



Neighbourhood Legal Services

LONDON AND MIDDLESEX

April 10, 2026

Planning and Environment Committee (PEC)
City of London
300 Dufferin Ave
London ON N6B 1Z2

By email to pec@london.ca

RE: Item 4.1 Councillor S. Franke - Tenant Assistance and Relocation Program

Neighbourhood Legal Services (London & Middlesex) Inc. is a poverty law clinic assisting low income Ontarians with legal issues in the areas of social assistance, housing, and employment law. Our mandate is to offer legal services to provide for the basic needs of food and shelter, to the most marginalized of society. As such, we are very in touch with the needs of the low income population in London.

We provide advice and representation for low income tenants facing evictions and other housing problems, and regularly appear before the Landlord and Tenant Board (LTB). We are well situated to speak to the issues that low-income tenants face in London, and the importance of affordable housing and the need for City programs and by-laws that both support low income tenants and protect our affordable housing stock.

The Rental Unit Repair License Program (known as the Renoviction By-law) which became effective in March 2025, was an important step and we applaud the City's efforts there. However, we are attaching to this submission a copy of our submission to CAPS for Monday's meeting which is looking at the City's review of the Rental Unit Repair License Program Renoviction. There are many things that can be done to strengthen and improve that by-law, as we have real time examples of where it is clearly falling short. The development at 145 Base Line Rd. West, still in progress, is our most recent example.

As to the above-noted motion at hand, we would also like to provide the following submissions in support of Councillor Franke's motion to have the Civic administration explore and report back on the feasibility of establishing a Tenant Assistance and Relocation Program for the City of London.

We submit that while the Renoviction By-law has created some success in reducing bad faith renovictions (from what we have seen at our clinic), we have been seeing a new trend emerge. Specifically, we have seen a sharp increase in landlords claiming demolition or conversion in order to evict tenants. Under the current law, by ticking a different box on the same form as for renovictions (the N13), a landlord can avoid the renoviction by-law, evict the tenant, and not have to offer the unit back to the tenant at the end of the work. We believe that these may sometimes be in bad faith. A demolition could really be a renovation, for example. Also, the conversion may not be necessary and of benefit to the community, and yet the affordable housing may be forever lost.

Additionally, as redevelopment and intensification continues in the City of London, we submit that City Council needs to find ways to help tenants who are facing undue hardship, and be creative with solutions that can reduce the overall loss of affordable housing stock which occurs with these developments.

As there doesn't seem to be a will to add demolitions and conversions into the Renoviction By-Law at this time (the recent review doesn't mention it despite Councillor Trosow's motion last fall), we strongly support Councillor Franke's motion to look at an additional framework which could manage demolitions and conversions, and which could better protect tenants.

City Council needs to be mindful that new developments are not subject to rent control/rules about allowable yearly increases. And for older buildings (before 2018) a landlord can set any amount of rent between tenants.

We support the City looking at other jurisdictions that have created programs to deal with redevelopment including demolitions and conversions. Such programs provide for things such as: a right for the tenant to return to the replacement unit or another comparable unit at

similar rent, rent gap assistance or alternative accommodation, provision for moving allowances, practical relocation support, and additional assistance for tenants with special needs, seniors and long term tenants. Programs that do these things would reduce the number of bad faith demolitions and conversions, would support tenants who are often the victims of redevelopment and intensification, and would protect the City's affordable housing stock.

Please do not hesitate to contact us should you require any further information.

Yours very truly,

A handwritten signature in red ink, appearing to read 'K. Pagnello', with a long horizontal flourish extending to the right.

Kristina M. Pagnello
Executive Director and Lawyer

Encl. April 10, 2026 Submission to CAPS for Renoviction By-law/Retal Unit
Repair and Licencing Review



Neighbourhood Legal Services

LONDON AND MIDDLESEX

COPY

April 10, 2026

Community and Protective Services Committee
City of London
300 Dufferin Ave
London ON N6B 1Z2

By email to cpsc@london.ca

**RE: Item 42.6 for April 13, 2026 CAPS meeting
Renovictions: Rental Unit Repair Licensing Program One Year
Update**

Neighbourhood Legal Services (London & Middlesex) Inc. is a poverty law clinic assisting low income Ontarians with legal issues in the areas of social assistance, housing, and employment law. Our mandate is to offer legal services to provide for the basic needs of food and shelter. As such, we are very in touch with the needs of the low income population in London. Furthermore, as we provide advice and representation for low income tenants facing evictions before the Landlord and Tenant Board (LTB) we are keenly aware of the forms that bad faith evictions take.

