CITY OF VANCOUVER

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The Older Persons and Elders Advisory Committee is a volunteer civic agency appointed by Vancouver City Council to help communicate community perspectives to Council and staff while advising on City priorities, projects, and initiatives. The following represents the views of the Older Persons and Elders Advisory Committee. The Older Persons and Elders Advisory Committee is not expressing views on behalf of the City of Vancouver.

THE OLDER PERSONS AND ELDERS ADVISORY COMMITTEE'S REVIEW OF THE CITY OF VANCOUVER'S TENANT RELOCATION AND PROTECTION POLICIES AND RECOMMENDATIONS FOR REVISIONS

September 28, 2026

Executive Summary

Introduction

This report contains OPEAC's review of the City of Vancouver's Tenant Relocation and Protection Policies (TRPPs) and our recommendations for policy revisions. It responds to the City's *Seniors Housing Strategy Key Direction 1.6: "Investigate opportunities to strengthen tenant relocation and protection for older adults" (p.* 25). It also responds to OPEAC members' personal experiences as employees and volunteers in the community-based seniors' service sector, where the number of older tenants experiencing forced eviction and its devastating impacts have become major concerns. The report is meant to inform the City's TRRP policy review process slated for late 2026/early 2027.

Findings of the Review

After careful review, OPEAC concludes that the City of Vancouver does not currently have TRPPs that meet the needs of many older residents who rent – particularly, but not limited to, those living with low income, low English proficiency, frailty, or disability, those living alone, and those who are women, immigrants, refugees or racialized individuals. Instead, OPEAC finds that senior renters are at high risk of falling through the cracks of the TRPPs and either joining the growing number of homeless seniors in Vancouver or being pushed outside the city altogether.

OPEAC's concerns with the TRPPs begin with their reliance on a generic landlord/tenant framework that marginalizes older adults (and other vulnerable renter populations) and fails to recognize the new partnerships and patterns of city-led and/or supported rezoning, eviction, demolition, and relocation in residential redevelopment in Canada today.

Consequently, the TRPPs do not reflect the fact that Vancouver's 55+ year olds comprise 27% of all renters (*Metro Vancouver Housing Data Book, 2021 Census*) nor the mounting evidence that older

adults are harmed much more than others by forced eviction and housing relocation. The literature on seniors and evictions in Canada points to significant psychological, financial, health, social, and systemic impacts and makes it clear that policies and interventions accounting for age, life stage and cumulative housing disadvantage are required. Similarly, the TRPPs do not reflect the extent to which policies from all levels of government are resulting in the housing insecurity and upheaval that Vancouver's tenant population is experiencing today.

OPEAC also finds that the TRPPs conform to a two-tier structure with different provisions for tenants displaced from market housing and non-market housing. Each set of provisions contains flaws regarding senior tenants, and neither adequately incorporates the principle of housing as a fundamental human right. Canada recommitted to this right as recently as 2019 in the *National Housing Strategy Act*. It is also reflected in the World Health Organization's *Age-Friendly Cities Framework*, which Vancouver subscribed to when joining the Network in 2025.

In addition, OPEAC finds the City's TRPPs view 'relocation' as a single transaction, rather than a lengthy process of losing one's home and, with luck, gradually regaining a home and housing stability.

Further, OPEAC finds that the TRPPs are confusing in many respects: implementation is far from transparent; data, including tenants' age and where and under what conditions tenants are living post-eviction and relocation, is not collected or shared publicly. In short, Vancouverites do not know if the TRPPs are working or not.

Finally, implementation of the TRPPs is overseen by very few people (City staff, the Applicant, developer-hired Tenant Relocation Specialists) despite the rapidly growing number of projects and tenants in the development pipeline – a situation that increases the chances for tenants with special needs, like seniors, to fall through the cracks.

Recommendations (partial list)

1. Ensure that the City's revised TRPP includes a section with a critical intersectional perspective on aging;

2. Hire a third-party organization to oversee the hiring, management and training of Tenant Relocation Specialists, including some with the expertise and experience necessary to support a diverse range of older adults through the difficult process of moving house at advanced age;

3. Ensure to the extent possible that all senior tenants complete a Tenant Needs Survey and have an Individual Tenant Relocation Plan in place at the outset of the relocation process, with assistance provided by Tenant Relocation Specialists and professional interpreters when necessary;

4. Adopt plain language for communicating with senior tenants about all aspects of the TRPP using a range of formats (print, digital, infographic), provide this information in the tenant's primary language, and offer professional interpreters to support understanding upon request;

5. Ensure that the City and Applicants/developers provide a Schedule of Information and Educational Opportunities to tenants about the eviction/relocation process early and throughout the phases of the relocation continuum described in the Report and in a variety of languages matching the makeup of a building's tenant population;

6. Offer non-market tenants the same choices for compensation and right of first refusal (ROFR) as those currently available to market tenants. Base the ROFR maximum allowable rent either on the tenant's rent before displacement or CMHC standard 30% of income (i.e. the shelter-cost-to-income ratio), whichever is less. Provide adequate funding to nonmarket housing developers so they in turn can offer interim rental top-ups and ROFR to tenants based on their length of tenancy and/or low income.

7. Ensure that the low-income threshold for seniors covered by the TRPP is at a minimum equal to that of a benchmark adjusted to the annual cost-of-living, such as the City's Leisure Access Pass;

8. Ensure that regular and special TRPP payments are not counted as income for purposes of calculating:

    a) the amount of or eligibility for Old Age Security. The Guaranteed Income Supplement and other government benefits for older adults (e.g., SAFER, Rental Assistance Program, Fair Pharmacare Assistance, City of Vancouver Leisure Access Pass);

    b) income tax and benefits such as tax rebates and credits.

9. Reimburse senior tenants the costs of transportation for site visits to potential housing units and when the location of an interim housing unit increases the costs of accessing key appointments and services;

10. Fund neighbourhood organizations in the community-based seniors' services sector that provide tenants with essential services and support throughout the eviction/relocation process beyond those provided by City staff, Senior Tenant Relocation Specialists, and Applicants/Developers;

11. Collect data from Tenant Needs Surveys and Individual Tenant Relocation Plans pertaining to age, race, gender, income, geographic area, housing type, etc. for monitoring, public reporting and referral;

12. Provide transparency for tenants, City staff, Tenant Relocation Specialists and the public on Applicants' compliance with the TRPPs.

For the complete list of recommendations, see page 13 of the full report below.

Conclusion

OPEAC believes that revisions to the City of Vancouver's Tenant Relocation and Protection Policies consistent with the findings of this review and policy-change recommendations will uphold Canada's commitment to housing as a human right, respect for older persons and elders, and the following statement by the City of Vancouver in its Older Persons Strategic Framework of 2025:" We *are committed to helping older adults stay engaged in the community and to enhancing their quality of life."*

THE OLDER PERSONS AND ELDERS ADVISORY COMMITTEE'S REVIEW OF THE CITY OF VANCOUVER'S TENANT RELOCATION AND PROTECTION POLICIES AND RECOMMENDATIONS FOR REVISIONS

September 28, 2026

Introduction

The mandate of the Older Persons and Elders Advisory Committee (OPEAC) is to advise Vancouver City Council and staff on enhancing access and inclusion for older persons and elders to participate fully in City services and civic life.

Here, OPEAC reports on its review of the City of Vancouver's Tenant Relocation and Protection Policies (TRPPs) and provides recommendations for policy revisions. We do so pursuant to Key Direction 1.6 of the *Seniors Housing Strategy* (adopted by City Council in July 2024), which states *"Investigate opportunities to strengthen tenant relocation and protection for older adults"* (p.25). This Direction originated in public engagement sessions conducted by City staff for the Seniors Housing Strategy, and more specifically, significant input to the effect that many shortcomings exist in the TRPPs for tenants who are older adults and elders.

Purpose: Throughout, the intention has been to identify critical areas of concern for the City's own TRRP policy review process, which is slated for late 2026/early 2027. TRPP policies need to be revised so the results are guiding principles, documents and implementation processes that significantly reduce the impacts of forced displacement and relocation on older adults and make way for the development of much-needed affordable, accessible and age-appropriate housing. We believe our findings and recommendations may also apply to younger renters who share some of the same "special circumstances" as older persons and elders.

