



June 16, 2025

**VIA EMAIL**

Email: [Mariah.Blake@kitchener.ca](mailto:Mariah.Blake@kitchener.ca)

To the City of Kitchener Planning and Strategic Initiatives Committee

**RE: Evictions due to Renovations – Staff Report**

I am writing to express disappointment with the recommendations of the Staff Report dated June 4, 2025 that recommend not moving forward with a Rental Renovation License By-law. The need for this By-law is exceptionally urgent and this seems like a very important missed opportunity for the City of Kitchener.

Waterloo Region Community Legal Services is a community legal clinic funded by Legal Aid Ontario to provide legal services to low income residents of Waterloo Region. We regularly see the devastating impact that bad faith evictions have in our community. This impact is felt deeply by the individuals we support and felt broadly across the community when more and more of our neighbours are forced to live unsheltered as a result. We look to local lawmakers such as yourselves to provide protections to the most vulnerable in our community. For that reason we urge all Councillors to support the amendment put forward by Councillor Chapman, with the hope that eventually a By-law will be enacted.

Unfortunately the regulations in Ontario's Bill 97 related to bad faith renovictions have not been proclaimed, despite the Bill being passed in *June of 2023*. This renders those protections meaningless. Despite the advocacy to the Province supported by this Council, movement by the Province on Bill 97 as it relates to renovictions has not been prioritized. If the City of Kitchener wants to be a leader on housing issues, moving forward with a Rental Renovation License By-law is essential.

There are no affordable units to replace the units lost from a renoviction. The staff report indicates that tenants with a low or moderate income that lose a rent-controlled unit "*may not* be able to find a similar unit at the same rent". We know they WILL NOT, and can say that with certainty. The people we support facing eviction before the Landlord and Tenant Board ask us for advice about where they can set up a tent in the community, that is the reality facing low-income renters in Kitchener.



According to [ACORN's Ontario Renoviction Report 2024](#), Kitchener experienced a 55% increase in N13 evictions in 2022 compared to 2017. **Kitchener has the 6<sup>th</sup> highest number of N13 evictions in the province** with 136 between 2017 to August 2023 behind London at 153. This aligns with the trends and increases we have observed at WRCLS regarding N13s.

Of the top 10 Cities with the most N13s, Toronto, Hamilton, London and Brampton have either passed a Renoviction By-law or have staff looking into it. Brampton is a lower-tier municipality and their process and By-law could easily be replicated and modeled by the City of Kitchener.

In a City that is increasingly becoming unaffordable for so many, and in a Region where the number of people experiencing homelessness more than doubled since the last point-in-time count, an anti-renoviction by-law is essential for saving Kitchener's few remaining affordable rental units.

I must also express disappointment that the conversations with the Lived Expertise Working Group (LEWG) were not more prominently featured in the analysis in the Staff Report. The Office of the Federal Housing Advocate recently released a [guide](#) on meaningful engagement with encampment residents that is relevant to how the City of Kitchener engages with the LEWG. The Federal Housing Advocate's guide notes that sometimes the language of "human rights" and "consultation" has been co-opted in some instances and used to justify processes that cause harm. If the LEWG are indicting that a Bylaw is important and would lessen the power imbalance between tenants and landlords these voices ought to be deeply considered and elevated in the decision making process. Recommending a Landlord-Tenant Forum where the parties are at the table as "equals" without thought and protections put into place for that process, does little to meaningful address with the power imbalance issues raised by the LEWG.

We would also like to highlight the many resources available for tenants, including on our website: [www.wrcls.ca](http://www.wrcls.ca) and [Steps to Justice](#), and for landlords including the Landlord's [Best Practices Toolkit](#) and the [Landlord's Self-Help Centre](#). From our perspective, rights violations don't happen because of a lack of knowledge, but rather a power imbalance between the parties and because of the lack of access to justice for tenants living in poverty.



**Waterloo Region**  
Community Legal Services

**Kitchener – Main Office**

450 Frederick Street, Unit 101  
Kitchener, Ontario N2K 2P5

**Phone:** 519-743-0254

**Fax:** 519-743-1588

If this Council is committed to elevating the voices of those with Lived Expertise and to re-define what that engagement can look like, we recommend supporting the Amendment of Councillor Chapman that will engage the Social Development Centre's Tenant Organizing team to create and sit on a committee. We are hopeful that this will ultimately lead to the passing of a much needed Rental Renovation License By-law while centering and elevating the expertise of the LEWG.

Sincerely,

**Waterloo Region Community Legal Services**

as per:

Ashley Schuitema

Lawyer and Executive Director