



April 13, 2026

Tricon Residential
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Nancy Martins
City Clerk's Office
Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON
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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,

Tricon Residential ("Tricon") is a leading owner and operator of purpose-built rental housing in Toronto, with a significant portfolio of affordable rental homes in the city operating under Contribution Agreements and planning agreements with the City. We write to respectfully but firmly express our opposition to the proposed implementation approach for the new Centralized Affordable Rental Housing Access System, as set out in the staff report dated March 27, 2026 (the "Report"), which is before the Committee as Item PH29.5.

Tricon has been a constructive participant in the process leading to this Report. Our representatives have engaged directly in the Affordable Rental Housing Access System Advisory Panel and its Operational Sub-Committee for two years, contributing expertise in operational policy and process development. We have done so in good faith and with a genuine desire to help design a system that works for applicants, housing providers, and the City alike.

Despite this sustained engagement, we have serious concerns about the substance of the recommendations in the Report and the pace at which they are proposed to be implemented. The Report, if adopted as presented, will create confusion and operational risk for housing providers, expose applicants to unrealistic and potentially harmful housing offers, overlook critical populations in need of affordable housing, fall short of the co-design standard Council itself directed in 2022, and introduce unwarranted political uncertainty into the development process. We urge the Committee to refer this matter back to City staff for further consultation before any implementation proceeds.

1. The Proposed Implementation Timeline is Premature

The Report proposes to launch the new system as early as Q3 2026. Introducing a change of this magnitude (the first fundamental overhaul of Toronto's affordable housing access system in approximately twenty-five years) in a matter of months, just before the October municipal election, does not allow sufficient time for education, training, and transition planning among housing providers, current applicants, or the general public. As a result, the new system will most likely lead to confusion and fail to deliver the intended results. For housing providers, the quick transition period from the current system could result in significant vacancy losses.

Tricon recommends that full system implementation not proceed in 2026. City staff should be directed to return to Council in early 2027 with a proposed pilot project to test the recommended access system, report on the results of that pilot, and recommend full implementation no earlier than 2028.

2. The Proposed Screening Model Creates Unacceptable Risk for Housing Providers and Applicants

The Report contemplates that applicants selected through the new Centralized Affordable Rental Housing Access System will be referred to housing providers for secondary screening – even in cases where the unit's rent could represent up to 100% of the applicant's annual income. Sending an applicant for secondary screening when they demonstrably cannot sustain the rent places both the applicant and the housing provider in an untenable position. If the provider declines the application on legitimate affordability grounds, the process invites disputes, appeals, and extended vacancy periods. This is neither fair to the applicant nor workable for the provider. It runs directly counter to the Report's stated goal of reducing vacancy loss.

Tricon urges the Committee to require City staff to address this gap directly, including by establishing clear affordability thresholds below which an applicant will not be advanced to secondary screening for a given unit.

3. The Targeted Allocation Framework is Unworkable for Housing Providers

Toronto's affordable housing crisis has had a profound and well-documented impact on the workers who keep this city functioning: hospital staff, emergency responders, transit operators, teachers, cultural workers, and others in essential roles. Many of the affordable rental units coming online under current and future Contribution Agreements will only be affordable to moderate-income key worker households which will require and warrant both random draw and referral partner approaches to leasing up these units.

The consultation process leading to this Report failed to account for this reality. The report states that targeted allocation requests for Affordable Rental homes will be approved by the Executive Director if the project targets a group identified as a priority population in the HousingTO 2020-2030 Action Plan (the "HousingTO Plan"). Any request outside that list requires City Council direction. This framing treats the HousingTO Plan as having established a closed and exhaustive set of priority populations for the purpose of affordable rental housing allocations. A careful reading of the HousingTO Plan does not support that interpretation. Tricon's position is that the HousingTO Plan is a living, principles-based document built on an evidence-driven, human rights approach to housing – not a closed catalogue. The City's proposed interpretation imposes a rigidity the HousingTO Plan was never designed to carry and does so in a way that will directly harm key workers and the housing providers trying to serve them. During consultation, City staff acknowledged concerns raised on this point but declined to revisit their position.

The Report recommends that any request to target affordable rental units for populations not already identified in the HousingTO Plan must receive specific direction from City Council. While Tricon supports the principle that targeted allocations should be transparent and consistent with City priorities, requiring a Council motion for each such request is unworkable in the context of how affordable housing projects are actually developed.

Housing providers commit to development timelines and community needs years before units become available. The ability to target specific populations – such as artists, hospital workers, emergency responders, or members of the Canadian Armed Forces – is often foundational to a project's design and community rationale. Subjecting these decisions to an unpredictable Council process introduces a degree of political uncertainty that will undermine housing provider and developer confidence and could jeopardize otherwise viable affordable housing projects.