Policy alignment: OPEAC's review and recommendations align with the City's *Seniors Housing Strategy 2024*, the intention of which is to *"ensure elders and older adults have the housing and supports needed to allow for aging in appropriate and affordable housing in their community"*; they align with the *Older Persons Strategic Framework and 2025 Early Actions* adopted in February 2025, in which the vision is *"Vancouver is a city where older persons are valued, engaged and supported;" and its Action to "Integrate a strategic aging lens in the review of the Tenant Relocation and Protection Policy"*; and they align with the World Health Organization's *Age-friendly Cities Framework* statements on the interconnected domains of urban life, including housing, transportation, community and healthcare, respect and social inclusion. Further, OPEAC recognizes the following Canadian Human Rights Commission statement: *"The right to adequate housing is a fundamental human right for everyone in Canada."*

Method: OPEAC Housing Sub-Committee members carried out this review and developed its recommendations for changes to the TRPPs after a presentation by City staff on March 14, 2025. Staff solicited questions on the TRPPs and Homelessness Services from OPEAC and requested input on information helpful for community-based organizations and those who should be involved in a renter campaign planned before the 2026/27 staff review of the policy.

The Sub-Committee had follow-up meetings and communications with staff and conducted research on seniors and forced evictions, and other municipalities' TRPPs and Rental Assistance policies. Members also read the City's TRPP *Bulletins*, tenant handouts on the TRPPs, quarterly reports on the

Broadway Plan, etc.; held interviews with tenant relocation specialists working with both market and non-market housing developers and landlords; met with a non-profit housing provider and a social planner responsible for revising the City of New Westminster's *Rental Assistance Principles and Policy*. OPEAC's analyses of City, BC Housing, CMHC and academic documents regarding the range of older persons' housing needs associated with evictions and displacement also informed this report.

Perspective: Lastly, Sub-Committee members' contributions to this report have been informed by their experiences as older adults, renters, and in several cases, volunteers and workers in Vancouver's community-based seniors' service sector. Some of us meet with and work to assist seniors who have been evicted or learned that they (together with friends and acquaintances in the building) will be evicted very soon. Consequently, we know first-hand the profound stress and anxiety seniors experience, the sense of overwhelm and helplessness they feel, and witness the tendency to give up and move out of their neighbourhood before the TRPPs even come into effect. We also know that many of the community-based supports some seniors require are non-existent, underfunded and/or overwhelmed by the need.

As a result, we feel the urgency to strengthen the TRPPs quickly, especially given the very large number of demolition and construction projects in Vancouver's 'development pipeline' including those in large areas of the city such as the Broadway Corridor.

Findings of the Review

1. **OPEAC commends the stated purpose of TRPPs,** which is to *"**add immediate supports for renters…"** who "**may have difficulty finding and affording suitable housing."*
   Like the City, OPEAC recognizes that *"... difficulty increases when renters have to move because their building gets renovated or redeveloped"* (City of Vancouver website).

2. **After careful review, OPEAC concludes that the City of Vancouver's current TRPPs do not meet the needs of its older adult renter population**.
   Particularly those who are women, low-income, indigenous, racialized, not proficient in English and needing professional interpreters, frail, living with disabilities or with complex health conditions, cognitive decline or mobility issues**.** The result, in OPEAC's view, is that these seniors are at high risk of falling through the cracks of the TRPPs to become homeless, along with other marginalized populations – or pushed out of town.

3. **OPEAC's strongest objection to the existing policies is the use of a generic landlord/tenant framework.**
   This means that older adults barely figure in the TRPPs. In fact, seniors are mentioned four (4) times, in lists with other groups (despite many intersections across those groups), and usually in parentheses. And while the TRPPs briefly acknowledge that older tenants tend to have "special circumstances," the generic tenant framing offers no room to fully describe these circumstances or what they imply for the eviction/relocation processes or compensation and protection provisions set out in the TRPPs. In other words, the current TRPPs take all tenants to be the same - and ignore the needs of many older adults.

   Significantly, at the same time, senior renters are virtually invisible in the TRPPs and therefore to everyone involved in the redevelopment process they speak to -- City staff, Applicants, Tenant Relocation Specialists, community-based seniors service organizations, and senior tenants themselves. It is also the case that **the 55+ population represents 27% of all renters** *(Metro Vancouver Housing Data Book 2025, Tables 1.1 and 1.4.1, assuming 45-64 year-old City residents*

constituted 1/2 of 2021 Census data added to 65+ numbers).

It is worth noting too that the City has recently addressed a subset of older renters' relocation in a separate TRPP. The ***Resident Relocation Policy for Community Care and Assisted Living Residences*** (RRP) of 2024 contains a set of principles that could guide TRPP revisions. As many in the community- based seniors' service sector know, community-dwelling older adults sometimes have the same health conditions and disabilities that take others into long-term care (LTC). Staff involved in tenant evictions and relocations will therefore need to know when transfer to an LTC facility is called for, which health officials to engage, and the lengthy delays involved. (See Appendix I A for the guiding principles of the RRP.)

4. **There is plenty of evidence that older adult renters, while diverse, share many things in common. As such, and because of their growing numbers, seniors constitute a group of tenants that deserves specific attention in a revised TRPP.**
The World Health Organization recognizes this to be the case. Housing is a key domain in the **WHO's *Age-Friendly Cities Framework***, to which the City of Vancouver subscribed as a member this past year. Age-friendly cities, according to the WHO, provide rental housing designed to "*promote seniors' health and well-being and community participation.*" The organization allows that few experiences are more destabilizing for older adults than losing a home, with the loss of safety, stability, and well-being that goes with it.

   United Way BC Healthy Aging reports on the increasing housing insecurity of senior tenants in its 2023 study, ***Aging in Uncertainty: The Growing Housing Crisis for BC Seniors*****.** Echoing the WHO, it states that without secure housing, seniors face severe risk of chronic health decline, extreme rent burden, and homelessness. (See Appendix I C for the report's key messages and summary of the major negative impacts of housing precarity on seniors.)

5. **The growing literature on seniors and evictions in Canada makes it clear that older adults are more negatively impacted by forced eviction and housing relocation than younger tenants.**
Notable in this literature are Zell and McCullough's (2021*)* ***Seniors and Evictions in Canada: A Life-Course Approach,*** CMHC's (2022) ***Evictions: Focus on Seniors and Older,*** McDonald's (2011) ***Examining Evictions Through a Life-Course Lens,*** and ***Poulin et al. (2025) Evictions in Canada: Inequities in Health Among Groups at Higher Risk of Evictions.*** See Appendix I D and E for additional research on this topic.

   The literature on seniors and evictions demonstrates that, as a group, older adults face unique circumstances and vulnerabilities in the context of involuntary or forced eviction and relocation from market and non-market rental housing. The preponderance of women in older tenant populations with household incomes significantly lower than their male counterparts means that many women tenants live in core housing need (Ivanova, 2017; Cho, 2019; on older women and housing challenges generally, see e.g., Gonyea and Melekis, 2017). In fact, in research that poses the question 'Who gets evicted?' it is older, low-income and racialized individuals, particularly women, living with chronic health conditions and mobility issues who figure prominently (Desmond and Gershenson, 2017).

   These and other researchers document the financial, health, social and systemic factors, challenges and outcomes when older renters are displaced from their homes. Forced relocation is shown to disconnect seniors from community and their networks of support, including friends and family, and increase their social isolation. Following eviction, many older adults face difficulty accessing suitable affordable, and accessible units, especially those living on low or fixed incomes. Many older adults who

experience eviction become homeless, usually for the first time in their lives (see, e.g., Grenier et al., 2016; Worton et al., 2025; Bachour et al., 2025).

Researchers often single out stress in seniors as a particularly corrosive factor tied to the extreme nature of eviction and relocation, disrupted social ties and exposure to market-driven housing pressures (e.g., Zell and McCullough, 2020; 2021; CMHC, 2022).

In short, the research literature supports the fact that forced moves late in life take a severe toll on the individuals involved.

