



# Neighbourhood Legal Services

LONDON AND MIDDLESEX

April 10, 2026

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

*By email to [cpssc@london.ca](mailto:cpssc@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 Renoviction 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

Appendix B – Letter from Property Owner/Applicant

November 07, 2024

Planning and Environment Committee  
City of London

Re: Item 3.4 on November 12<sup>th</sup> PEC Agenda: 145 Base Line Road W.

Dear Councillors, Members of Planning and Environment Committee,

I am writing on behalf of 1000915350 Ontario Inc. (owner of 145 Base line Road West) to respectfully request your approval to move forward with our exciting project that represents an excellent example of gentle density within existing neighbourhoods that will provide additional units of much needed rental housing stock within a relatively short timeline.

Our team has worked diligently to ensure that the development aligns with the Provinces and City's Planning Policies and housing goals. We always have and always will comply with Provincial Legislation in good faith. We understand there is a housing crisis in the city, and we plan on improving the situation with providing additional rental stock.

You have my personal and company's word, written and verbal, that there will be no deliberately displaced tenants at any point during the necessary renovations to add the additional units. If approved, we are willing to offer tenants a temporary unit within the same complex while renovations to add the additional basement units takes place. Once the renovations are complete, tenants will return to their original units. See proposed Schedule 'A' for the agreement that will be presented to the remaining existing tenants.

Sincerely,

*Carlos Afanador*

Carlos Afanador  
Director | 1000915350 Ontario Inc.

it being acknowledged that any and all oral and written submissions from the public, related to this application have been, on balance, taken into consideration by Council as part of its deliberations and final decision regarding these matters.

**Motion Passed**

8. (3.6) Site Alteration By-law (Relates to Bill No. 390)

- Motion made by: S. Lewis

That, on the recommendation of the Director, Planning and Development, the proposed by-law appended to the staff report dated November 12, 2024 as Appendix "A" BE INTRODUCED at the Municipal Council meeting to be held on November 26, 2024, introduce a new Site Alteration By-Law to expand the by-law's coverage to encompass the entire limits of the City, with specific exceptions, addressing the limitations of the existing by-law and repeal By-Law No. C.P.-1363-381;

it being pointed out that the following individual made a verbal presentation at the public participation meeting held in conjunction with these matters:

- M. Wallace, Executive Director, London Development Institute;

it being acknowledged that any and all oral and written submissions from the public, related to this application have been, on balance, taken into consideration by Council as part of its deliberations and final decision regarding these matters.

**Motion Passed**

10. (5.1) Deferred Matters List

- Motion made by: S. Lewis

That the November 1, 2024 Deferred Matters List BE RECEIVED.

**Motion Passed**

6. (3.4) 145 Base Line Road West (Z-9783) (Relates to Bill No. 394) This item has Video



- Motion made by: S. Lewis

That, the following actions be taken with respect to the application of 1000915350 Ontario Inc., (c/o Siv-ik), relating to the property located at 145 Base Line Road West:

- a) the proposed attached by-law BE INTRODUCED at the Municipal Council meeting to be held on November 26, 2024 to amend Zoning By-law No. Z.-1 to change the zoning of the subject property FROM a Residential R3 (R3-1) Zone TO a Residential R3 Special Provision (R3-1(\_)) Zone;
- b) the Site Plan Approval Authority BE REQUESTED to consider the following design issues through the site plan approval process:



- i) in consultation with Municipal Housing Development, a provision of entering into a temporary rental unit accommodation agreement for existing tenants be entered into; and,
- ii) a parking management plan be included in the site plan approval process for the following reasons:

- A) the current lines are not clearly painted;
- B) the current angle parking is not being utilized correctly;
- C) establish designated parking spaces for each unit; and,
- D) accommodate parking on site;

it being noted that the Planning and Environment Committee received the following communications with respect to these matters:

- a communication dated November 7, 2024, from J. Smolarek, Siv-ik Planning and Design;
- a communication dated November 10, 2024 from E. Wilcox and J. Sutherland;
- a communication dated November 8, 2024 from P. Morris; and,
- a communication dated November 11, 2024 from A. Johnson;

it being pointed out that the following individuals made verbal presentations at the public participation meeting held in conjunction with these matters:

- J. Smolarek, Siv-ik Planning and Design;
- Courtney;
- Bethany;
- C. Afanador; and,
- P. Cano;

it being further noted that the Municipal Council approves this application for the following reasons:

- the requested amendment is consistent with the Provincial Planning Statement, 2024, by promoting densities for new housing which efficiently uses land, resources, infrastructure and public service facilities, and support the use of active and public transportation; and,
- the proposed intensification can be appropriately accommodated on the subject lands and is not compatible with the surrounding neighbourhood;

it being acknowledged that any and all oral and written submissions from the public, related to this application have been, on balance, taken into consideration by Council as part of its deliberations and final decision regarding these matters.

- Motion made by: S. Lewis

Seconded by: P. Cuddy

That the motion be amended to read as follows:

That, the following actions be taken with respect to the application of 1000915350 Ontario Inc., (c/o Siv-ik), relating to the property located at 145 Base Line Road West:

a) the proposed attached by-law BE INTRODUCED at the Municipal Council meeting to be held on November 26, 2024 to amend Zoning By-law No. Z.-1 to change the zoning of the subject property FROM a Residential R3 (R3-1) Zone TO a Residential R3 Special Provision (R3-1( )) Zone;

b) the Site Plan Approval Authority BE REQUESTED to consider the following design issues through the site plan approval process:

i) in consultation with Municipal Housing Development, a provision of entering into a temporary rental unit accommodation agreement for existing tenants be entered into; and,

ii) a parking management plan be included in the site plan approval process for the following reasons:

- A) the current lines are not clearly painted;
- B) the current angle parking is not being utilized correctly;
- C) establish designated parking spaces for each unit; and,
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it being noted that the Planning and Environment Committee received the following communications with respect to these matters:

- a communication dated November 7, 2024, from J. Smolarek, Siv-ik Planning and Design;
- a communication dated November 10, 2024 from E. Wilcox and J. Sutherland;
- a communication dated November 8, 2024 from P. Morris; and,
- a communication dated November 11, 2024 from A. Johnson;

it being pointed out that the following individuals made verbal presentations at the public participation meeting held in conjunction with these matters:

- J. Smolarek, Siv-ik Planning and Design;
- Courtney;
- Bethany;
- C. Afanador; and,
- P. Cano;

it being further noted that the Municipal Council approves this application for the following reasons:

- the requested amendment is consistent with the Provincial Planning Statement, 2024, by promoting densities for new housing which efficiently uses land, resources, infrastructure and public service facilities, and support the use of active and public transportation; and,
- the proposed intensification can be appropriately accommodated on the subject lands and is compatible with the surrounding neighbourhood;

it being acknowledged that any and all oral and written submissions from the public, related to this application have been, on balance, taken into consideration by Council as part of its deliberations and final decision regarding these matters.

Yeas: Mayor J. Morgan, A. Hopkins, S. Lewis, S. Hillier, E. Peloza, P. Van Meerbergen, S. Lehman, H. McAlister, P. Cuddy, S. Stevenson, J. Pribil, S. Franke, D. Ferreira, and C. Rahman  
(14)

Absent: S. Trosow  
(1)

**Motion Passed (14 to 0)**

- Motion made by: S. Lewis

Seconded by: P. Cuddy

That the motion, as amended, BE APPROVED.

