



By her side
for 50 years

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Charitable Number: 11897 1159 RR0001

Nancy Martins

City Clerk's Office
Planning and Housing Committee
Toronto City Hall
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Copy to:

Councillor Gord Perks, Chair, Planning and Housing Committee
Mayor of Toronto Olivia Chow

Re: Item PH29.5 – Advancing the City's Affordable Housing Access System

Dear Members of the Planning and Housing Committee,

Interval House of Toronto is Canada's first shelter for women and children fleeing intimate partner violence providing emergency shelter, housing support, counselling, and economic empowerment programming. We work closely with housing providers across the city to support survivors in accessing safe, stable, and appropriate housing.

We write to express our concerns regarding the proposed implementation approach for the new Centralized Affordable Rental Housing Access System as set out in the City's staff report dated March 27, 2026 (the "Report") – Item PH29.5.

We support the City's objective of improving access, transparency, and consistency in the allocation of affordable housing. However, we urge the Committee to refer this matter back to City staff for further consultation and to ensure that the system design meaningfully reflects the needs of vulnerable populations, including survivors of intimate partner violence, prior to full implementation.

Our Concerns

We share the following concerns:

A consultation process that has not met Council's co-design standard

Through item PH35.20 (July 2022), Council directed staff to include housing providers and stakeholders in the co-design, implementation planning, and timing of the new system. From our perspective as a frontline service provider working directly with individuals most impacted by housing instability, the consultation to date has not sufficiently captured the lived realities of high-needs populations or the operational realities of organizations supporting them. A more robust, inclusive, and trauma-informed consultative process is needed to ensure the system is effective in practice, not only in principle.



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Premature implementation timeline

The Report proposes to launch the new system in Q3 2026, without adequate time for education, training, or transition planning. For service providers supporting clients with complex needs, including those experiencing trauma, housing instability, and digital access barriers, additional time is required to adapt processes and ensure that clients are able to meaningfully access the system. Without this, there is a risk that the individuals the system is intended to support will face new barriers rather than reduced ones.

Unworkable secondary screening model

The Report contemplates referring applicants to housing providers for secondary screening even where a unit's rent may represent up to 100% of their annual income. For the clients we serve, many of whom are low-income and financially vulnerable, this creates confusion, false expectations, and potential harm. It also places housing providers and support organizations in difficult positions, and runs counter to the goal of improving efficiency and housing stability.

An overly narrow and operationally unworkable targeted allocation framework

The Report treats the HousingTO 2020–2030 Action Plan as establishing a closed list of priority populations for targeted allocation, requiring City Council direction for any group not on that list. This approach risks limiting the ability to respond to evolving and intersectional housing needs, including those of survivors of violence, and may reduce flexibility for housing providers and service organizations to work collaboratively to achieve appropriate placements.

Potential loss of effective housing access pathways through existing partnerships

We are also concerned about the potential unintended impact of the proposed centralized system on existing partnerships between violence against women organizations and housing providers. Over time, organizations like ours have developed collaborative relationships that support the placement of women and families fleeing violence into appropriate housing in a timely and coordinated way. These partnerships are critical access pathways for individuals who face significant barriers navigating mainstream housing systems. Without mechanisms to preserve or replicate these pathways within the new system, there is a risk that survivors of intimate partner violence will experience reduced access to housing and poorer outcomes, despite the system's intention to improve fairness and transparency.

Lack of explicit recognition of survivors of intimate partner violence

We are particularly concerned that survivors of intimate partner violence are not explicitly identified as a priority population within the proposed framework. Women fleeing violence face unique and immediate housing risks that are not fully captured under broader categories such as "women" or "low-income households." Without explicit recognition and targeted access pathways, there is a significant risk that these individuals will be further



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disadvantaged within a randomized allocation system, despite having some of the highest levels of housing need.

Recommended Actions

We respectfully request that the Planning and Housing Committee:

- Refer Item PH29.5 back to City staff with direction to undertake a genuine co-design process consistent with PH35.20 (2022), engage a broader group of impacted stakeholders, and report back with an amended report in early 2027;
- Direct City staff not to proceed with full implementation of the new system in 2026, and to return to Council in early 2027 with a proposed pilot project, with full rollout no earlier than 2028;
- If the report proceeds in any form, defer implementation to no earlier than mid-2027 to allow adequate time for education, training, and transition planning;
- Direct staff to revise their interpretation of the HousingTO Plan's priority populations framework to reflect the HousingTO Plan's principles-based language, and to establish a mechanism to recognize women survivors of intimate partner violence as an eligible targeted population; and
- Direct staff to provide the Executive Director, Housing Secretariat with delegated authority to approve targeted allocation requests outside the HousingTO priority populations, subject to Human Rights Code compliance and an approved Access Plan, without requiring City Council direction in each case.

Interval House is committed to working collaboratively with the City to deliver well-managed, affordable rental housing in Toronto. We believe a well-designed access system can be a genuine improvement for applicants and providers alike. But getting the design right matters more than getting it done quickly. We respectfully urge the Committee to take the additional time required to do this properly.

Yours respectfully,

Lesley Ackrill
Executive Co-Director