Seniors are stressed before eviction occurs. In Vancouver's community-based seniors' service sector, it is not uncommon to hear of a senior who moved out of their apartment building soon after the developer's redevelopment sign went up, before eviction notices were circulated, and before a compensation package was offered – out of fear of a lengthy (2 1/2 years on average) displacement and relocation process known for its uncertainty and stress. The United Way BC study of seniors' housing precarity (2023), Lewis (2026) and others report increasing levels of stress among seniors living in buildings and neighbourhoods undergoing rent escalation over long periods of time – again, before eviction occurs.

6. **Considering older adults as a group suggests the need for policy, communications and implementation design interventions that account for age, life stage and cumulative housing disadvantage.**
   Whether seniors (or anyone else) occupy market or non-market housing should not be the determining factor in TRPP provisions and compensation, as is presently the case. Rather, structured relocation support should be required for seniors (and others) based on their needs. In terms of assistance, Zell and McCullough (2020; 2021) and others find that emergency funding and case management can help seniors stabilize their housing. In terms of health, social, and other services and supports, the list is potentially quite long, depending on the state of individual tenants' health and well-being before eviction and during relocation (e.g., assistance getting to and from medical appointments).

In the view of Alison Silgardo, CEO of Seniors Services Society of BC, ***"the most important opportunity in revising the TRPP is to move beyond viewing relocation as a [singular] transaction and instead [conceive of and] establish a senior housing stability and homelessness prevention continuum. For an older adult, successful relocation does not simply mean finding another apartment. It means finding affordable housing, accessible, appropriate and connected to the person's community and support system."***

1. Before displacement
   - Early, independent information and education about rights and options;
   - Identification of seniors who may be at heightened risk;
   - Housing navigation and benefits assistance;
   - Support to prevent seniors from prematurely leaving their homes because of fear or uncertainty.

2. During relocation
   - Individualized assessment and relocation planning;
   - Assistance locating affordable and accessible housing;

- Support with applications, transportation, interpretation and moving;
- Coordination with health, social and community services were necessary.

3. After relocation
   - Follow-up to ensure housing remains stable and affordable;
   - Reconnection to community and essential services;
   - Identification of emerging risks that could lead to homelessness or another forced move.

7. Globally, it is common for low-income senior tenants to be evicted and relocated in the context of central-city urban redevelopment.

This is because they tend to live, as other marginalized populations do, in cities' oldest neighbourhoods, places where streets are walkable, services are close at hand, and more than anything, rent for older apartment units is still affordable (e.g., Fainstein, 2001; Kothari, 2015; Soederberg, 2018). With gentrification and densification, these tenants find themselves in the proverbial 'path of progress, swept up in municipal government led attempts to address the aftermath of urban land development. In cities in the northern hemisphere, TRPPs have recently been introduced in this very context. For more, see examples from the global city, gentrification, and social polarization literatures cited in the Bibliography, as well as the CMHC-funded research on seniors and evictions cited above (e.g. Poulin et al., 2025; Worton et al., 2025).

In Vancouver, low-income seniors tend to occupy the same neighbourhoods undergoing the most rapid residential redevelopment and zoned by the City for more higher-density residential use in the future, like the Broadway Corridor (*Social Housing Initiative* 2025 and *2021 Census Data*). Jones (2023) points out that Vancouver houses the largest concentration of purpose-built rental apartment units in Metro Vancouver, the type of housing – and significantly, the type of *affordable* housing – that is being demolished faster than any other to make way for redevelopment and higher-priced homes. In addition, many seniors in these neighbourhoods live in dwellings managed by BC Housing or nonprofit housing providers. The fact that dozens of these operating agreements are currently expiring or scheduled to expire through to 2050 (*Metro Housing Data Book 2025 Parts 5.2-5.3*) places their largely older tenant population at risk.

Here, it is important to note that the lengthy tenancies of older adults in these most-affected neighbourhoods are only recognized in the existing TRPPs' compensation provisions when the rental units are in market housing.

8. The context of Vancouver's rental housing market: Barriers to the relocation of senior (and other) tenants displaced in urban redevelopment.

It is crucial that revisions to the City of Vancouver's TRPPs are based on a clear understanding of the housing context in which these policies unfold, particularly for vulnerable tenants like low-income and otherwise marginalized seniors. To that end, OPEAC's Housing Sub-Committee has created the summary below – the objective housing situation.

The subjective housing situation: As mentioned, research in Canada finds it common for older renters who are displaced to simply give up, pack their belongings, and move out of town (Zell and McCullough, 2020; 2021; CMHC, 2022). Staff at local neighbourhood houses regularly report this phenomenon in Vancouver too. Of course, this speaks to the emotional upheaval (subjective state) seniors feel when they lose their homes and local social connections. A forced move late in life brings worries about not having the time or the energy to rebuild the crucial support for aging in place they've

just lost (Versey et al., 2019). In addition, the pack-it-in and move-out-of-town reaction also speaks to the anxiety seniors feel about being caught up in a bureaucratic process they did not choose, fear the outcomes of, and know from experience is beyond their control.

In Vancouver, a city known worldwide for its crisis of affordable housing, the **objective housing situation** evicted seniors find themselves in is highly problematic in and of itself. In short, the market is so tight and the policies meant to address the situation (e.g., the SAFER grant, the BC Housing Registry) so ineffectual that the chances of rehousing an evicted older tenant as part of the TRPP process at all, not to mention in housing that is suitable for them as older adults, are not good. In the experience of OPEAC members, most senior tenants who experience eviction due to residential redevelopment in the city face challenges finding a new housing unit, despite the existence of the TRPP.

The poor rental housing options of evicted seniors develop from a mix of intersecting factors that the City of Vancouver does not acknowledge in relation to its TRPPs. Accordingly, the revised TRPP must address the fact that displaced senior tenants face a rental housing market marked by significant pressures and barriers to their successful relocation. These include:

- **More renters**: The renter population in Vancouver was 55% in 2021 (45% owned their home), and the proportion of renters has grown since, placing pressure on existing rental stock.
- **Population aging is creating more renters**: Between 2016 and 2021, the 65+ population in Vancouver increased by 15.5% compared to 0.1% growth in the population under 15, a phenomenon exerting pressure on housing and services across the board. 27% of Vancouver's 55+ population were renters in 2021 (45,242 individuals), a figure that increased by 8% to roughly 42,000 in 2024 and, with downsizing baby boomers and population aging more generally, is expected to increase by at least another 16% by 2045. The growing number of senior (and other) renters threatens to crowd out the displaced 55+ renters caught up in TRPPs.
- **Many senior tenants have low incomes** (roughly 20,200 overall), which means they have few options in the increasingly pricey rental market in the likely event they are displaced.
- **40% of senior renters live in Core Housing Need, with 14,000 spending more than 30% of** income and about one-third (5,100) spending more than 50% on housing in 2021. This makes them candidates for social housing, but the production of social housing in this city has lagged far behind the needs of the local population.
- **Competition for social housing is intense in Vancouver:** Since over 39,695 other Vancouver renters reportedly lived in Core Housing Need (2021), displaced low-income seniors face stiff competition in relocating to the small number of social housing units available.
- **Vancouver's low vacancy rates** mean there are few units to rehouse the displaced.
- **The low-vacancy problem is particularly pronounced in high-eviction neighbourhoods** like those impacted by the Broadway Plan, Transit Oriented Developments and other urban renewal policies the City has recently put in place.
- **The affordable housing crisis in Vancouver** means there is a shortage of units that renters – including seniors – can afford.
- **The SAFER grant is not calibrated to Vancouver's high rents**. While SAFER is of some help in covering the affordability gap for seniors, the sizeable shortfalls further limit seniors' options in the relocation process and push them into social housing – or, very often, out of town.
- **The mismatch between the price of rental units and senior renters' household income over time is strong**. For a glimpse into what this means, the average rent in October 2025 for studio and 1-bedroom apartments in Vancouver was $1,667 and $1,970, respectively, and median rents were $1,700 and $1,875. Prices in these two categories have risen 4.2% from Oct 2024 to Oct 2025, while seniors' incomes have risen only 2.0-2.6% for those on fixed incomes or

government pensions. This mismatch diminishes the likelihood that displaced tenants 55+ will be successfully relocated. Larger discrepancies in the past explain to a large degree the exodus of many low-income senior renters from Vancouver to the Fraser Valley and small towns in the interior and Vancouver Island.