We have reviewed the City's Report to CAPS on the review and suggested amendments to the Rental Unit and Repair Licensing Program and wish to submit as follows:

1. London's By-Law only pertains to N13 Notices issued for renovation and repair. It does not address Demolitions and Conversions. We understood from a prior Motion (Sam Trosow, December 1, 2025) that this would be looked at in conjunction with the Renoviction by-law review. We are attaching our November 27, 2025 submission on this issue which outlines why demolitions and conversions are an issue and need to be better regulated by the City (ideally by creating rules

to prevent bad faith demolitions and conversions, and incorporating same into the Rental Unit Repair Licensing program).

2. The longer term of one year will only work if the by-law is expanded and can better protect tenants where there are clear violations under the Residential Tenancies Act (RTA) and other Acts. Otherwise, it emboldens landlords to be non-complaint with the RTA and City by-laws.
3. The 145 Base Line Rd. West evictions for renovations, for which the landlord obtained a Rental Unit Repair License, have been an experience signaling much needed changes and additions to current Renovation By-Law.
 - (a) Compensation: Landlord did not pay the required compensation in the 145 Base Line Rd. West situation before the termination date. As such, we support the recommendation on this and specifically the requirement of affidavit evidence to show the landlord has paid the legislated compensation.
 - (b) The 145 Base Line Rd West Landlord took the position that temporary accommodation satisfied compensation. This in spite of the law that other accommodations do not satisfy the compensation requirement, particularly when there has been an exercise of the right of first refusal to return. Even where other accommodations may suffice, they should be permanent, habitable, and agreed to by the tenant. As such, we support amending the Tenant Information Application with clear information about Compensation and an easy to understand summary of the relevant sections of the RTA.
 - (c) In the 145 Base Line Rd. W case, the Landlord did not offer actual temporary accommodation that was habitable, despite having provided those assurances to the City (which seemed to have allowed him to get various permits). When our office raised this with City Compliance we were told there is no way to enforce the assurances the landlord made to City Council. We have attached to this submission a copy of the letter from the landlord promising temporary accommodation, and City Council

minutes making the amendment requiring the temporary accommodation.

- (d) We submit that if temporary accommodation is being provided, it must be equivalent, and the tenant must be given a chance to view it before accepting or rejecting it. Further, the tenant should be given sufficient notice for a move to a temporary accommodation, and assistance to move and store belongings.
- (e) In an amended Renoviction By-Law, the landlord should be required to provide an easy to understand list of improvements and details of the renovated space, so that tenants can properly assess their interest in right of first refusal to return.
- (f) The landlord should be required to be compliant at all times with City by-laws.
- (g) We submit that the landlord should not be permitted to create interruptions to vital services or change the habitability of the remaining/non-vacant units while work proceeds.
- (h) We submit that the amended by-law should contain rules about the safety and conditions of the job site, where tenants are still in place. The landlord should not be permitted to create a hazardous job site for tenants who remain in the complex.
- (i) Tenants should not lose access to common space services including parking other than very temporarily and with accommodation.
- (j) We submit that the by-law should require the landlord to communicate updates and information to the tenants, and the tenants' representative where applicable. The landlord should be required to be responsive to written correspondence concerning matters relevant to the renoviction process.
- (k) In the 145 Base Line Rd. West case, the Landlord started the renovations with tenants still in possession, causing extreme loss of reasonable enjoyment (as well as disruptions to vital services, damage to structures including a firewall, noise, etc)

- (l) Where tenants asserted their rights to not have significant renovations begin before the unit was vacant, the landlord issued N5s, commenced proceedings at the LTB, and even brought a complaint to the Ontario Rental Housing Enforcement Unit, causing great stress to the tenant, only to abandon it (it would not have succeeded as a complaint in our opinion).
- (m) In the 145 Base Line Rd. W case, the Tenants were only given the right of first refusal to occupy a substantially altered unit. This included the loss of half their square footage, more expensive utilities, and a loss of amenities. We submit that an amended Renoviction By-Law should contain a mechanism for the City to determine if the contemplated renovations preserve “substantially the same unit” and where they do not, a license should not be granted.

Given the foregoing, we would recommend that the By-law be amended to give the City greater powers upon breaches of the Residential Tenancies Act (RTA). There should be a mechanism for tenants to report violations of the RTA, where there is an existing licence, and such to allow the City to investigate and impose fines and/or revocation of the Rental Unit Repair License.

Yours very truly,



Kristina M. Pagnello
Executive Director and Lawyer

Encls: November 4, 2024 Letter to Planning and Environment
 Committee from Landlord owner of 145 Base Line Rd. West
 AND
 Excerpt from City Council Minutes for November 26, 2024
 Motion before Council