



June 12 2025

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins

RE: PH22.1 Development Pipeline 2024

Dear Chair Councillor Gord Perks and Members, Planning and Housing Committee

Preliminary Matters

First, we wish to address a blanket concern that applies to the six Housing reports on this PHC agenda, taken as a whole. The six reports reflect three key directions:

- Enabling gentle density in residential neighbourhoods:
- Enabling mid-rise buildings along transit corridors:
- Unlocking more housing on apartment sites by simplifying permissions

These reports are of great importance to the future of communities across the City of Toronto and of great interest to residents of those communities. However the six reports include a total of *35 attachments* representing hundreds of pages of policy and technical details, ***Resident associations and small businesses and other stakeholders require time to review and discuss their response these reports.*** One week is simply inadequate.

It is recommended:

1. That PHC receive PH22.1 and defer consideration of the other five reports (22.2, 22.3, 22.4, 22.5 and 22.8 to the following PHC meeting on July 15, 2025. ***The substantive importance of these issues is too great to be rammed through with no time for public consultation.***

The report itself

The report on the Development Pipeline 2024 provides a snapshot of development activity from 2020 to 2024 including where and how much new housing is being built across Toronto. Notably, this represents the largest development pipeline ever recorded in Toronto, with 854,898 proposed homes and 2,335 projects.

Findings (as of the end of 2024)

- *“Toronto is on track to meet provincial population and housing targets.”* This is true only if you look only at the reported statistics in isolation and ignore (1) the current market conditions and (2) the actual housing needs of young below-median-income families.
- *“There are more residential units and more non-residential floor area proposed in the current Development Pipeline than in any other prior Pipeline.”* But will they get built?

Too many development applications are based on a marketing model – small units for small investors – that is no longer commercially viable. The report correctly notes that recent economic conditions create a number of barriers to conversion of the pipeline potential into actual new residential units.

- *“While condominium units continue to be the predominant proposed tenure, the number of purpose-built rental units is increasing.”* But the number of rental units under review is only somewhere between 10% and 30% of the total units under review [Table 10]. There will need to be a substantial increase in the number of rental projects if the units in the pipeline are going to actually be built. And, more important, if the housing needs of the future Toronto population are to be met.
- *It is important to emphasize that the full spectrum of housing options, including affordable housing, and the provision of hard and soft infrastructure necessary for complete, sustainable and livable communities must occur on pace with the scale of growth.* These objectives, while not addressed in this report, are the focus of city-wide policy and area planning frameworks that will determine the true future of housing in the City of Toronto.

Comments:

We note that the report only deals with private developments and as such does not integrate the effect of increasingly important government-financed housing programs aimed at the production of affordable housing. It is important to integrate the effects of affordable housing programs into an overview of the total housing development pipeline. And it is important to analyze the total housing construction program compared to housing needs.

In examining the total housing market it is also important to look at all housing construction. The Development Pipeline numbers do not include developments of less than ten units. As such, they exclude the effects of EHON initiatives that are an important potential source of new family housing.

It is important that the City base policy on a holistic understanding of needs and potential. Too many approved developments will likely never be built, with approvals being obtained simply to increase land values. The City badly needs tools to revoke development permissions that are not built.

It is recommended:

- That the City investigate how zoning permission approvals can be made time limited.
- That City Council work with other Ontario municipalities to request the Provincial government to fulfil its original commitment to inclusionary zoning in Major Transit Station Areas (MTSA) (ie Priority Major Transit Station Areas- PMTSA).
- That this committee request staff to develop statistics on the total number of housing units in the development pipeline, including both government-financed units and developments of less than ten units.

Yours truly,

Geoff Kettel

John Bossons

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Cc: Jason Thorne, Chief Planner and Executive Director, City Planning Division

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The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 250,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.