- **New rental units are too expensive for most**. Very few of the new rental units in Vancouver's development pipelines are suitable for low-income senior renters, for reasons of price alone.
- **Long waitlists for social housing**: The waitlist on BC Housing's Registry for social housing in the Vancouver Coastal Health region currently yields a rental unit in 2 to 10 years' time. This is for an eligible applicant, a senior or anyone else, depending on an individual's circumstances and ability to renew their application every 6 months. This is another stark reminder of how much the **c**onstruction of social housing has fallen behind the need for it in Vancouver.
- **Senior renters are overrepresented in BC Housing complexes where operating agreements are set to expire**. The expiry of BC Housing operating agreements in Vancouver between 2024 and 2050, affecting about 7,800 non-market housing units, is likely to impact senior tenants more than other age groups, because they are overrepresented in the affected buildings. If the agreements are not renewed, the number of seniors' social housing units in Vancouver will sharply decrease and lead to significantly less housing for seniors in Core Housing Need. This in turn will challenge the promise of the TRPP to guarantee either temporary or permanent housing to evicted seniors.
- **Vancouver's rate of no-fault-by-tenant evictions is the highest in Canada** (see Xuereb and Jones, 2023).
- **Future development will bring increased housing units and increased evictees searching for homes**: There are currently over 100 permit applications and thousands of TRP Plans (cases) being processed in the City of Vancouver's permitting pipeline, many of them for seniors.

Statistics and citations used to document these barriers to displaced senior tenants' successful housing relocation are available and will be presented during 2027 TRPP review engagement sessions.

9. **Not only is the generic landlord/tenant framework of the TRPPs inadequate because it overlooks senior (and other marginalized) renters, but it also overlooks key players in the new kind of urban (re)development practiced in large Canadian cities today**.
As researchers point out, evictions are now occurring at a scale and pace never seen before, and this is related to the deepening involvement of municipal governments, developers, and financial organizations in the 'reinvention' of older, often inner-city residential and commercial neighbourhoods (see e.g. CMHC 2022; Zell and McCullough, 2020; 2021). As such, recognition of the actors standing in for/with landlords (e.g. Real Estate Investment Trusts or REITS) in the old landlord/tenant couplet should inform the process of revising tenant relocation and protection policies, practices and outcomes in Vancouver. For instance, the City's involvement in spurring on development should extend to its financial support of displaced older adults by Vancouver's community-based seniors' service sector.

The growing body of research on gentrification and displacement is one response to the new kind of urban redevelopment in Canadian cities today (e.g., August and Walks, 2018; Bates et al., 2020; Kothari, 2015; Shelton, 2018; Soederberg, 2018; Torres, 2020). With titles like "'For a younger crowd': Place, Belonging, and Exclusion among Older Adults Facing Neighbourhood Change" they address the misfit many see, due to ageism, between newly 'reinvented neighbourhoods' and older residents. Another response to gentrification and the displacement of older, low-income renter populations is coming from researchers examining the impact of major new transit developments. On transit-

oriented development or TODs, including the impact on Metro Vancouver, see e.g., Delmelle (2020), Delmelle and Nilsson (2020), Doucet (2021), Jones (2023) and Lewis (2026).

In Navigating Transformations: The Future of Rental Housing in an Era of Transit Investment. Lewis (2026) reports on a 14-year study of evictions in Toronto (2010-2023) with a focus on new transit stations and their displacement impacts in five (5) communities. The major findings of this work are:

(1) Transit investment can cause displacement pressure when tenant protections are weak;
(2) Eviction pressure is concentrated in particular neighbourhoods and buildings;
(3) Large-scale ownership organizes how pressure reaches tenants;
(4) Rent growth and ownership change make displacement hard to escape;
(5) Tenants experience displacement pressure before they leave; and
(6) public systems must treat housing stability as part of transit planning.

Jones (2023) observes that "*Expanded rapid transit and residential densification are the future of North American cities, and academics, planners, and politicians must work toward the equitable distribution of TOD's benefits so that costs are not borne "naturally" by those least able to pay*."

In Vancouver, there are currently over 100 permit applications and thousands of TRP Plans (cases) being processed in the City's permitting pipeline. At the same time, there are only four (4) to six (6) City staff assigned to TRPP work (from December TRPP webinar for community-based social service organizations). At present, the responsibilities of City staff are demanding: to liaise with Applicants, answer questions posed by individual tenants via the help line, remain up to date with tweaks in policy, deal with area-specific policies and different categories of tenants (market vs non-market), maintain a website, evaluate documents submitted by Applicants, etc.

In other words, City TRPP staff are currently accountable *along with* Applicants/Developers for compliance with the TRPP. If each tenant were to submit a Needs Assessment Survey and have a co-developed TRPP Plan, existing City TRPP staff could not be expected to meet the demand for services by the number of tenants being affected by TRPP provisions. It should be clear that with greater recognition of older tenants' needs, there is need for more staff – and support from the city's community-based seniors' service sector.

10. **The City's current TRPPs reflect a two-tier structure with different requirements for market-based developers, landlords and tenants and their non-market counterparts**.
Market-based tenants receive three options for financial compensation and the right of first refusal (ROFR) to return at a discounted rent *(TRPP Bulletins Section 2).* By contrast, non-market housing tenants do not have the choice of three compensation options, and length of tenancy is not considered in developing tenants' TRPP Plans (*TRPP Bulletins Section 3).* Instead, displaced nonmarket tenants are offered one month's rent and a guarantee of a housing offer by the landlord/developer who may offer ROFR, but only if it can be demonstrated that they have adequate funding to offer all tenants ROFR at a discounted rate. (See Appendix II A for details).

In sum, the two-tiered structure means that non-market housing tenants have a guarantee of some housing plus one month's rent, whereas market housing tenants have no guarantee of housing but a choice of compensation package and right of first refusal (ROFR).

With low vacancy rates, many senior tenants will be required to leave their neighbourhoods to find either interim or permanent housing that is affordable, available or suitable to fill their Core Housing

Need. Only market tenants have the ROFR as a required option (see Recommendation #2 below).

This two-tier TRPP structure in Vancouver is not the case in all Metro Vancouver municipalities. For example, the City and District of North Vancouver, City and District of Langley, and the City of Maple Ridge do not distinguish between market and non-market tenants. Length of tenancy is considered in compensation to some extent for all tenants, regardless of their occupancy status, in these municipalities. Lastly, the provincial TRPP guidelines do not require the two-tier structure. It is a choice the City of Vancouver made in 2019 and could be changed.

11. **Little TRPP-related data appears to be collected, and less is made available to the public.**
    One of the most surprising findings of OPEAC's review of the TRPP is just how little data seems to be collected and likewise how little information is available to the public about the joint implementation of the policy by the City and Applicants/Developers. The result is that it is not clear who the policy is attempting to ease the eviction/relocation process for, and what the process looks like for those caught up in it for 2 ½ years. **In fact, it is not inaccurate to say that we really don't know if the TRPP is doing what it was intended to do – if it is working or not.**

12. **TRPP processes are difficult to discern and navigate.**
    Another surprising finding of the review was just how bureaucratic, opaque and difficult to navigate the TRPP process has become. Had we not been a team of four, who met regularly to compare notes and learn from one another, the review would have been set aside.

Recommendations

TRPP Guiding Principles

Recommendation #1: **Endorse housing as a human right**
Enshrine the principle of housing as a human right in the revised TRPP and guarantee housing for all people displaced due to residential redevelopment in Vancouver.

Recommendation #2: Honour the Right of First Refusal to all tenants
The right of first refusal (ROFR) should be offered to all tenants so they can remain in their original neighbourhoods, if that is their choice. For seniors, the right is particularly important because it means the hard-won support systems they have put in place in their local neighbourhoods over the years can serve them in the future. TRPPs currently provide this option to tenants of market housing developments, but providing ROFR to non-market tenants requires developers to demonstrate adequate funding to offer that right to all tenants at discounted rents. This puts non-market housing permit applicants and tenants at a disadvantage if adequate funding cannot be acquired. Funding sources to explore for this purpose include the *Empty Homes Tax*, *Vancouver Affordable Housing Endowment Fund*, the federal *Housing Accelerator Fund* and *BC Builds*. (See Appendix I G).

