



# LONDON DEVELOPMENT INSTITUTE

July 12, 2024

Chair and Members of Community and Protection Services Committee  
City of London

RE: Agenda Item 3.1

Public Participation Meeting: Renovations License and Relocation Bylaws Changes: Public  
Comments Received

Dear Chair and Committee Members

On behalf of the members of the London Development Institute (LDI) we are submitting the following points regarding the potential of a new license category pertaining to the licensing renovation-induced evictions.

1. The problem of unethical rental property owners using the N13 process to illegitimately evict tenants is an issue that should be tackled through improvements to the Residential Tenancy Act and its enforcement. We recognize this has been a legitimate problem across the province including a recent case in London.
2. The vast, vast majority of rental property owners in London have followed the correct procedures and process in balancing the need for renovations of their properties and the rights of their tenants. Our concern is any future licensing regime may inadvertently affect the required renovation process by rental property owners to insure the long-term maintenance, security and livability of their rental units for their tenants.
3. The annual estimate of over \$500,000 to create and maintain the new license regime is significant. We suggest the City look to other opportunities to improve support to tenants at the local level and tackle the renovictions issue through advocacy efforts at Queen's Park. To assume unscrupulous rental property owners, that have skirted the requirements of the N13 process, will now follow the rules and regulations because of a City license may be wishful thinking.

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4. If the City decides to proceed with a license, we suggest that any fee to obtain a license to renovate be kept to a minimum and that the fines for violating the license be the deterrent. In addition, any license process needs to align with the actual process and timing of the issuance of building permits in London to be implementable.
5. LDI reserves the right to comment further if the City of London proceeds with a Renovation License and Relocation By-law and any subsequent amendments to the Business Licensing By-law and the Administrative Monetary Penalties By-law.

Thank you for receiving our comments as part of the public participation meeting regarding the potential new renovation license.

Sincerely,

A handwritten signature in black ink that reads 'Mike Wallace'. The signature is fluid and cursive, with the first name 'Mike' and last name 'Wallace' clearly distinguishable.

Mike Wallace  
Executive Director