was being discussed, Kathryn maintained an openness to the option that some of her other neighbours did not share and was dismissive of concerns about any possible impact on property values.

I met one of the former tenants and asked if I could interview him about his experience at 28-30 Langley. He agreed and we exchanged numbers and appointments were set. But after he requested to reschedule a few times, we lost touch and were not able to speak together.

Queen's Hotel (1521 Queen St. W.)

The Queen's Hotel was a single room occupancy (SRO) hotel that had been operating in Parkdale for many years. In 2011 an application for a rooming house license was turned down by the City citing "poor property management and chaotic conditions" (Hatfield, 2011), but the owner continued to rent rooms, leaving the status of the site unclear. I spoke with a former tenant, Tom who described the Queen's Hotel as a "crazy place", with a lot of fighting and drug activity, but also a place where the tenants knew each other and looked after each other, following what he called 'street rules' to get along. Tom had been living there for about "a year and a bit" and had moved in because, like the other tenants there, he "had nowhere else to go". He was paying about \$850 per month in cash and never received a receipt.

In 2015 the property was bought by the BSäR Group of Companies, a niche developer with a reputation for midrise upscale boutique condominiums. Shortly after the purchase, in August, 2015, the 27 tenants living at the Queen's Hotel were all illegally evicted with only seven days' notice. BSäR justified the actions on the premise that the building was operating as a hotel and not a rooming house despite the fact that many of the tenants had been living in the building for several years. Prior to the eviction, the former tenants recounted a campaign of intimidation and harassment that included shutting off the hot water, removing the privacy doors to the shared bathrooms and numerous calls to police on the slightest pretense.

Once the seven-day notice evictions had been served an "ex-motorcycle gang thug" was posted on the property to enforce the tenant's removal by the deadline and to exclude members of the press or advocacy groups from entering. Tenants that did not leave by the deadline, were blocked from entering and their possessions were disposed of. Tom described that he and many of the tenants lost everything; "they took all our stuff, stuff you cherish, and threw it out". Some of the possessions that Tom lost included gold items from his parents and the pool cue that he sometimes used to make himself a little extra money. A challenge to BSäR's assertion that the building was a hotel and therefore did not require the minimum notice period for an eviction notice due to demolition and renovations (120 days) had been submitted to the Landlord and Tenant Tribunal (LTTB) but it did not deter the

forceful eviction of all 27 tenants, a very visible event that was covered by a number of mainstream media outlets amidst general confusion about what was taking place.

Two local agencies, Parkdale Activity and Recreation Centre (PARC) and Parkdale Neighbourhood Land Trust (PNLT) supported the tenants and contacted the City to initiate the emergency rooming house response protocol that involved a temporary hotel stay supported by the Red Cross and relocation supports from WoodGreen Community Services. Tom believed that if not for this temporary relief, all 27 tenants would have been immediately left on the street. But he also described the heavy toll that the displacement took on him and the other tenants. Shortly after the eviction, one tenant committed suicide and two others died of overdoses. Tom could relate to the same burden of feelings; “I gave up. I didn’t care about anything anymore”. When I asked about where he went to live after the temporary hotel stay, Tom said that he “wandered” but “for the life of him” could not remember details. Tom is now living in a COTA supported rooming house in Parkdale which he is very pleased with and paying \$500 per month. If not for this housing, Tom believes that he too would have ended up dead: “something that I had thought about for a long time”.

Eventually BSäR was charged under the Residential Tenancies Act, pleading guilty to four counts of unlawful recovery of possession of a rental unit, and received a fine of \$14,000. By one former tenant’s estimation, three quarters of the evicted tenants ended up homeless or in the City’s emergency shelter system. The cost to the City of the emergency response alone was estimated at more than \$100,000.

In 2019, four and a half years after the violent and illegal evictions, BSäR submitted a rezoning application to construct an eight-storey mixed use building to include ground level retail and 78 rental units, none of them at rent levels considered affordable under the City’s current definition. Also explicitly absent in the application are considerations of rental replacement requirements or dwelling room protection policies. As one advocate that I spoke to described it, the evictions that had taken place at the start of BSäR’s ownership of the Queen’s Hotel had been made invisible. The community opposition that had first been mobilized in response to those evictions, now came together to oppose the development application lead by the Justice for Queen’s Hotel Coalition (J4QH).



Figure 6: Justice for Queen's Hotel poster. Source: Justice for Queen's Hotel website.

At this point the surviving original tenants of the building, the most immediate stakeholders, had been largely dispersed. A member of the J4QH coalition that I spoke to said the efforts to locate and contact former tenants had been a challenge despite considerable outreach



Figure 7: Poster seeking former tenants of Queen's Hotel. Source: author photo.

and a local postering campaign. Some of the few that were reached were now too far away to participate or were too “tired and beaten down”. The coalition is made up of both former tenants, including Tom, and local community members and organizations that have come together around the broader issues of equitable development and community benefits for Parkdale. Supported by a successful petition campaign in the neighbourhood, the J4QH coalition has put forward community demands that the development not be approved unless BS&R is made to replace the 27 affordable dwelling rooms and make them available to the displaced tenants, or others in similar need, under the terms of a binding community benefits agreement.

The J4QH Coalition and other community members expressed their opposition throughout the pre-application process and at the East York Community Council meeting where City Planning's Preliminary Report was presented, which also failed to acknowledge and respond to the history of the illegal eviction and the community demands. The BSäR Group appealed their application to the LPAT on the grounds that the City had exceeded the 90 days to make a decision, effectively bypassing a public process. The J4QH Coalition and other members of the community were faced with the decision of whether to pursue party status at the LPAT proceedings, a very prescribed and potentially costly process, or risk having their opposition to the development and community demands largely excluded from the official proceedings. Following a series of meetings and consultations it was decided that the Parkdale Neighbourhood Land Trust would pursue party status in order to continue to represent community demands throughout the formal development application process.

In Tom's assessment, the suffering that he and his fellow tenants endured, and still endure, is the direct responsibility of the new owner, BSäR principal Tyler Hershberg, who threw 27 people out on the street "against all common ethics" in disregard for everything except the "bottom line". These days, having lived in the neighbourhood for over 60 years, Tom does not ever leave Parkdale, saying that "his mind goes blank" when he is out of the familiar surroundings. What Tom loves about Parkdale is that it is a neighbourhood where people "stick together". As for his thoughts on BSäR's development application, Tom is clear; "we are the people who live here, we have to have some say in what gets built here".

Date of Interview	Interviewee	Organization	Role / Case Study site
February 25, 2021	Petrea McConvey	Scarborough Community Legal Services	Key Informant
February 25, 2021	Chris Persaud	Habitat Services	Key Informant
March 3, 2021	Tracy Murdoch	WoodGreen Community Services	Key Informant
March 5, 2021	Sherri Hanley	Housing Secretariat	Key Informant
March 31, 2021	Keir Matthews-Hunter	City Planning	Key Informant
May 11, 2021	Joy Connelly	Consultant	Key Informant, Advocate - 28-30 Langley
May 21, 2021	Ana Teresa Portillo	Parkdale People's Economy	Key Informant, Advocate – The Queen's Hotel
May 27, 2021	Name Withheld "Kathryn"	Neighbour	Advocate - 28 – 30 Langley
June 1, 2021	WoodGreen staff	Woodgreen Community Services	Advocate/agency staff - 81 Charles St.
June 2, 2021	Melissa Goldstein	Advocate	Key Informant
June 4, 2021	Name Withheld "Peter"	Former Tenant	81 Charles St.
June 11, 2021	Tom Ermidas	Former Tenant	The Queen's Hotel

Table 13: Interview schedule

Further Research

In some ways, it could be argued that both the datasets and case studies included in my research reflect a convenience sample rather than one that is comprehensive and truly representative. By beginning with the question of how LEM losses are currently being tracked, areas of the City with the least data were not well covered. The result was a greater concentration on the city centre with less inclusion of the experience in the inner suburbs.