For this reason, OPEAC recommends providing non-market housing developers/providers in this position with the funding necessary to offer ROFR to all tenants (drawing, as required, from sources listed above).

Recommendation #3: **Adopt a critical intersectional perspective on aging and the Age-Friendly City Framework**
City staff should revise the TRPP so that it incorporates (a) a critical intersectional perspective on aging (see e.g. Koehn, 2020) and (b) the *Age-Friendly Cities Framework* as defined by the World Health Organization. (See Appendix I B.)

In addition, City staff should be encouraged to consider the *Resident Relocation Policy for Community Care and Assisted Living Residences* (2024) in conceptualizing the TRPP revision process. For instance, the idea of developing protections, provisions and processes according to a 'spectrum' of seniors living independently in community at one end and those living in long-term care facilities at the other should be explored. (See the text of that policy in Appendix I A.)

Recommendation #4: Prioritize phased development projects

Phased developments can ease the transitions to and from interim housing that impact older adults' health and wellbeing more negatively than younger tenants. This already seems to be best practice for some non-profit housing developers in Vancouver. Accordingly, OPEAC recommends that the City assign priority to phased development proposals. In addition, we recommend that Applicants be required to recognize and follow the three phases of the senior housing stability and homelessness prevention continuum devised by Seniors Services Society of BC (noted above).

TRPP infrastructure

Recommendation #5: Hire a third-party organization for TRPP case management

The City should contract a third-party organization to provide tenant relocation services by Tenant

Relocation Specialists (TRSs). The third party oversees the hiring, management, and training of Specialists who possess the expertise and experience necessary to support a diverse range of older adults. This organization provides TRSs with onboarding training about the City's TRPP, as well as monthly Community of Practice meetings with all TRSs to share examples, questions, City updates, and procedures.

The purpose is to provide arm's-length assistance and support for tenants throughout the TRPP eviction/relocation process by having a third-party hire, manage, train and oversee Tenant Relocation Specialists (TRSs) and their caseloads. The development permit Applicant should pay the City for TRS and third-party services.

See Appendix section II 2B for details about the rationale for and roles/responsibilities of TRSs, City Staff, and permit Applicants in this new structure.

Several Metro Vancouver municipalities have the third-party requirement for Tenant Relocation Specialists or strongly encourage it in their policies. Examples include both Langley City and District of Langley, both the City and District of North Vancouver, Maple Ridge, and Burnaby.

Recommendation #6: Create the position of Senior/Elder Tenant Relocation Specialist

The third-party organization should employ TRSs who have experience in supporting and communicating with older adults as well as monitoring, analyzing and reporting on data drawn from case management databases. These Senior/Elder TRSs (STRSs) should use an age-informed intersectional lens and be responsible for performance oversight of other TRSs whose caseloads include seniors. They should contribute to TRS training and coach TRSs who are supporting older adults. Appendix II 2D provides more details about the qualifications, roles and responsibilities of Senior TRSs.

It is important that these STRSs regard younger seniors, older seniors, and the oldest seniors with different lenses and expectations. Their work includes recognizing and addressing intersecting identities such as language, immigration status, marital status, sex and gender expression, Indigeneity, sexual orientation, mobility and sensory abilities.

Recommendation #7: **Support the Community-Based Seniors' Service (CBSS) Sector in Vancouver**
Fund organizations in the city's CBSS sector to extend key support services to the older renters caught up in forced evictions and relocations, and coordinate their efforts with those of City staff, Applicants, Senior/Elder Tenant Relocation Specialists, and others in the CBSS sector. Organizations should be funded as formal partners in the TRPP implementation model and on a two-to-three-year basis, rather than referral resources.

Community-based seniors' service agencies often hold longstanding relationships with older adults in their catchment areas. Accordingly, seniors who may be reluctant to disclose their circumstances to a developer, etc., will often seek help from an organization they already trust. These organizations can provide the human connection and assistance necessary to turn an abstract policy entitlement into the achievement of renewed housing stability for older adults.

Currently, the staff of seniors' centres, neighbourhood houses and other senior-serving agencies in this city spend a significant amount of their time supporting older adults experiencing Vancouver's housing affordability crisis. They work with many seniors living in unsafe or precarious housing, and there is currently insufficient funding for these organizations to cover the information and referral services, navigation and peer support programs, simple moral support, and other important services (e.g., food security, socialization in diverse languages, skills training opportunities) they provide.

The City of Vancouver needs to recognize and financially support the work of these small non-profits, particularly because of the increased levels of support they have been called upon to provide in the face of municipal policies to redevelop and densify housing – and, as it has turned out, increase the housing precarity, if not the homelessness of unprecedented numbers of seniors. The scale of projected future displacement calls for greater financial support for these crucial community services.

TRPP processes – Senior-Focused Steps and Provisions

Recommendation #8: **Require a Tenant Needs Survey from all seniors**
All seniors should be strongly encouraged and appropriately assisted to complete a Tenant Needs Survey (TNS, see Appendix III A). This survey should be completed by all seniors with or without the assistance of a Tenant Relocation Specialist (TRS) or Senior TRS (STRS, see recommendations above), professional interpreters for those with low English proficiency, interpreters for the deaf/deafblind, or people who have other barriers to understanding written and spoken English when required – unless the individual specifically opts out. The survey represents a means to assess individuals' needs and should form the basis of a personalized Tenant Relocation Plan that is co-created with the TRS and STRS. Currently, this survey is required for tenants of market rentals, but it is only optional for those in non-market housing. Anecdotally, we know from privately hired TRSs that the current return rates of these surveys are low.

Currently, we know very little about the age, gender, income, principal language spoken, unit type, length of tenancy etc., of the tenants that the City of Vancouver and its partners are protecting and compensating through the TRPPs. For more details about how the TNS is currently evaluated by City staff and how, in the future, this data should be used, see Appendix III A. Note: The March 2025 *TRPP Provincial Policy Manual* includes relevant recommendations on data collection, sharing, etc.

Recommendation #9: **Require a Tenant Relocation Plan for all seniors**
Ensure that all senior tenants are offered an opportunity to co-create an Individual Tenant Relocation Plan with assistance as in Recommendations #11-16 below. The Plan should be available in print, dated, and

signed by the tenant(s) and Tenant Relocation Specialists consulted.

Recommendation #10: Recognize, respect and meet the needs of seniors' diverse households.
Seniors' households are increasingly including children, grandchildren, several generations, and unrelated adults, and TRPPs need to acknowledge and include this diversity in TRP Plans.

TRPP processes – Seniors-Focused Communication

Recommendation #11: **Provide TRPPs in accessible languages and formats**
Write the revised TRPP in plain English, make it available in other languages spoken in Vancouver, and offer it in formats known to be accessible (print, digital, infographic, images). The steps, choices, processes, timelines, etc. the TRPP sets out must be easy to understand and navigable for everyone involved. It must also be publicly available.

Recommendation #12: **Tailor TRPP communications to individuals**
Tailor TRPP-related communications to individual older adults. TRPP communications addressed to evicted/to-be-relocated senior tenants should be tailored to the needs of diverse older adults, as individuals. Not all older adults are the same, and the ways they are informed and supported need to reflect individuals' similarities and departures from a flexible 'norm'.

To meet the needs of Vancouver's diverse 55+ population, TRPPs centered on the needs of the individual should have timely, appropriate and dated documentation of the case management process. Those communications may emerge from one-on-one conversations with TRSs, City staff, Applicants' staff and/or attendance at a project's group meetings. For transparency, the third-party's TRS, City and tenant should discuss barriers to help resolve problems and anonymously share solutions with other TRSs who may encounter similar needs.

Recommendation #13: Ensure seniors receive information, learn about the TRPP, and can raise questions in settings that are supportive and age-inclusive
Senior tenants may not generally understand their rights and/or may be reluctant to assert them. The eviction/relocation process should be attuned to the needs of older adults and include an appropriate overview of the market, below-market and non-market housing landscape in Vancouver (e.g., vacancy rates, rental rates, etc.). Other topics key for understanding individual seniors' displacement rights should be explained before seniors make any choices related to compensation, interim or permanent housing, Right of First Refusal, etc.