Yeas: Mayor J. Morgan, S. Lewis, S. Hillier, E. Peloza, P. Van Meerbergen, S. Lehman, P. Cuddy, S. Stevenson, J. Pribil, D. Ferreira, and C. Rahman  
(11)

Nays: (3) A. Hopkins, H. McAlister, and S. Franke

Absent: S. Trosow  
(1)

**Motion Passed (11 to 3)**

Item 6, clause 3.4, as amended reads as follows:

That, the following actions be taken with respect to the application of 1000915350 Ontario Inc., (c/o Siv-ik), relating to the property located at 145 Base Line Road West:

- a) the proposed attached by-law BE INTRODUCED at the Municipal Council meeting to be held on November 26, 2024 to amend Zoning By-law No. Z.-1 to change the zoning of the subject property FROM a Residential R3 (R3-1) Zone TO a Residential R3 Special Provision (R3-1( )) Zone;
- b) the Site Plan Approval Authority BE REQUESTED to consider the following design issues through the site plan approval process:
  - i) in consultation with Municipal Housing Development, a provision of entering into a temporary rental unit accommodation agreement for existing tenants be entered into; and,
  - ii) a parking management plan be included in the site plan approval process for the following reasons:
    - A) the current lines are not clearly painted;
    - B) the current angle parking is not being utilized correctly;
    - C) establish designated parking spaces for each unit; and,
    - D) accommodate parking on site;

it being noted that the Planning and Environment Committee received the following communications with respect to these matters:

- a communication dated November 7, 2024, from J. Smolarek, Siv-ik Planning and Design;
- a communication dated November 10, 2024 from E. Wilcox and J. Sutherland;
- a communication dated November 8, 2024 from P. Morris; and,
- a communication dated November 11, 2024 from A. Johnson;

it being pointed out that the following individuals made verbal presentations at the public participation meeting held in conjunction with these matters:

- J. Smolarek, Siv-ik Planning and Design;
- Courtney;
- Bethany;
- C. Afanador; and,
- P. Cano;

it being further noted that the Municipal Council approves this application for the following reasons:

- the requested amendment is consistent with the Provincial Planning Statement, 2024, by promoting densities for new housing which efficiently uses land, resources, infrastructure and public service facilities, and support the use of active and public transportation; and,
- the proposed intensification can be appropriately accommodated on the subject lands and is compatible with the surrounding neighbourhood;

it being acknowledged that any and all oral and written submissions from the public, related to this application have been, on balance, taken into consideration by Council as part of its deliberations and final decision regarding these matters.

9. (3.7) 1408 and 1412 Commissioners Road West (Z-9780) (Relates to Bill No. 396) This item has Video

- Motion made by: S. Lewis

That, on the recommendation of the Director, Planning and Development, the following actions be taken with respect to the application of Domday Developments, (c/o Zelinka Priamo Ltd.), relating to the property located at 1408 and 1412 Commissioners Road West:

- a) the proposed by-law appended to the staff report dated November 12, 2024 as Appendix "A" BE INTRODUCED at the Municipal Council meeting to be held on November 26, 2024 to amend Zoning By-law No. Z.-1, (in conformity with the Official Plan for the C, The London Plan, to change the zoning of the subject property FROM a Residential R1 (R1-8) Zone TO a Residential R8 Special Provision (R8-4(\_)) Zone;
- b) the Site Plan Approval Authority BE REQUESTED to consider the following design issues through the site plan process:
  - i) enhanced landscaping along the interior and rear boundaries that exceed the minimum requirements of the Site Plan Control By-law;



# Neighbourhood Legal Services

LONDON AND MIDDLESEX

November 27, 2025

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

*By email to [cpsc@london.ca](mailto:cpsc@london.ca)*

**RE: Item 4.1 for December 1, 2025 CAPS meeting  
Need for Demolitions and Conversions to be added to the  
Rental Unit Repair License By-Law**

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 applaud the City for enacting the Rental Unit Repair License By Law (known as the Renoviction By-law) in March 2025. We would submit that based on what we have seen so far at our clinic, the By-Law has been successful in significantly curtailing and possibly even eliminating bad faith renoviction cases.

However, we are seeing a new trend emerge which is causing concern. Specifically, we have seen a sharp increase in landlords claiming demolition or conversion in order to evict tenants. 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 often 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.

We would submit that adding demolitions and conversions into the By-Law through amendment would greatly benefit good tenants in the City of London, and help to protect our affordable housing stock. It would also curtail bad landlords from using demolition and conversation in bad faith.

We support a motion in this regard.

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