

April 13, 2026

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**Nancy Martins
City Clerk's Office
Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, Ontario M5H 2N2**

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,

Kilmer Group is among the most active developers of residential public private partnership projects, with over 4,600 units of purpose-built, mixed-income residential units in Ontario. This includes Canary Landing, the 9-acre, 2,300-unit purpose-built rental community with 30% of units allocated as affordable as part of the Provincial Affordable Lands Housing Program, as well as two City of Toronto HousingNow sites (5207 Dundas St W and the landmark Coach Terminal 610 Bay St, both under construction) and the newly awarded Toronto Builds site at 970 Kipling Ave. Each project contributes to the creation of resilient, complete communities, providing mixed-use, mixed-income, transit oriented housing, serviced by a sustainable energy source, contributing to the reduction of greenhouse gas emissions. We write today 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 urge the Committee to refer this matter back to City staff for further consultation and to direct that full implementation not proceed in 2026.

Our Concerns

We share the following concerns:

Premature implementation timeline. The Report proposes to launch the new system in Q3 2026, without adequate time for education, training, or transition planning. For housing providers operating under existing affordable housing agreements with the City, the Report provides no clear guidance on how the transition will be managed. This creates real risk of vacancy losses and operational disruption.

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. This places housing providers and applicants in an untenable position and runs counter to the Report's stated goal of reducing vacancy loss.

An overly narrow and operationally unworkable targeted allocation framework. The Report treats the HousingTO 2020-2030 Action Plan (the "HousingTO Plan") as establishing a closed list of priority populations for targeted allocation, requiring City Council direction for any group not on that list. 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. Requiring

Council approval for each case will introduce unpredictable political uncertainty into the development process, threatening otherwise viable projects.

A consultation process that has not met Council's own co-design standard. Through item PH35.20 (July 2022), Council directed staff to include housing providers in the "co-design, implementation planning and timing" of the new system. What was delivered – a quarterly advisory panel and a series of information sessions – falls well short of that standard.

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 key workers 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.

Kilmer 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,



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