Recommendation #14: Hire professional interpreters
Hire professional language interpreters to support senior tenants as required.

Recommendation #15: Provide a Schedule of Information and Educational Opportunities
Ensure that the City and Applicants/developers provide a Schedule of Information and Educational Opportunities to tenants about the eviction/relocation process, and amend it as needed throughout the process.

Recommendation #16: Address tenants in all types of rental housing
Ensure that all public-facing TRPP communications include information applicable to tenants in all types of housing. Currently, public-facing TRPP communications are only addressed to the tenants of market rentals (e.g. provisions in *Bulletins, Section 2),* possibly because most provisions/protections apply to this group alone. (OPEAC found that it is only by consulting details in TRPP *Bulletins Section 3 or* receiving a

non-market tenant's *Fact Sheet* that the differences between provisions for market and non-market tenants are apparent.)

Recommendation #17: Train 311 staff in basic TRPP provisions
Provide 311 staff with a list of people, organizations, etc. that they can refer callers to and schedule regular updates so they can better assist and direct related inquiries. Training should include age-friendly approaches.

TRPP processes – Transportation; Pets

Recommendation #18: Pay seniors' transportation costs
Many seniors do not drive, particularly those over 80 years of age or on low income***,*** so transportation should be part of individual TRRP Plans. At a minimum, senior tenants should be compensated for the costs of transportation to visit potential housing units and when the location of an interim housing unit increases or introduces new transportation costs to their household budget (e.g., in the case of doctors' offices and grocery stores further away after a forced move).

Recommendation #19: Accommodate seniors' pets
The animals that alleviate loneliness and social isolation in many seniors' lives need to be planned for and accommodated in forced relocations.

TRPP processes – Compensation

Recommendation #20: Make the rental rate for Right of First Refusal affordable
Change the rent on Right of First Refusal (ROFR) from 20% of market rate to 30% of seniors' or co-senior household income to ensure seniors' housing affordability and align with CMHC's affordability standard (shelter-cost-to-income ratio or STIR). See Appendix IV for rationales and details about calculations for housing types for ROFR.

If rent originally included goods/services before eviction, then upon return, these goods and services should likewise be included in the rent (i.e., a returning tenant should not have to pay increases for parking, heat, water, hot water, etc.).

Recommendation #21: Respect the integrity of income, compensation and government programs
The revised TRPP must clearly and explicitly state that both regular and special payments and other compensation received pursuant to the provisions of a TRP Plan are not regarded as income.

More specifically, revised TRPPs must ensure that regular and special TRPP payments are not counted as income for purposes of calculating:

- the amount of or eligibility for Old Age Security, the Guaranteed Income Supplement and other government benefits for older adults (e.g., Shelter Aid for Elderly Renters or SAFER, Renter Assistance Plan, Fair Pharmacare Assistance, City of Vancouver Leisure Access Pass); and
- income tax and benefits such as tax rebates and credits.

Recommendation #22: Exclude the OAS/GIS increase for seniors aged 75+ from TRPP income calculations
The federal government has increased the amount of OAS/GIS seniors receive at age 75 by 10%. That increase should not be calculated as income for TRPPs because that would negate the purpose for which the increase was enacted.

Recommendation #23: Increase the low-income ceilings
Increase the low-income ceilings for tenants to be entitled to provisions (including services) in the revised TRPP and index the new levels to annual increases in the cost of living. The current income ceilings are too low and, as a result, leave out many low- to moderate-income seniors and others. The ceiling should be the ceiling used for SAFER or other benchmark that is indexed more frequently to the annual cost of living (e.g., the City's Leisure Access Pass), whichever is greater.

Recommendation #24: Pay utility fees
The costs of utility fees included with the tenant's previous rent should be added to a compensation package that already includes the costs of moving to and from interim housing (i.e., the fees for hydro, phone, internet and other utilities, laundry, etc.).

TRPP processes – Data collection and transparency

Recommendation #25: **Collect and disaggregate data by age**
Data should be collected on tenants' age, gender, language, indigeneity, dependent status, housing type, size, and location, etc., from Tenant Needs Surveys and individual Tenant Relocation Plans and then appropriately be disaggregated into 55+ and analyzed for purposes of monitoring, public reporting, and policy improvement purposes.

In OPEAC's estimation, the collection and analysis of tenant- and TRPP journey-related data, disaggregated by age and other key tenant characteristics (income, etc.), along with regular communication about this data (see next recommendation) are key areas of the TRPPs to be revised.

Recommendation #26: Provide transparency to senior tenants and others
Provide transparency to tenants, City staff, Tenant Relocation Specialists and the public on Applicants' compliance with the TRPP and the status of its implementation. Information about the process is not currently available, even to individuals who have a TRP Plan. This is because verification of a developer's policy compliance and submitted documents on an individual's behalf are currently only available to Applicants and City staff. They share access to a project's online SharePoint account for information and the exchange of documents, but tenants do not.

Recommendation #27: Make public the rubric used for Applicant compliance with the TRPP
At present, there appear to be no provisions for anyone involved in the TRPP process to share with the public how and to what extent actions in the name of the TRPP comply with the policy. This much would at least ensure some transparency about the process.

OPEAC believes that revisions to the City of Vancouver's Tenant Relocation and Protection Policies consistent with the findings of this review and recommendations will uphold the intent of the City's Older Persons Strategic Framework, which states: ***"We are committed to helping older adults stay engaged in the community and to enhancing their quality of life."***

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APPENDIX

I. GOVERNING PRINCIPLES AND PERSPECTIVES - FINDINGS

A. *Resident Relocation Policy for Community Care and Assisted Living Residences* (RRP) November 2024, APPENDIX: VANCOUVER COASTAL HEALTH'S PRINCIPLES GUIDING RESIDENT MOVES RELATED TO HOME RENOVATIONS OR CLOSURE*S*

The VCH Principles Guiding Resident Moves Related to Home Renovations or Closures (2020) are:

- Planning is proactive in order to minimize potential for residents or family stress.
- The care home closure process is effectively coordinated so disruption to residents and family is minimized. This includes a Closure Team that is responsible for co-ordination of the resident moves and identification of system issues and conflicts and referral for resolution.
- Residents, family members and staff are provided with personalized communication and open and frequent communication, and consultation is encouraged and maintained. This includes a joint letter, mutually approved by VCH and the care home, of the planned closure and with an invitation to a small group meeting where individual and personal concerns can be addressed. Existing groups such as Resident and Family Councils are also utilized, as agreed upon by the Chairs of these Councils.
- Open and planned communication with the public and media is maintained. Communication should be planned prior to a public announcement of the closure.
- Residents and families are supported to identify and access one of two preferred care homes, which are capable of meeting resident care needs. The resident's preference will be honoured unless the care homes are not capable of meeting the resident's safety needs.
- Individual resident quality of care is maintained through the planning and implementation of the moves. This includes resident reassessments so individualized care plans are current, supporting documentation, and a jointly facilitated move to ensure special needs are addressed.
- VCH assumes responsibility to move the residents and their personal belongings, which may include furniture and equipment for VCH-owned and operated sites. The closing care home arranges transportation and movement of furniture, equipment and resident belongings. VCH assumes all appropriate one-time costs associated with the move, e.g., transportation, cable and telephone installation. Residents who move outside of the VCH boundaries assume costs of relocation.

All care home closures are subject to review, in order to guide and improve processes for future closures. This includes a family satisfaction survey to identify issues and follow-up as necessary to guide future practice.

B. WORLD HEALTH ORGANIZATION'S AGE-FRIENDLY CITIES FRAMEWORK

The work of the World Health Organization (WHO) on age-friendly community planning includes housing as one of eight important domains in the Age-Friendly Cities Framework. Social inclusion, equity and quality of life for older adults are key policy concerns. While rental housing for seniors is recognized, the

WHO's focus is on housing in general, largely in terms of the need to adapt new and existing housing for older adults in response to worldwide population aging.