Examples of this imbalance include:

- Developments with rental replacement requirements occur primarily in the city centre (Map 2).
- Use of licensed rooming house data excluded areas where rooming houses remain illegal (see Map 3)
- TRSS program data and OPA 453 engaged sites reflect redevelopment of SRO hotels which historically occur in the central city (see Map 3).
- By contrast, redevelopment of long term stay motels common in Scarborough do not elicit the same City Planning responses, for example requiring documented TRAPs.
- The use of service agency data also reflects a more central orientation as support services tend to decrease in “concentric rings” from the city centre.
- WoodGreen staff noted that they tend to receive requests for service almost exclusively from 10 Wards only, reflecting a well-established network (see Map 8).
- Tenant and community organizing is also less prevalent in the inner suburbs due at least in part to geographic challenges (Kamizaki, 2013).

This represents not only a geographic bias but also an important demographic bias. Those areas that are least well represented in my research are also areas of the city where LEM tenants are more likely to be racialized or born outside of Canada (Freeman, 2014). The Parkdale Rooming House Study, on the other hand, confirmed an over-representation of white Canadian-born men that other studies of central city rooming houses had also identified (PNLT, 2021). Furthermore, this study primarily considered rooming houses that benefit from legal status and licencing. In other areas of the city, such as the inner suburbs, informal rooming houses prevail, for instance, around university campuses where they are a

common form of housing for racialized and low-income students (Sotomayor et al., forthcoming). Similarly, August and Walks (2018) study on the impacts of financialization on multi-family rental housing identified differences in strategies and techniques for extracting profits used by financialized landlords operating in suburban areas from those in the central city. A sharper focus on the dynamics of LEM losses in the inner suburbs and the experience of the tenants impacted is needed with consideration of demographic factors.

Summary and conclusions

Years of state policy that prioritize developer and real estate interests over tenant rights and protections have resulted in widespread losses of LEM housing, through demolition, redevelopment and conversion and through the erosion of affordability by allowable business practices that bypass controls to maximize rent increases. While these policy priorities remain in place, the unacceptable condition of ‘displaceability’, ongoing housing insecurity, becomes the reality for more and more of Toronto’s residents. My research on available data that could speak to this situation in the City of Toronto identified distinct gaps in information about where LEM housing is located, how and to what degree it is being lost and what are the impacts of the related displacement and displacement pressures.

Current government responses to housing affordability and homelessness have focused primarily on two strategies: increasing the supply by building new affordable housing and providing rent subsidies to low-income tenants seeking to access housing that is unaffordable to them. In the absence of meaningful and timely information on losses of LEM housing, the success of either of these strategies cannot be demonstrated and efforts to shift the underlying policy priorities will be disadvantaged. Better data on both the extent of the problem and the impacts is required both for designing effective policies and programs and supporting advocacy to have them developed and implemented. But data availability is governed by resources and politics and opportunities to collect and coordinate meaningful data are not being taken by City Divisions. Community organizations and agencies are fully occupied with responding to the immediate social impacts of the problem and complying with the terms of their service contracts and are unable to engage in data collection, analysis and advocacy.

In this final section I explore what accounts for this situation and ongoing policy imbalances, who are the actors involved and what are the implications for policy and program development and community practice to preserve LEM housing and resist displacement.

LEM housing: summary of losses and responses

Despite a lack of detailed knowledge, my research demonstrated that over the past five years the City of Toronto has lost LEM housing in significant amounts. Over that period, 50 multi-tenant housing sites, home to an estimated 450 to 550 tenants were confirmed lost. This is almost certainly an underestimate. For example, it does not include the 49 rooming houses that let their licenses lapse during that time and whose status is unknown, representing homes for another estimated 660 tenants (using the Parkdale Rooming House Study average occupancy figure of 13.5). Additionally, it does not include the 47 rooming house incident response sites identified by WoodGreen Community Services that lack details of final outcomes and status. For some perspective on these losses, the City's heavily resourced modular housing initiative will produce 250 units of supportive housing, for a tenant population similar to those displaced from the LEM housing outlined above, at 5 sites over a three to five year period at a total capital cost of \$47.5 Million (Smith, 2021).

Affordable rental apartment units have also experienced significant losses in this time. 1,187 units of affordable rental housing at 64 sites were demolished and replaced with a time limited affordability. 39 affordable units were not replaced. In a three-year period between 2017 and 2019 there were 745 Above Guideline Increase (AGI) applications submitted affecting tens of thousands of tenants. Only 179 of these were contested to achieve a small reduction. This represents millions of dollars in lost rental affordability that will directly increase the profits of landlords who are not required to demonstrate the financial need for the AGI (Zigman & August, 2021). This is in stark contrast to the rigorous income testing and needs assessment that applicants for housing subsidies are subjected to.

These losses have gone minimally recorded and largely unacknowledged and uncontested. Many of the processes by which these units were lost have been within the owner's legal rights and where the processes used have been illegal, there have been only minor consequences if any. The resulting displacement of lower income and often vulnerable

tenants has also gone largely unacknowledged and uncontested such that the trauma associated with these events remain untold stories and private personal tragedies. The impacts of these displacements on the City's housing and homelessness system are not directly tracked or measured and any resources that are allocated by the City and other levels of government to respond through funded social agencies are confined to mitigating the worst immediate impacts, often on an emergency basis.

Who is acknowledging the impact?

“Happy to let it disappear”

By all accounts, conditions in multi-tenant housing are often very poor. Yet they are home to many who, as Tom, a former resident of the Queen's Hotel, described, “have nowhere else to go”. Despite the inherent turbulence of sharing living space with others with few other options due to poverty, mental health issues and addiction, these are homes from which people build community and agency and connection to their neighbourhood. Being involuntarily displaced can cause real trauma and further destabilize the lives of already vulnerable individuals often leading to homelessness (Paradis, 2021).

Rather than seeing multi-tenant housing as a vital supply of deeply affordable housing for those with the lowest incomes and greatest vulnerabilities, the prevailing response to this form of housing is efforts to limit and control their existence (Campsie, 2018). Efforts to harmonize zoning regulations on rooming houses throughout the City following amalgamation over twenty years ago have been continually frustrated by Councillors and homeowners constituents who have opposed the legalization of rooming houses in their Wards, most recently at the July 14, 2021 Council meeting. As a result, protections for multi-tenant housing and their tenants are minimal, particularly in areas of the City where they remain illegal, and their losses by any one of several processes typically go unremarked and unchallenged. Under the current system, almost any alternative to multi-tenant housing is seen as a better use and an improvement; in the words of one of the advocates that I spoke to, city staff, local politicians and residents are generally “happy to let it disappear” (WoodGreen staff interview, June 1, 2021).

Even in the exceptional case study of 28-30 Langley where residents and the local Councillor joined with other advocacy groups to launch a robust challenge of the “renoviction” of their neighbours, ultimately, there were insufficient protections in place to stop the new owner’s intention to convert this multi-tenant housing to a more upscale and profitable arrangement. Similarly, the well documented and widely condemned treatment of the illegally evicted tenants of the Queen’s Hotel did not have any bearing on the development application that the new owners brought forward a few short years after they had forcibly displaced all of the tenants. As one of the members of the Justice for Queen’s Hotel Coalition noted, the unlawful eviction of the 27 tenants had been made invisible within the planning process.

