DEPUTATION

To: Planning and Housing Committee.
Date: October 30, 2025.
Re: PH25.4 2024-2025 Annual Progress Report – HousingTO 2020-2030 Action Plan and Housing Action Plan (2022-2026).

The Toronto Alliance to End Homelessness (TAEH) is a community-based collective impact initiative committed to ending homelessness in Toronto. Our network includes non-profit organisations that support those living with homelessness and those who are housed and who must spend a disproportionate amount of income on housing, as well as affordable and supportive housing developers, property managers, and landlords.

As part of our mission, TAEH works directly with the City of Toronto in its mandates surrounding homelessness and maintaining and growing affordable housing stock in the city, including engagement on client support services and funding. This includes TAEH co-chairing the Toronto Housing and Homelessness Service Planning Forum with both Toronto Shelter & Support Services and the Housing Secretariat.

TAEH is also the non-Indigenous Community Advisory Board to the City of Toronto on housing and homelessness.

TAEH would like to take this opportunity to congratulate the City, both staff and elected officials, in the significant work accomplished over the last few years to prioritise the City's response to the housing crisis in Toronto, especially in relation to alleviating homelessness, providing housing supports to low income Torontonians, the retention of existing affordable housing stock, and the construction of new supportive and affordable housing. With this Council's renewed commitment to a more active role in solving this crisis, as illustrated in the 2024-2025 Annual Report, the halfway mark of the ten-year HousingTO 2020-2030 Action Plan, Toronto is much better positioned to reach its housing goals.

TAEH supports the recommendations of the Executive Director of the Housing Secretariat as set out in the Report for Action (the "Report") for this agenda item. In particular, TAEH supports the funding request to the federal government set out in recommendations 1 and 2 of the Report. However, TAEH does have some concerns about the particulars set out therein:

Firstly, the request for $163M in capital funding for 230 supportive homes on public land does not appear cost effective, working out to $708.7k per door, which seems high, especially since these homes will be built on public land. Considering current development costs per door, even for supportive housing, the target cost per door should be at least 30% lower, meaning better value for money and thus the development of additional supportive housing units from this amount of capital funding. While it is salutary to see the prioritisation of supportive home development, 230 units is far too modest, considering how far behind target the City is in reaching its goal of 18,000 new supportive housing homes by 2030, this number working out to only 12.7% of the annual target under the HAPs.

Secondly, and building upon this last observation, the request for $2.6B in funding and low-cost financing to build 3,900 home, only some of which will be affordable, represents a missed opportunity for the City to scale up its successes in 2024 and 2025 with its pilot program of City-led affordable housing projects on public land. TAEH believes that the only way for the City to reach its targets for affordable and supportive housing builds under the HAPs is by scaling up its partnerships with the nonprofit affordable housing sector, including co-operatives, community land trusts, and Indigenous and Black-led housing organisations. Accordingly, TAEH recommends that this requested funding be restricted to projects that will benefit the nonprofit affordable and supportive housing sector.

Thirdly, while the request for $150M under the newly organising Canada Rental Protection Fund (CRPF) reflects the absolute need to retain existing affordable housing stock in Toronto, TAEH notes that the current planned CRPF funding for 2025 and 2026 is $200M per annum. (An additional $500M in program funding has been announced, but it is unclear how this additional funding will be allocated over the 5 years of the current program funding model.) While the arms-length entity/entities that will administer the fund is/are expected to leverage these funds and thus create a larger investment pool, TAEH believes that it is unlikely that the fruits of this process will be reflected in available CRPF loan assets in the next 14 months. As such, TAEH recommends that the City engage with the administrating entity/entities as soon as possible to coordinate funding allocations under CRPF and MURA, to ensure that the existence of the MURA program does not result in funding applications from Toronto being deprioritised under the CRPF due to the existence of an alternative source of funding.

Fourthly, TAEH recommends that the request to the provincial government to provide sufficient operating funding for new supportive homes built with funding from Build Canada Homes be amended to make it clear that this request subsumes both City and nonprofit supportive housing projects, and not only those the City contemplates to build itself. Indeed, considering the planned lifetime of supportive housing buildings, it would also provide greater certainty in fiscal planning if the City could build upon the spirit of the Ontario-Toronto New Deal by locking in supportive housing operational funding for a longer period than a mere 2 years.