C. AGING IN UNCERTAINTY: THE GROWING HOUSING CRISIS FOR BC SENIORS - United Way BC 2023 Report

Key messages include:

- Population aging, coupled with rapidly rising costs of living and the inadequate incomes of seniors, is contributing to the seniors' housing precarity crisis.
- Access to subsidized rent-geared-to-income seniors' housing has been declining in BC, while at the same time, low-cost private market options are being lost due to skyrocketing rents, evictions, renovictions, and redevelopments; as well as seasonal and regional influxes of people into communities.
- Almost 1 in 5 senior-led renter households (18% or 21,565 households) are spending 50% or more of their income on housing and are considered to be precariously housed and at risk of homelessness.

Interviews by United Way BC Healthy Aging for the **Aging in Uncertainty** report revealed that:

- There are growing numbers of seniors who are unsheltered or living in substandard or unsafe housing situations (e.g., staying with abusive family members; living in cars or storage lockers; camping in the woods; in housing without heat or electricity).
- An increasing number of these seniors find themselves on the verge of homelessness for the first time in their 60s and 70s.
- Housing precarity and homelessness take a significant toll on the physical and mental health of seniors. For example, one frontline service provider stated that over half of their clients experiencing housing precarity talk openly about whether they want to live anymore.

At the time of the report, the following were among United Way's stated recommendations:

- To increase access to subsidized rent-geared-to-income housing for low-income people of all ages (i.e., where tenants pay no more than 30 percent of their income from housing).
- To increase financial assistance for low- and moderate-income seniors living in private market rental housing by introducing needed changes in the SAFER program.
- To increase access to housing with support (both social and health support) to ensure low-income seniors can maintain their housing tenancy and improve their health and well-being.
- To ensure that housing navigation supports the shelter system, and transitional and low-income rental housing are not only adequately funded, but also accessible, safe, and appropriate for seniors who are homeless or precariously housed.

D. FORCED EVICTION AND HOUSING RELOCATION

CMHC recently focused on the topic of forced eviction and relocation amongst tenants, including older tenants in Canada, in a series of publications (see CMHC 2022; Zell and McCullough, 2020; 2021; Bachour et al., 2025; Maskovich, 2021; Poulin et al., 2025). Among other things, the reports found increasing numbers of older adults were being displaced in the country's largest cities - notably Vancouver and Toronto - and that older adults experience significantly greater negative impacts of eviction and relocation than their younger counterparts. The impacts ranged across mental and physical health, social connections and community belonging, household finances, etc. See the Bibliography below for these and other research on this topic.

E. SENIORS LIVING IN THE OLDEST, MOST AFFORDABLE, MULTI-UNIT BUILDINGS

Senior-led renter households tend to occupy the same neighbourhoods in Vancouver undergoing the most rapid residential redevelopment and zoned by the City for more high-density housing in the future. Many of these households have long tenancies, low or moderate incomes, and rents geared to income, and/or rent increases governed by BC Housing's annual Housing Income Limits (HILS).

For example, the Fairview neighbourhood, located in the rapidly redeveloping Broadway Plan area (with its own TRPP), is over-represented by seniors. It is home to 59% renters (20,000 people, Census 2021), and the median income for household maintainers 55-64 years of age was approximately $43,000 (so rent@30% should approximate $1,075) and median income for older household maintainers 65+ was $32,000 (so rent@30% approximately $750). While affordable rents for both age groups of seniors at 30% of their income likely no longer exist in Fairview, the older units generally rented in 2021 at $1,660/month. This means that significant numbers of Fairview seniors spend more than 30% annually on housing and some more than 50%. BC's Office of the Seniors' Advocate reported in 2022 that 1 in 4 seniors in BC had household incomes less than $29,000.

In another older apartment-dominated neighbourhood experiencing rapid redevelopment in Vancouver (with its own TRPP as well), namely Grandview-Woodlands, 34% of 55+-year-old-led households lived in subsidized housing, and 20% spent over $30,000/year on their housing. (*2021 Census, Community Data Program*).

While we have yet to learn the median rent in recently constructed apartment buildings and condominiums in these Vancouver neighbourhoods, just as we have yet to learn from the 2026 census how the socio-economic makeup of their tenants has changed since the recent surge in redevelopment began, we can expect that rents will be higher and the number of low-income seniors n redeveloped properties will be lower.

This is expected to be the case because of a growing international literature on social and income polarization (gentrification) following urban redevelopment in so-called 'global cities' like Vancouver. Researchers have documented the before-and-after experience of gentrification, ghettoization, rent and house-price escalation, forced evictions and relocations, and other urban housing-related processes driven by international capital, REITS, and post-2008 financial crisis patterns in urban land (re)development partnerships and practices, among other things (for example, see the Bibliography below).

This body of work routinely shows that older adults and other low-income groups are being expelled from cities like Vancouver through new partnerships and processes of urban redevelopment. In other words, seniors are widely recognized as casualties of urban renewal, housing densification practices and transit-oriented development around the world. For Toronto, Lewis (2026) states that "existing public systems are not strong enough to protect existing renters."

Alternatives to the municipal and development industry-led urban renewal/densification processes we know in Vancouver tend to emphasize socially inclusive and age-friendly forms of community planning and development and eviction prevention (see Zell and McCullough,2020). For other policy directions and recommendations, as well as accounts of how others are "chasing accountability through a fragmented system," see Lewis (2026).

F. HOUSING AS A HUMAN RIGHT

In Canada, the federal government committed to housing as a fundamental human right in 1976 and reaffirmed this commitment in 2019 with the National Housing Strategy Act. The Act emphasizes a human rights-based approach to housing policy and requires the government to prioritize housing access to vulnerable groups, including low-income seniors and older adults at risk for other reasons.
The Federal Housing Advocate plays a key role in monitoring implementation of the Act and advocating for vulnerable groups' right to housing.

G. HONOUR THE RIGHT OF FIRST REFUSAL (ROFR) FOR ALL RESIDENTS

Tenants of market housing have an opportunity to "*move back into the new building with a 20% discount off starting market rents, or at the new non-market rents in circumstances when the replacement unit is social housing*" (*TRPP Bulletin 2026 Section 2.2(h*)).

For non-market housing tenants, the requirements are different: "*The applicant will be required to demonstrate that all reasonable efforts have been taken to pursue funding in order to provide all residents with the right of first refusal to return to the new development at rents as per Section 3.1(b)... if not feasible for all residents, then the applicant may be required to develop priority criteria for Right of First Refusal e.g. priority for longer-term tenants or tenants who qualify based on income*." (Section 3.1(e)). This puts non-market housing permit applicants at a disadvantage if they cannot prove they have secured the necessary funding.

As noted above, OPEAC recommends the City provide non-market housing developers/providers with adequate funding so they can offer all tenants the Right of First Refusal. The City can draw funds from the Empty Homes Tax, Vancouver Affordable Housing Endowment Fund, federal Housing Accelerator Fund or BC Builds for this purpose.

Furthermore, ROFR should be based on 30% of tenants' income and not 20% below the average City of Vancouver market rent. Even at current rents, the cost of returning to a studio or one-bedroom apartment would cost a senior more than 30% of their income.

II. TRPP INFRASTRUCTURE

A. TWO-TIERED TRPP STRUCTURE

First, market-based tenants receive three options for financial compensation:

i) based on length of tenancy, in the form of free rent, a lump sum payment, or a combination of both;
ii) temporary monthly rent top-up option (area-specific) or
iii) lump sum rent top-up payment *(TRPP Bulletins Section 2)*.

Market landlords/developers have protection provisions that specify they are "required" to provide tenants with protections which are presumably tracked and enforced by City staff (*TRPP Bulletins Section 2).* Among them is the Right of First Refusal (ROFR) discussed below.

Second, and by contrast, non-market housing tenants *(TRPP Bulletins Section 3)* do not have the choice of three compensation options, and length of tenancy is not considered in developing tenants' TRPP Plans. Instead, tenants are offered one month's rent and a guarantee of a housing offer by the landlord/developer, who demonstrates *"every effort to secure a permanent replacement option meeting affordability requirements in Section 3.1(b) that involves minimal moves for each resident and prioritizes options in the current neighbourhood*."

Non-market tenants have the right of first return as a conditional option for landlords/developers who can demonstrate adequate funding for all tenants (*TRPP Bulletin Section 3.3(e)*) as indicated above in Section I G. Furthermore, submission of a Non-market Tenant Needs Assessment to City staff is recommended but not required for non-market tenants as it is for tenants of market housing.