Picking up the pieces - impact on service providers and the City’s housing and homelessness system

It is the association of multi-tenant housing with a tenant population that “nobody wants” (WoodGreen staff interview, June 1, 2021) that causes its stigmatization and lack of local public and political support. But this also means that the loss of this housing causes the displacement of the City’s most vulnerable residents. In those incidents that do come to the attention of City staff or community agencies, a humanitarian response is expected, and the services provided are temporary emergency care as needed and individually focused relocation supports by contracted social agencies. These relocation supports can be described as ‘best efforts’. Agencies involved in working to rehouse displaced vulnerable tenants have noted the diminishing supply of housing that is affordable to these clients on their incomes. Under program rules most do not qualify for the City’s scarce supply of housing allowances and those that do face reduced options in the rental market that are still affordable to them. Staff must work quickly in a short window of time to maintain connection with clients under challenging circumstances, locate and secure housing and supports and coordinate relocation, all with limited resources. Many displaced tenants ‘disappear’ before these processes can be successfully completed. Anecdotally, the evidence is that these tenants fall into homelessness or the City’s emergency shelter system but opportunities to track this information systematically are not being taken, even when engagement is made at the time of displacement.

The impacts of displacement

An exception to the lack of documentation of displacement events is the evaluation report from the Tenant Relocation Support Services Program which operated at four sites in 2016 and 2017. Because of an arrangement that included developer funding, relocation efforts were well resourced allowing for better tracking of activities and outcomes. Program information was then analyzed along with a series of interviews by a pair of highly experienced researchers to produce the report. Tenant experiences all identified the initial displacement as highly stressful and traumatic, often to the point of being unable to engage initially in the relocation process. The report also documented what was required to successfully relocate and stably house vulnerable tenants, including staffing resources, housing allowances and overall costs. All tenants who participated in the interviews reported significantly improved housing conditions and overall well-being in their new housing although in almost all cases it required moving away from their neighbourhoods and networks of support.

The report's carefully quantified costs to achieve these outcomes identified that they were significant, shared between the developer and the City. These costs were exceeded only by the estimated costs of allowing the tenants to become homeless. The TRSS evaluation was that the program had been very effective and the report recommended building on that success, however, a short time after the evaluation report, the roster of agencies involved was allowed to lapse and the program largely ceased to operate in its original design. It would seem that the report's careful documentation of the actual costs of responding to displacement from the redevelopment of multi-tenant housing tenants had the opposite of its intended effect on City policy and program development.

Less visible and harder to document are the impacts of ongoing housing insecurity experienced by tenants in LEM rental apartment buildings. At the time of writing this, a report is being finalized for a [community-based research project](#) in Parkdale that involved surveys of tenants in LEM rental apartment buildings to understand their experience of the displacement pressures they were living with.

Supporting relocation or contesting displacement?

Almost all of the data that I was able to obtain came from efforts to support successful relocation of displaced tenants or to provide supports in reaction to served eviction or AGI notices. These are resource intensive activities that are not addressing the loss of LEM housing. What is required is a focus on preservation of existing units and affordability and contesting displacement through efforts that are preventive and respond to the systemic nature of these losses. Ultimately this will require expansion of existing protections for tenants and LEM rental housing with sufficient resourcing for enforcement and oversight.

Implications for preservation of affordable housing and resisting displacement

Policy and program development

There have been a number of recent excellent reports on the loss of LEM housing in Toronto that have included recommendations for policies and programs to preserve this housing and prevent displacement (Goldstein, 2020) (Paradis, 2018). Many of the recommendations are already in place in other jurisdictions and have been brought forward in deputations to Toronto City Council. They reflect a shift in the current policy priorities that prioritize development and real estate interests and homeowner sensibilities over those for whom LEM housing is their home. The question is what is needed to bring about the political will to effect these changes?

The need for a better data strategy

One of the recommendations that is common to all the reports referenced above is the need to improve the strategic collection and coordination of data to support policy development and proactive interventions. As my research has shown, many City divisions and service agencies carry out different roles in responding to losses of LEM housing and tenant displacement, but they are not well coordinated and opportunities to collect and share data that could improve services but also demonstrate the scope and impact of these losses are not being taken. Information from these sites could provide the basis for capacity to develop warning systems to anticipate potential losses and programs to engage with tenants and

landlords more strategically and proactively. As a small example, the displacement that took place at the three case sites were all preceded by the recent sale of the property.

Without good data, it is difficult to advocate for program resources or policy changes. But even with an improved strategy, there are also limits to the data that can be formally collected by City staff and funded agencies who are made aware of LEM housing and tenants only when they engage with the system in some way. Much LEM housing continues to operate and remain out of sight of City authorities. Additionally, data alone may not be sufficient to affect policy and program change. The well documented success of the TRSS program, for example, did not result in its continuation and the publicly acknowledged violations by the developer of the Queen's Hotel site has yet to have any bearing on the development application.

Local knowledge and leadership

In my research I found that the most detailed information on LEM housing came from local community-based organizations carrying out their own research. The Parkdale Rooming House Study (PNLT, 2017) was funded by several Foundations and carried out by a team of peer researchers. The study was able to locate a large percentage of multi-tenant houses that were operating unlicensed and hidden to authorities, identify previous losses and displacements that had not been recorded and identify factors that placed current rooming houses and their tenants at risk. The information was then used to develop and implement a number of initiatives including the Parkdale Proactive Eviction Prevention pilot that was successful in preventing evictions and displacement through a systemic program of proactive tenant organizing and education. The Rooming House Acquisition and Rehabilitation pilot achieved the permanent preservation of a 20-unit bachelorette by acquiring it and transferring ownership to a local land trust (PNLT, 2021). In combination, these community-initiated projects represent not only an unprecedented data collection of rooming house stock and tenant communities at the neighbourhood level but also demonstrated the capacity to utilize that information to take proactive steps to effectively preserve and protect them.

Community organizing, and the right to housing

One of the key informants that I spoke to said that the role of community organizing is to engage with what has been made invisible, made not to matter, and to make it visible and actionable. (Portillo, personal communication, May 21, 2021). Community and tenant organizing that is independent of government funded social agencies can build tenant and community power to contest the forces of displacement outside of the constraints of the current system through extra-legal and direct-action approaches. This independence was identified as a key principle by the organizers interviewed by August and Webber (2021) in their review of best practices for community organizing to contest displacement. Some of the tenant associations that took this approach to fight their landlord's AGI were successful in having the application withdrawn altogether rather than the modest reduction that could have been expected using the Landlord and Tenant Board processes.

While these more radical approaches are not easily embraced by all groups, for a number of the advocates that I spoke to, their contention was that the necessary systemic change will only be brought about by this type of mobilization. As a member of the Justice for Queen's Hotel Coalition put it, there is no longer a place for trying to prove to the perpetrators of gentrification and displacement what is happening. They are profiting from it greatly and benefit from continuing not to see what is happening. Instead, more militancy is required in demanding equitable development in communities affected by gentrification (Portillo, personal communication, May 21, 2021).

The existing system of policy priorities has left tenants of LEM private rental market housing with few protections and consigned them to a constant condition of displaceability. Efforts to respond have exposed the very real limits to achieving housing stability for low-income tenants and the shortcomings of current government programs and policies to do so. Ultimately, contesting the condition of displaceability will require organizing affected tenants to build the collective political power to bring about transformative systemic change and claim the right to housing, full and equal urban citizenship and a voice in development priorities; a right to the city.