Tricon recommends that the Executive Director, Housing Secretariat, be granted delegated authority to approve targeted allocation requests for groups beyond those listed in the HousingTO Plan priority populations, subject to confirmation of Ontario Human Rights Code compliance and the filing of an approved Access Plan – without requiring City Council direction in each case. Enclosed in Appendix A is a proposed framework for determining the eligibility of an organization to be considered as an approved affordable housing referral partner to housing providers, for consideration.

4. The Consultation Process Has Been Inadequate and Has Not Met the Co-Design Standard Directed by City Council

The consultation process to date has failed to meet the co-design standard established by City Council in 2022. Through item PH35.20, adopted by City Council on July 19, 2022, Council directed the Executive Director, Housing Secretariat, to “maximize the success of developing the new Centralized Affordable Rental Housing Access System by including representatives of current non-profit, co-operative, and private sector operators of affordable rental housing in the co-design, implementation planning and timing of the Access System being developed by the City and the City’s Vendor of Record.” This direction was carried and is part of the formal adopted record of that item. It was not a direction to consult, or to seek feedback, or to inform. Council’s chosen word was co-design – a materially higher standard that implies joint development, shared authorship of key decisions, and a genuine ability to influence outcomes before they are determined.

The process that followed has not met that standard. What was established was an Advisory Panel that met quarterly, a working group focused on operational matters, and a series of information sessions. These mechanisms fall well short of co-design. True co-design requires that housing providers be involved upstream – before program design decisions are made – not downstream, where providers are asked to comment on frameworks that have already been internally resolved. Tricon’s experience across two years of participation in the Advisory Panel confirms the latter was the reality: at critical moments, staff had already reached internal conclusions, and provider input was received but not incorporated. At times the input provided to the City was effectively set aside, as officials had already decided what they were going to recommend.

Tricon participated in good faith in the Advisory Panel and working group processes convened by City staff. However, the scope of consultation was too narrow to support a change of this magnitude. Furthermore, key stakeholders with a direct interest in the outcomes of the new system were not meaningfully engaged, including, CreateTO, Waterfront Toronto, Toronto Community Housing Corporation, the Toronto Economic Development Division, the Toronto Film and Television Advisory Committee, the Ontario Human Rights Commission, or the Board of Trade – all organizations with a direct and material interest in how the system is designed and who it serves.

Tricon urges the Committee to find that the process leading to this Report has not satisfied Council’s 2022 direction under PH35.20. Before any implementation proceeds, staff should be directed to undertake a genuine co-design process – one that brings housing providers, impacted stakeholders, and the public into the design of the system before decisions are finalized, not after. A report back to Committee in early 2027, following that process, is the appropriate and necessary next step.

Summary of Recommended Actions

Tricon Residential respectfully requests that the Planning and Housing Committee:

- Refer Item PH 29.5 back to City staff, with direction to undertake a genuine co-design process consistent with the standard established in PH35.20 (2022), engaging 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, reporting on results before any recommendation for full implementation, with 2028 as the earliest realistic target date for full rollout;
- If the report is to proceed in any form, direct that implementation be deferred to no earlier than mid-2027 to allow adequate time for education, training, and transition planning for housing providers and applicants;
- Direct staff to revise their interpretation of the HousingTO 2020-2030 Action Plan’s priority populations framework to reflect the Plan’s actual principles-based language, and to establish a mechanism within the new access system to recognize key workers as an eligible targeted population, with specific reference to geographic employment areas such as the Toronto hospital district and the Toronto film and television district; and



- Direct staff to revise the targeted allocation framework to provide the Executive Director, Housing Secretariat with delegated authority to approve requests for groups beyond the HousingTO priority populations, subject to Human Rights Code compliance and an approved Access Plan, in lieu of requiring City Council direction for each request.

Tricon Residential remains committed to partnering with the City to deliver on the shared goal of increasing the supply of well-managed, professionally operated, affordable rental housing in Toronto. We believe a well-designed access system has the potential to be a genuine and lasting improvement for applicants and providers alike. But the design must be right before it is launched, and the transition must be carefully managed. We respectfully urge the Committee to take the additional time required to do this properly.

Yours respectfully,

A handwritten signature in blue ink, appearing to read "Andrew Joyner", written over a horizontal line.

Andrew Joyner
Senior Managing Director and Head of Multi-family
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Appendix A

Principles for an Affordable Rental Housing Referral Partner Policy for the City of Toronto

1. The referral partner is a priority group of one of the project's government funding partners and the proponent building the rental housing project.
2. The referral partner has adopted the city of Toronto's anti-discrimination policies or similar policies.
3. The referral partner is committed to running a fair, open and transparent referral process for applicants
4. There is a demonstrated housing need by the members of the referral partner, who would qualify based on the city of Toronto's and the landlord's selection criteria, including demonstrated ability of the applicant to pay the rent and maintain their tenancy.
5. There is demand by the members of the referral partner for the affordable housing within the project, as it relates to project location, unit types and amenities.
6. The referral partner has the organizational capacity or has retained the organizational capacity to successfully administer the referral partnership.