B. PROVIDE TENANT RELOCATION SPECIALIST CASE MANAGEMENT VIA THIRD PARTY

Proposed changes:

1. City and Third Party co-prepare and advertise a job description for Tenant Relocation Specialists (TRSs), both those who have required relocation experience and some who also have preferred qualifications in gerontology or several years of experience working with all ages of adults 55+.
2. Developer Applicants are required to hire their TRS(s) from a list of TRS applicants who meet the job description requirements.
3. TRSs are case workers with specific responsibilities and project management tools, including communication, calendar and data collection tools (templates, rubrics) for developing individual clients' TRPP Plans.
4. TRSs should possess the expertise and experience necessary to support a diverse range of tenants and have advanced digital technology skills for managing a caseload database and remaining up to date with digital publications.
5. The third-party organization would offer TRSs with a regular Community of Practice for continuous shared learning about cases, questions, City updates, procedures, etc.

With the above-mentioned changes in the structure of TRPP case management, City TRPP staff would be available to deal with the logistics of TRPP implementation and provide oversight of the third-party organization hired for case management roles.

In other words, City TRPP staff are currently accountable, *along with* Applicants, for compliance with the TRPP. If each tenant were to actually submit a Needs Assessment Survey and have a co-developed TRPP Plan, City TRPP staff with the aforementioned set of responsibilities cannot be expected to meet the demand for services by the number of tenants being affected by TRPP provisions. The need for more staff, particularly with greater recognition of the needs of older tenants, should be clear.

C. CREATE SENIOR TENANT RELOCATION SPECIALIST POSITIONS

Proposed changes:

1. At least two Tenant Relocation Specialists with gerontological training (or equivalent) are hired as Senior Tenant Relocation Specialist(s) (STRS) to oversee and work closely with TRSs who have caseloads involving 55+ adults.
2. STRS leadership positions are available for consultations with City staff, TRSs and their tenants clients when requested.
3. STRSs provide de-identified data to the City about 55+ client case management records and liaise regularly with City staff who work with Developer Applicants;
4. STRSs contribute to regular Community of Practice sessions with TRSs.

D. INTERSECTIONAL PERSPECTIVE ON AGING AND AGE-FRIENDLY CITIES FRAMEWORK

A helpful guide to understanding intersectionality and ageing is Sharon Koehn's (2020*) Ageing at the Intersections: A Literature Review* (prepared for Employment and Social Development Canada's Seniors and Policy Secretariat ((PDF) Ageing at the intersections: A literature review) describes "intersections of age with gender, sexuality, race/ethnic/minority/indigenous/immigration status; (dis)ability, and stigmatized illness (dementia and AID/HIV)". Koehn's guide ranges across three different contexts, one of which includes health, housing and social services.

E. SUPPORT THE COMMUNITY-BASED SENIORS SERVICE (CBSS) SECTOR IN VANCOUVER

Currently, support for seniors who have been forcibly evicted and relocated in Vancouver typically falls to family, friends and neighbours, on the one hand, and the community-based seniors' service or CBSS sector, on the other.

The recommendations in this report are intended to strengthen the provisions and protections in the City's TRPP, particularly with revisions to the policy that recognize the unique needs of older adults caught up in the eviction/relocation process. However, the City and developers (Applicants) alone will not be able to support the large number of seniors that current city zoning/development policies potentially displace across the 2 ½ years of the average eviction/relocation process.

For the added support required for older adults, the City needs to provide sustainable funding to the network of neighbourhood houses and typically small non-profit organizations in the local CBSS sector. The City is called upon to do so given its clear and powerful role at the front end of evictions and relocations, which we know impact Vancouver's oldest citizens most deeply.

III. TRPP PROCESSES - SENIOR-FOCUSED STEPS AND PROVISIONS

REQUIRE A TENANT NEEDS SURVEY FOR ALL SENIORS

A Tenant Needs Survey (TNS) submitted by the tenant or tenant's designated proxy is currently evaluated at the Applicant's and TRPP staff's discretion. Tenants need to have trust in both the Applicant and City staff to apply TRPP provisions equitably and diligently at all stages throughout the development and permitting process, which can last 2+ years, but there is currently no transparency in the process.

TRPP Bulletins have specific requirements for tenants to receive updates from Applicants (see *Bulletin* observations quoted below), but there are no requirements for tenants to have copies of the documentation being submitted by Applicants or their staff on the individual's behalf or copies of completed rubrics for how their needs have been evaluated by the Applicant or City staff.

The definition of rubric includes a list of specific requirements to be met, a grading scale for each level of achievement, and detailed and descriptive performance for each requirement and level of achievement thereof. For transparency, the rubric laying out the various criteria used to evaluate responses to the Tenant Needs Survey must be publicly available.

In addition, steps need to be taken to protect the tenants' privacy rights and to ensure anonymity of the data. Tenants with a Tenant Relocation Plan should have the right to copy their evaluated TNS rubric, dated and returned in print with their Eligibility letter. Needs may change over the course of the permit approval process, so individuals need to know what was evaluated at the outset.

TRSs, we interviewed indicated that only about 10% of tenants have a TNS submitted and results of the survey's review by staff are not mandated to be available to the tenant (in either print or digital form). Some seniors may need assistance in filling out these surveys (including but not limited to literacy assistance, translation and interpretation).

The current lack of TNS submissions prevents the City from collecting the depersonalized demographic data that is critical for oversight of the TRPP and its improvement over time. Summaries of disaggregated depersonalized TNS data should be included in the provincially required quarterly reports to City Council.

In fact, the data collected from TNS should not only inform case management, but also conform to Development Approval Information laid out in the Local Government Act Section 484: "*Local governments*

may require information about the anticipated impacts of a proposed redevelopment ***to better understand the effect on displaced tenants****...(collect) development approval information (DAI) to* ***enhance the municipality's ability to build more affordable, livable and complete communities*** *(with) information on the anticipated impact of a proposed activity or development on the community*." (*Provincial Policy Manual: Tenant Protection Bylaws March 2025 p13).* City residents, tenants and the public at large deserve summary data about tenants moving through the before, during and after phases of the relocation continuum, so the impacts of displacement coordinated by TRPP implementation can be assessed.

IV. TRPP PROCESSES – COMPENSATION

A. MAKE THE RENTAL RATE FOR RIGHT OF FIRST REFUSAL AFFORDABLE

The rent thresholds for the right of first refusal under City TRPPs are generally 20% below the CMHC City-wide average market rental. According to the January 22, 2026, *Table 2 Bulletin Tenant Relocation and Protection Policy*, this 20% reduction is:

- $1,364 for a studio apartment
- $1,488 for a one-bedroom
- $2,118 for a two-bedroom
- $2,891 for a three-bedroom or larger.

These monthly rental amounts are too high for many low- to moderate-income seniors, as they will require seniors to pay more than 30% of their monthly income in rent.

The median income for males aged 65+ in BC increased from $34,400 in 2015 to $37,600 in 2020 — an increase of 9.3% (see Table 12.1 *Factbook on Aging in British Columbia and Canada, Wister A et al. 2023*). For women aged 65+ in BC, median income increased at a slightly higher rate, but with a significantly lower amount — from $24,600 to $27,600 between 2015 and 2020 (an increase of 12.2%) (ibid.) This amount has increased since 2020, but accurate data is not yet available.

Using this data, even with income increases for seniors since 2020, the cost of rent for a studio apartment is more than 30% of a senior's monthly income. A senior would have to receive $45,460.67 in annual income to pay only 30% of their income on a studio apartment. This income amount is not the reality of many seniors in Vancouver, especially since a significant number rely on both Old Age Security and the Guaranteed Income Supplement.

Requiring a senior to pay more than 30% of their income on rent means they will have to find the money somewhere. Given that many seniors do not have significant savings, this means they will have to scrimp on food, medication, and social outings. All these are necessary to address the social determinants of health and to allow seniors to age independently and with dignity at home.

OPEAC therefore recommends that the amount of rent in the right of first (and any subsequent) refusals (ROFRs) be tied to the 20% discount on the current average city-wide rents for comparable unit sizes. Rather, it should be tied to 30% of that senior's or co-tenant senior couple's gross before-tax income, or their rental rate before relocation, whichever is lower.

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