Bibliography

- Advocacy Centre for Tenants Ontario (ACTO). (2019) We can't wait: Preserving our affordable rental housing in Ontario. https://www.acto.ca/production/wp-content/uploads/2019/11/FINAL_Report_WeCantWait_Nov2019.pdf
- August, M. & Walks, A, (2018). Gentrification, suburban decline, and the financialization of multi-family rental housing: The case of Toronto. *Geoforum* 89 (2018) 124-136.
- August, M. & Webber, C. (2019). Demanding the Right to the City and the Right to Housing (R2C/R2H); Best practices for supporting community organizing. Parkdale Community Legal Services. <https://www.parkdalelegal.org/news/demanding-the-right-to-the-city/>
- August, M. (2020). The financialization of Canadian multi-family rental housing: From trailer to tower. *Journal of Urban Affairs*, 42(7), 975-997.
- CBC, (2015). Queen's hotel tenants say they are being ousted on short notice. CBC, August 7, 2015. <https://www.cbc.ca/news/canada/toronto/queen-s-hotel-tenants-say-they-re-being-ousted-on-short-notice-1.3182889>
- Campsie, P. (1994). A brief history of rooming houses in Toronto, 1972-1994. Toronto: Rupert Community Residential Services of Toronto Inc.
- Campsie, P. (2018). Rooming Houses in Toronto, 1997-2018. Neighbourhood Change Research Partnership, University of Toronto.
- Campsie, P. (2018). What we talk about when we talk about rooming houses: Regulation in Canada, 2000-2018. Neighbourhood Change Research Partnership, University of Toronto. <http://neighbourhoodchange.ca/documents/2018/10/campsie-2018-talking-about-rooming-houses-canada.pdf>
- Canadian Urban Institute. (2018). Rental Market Listing Analysis for the City of Toronto: for City of Toronto Planning and Shelter, Support and Housing Administration
- Canadian Urban Institute. (2019). Toronto Housing Market Analysis: From Insight to Action. For City of Toronto Affordable Housing Office, January 2019. <https://www.toronto.ca/legdocs/mmis/2019/ph/bgrd/backgroundfile-124480.pdf>
- City of Toronto (2020), Proposed Official Plan Amendment to the City's Affordable and Mid-range Rent Definitions. Planning and Housing Committee, September 8, 2020. <https://www.toronto.ca/legdocs/mmis/2020/ph/bgrd/backgroundfile-156420.pdf>
- City of Toronto (2019). Final Recommendation Report: Official Plan Amendment - Policies to Address the Loss of Dwelling Rooms. Planning and Housing Committee, May 21, 2019. <https://www.toronto.ca/legdocs/mmis/2019/ph/bgrd/backgroundfile-133413.pdf>
- City of Toronto (2020). Tenant Support Grant program updates. November 4, 2020. [PH19.9](#)

Connelly, J. & Connelly, P. (2021). The economics of rooming houses. Maytree Foundation. <https://maytree.com/publications/the-economics-of-rooming-houses/>

Federation of Metro Tenants' Associations (FMTA), (2012). The City of Toronto Tenant Defence Fund Grant Program. https://d3n8a8pro7vhmx.cloudfront.net/fmta/pages/594/attachments/original/1575512515/Guide_to_the_Tenant_Defence_Fund_Program.pdf?1575512515

Freeman, L. (2014). Toronto's suburban rooming houses: Just a spin on a downtown problem? Wellesley Institute. <https://www.wellesleyinstitute.com/publications/toronto-suburban-rooming-houses-just-a-spin-on-a-downtown-problem/>

Goldstein, M. (2020). Fixing the leaky bucket: A comprehensive policy and program framework to preserve Toronto's supply of deeply affordable housing. Neighbourhood Land Trust. http://www.pnlt.ca/wp-content/uploads/2020/10/Fixing-The-Leaky-Bucket_Full-Report_V1.pdf

Hatfield, E. (2011). No to rooming house at Queen's Hotel: Commissioner refuses application for 40 unit facility. *Bloor West Villager*. <https://www.toronto.com/news-story/70363-no-to-rooming-house-at-queen-s-hotel/>

Kamizaki, K. (2013). Linking community organizing with policy change initiatives: Implications for future community practice in Toronto. Social Planning Toronto.

Leon, S. (2021). Renovictions, demovictions, landlord's own use evictions and more. Wellesley Institute Evictions Data Brief #2. <https://www.wellesleyinstitute.com/wp-content/uploads/2021/03/Brief-2-Non-Arrears-Eviction-Application-FINAL.pdf>

Marcuse, P. (1986). Abandonment, gentrification and displacement: The linkages in New York City. in N. Smith and P. Williams (eds) *Gentrification of the City*, pp. 153-177. London: Unwin Hyman.

Marcuse, P. (2010). A Note from Peter Marcuse. *City* (London, England) 14.1-2: 187–188. Web.

Metro Vancouver Housing Data Book (MVHD). (2019). http://www.metrovancouver.org/services/regional-planning/PlanningPublications/MV_Housing_Data_Book.pdf

Paradis, E. and Connelly, J. (2018). Tenant Relocation Support Services Program. Final Evaluation Report. For Shelter, Support and Housing Administration, City of Toronto.

Paradis, E. (2018). Saving room: Community action and municipal policy to protect dwelling room stock in North American cities. http://www.pnlt.ca/wpcontent/uploads/2018/11/Saving_room.pdf

Parkdale Neighbourhood Land Trust. (2017). No room for unkept promises, Parkdale rooming house study. PNLT. <http://www.pnlt.ca/our-projects/parkdale-rooming-house-study/>

Parkdale Neighbourhood Land Trust. (2021). Parkdale Proactive Eviction Prevention and Rooming House Preservation Project – Final Report.

Prism Consulting. (2017). City of Toronto low end of rental market study: Final report. Prism Economics and Analysis: September 20, 2017.

Sotomayor, L., Tarhan, D.M., Vieta, M., McCartney, S. and Mas, A. When Students are House Poor: Universities, Student Marginality, and the Hidden Curriculum of Student Housing (*Cities*, forthcoming).

Smith, A. (2020). Toronto Spending \$47M to Build 250 Modular Housing Units for Those Living in Shelters. Storeys. April 30, 2020. <https://storeys.com/toronto-250-modular-housing-units/>

Vincent, D. (2021). 'Where are they going to send me?' King Street rooming house redevelopment plan sparks upset over loss of affordable housing. Toronto Star, (Feb. 18, 2021). <https://www.thestar.com/news/gta/2021/02/18/where-are-they-going-to-send-me-king-street-rooming-house-redevelopment-plan-sparks-upset-over-loss-of-affordable-housing.html>

Warren, M. (2019). Online registry aims to crowdsource tracking of Toronto evictions for landlord's personal use. *Toronto Star*, Jan. 22, 2019. <https://www.thestar.com/news/gta/2019/01/22/online-registry-aims-to-crowdsource-tracking-of-toronto-evictions-for-landlords-personal-usehttps://www.thestar.com/news/gta/2019/01/22/online-registry-aims-to-crowdsource-tracking-of-toronto-evictions-for-landlords-personal-use.html.html>

Zigman, P. and August, M. (2021). Above guideline increases in the age of financialization. RenovictionsTO. <https://renovictionsto.com/agi-report>

A proof of concept data solution for monitoring losses of low end of market rental housing: a CMHC Housing Supply Challenge submission.