Fifthly, while new housing development in Toronto, unlike greenfield developments in other parts of the province, does not usually require extensive infrastructure construction, infrastructure funds are still needed for developments whose infrastructure footprints will exceed any slack in existing City infrastructure. As such TAEH recommends that the City request dedicated funding from the provincial government for anticipated infrastructure construction and upgrades.

TAEH also fully supports recommendation 7 in the Report and the proposed MOU between the Housing Secretariat, Social Development, and the United Way of Greater Toronto (UWGT) to support building capacity in the Black-focused nonprofit housing sector. TAEH stands ready to collaborate with UWGT and the Black-focused nonprofit housing sector in pursuit of this goal.

Further, TAEH commends the Housing Secretariat for the 2024-2025 Annual Progress Update Report, and in general with the design showing both the metrics of the annual achievements in achieving the goals set out in the HousingTO 2020-2030 Action Plan and Housing Action Plan (2022-2026) (the HAPs) alongside examples of projects that illustrate the various programs the Housing Secretariat manages in relation to those goals.

TAEH is gratified to see supportive housing being treated as its own type of housing under the HAPs (as reflected in recommendations 1 and 2 of the Report) and to see the addition of the supportive housing target to the dashboard included in Attachment 3 to the Report.

However, other recommendations from TAEH's deputation in relation to the 2023-2024 Annual Report have not been acted upon. In particular, TAEH believes that the current format that compares annual numbers to the year before is not a useful metric. Without context on the prior year's result in relation to annual targets under the HAPs, percentage changes in the current year are meaningless. For example, if an annual target was 1,000 units, and this year 10 were built compared to 1 the year before, using the current reporting style would show an annual change of +1,000%, when in fact the current year's output was only 1% of the annual target.

As such, TAEH reiterates its recommendation that future annual reports include charts for key metrics, showing the annual target and the actual number of units built (for example), for each year to date, as well as an indication of the growing or declining deficit/surfeit, and the amended annual target needed for the balance of the HAPs timeframe in order to reach the final target. This will not only provide a quick reference showing the "state of the plans" but also indicate trends and provide a clearer picture of how important any given change is year over year, and where funding can be decreased or needs to be increased.

TAEH recognises that the targets in relation to new housing only measure units in approved applications. However, the goal of the HAPs is not to approve projects but to see new housing built. It is well known that the City has already approved sufficient applications to build twice the number of new units the provincial government has established for the City of Toronto by 2030, yet we still speak of a housing crisis. This is because there are several reasons why an approved project may not be successful. TAEH notes that the Housing Secretariat recognises this by including in its annual reports the number of new units occupied in that year.

TAEH recommends that the Housing Development Office, in conjunction with the Housing Secretariat and the Development Review Department, review all outstanding approved projects which have not begun construction and rate them by likelihood of continuing to be viable projects. By sifting out the “zombie” projects from those actually showing momentum towards construction, a more realistic assessment can be made of the overall success of the HAPs, including projected occupancy dates that can be used to project future newly occupied units on an annual basis in relation to the HAPs (actual)new build targets.

TAEH notes that this annual report shows that 29,744 rent-controlled homes were approved between 2020 and 2024 (46% of the HAPs target) while only 4,576 net new affordable rental homes started construction (7.4%), and only 2,511 were completed in that time frame (3.9%). These data do not suggest the HAPs are on track to achieve this target if it is intended to reflect the actual growth in housing stock in Toronto. While TAEH is gratified at the success of the Development Review Department in speeding up application approvals, especially for affordable and supportive housing projects, one cannot assume that even those speedily approved projects will achieve occupancy: ongoing annual assessments along the proposed model will keep the tracking of metrics under the HAPs more realistic.

Finally, TAEH notes that the annual report references “250 additional affordable rental projects.” This term is unfortunately ambiguous, and it is unclear what criterion was used to meet this definition: one unit or a certain percentage of units, for example. As such, TAEH recommends that this ambiguity be clarified, so that readers can gain a better understanding of the degree to which these projects will contribute to achieving the supportive and affordable housing targets under the HAPs. Likewise, providing a total number of affordable units that would be built from these 250 projects would be useful in assessing general expectations in terms of growing the stock looking forward.

Thank you,

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