



April 13, 2026

**Re: Advancing the City's Affordable Housing Access System**

To the Chair and Members of Planning and Housing Committee,

We would like to comment on the report *Advancing the City's Affordable Housing Access System*. PAL Toronto supports the City's broader goal of improving transparency, consistency and accessibility in the allocation of affordable housing. A more coordinated access system has the potential to make the process clearer for applicants, more efficient for providers, and more accountable for the City as it advances its housing objectives.

At the same time, Council should take care to ensure that, in seeking to standardize access across the system, it does not unintentionally create barriers for housing providers already operating under established City-recognized mandates. PAL Toronto is one such organization. We provide affordable housing for artists and cultural workers under a recognized mandate, maintain a waiting list tied to that mandate, and are actively working to increase the supply of affordable housing. The report acknowledges that Council previously directed the Housing Secretariat to provide for the inclusion of sector-specific housing, including for workers in the arts, film, television and culture sector.

The concern for Councillors is not with the objective of modernization itself, but with whether the proposed implementation framework is sufficiently developed for providers that do not fit neatly within a general affordable rental model or access plan agreement. Under the report, targeted allocations aligned with HousingTO priority populations could be approved by the Executive Director, while groups outside that framework would require direction from City Council. The report specifically identifies artists and cultural workers among those examples, as well as other important sector-specific groups key to our City's infrastructure and economy.

The proposed approach effectively treats existing sector-specific housing providers as exceptions to be managed, rather than as established partners already delivering on a recognized public policy objective. Requiring project-by-project Council approval for providers with existing mandates is not an implementation strategy. It is an obstacle, and one that risks undermining the very housing expansion the City says it wants to encourage.

For Council, this raises a practical and governance question. If a provider already operates under a recognized City mandate, has an established applicant base, and is seeking to add new affordable units, should that provider have to return repeatedly for site-specific approvals simply to continue delivering on a model the City has already endorsed? In our view, the answer should be no. Council should be looking for a durable framework that respects prior decisions, supports implementation certainty, and enables qualified providers to grow.

This issue becomes more pressing because the report proposes applying the new allocation request process to Affordable Rental homes approved for City financial incentives on or after Q3 2026. As a result, the current framework could affect not only existing operations, but also expansion opportunities already being explored by sector-specific providers. That is precisely why this is the right moment for Council to pause and ensure the policy architecture is fully thought through before implementation begins.

PAL Toronto also believes there would be value in a more focused consultation with existing mandated and sector-specific providers before the system is finalized. The report describes substantial engagement with applicants, advocacy bodies, providers and other stakeholders, which is positive and important. But where Council-recognized sector mandates are concerned, there is a strong case for a more specific implementation discussion to ensure the final framework reflects the realities of those providers and the communities they serve.

For those reasons, PAL Toronto respectfully urges the Committee to recommend that Council refer the report back to staff for further consultation and refinement. Doing so would not reject the goal of a centralized access system. Rather, it would ensure that the system is implemented in a way that is fair, workable and durable, including for providers operating under existing City-recognized mandates. A short delay now may prevent much greater policy confusion and implementation difficulty later.

Given the significance of the proposed changes, and the unresolved questions around how mandated providers will fit within the new framework, PAL Toronto further recommends that implementation be deferred until 2027, following the next municipal election. That would allow the current Council to provide clear direction on the principles involved, while giving the next term of Council the opportunity to oversee implementation of a revised and more complete model. It would also provide time for the City and sector-specific providers to work together on a framework that supports both consistency and the diversity of Toronto's affordable housing ecosystem.

PAL Toronto therefore recommends that Planning and Housing Committee recommend that City Council:

1. Refer the report *Advancing the City's Affordable Housing Access System* back to the Executive Director, Housing Secretariat, for further consultation with sector-specific and other mandated housing providers.
2. Direct staff to revisit the proposed implementation process for housing providers operating under existing City-recognized mandates, including sector-specific providers serving artists and cultural workers.
3. Direct staff report back with a revised implementation framework that establishes a clear and durable process for the inclusion of existing mandated providers in the centralized access system, without requiring unnecessary project-by-project referrals to Council.
4. Defer implementation of the centralized Affordable Rental access system until 2027, following the next municipal election.
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PAL Toronto offers these comments in support of getting this important policy right. Council has an opportunity to improve this report by ensuring that implementation is not only streamlined, but also workable. Sector-specific housing providers are not edge cases. They are part of Toronto's affordable housing solution and support building active, integrated and healthy communities. Toronto is defined by its neighbourhoods and their shared-lived character, whether by gender, race, language or cultural sector. The City should make sure the new system recognizes that reality clearly and from the outset.

Submitted respectfully -



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