Introduction

The need for better data on the City's Low End of Market (LEM) housing, numbers of units and rent levels, where it is located and details of losses taking place, was a recurring theme throughout my research. In the absence of reliable real time information about LEM housing in their communities and the threats that they are under, community organizations and governments are limited to reactive, often crisis responses when displacement does take place. The inability to demonstrate the extent of these losses hinders efforts to shift the predominant policy response to the lack of affordable housing from development of new supply to also include policy options focused on preservation and resisting displacement.

At the start of the Fall 2021 term, I learned of the [Canada Mortgage and Housing Corporation's \(CMHC\) Housing Supply Challenge](#); an initiative that "invites citizens, stakeholders, and experts to propose solutions to the barriers to new housing supply". Applications were being invited for the first of 6 planned rounds, the Data Driven Round which was seeking "data solutions that aim to improve decision-making for housing supply in Canada". A review of the application process and forms confirmed my expectation that the solutions to housing supply that the Challenge was seeking were oriented towards new development.

During my internship at the Canadian Urban Institute, my supervisor was Daniel Liadsky, a data analyst who had worked on a rental market analysis commissioned by the City of Toronto. He had left to start a non-profit consultancy that provided data services to the public benefit sector. When I spoke to him about the Challenge and its lack of attention to

losses of affordable rental housing as a supply issue, we decided to submit an application that aimed to provide better data on what was happening to the supply of LEM housing in an effort to introduce preservation into the conversation about housing supply solutions. Despite the challenges of adapting our proposed project to the application process, our submission to develop a tool that we were calling the Low End of Market Rental Housing Monitor was successful. What follows below is an outline of the Housing Supply Challenge program, a summary of our submission and the steps that we are taking to develop the proposed solution.

The CMHC Housing Supply Challenge – Data driven round

The Housing Supply Challenge is one of a number of innovation and research initiatives that CMHC is delivering as part of the Federal government's National Housing Strategy, a ten year \$70 billion plan to "create a new generation of housing in Canada". The first of six planned rounds of the Housing Supply Challenge is the Data Driven round which is intended to bring forward "proposed data solutions that aim to improve decision-making for housing supply in Canada". The round is broken into two stages, each with an evaluation and selection process with funding awarded to selected projects. As a shortlisted applicant in stage 1, our project received \$200,000 in funding to support the development of a proof-of-concept technology solution or methodology that can "improve the collection, sharing, analysis and integration, and/or presentation of data". The stage 2 application will focus on how this proof of concept can be scaled and adapted for implementation across Canada.

Application submission summary – the Low End of Market Rental Housing Monitor

Why create an LEM Rental Housing Monitor?

Deeply affordable rental housing, or the low-end of market, represents a critical component of the housing spectrum, providing homes for low-wage workers, students, and households with fixed incomes. New construction of market and affordable rental housing does not directly address the demand for deeply affordable units and increasingly municipalities will

need to include preservation of existing affordable rental housing in successful housing strategies. Anecdotal evidence suggests that this supply may be shrinking and migrating out of urban centres but there is an absence of good data. This project will shed some light on the dynamics of the low-end of the rental housing market and assist decision makers with identifying the magnitude of the issue, planning for inclusive communities, setting policy and affordability targets, and supporting preservation and acquisition strategies.

Basic project description

The Low-end of Market Rental Housing Monitor will integrate several historical and current datasets to estimate the supply and location of deeply affordable rental housing in urban areas. The data will be made accessible through an interactive, map-based tool and through an application Programming Interface (API) that will permit researchers and developers to incorporate the dataset into other applications.

Data Barriers to address

The rental housing supply is a heterogeneous mix of market types, vintages, unit sizes, and amenities which cater to a range of renter household types. In a market where affordability is an urgent concern, most renters have some flexibility to move along this spectrum. However, households with low incomes are more limited and must rely on the low-end of the market (LEM) to meet their housing needs.

One of the limitations with existing rental market datasets is that they are largely reliant on surveys, they are subject to sampling limitations, and they do not include all market types. Most notably, those segments of the market that are most likely to include LEM housing are the least well covered in these datasets. This approach attempts to use other datasets to provide meaningful estimates at spatial resolutions that are not available in the survey-based datasets.

How the solution will address these barriers

The LEM Rental Housing Monitor will integrate several open datasets and custom tabulations at small area geographies to make strong inferences about the LEM rental

housing supply and how it is changing over time. As there is no standard definition for the LEM, this project will explore different market- and income-based thresholds.

We will use custom tabulations from the 2011 and 2016 Census that summarize monthly rent, unit characteristics, and whether the household moved in the last year to make observations about the LEM supply, where it is located, and the change over time.

We will then look for other datasets that can be used to model the supply in the intervening years. For Toronto, where we will be piloting this project, this will include CMHC's Rental Market Survey, but also the City of Toronto's Apartment Building Registry, MPAC property assessment data, evictions data from the Landlord Tenant Board, and building permit applications to renovate, convert, or demolish units. The LEM Rental Housing Monitor will produce a spatial dataset with an annual estimate for the current and historical LEM supply.

Improvements to collection, analysis, integration sharing and presentation of housing supply data

The LEM Rental Housing Monitor will contribute directly to improving the integration, sharing, and presentation of housing supply data and indirectly to improved data collection.

Integration – The LEM supply model will link a number of housing-related datasets that are not commonly combined. While this is a critical step in the modelling process, it will also produce novel descriptive statistics that will be exposed to users in an interactive map-based tool.

Sharing – The solution will include an API which will allow users to download the dataset in its entirety and to permit developers to incorporate the dataset into other applications.

Presentation – The interactive map-based tool will include a user interface that makes spatial data more accessible to non-technical audiences by allowing users to interactively search data points by geography.

Collection – While this solution will not contribute directly to improving data collection, the process of scaling the solution to other cities will help to highlight local data gaps that could compel municipalities to release or collect additional relevant data.

Potential users and informing decisions

The LEM Rental Housing Monitor has the potential to be useful to policy-makers at all levels of government as well as to community-based organizations, researchers and housing advocates working to develop effective data-informed policy alternatives.

The solution will provide additional context for measuring the success of government efforts to increase affordable rental housing supply by looking at the net gain of new affordable units relative to the loss of deeply affordable ones. Understanding the geographical distribution of housing available to lower income households can have implications for a range of locally specific planning decisions including infrastructure and transit development, inclusionary zoning and rental replacement policies. More finely grained detail could identify LEM rental properties at risk and support more proactive interventions including increased tenant organizing and supports, closer monitoring or acquisition and transfer to non-profit housing providers.

Potential for scaling and adapting to increase geographic reach

The LEM Rental Housing Monitor will be designed to scale to other cities in Canada where housing affordability and the availability of low-end of market rental supply is a pressing concern. At a minimum, we expect this would be relevant to census metropolitan areas over 100,000 people.

The interactive, map-based tool and the data storage infrastructure that supports it will be transferrable to the other communities with minimal modification. Similarly, the underlying data integration model will also be scalable, but we will ensure that there is some built-in flexibility for customization. This is important because there will be differences in the types and availability of local data and the models will need to be calibrated appropriately to the local context. In addition, the needs and priorities of the local users will be different within each community and this should be reflected in each implementation. To address this, an

Advisory Group will be established to inform the proof of concept in Toronto and this partnership and governance model will be replicated in Advisory Groups for other cities.

One benefit of scaling the solution is that some of the datasets involved span multiple regions or have national reach. The geographic scale for each dataset will be encoded in the data processing scripts so that updates to these datasets will automatically update the appropriate local models.

Data Management Strategy

Data accessibility

An important feature of the LEM Rental Housing Monitor will be to make the datasets used more readily accessible to users. The solution will primarily use open data or data from custom tabulations and freedom of information requests that are permitted to be made open. Data sources will be made available through an Application Programming Interface (API) so that users can retrieve the original data directly or integrate it into other applications for research and analysis. Additionally, the integration of datasets that are not commonly combined but help to tell the story about rental housing supply and an intuitive easy to use interface will create a standard set of measures and definitions that can be compared easily between cities and regions.

Data management best practice

The LEM Rental Housing Monitor will use the following best practices with respect to data management including

Governance – The solution will use open metadata best practices for cataloguing, classifying, and tracing the lineage of data sources.

Storage – The original datasets will be stored in a secure and password protected environment.

Privacy – None of the original datasets will contain personal information therefore there are no privacy risks inherent in this solution.

Project Development

Requirements, Timelines and funding

The expectations of stage 1 of the application is that a functional proof of concept is developed by September 23, 2021 and submitted with an extensive Stage 2 application package detailing an implementation plan for how the proof of concept will be scaled and adapted for use across Canada. In addition, all stage 1 applicants are expected to provide a guided demonstration of their solution.

Project team and resources

Funding of up to \$200,000 was provided to support a project budget that included:

- Project staff
- Data purchases
- Expert consultants fees
- Administrative costs

The project team of seven people was made up of both data professionals and housing sector consultants as well as a graduate student from the York University Faculty of Environmental and Urban Change.

CMHC has also contracted with Evergreen to operate the Housing Supply Challenge Support Program to connect applicants with mentorship and resources needed to develop their data solutions. From a slate of experts convened by Evergreen in the fields of housing and data, our team selected 5 to for one-on-one meetings to discuss our project and receive advice and guidance. In addition, our team identified two other housing data experts that we contracted to serve as consultants on the project using CMHC funds.

Functional Proof of Concept

At the time of submission of this portfolio, development of the proof of concept was ongoing. The following sections outlines some of the steps taken in that process.

Precedent review

As a first step in developing our tool, a precedent review was carried out to identify examples of other similar data solutions in Canada and other jurisdictions with attention to the organization that created and maintains it, user groups and how they use the tool, what is being tracked and the datasets that are used, as well as features that could be of potential use in our development of the LEM Monitor (see Appendix 1).

Many of the examples were operating in the United States, where the availability of property data is considerably different than it is in Toronto, but a number of the features were very similar to those that we had proposed for the LEM Monitor including interactive maps and guided analysis. One feature of several of the tools in the review that we considered adopting was the inclusion of tenant narratives to provide a human face to the displacement that is caused when LEM housing is lost. The tools were designed to support a variety of uses ranging from tenant and anti-displacement organizing to academic research and advocacy for policies and programs to preserve affordable housing.

Defining LEM

One of the first tasks was to define LEM. There are numerous considerations in how housing affordability is measured. Through our own research and in consultation with our contracted project advisors, the project team worked through a range of considerations to make the following decisions for the project. The LEMR Housing Monitor will use two different LEM measures, both of them income based and applied to 'asking rents', or market value rents that do not reflect the rent-controlled rate. Because the proof of concept for the LEM Monitor will be based in the City of Toronto, the decision was to use the City's new definitions of affordable rents to support alignment with other related policy decisions (see Table 1). To allow use of the tool in other jurisdictions with little adaptation and to support

comparison between areas, a more generic definition will also be used based on 30% of the total income for households at 30% of Area Median Income (AMI) by household type.

Testing the initial concept

Initial feedback from the CMHC evaluation panel was that the project required more specificity and clarification of the objectives or goals of the project. Additionally, it was noted that differences in the types and availability of relevant data across municipalities would make scaling the project challenging. Overall, however, there was recognition from the Evergreen expert advisors that the project was addressing an important gap in information about the rental housing market.

Project and Methodology

Defining the project's goals and capabilities in Stage 1 required a realistic assessment of what was possible in the relatively short time span available. Beginning with multiple census years to determine 5-year baselines, the Low-end of Market Rental Housing Monitor will use available data to estimate the supply of private market LEM rental housing based on the shelter costs of households that moved within the last year. The goal is to estimate the volume of deeply affordable housing units, where they are located, and track changes over time. Below is a screen shot from a mock-up demonstrating this functionality (see Figure 8).

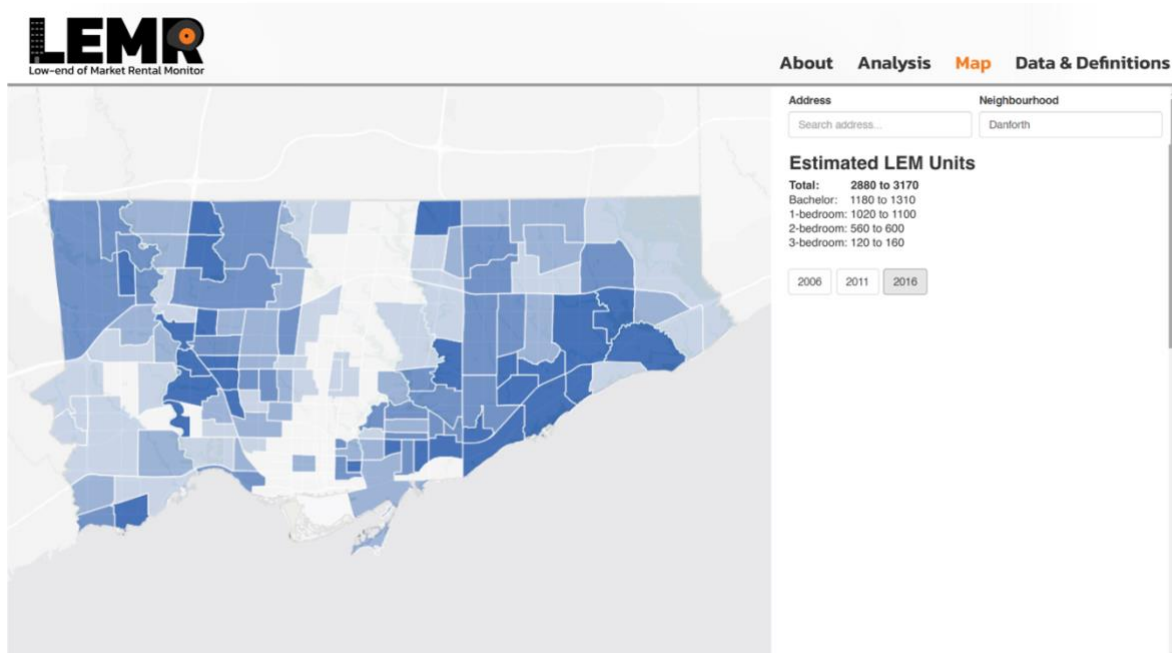


Figure 8: Screen shot of LEMR Monitor displaying estimated LEM units by census year.

A more detailed analysis at the neighbourhood level can be accessed using the search function (see Figure 9) along with other housing and demographic information.

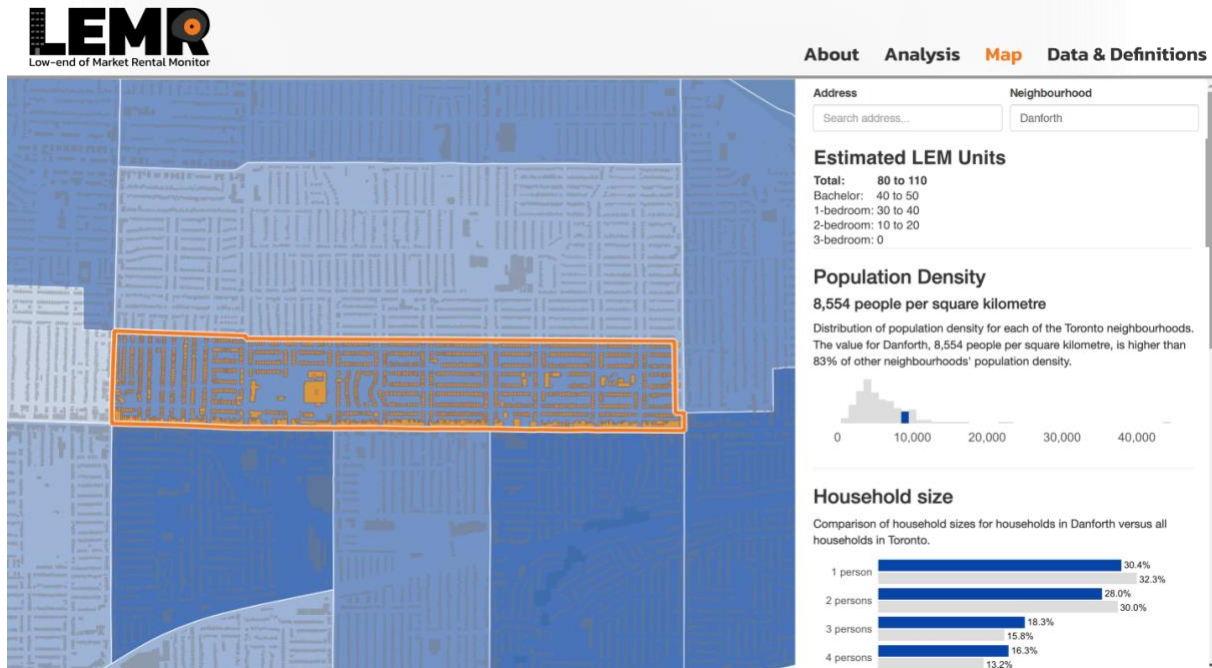


Figure 9: Screen shot of LEMR Monitor displaying estimated LEM units at neighbourhood level with additional housing and demographic information

To improve the resolution of this estimate, we will look at other datasets for indicators that predict the changes observed in the census and provide finer spatial resolution (see Figure 10).

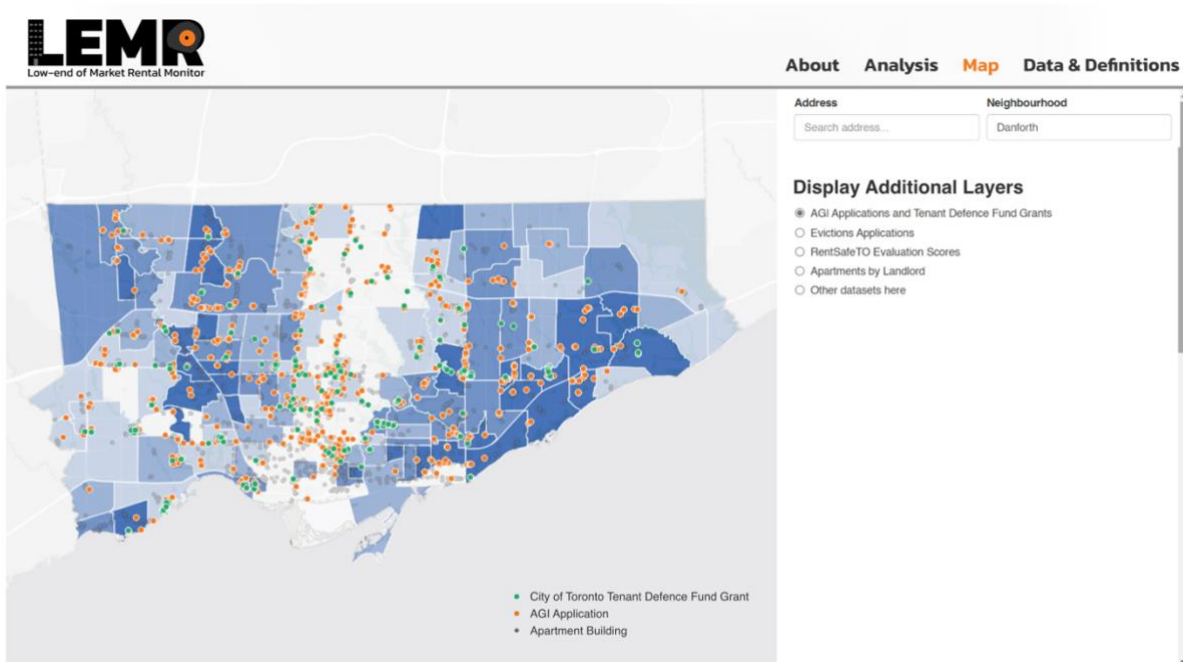


Figure 10: Screen shot of LEMR Monitor showing additional data layers.

It is anticipated that these indicators will differ for each segment of the rental market, for example:

Primary rental market indicators could include:

- changes in ownership (City Apartment Building Registry)
- eviction rates (Landlord and Tenant Board)
- evidence of tenant organizing (City of Toronto Tenant Defence Fund)

Secondary rental market indicators could include:

- building permits (City Planning)
- changes in non-owner-occupied units (MPAC)
- Multi-tenant housing possible indicators could include:
 - changes in licensed buildings (Municipal Licensing and Standards)
 - evidence of change in unlicensed units (By-law Enforcement, MPAC, Office of Emergency Management).

Diversity, Inclusion and Reconciliation Considerations

The CMHC application guide encourages all Housing Supply Challenge shortlisted projects to consider issues of diversity, inclusion and reconciliation in every stage of their project development and implementation. This includes how the policy issue to be addressed is defined, the data sources and evidence collected and how they are used, and the selection of stakeholders to engage with to inform the project.

In an early engagement with Housing Supply Challenge advisors we were encouraged to consider how our project could support the goals of the National Housing Strategy but also upcoming decisions to be made at the Federal level regarding pandemic recovery. One of the early lessons of the pandemic was the highlighting of racial inequality in many areas including housing and how that was in turn affecting the unequal impact of the pandemic. Wherever possible, one of the goals of the LEMR Housing Monitor project will be to include demographic and disaggregated data to identify uneven impacts of LEM housing loss across racial groups.

User Engagement

The purpose of this round of the Housing Supply Challenge is to develop data solutions that improve decision making about housing supply in Canada. An important consideration in the evaluation of the proof of concept will be the degree to which the tool has incorporated feedback from potential users in its development. A user engagement plan was developed to test and validate the LEM Monitor. The purposes of the engagement plans are:

- To identify potential users and how they would use the tool.
- To learn from relevant stakeholders what data they are currently using in their work and how.
- To inform user experience design.
- To form a community of practice and generate support for the tool's ongoing development.

A list of stakeholders was generated from among the groups listed below and focus groups and one on one meetings scheduled in two stages. The first sessions will introduce the proof of concept to gain insights into its development from user feedback. Time permitting, the second sessions will be a more practical hands-on test of the tool's user interface and functionality.

- Municipal staff from Divisions responsible for:
 - Housing policy
 - Planning and land use
 - Housing and tenant supports
 - Property standards and licensing of rooming houses and short-term rental operators
- Community Agencies representing a diversity of demographic groups
- Non-profit housing providers
- Tenant advocacy and support organizations
- Researchers

Project documentation

Throughout the development of the proof of concept, details of the process will be thoroughly documented to demonstrate that the tool has been shaped by extensive testing and validation by a diverse range of potential users and also to support replication of the process in other jurisdictions when scaling the project.

Partnerships and collaboration

There is a heavy emphasis on implementation of the project at a national level in the Stage 2 application. Applicants will be evaluated on their demonstrated capacity to scale and adapt the proof of concept to be used in other jurisdictions across the country. In anticipation of this next stage, the team has engaged with several housing research initiatives already operating at a national level to discuss possible partnerships and collaboration. Two of the groups approached are also working on Housing Supply Challenge submissions that are complementary to the LEMR Housing Monitor.

Summary and Conclusion

Early feedback from engagement is that the LEMR Housing Monitor will fill an important gap in knowledge about rental housing stock. The project was seen to have the potential to coordinate diverse datasets to create a more complete evidence base from which to make local policy and program decisions and to advocate for change from other levels of government. These decision areas include the prioritization of affordable housing preservation initiatives and their inclusion in housing supply targets, funding for capital upgrades and acquisition programs, and improved tenant protections.

The degree to which the LEMR Housing Monitor can play a preventive and proactive role in preserving LEM housing and resisting displacement will be determined by the timely availability of relevant data sets and the level of resolution achievable, ideally at the building level. Once established and implemented, the LEMR Housing Monitor could begin to inform data collection and coordination practices and continue to improve the tool's efficacy. It is

our hope that as a proof of concept, the LEMR Housing Monitor will strengthen a preservation orientation within housing supply decision making and expand the collection and analysis of data demonstrating and predicting losses of LEM housing.

Appendices

Appendix 1 – Precedent Review

Created by Melissa Goldstein and Nigel Carvalho

Name (Location) *most are links*	Created by...	Founded	Used by....	Used to...	Datasets Used	What is Tracked	Considerations for LEM Monitor
The Displacement Alert Project Dap.Map (NYC)	Association for Neighbourhood and Housing Development (non-profit)	2016	Community groups, decision makers, local residents, anti-eviction organizers	Prevent tenant displacement and loss of rent stabilized units by proactively identifying at risk buildings to and pushing back with outreach, education, and organizing strategies	Multiple Dwelling Registrations DOB Job Application Filings DOB Complaints Received Housing Maintenance Code Violations	Buildings at risk of displacement (construction permits and loss of stabilized housing, high volumes of construction permits, high-price sales in the area)	
DAP District Reports			Community groups, decision makers, local residents, anti-eviction organizers	“ ”	Housing Maintenance Code Complaints Rolling Sales Data	Where rent stabilized tenants are at greatest risk of displacement in each community district (new property sales, HPD complaints, HPD violations, DOB complaints, and	

						DOB construction permit applications)	
<u>DAP Watch List</u>			Organizers (members only) intervening before speculation has put tenants at risk	" "		Rent-stabilized buildings that are currently being marketed for sale at a price that appears to be speculative and predicated on a plan of tenant displacement	
<u>Who Owns What (NYC)</u>	JustFix.nyc (non-profit)	2018	Tenants and organizers	Facilitate the organization of tenant associations by identifying shared landlords or property managers and violation histories across multiple buildings Enable renters to make informed decisions when choosing where to live		Bad landlords - Identity of property owner (building level, portfolio level) -Code/permit violations and complaints over time (building level): complaints verified by the Department of Housing Preservation and Development (HPD) inspector, tenant	Has user-friendly page on "the most important things you can do with Who Owns What" to help users use the tool Is in English and Spanish Provides links to original data sources Building-level data is fundamental to the function of

						complaints via 311 -eviction history (building level) -rent stabilized units (number lost over time, building level) -last sale date and sale price	the tool
<u>Landlord Watch List (NYC)</u>	New York City's Public Advocate		Tenants, public officials, advocates	Identify which residential property owners consistently flout City laws that protect tenants' rights and safety	The City of New York's Speculation Watch List - buildings at risk of being upscaled (recently sold multiple unit dwellings for which the rental income the property currently generates does not justify the high sale price of the building)	The city's worst landlords, evaluated based on the number of open, serious Housing Maintenance Code and building permit violations per unit	
<u>Urban Displacement Project</u> (several American & international cities)	U of California, Berkeley researchers	2015	Advocates and academics, but varies by city	Inform policy interventions and investment to support more equitable development by describing the nature of gentrification,	City dependent	Gentrification and displacement	Potential institutional partner?

				displacement, and exclusion			
<u>Anti-Eviction Mapping Project</u> (California primarily)	Local volunteers	2013	Tenants, non-profits, fundraisers	<p>Help tenants prepare and seek legal counsel in advance evictions and direct outreach using mapping tools that document where evictions are happening, frequently targeted neighborhoods, and which property owners possess buildings with the highest rates of evictions</p> <p>Help tenants fight evictions and drive local/state policy through multimedia storytelling and building solidarity</p>	City dependent	Bad landlords, dispossession	

<u>Housing Market Indicators Data Portal</u> (Chicago)	DePaul University's Institute for Housing Studies'	2013	<u>Chicago's Preservation Compact</u> - an assembly of public, private, and nonprofit leaders committed to preserving affordable rental housing in the Chicago	Develop preservation programs strategically designed to address the particularities of the housing at risk of being lost		13 indicators of housing market health in the region	
<u>Coredata.nyc</u> (NYC) FKA. Subsidized Housing Information Project (SHIP)	New York University's Furman Center	2011 <u>/2016</u> (rebranded with added data sources & tools)		Help identify opportunities to preserve affordability by viewing city's subsidized housing supply	Multiple sources on subsidized, privately-owned rental properties including data on 40 property-level variables, including subsidy, ownership, and physical and financial information	Affordability preservation	
<u>The National Housing Preservation Database</u> (USA)	Public and Affordable Housing Research Corporation (PAHRC), National Low Income Housing Coalition (NLIHC)	2011	Communities	Preserve the stock of public and affordable housing by determining whether or not a property is at risk of leaving the subsidized housing stock and helping identify priority properties	Data from individual funding agencies and departments - contract expiration dates, loan maturity dates, recent physical inspection scores, number of units, type of	Federally assisted public and affordable housing	

				for acquisition	owner, and other property and subsidy characteristics		
Rooming House Audits in Montréal	City of Montréal		The City and housing advocates	Track trends and changes in the rooming house stock	Tax rolls, fire department records, other administrative departments, and reports from neighbourhood front-line organizations	Trends and changes in rooming house stock	
<u>EvictionsOntario</u>	Local volunteers	2020	Tenants and organizers	Facilitate tenant organizing against the mass of pandemic evictions in Ontario through educating and connecting tenants		Eviction hearings at the LTB	
<u>Renovictions TO</u>	Local volunteers		Tenants and organizers	Document and make public information about renovictions and AGIs and to support tenants as they organize and fight back	Anonymous tenant reporting	Renovictions, N13 notices, above guideline increases (AGI) applications	

<u>Rental Housing Index</u> (Canada)	BC Non-Profit Housing Association	2014	Policy makers at all levels of government			Renter households, cost, affordability, overspending, income gaps, overcrowding, and bedroom shortfalls	Possible partner?
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