



June 10, 2026

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins

RE: PH31.13 - Development Activity 2025

Dear Chair Gord Perks and Planning and Housing Committee Members,

The Federation of North Toronto Residents' Associations (FoNTRA) has reviewed the *Development Activity Bulletin 2025*. While the report provides an impressive statistical overview of Toronto's development pipeline, the data reveals a fundamental disconnect between current industry output and the long-term (25-year) needs of our City.

The report confirms that "speed" is no longer the primary barrier to housing; planning approvals are now occurring four times faster than in 2023, yet construction starts remain stalled at just 31% of the Provincial target. This proves that the "More Housing Faster" mantra – which prioritizes developer profitability and short-term delivery - is failing to build a livable city. We urge the Committee to adopt a Triple Bottom Line (TBL) evaluation framework to ensure that future growth serves the environmental, social, and economic health of Toronto for decades to come.

Our major concerns are the following:

- **The Failure of "More Housing Faster":** The data proves that faster approvals do not equate to more construction. The industry's 5-to-10-year profitability model has led to a market standstill, leaving the City with a massive pipeline of "investor-grade" units that no longer align with market reality or resident needs.
- **The Critical Housing Mismatch:** The current industry-driven output is skewed toward studios and one-bedroom condos (62%), while ignoring the essential 25-

year social need for family-sized housing and "missing middle" options (detached/rowhouses), which face a projected shortfall of 2,200 units per year.

- **Erosion of Complete Communities:** The decline of 1 million square metres in proposed non-residential space suggests that we are building "bedroom precincts" rather than balanced, mixed-use neighborhoods. This undermines the City's fiscal stability and its long-term climate and walkability goals.

We all share a goal in building a livable city for all residents. This requires us to look past the quarterly reports of the building industry and focus on the 2050 horizon. By integrating Environmental Health, Social Equity, and Good Housing Economics into a formal Triple Bottom Line framework, the Planning and Housing Committee can move away from the failed "More Housing Faster" model and begin building a city that is truly inclusive, resilient, and successful.

It is recommended:

- **That Planning and Housing Committee request the Chief Planner to report back with an assessment of the 2025 Development Activity with regard to a Triple Bottom Line framework**

Sincerely,

Geoff Kettel

Geoff Kettel
Co-Chair

c.c. Jason Thorne, Chief Planner and Executive Director, City Planning
Sally Nicholson, Senior Planner, Planning Research and Analytics,
Victoria Blake-Stroz, Senior Planner, Spatial Analysis, Planning Research and Analytics
Michael Wright, Manager, Planning Research and Analytics

Attachment: Triple Bottom Line Analysis and Discussion

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 35 member organizations. Its members, all residents' associations, include at least 250,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.

Attachment: Triple Bottom Line Analysis and Discussion

Social Equity and Cultural Wellbeing

The Development Activity Bulletin highlights a staggering imbalance in our housing stock. With only 11% of the pipeline dedicated to three-bedroom units, the building industry is effectively designing families out of the city. A TBL approach would prioritize "Social Equity" by ensuring that new developments support a diversity of life stages, from young families to seniors wishing to age in place. The current reliance on market-priced one-bedroom condos serves a transient investor class rather than building the stable social networks required for a vibrant 25-year city-building horizon.

- **Opportunity for Improvement:** The City should utilize a TBL "Social Equity" scorecard to evaluate projects, providing higher priority to those that meet "Missing Middle" targets and family-sized unit quotas, rather than simply rewarding the sheer number of units proposed.

Environmental Health and Integrity

Long-term environmental integrity depends on "complete communities" where residents can work, shop, and live within a walkable distance. The report's finding that non-residential GFA has declined significantly—with office transactions down 60%—is an environmental red flag. Scaling back employment and retail space in favor of pure residential density creates car-dependent neighborhoods and undermines the *TransformTO* Net Zero 2040 goals.

- **Opportunity for Improvement:** The Planning and Housing Committee should adopt a "Net Sustainability Gain" requirement. Approvals should be contingent on a project's contribution to local employment-balance and the protection of permeable green space, ensuring that intensification does not come at the cost of urban heat island mitigation and stormwater resilience.

Economic Prosperity and Fiscal Responsibility

The industry narrative often claims that "red tape" is the enemy of affordability. However, the report shows that the market is "too high to buy and not high enough to build." This volatility proves that industry profitability is a fragile foundation for city building. Furthermore, the sharp decline in office and industrial space threatens Toronto's long-term commercial tax base. Fiscal responsibility requires the City to plan for a balanced economy that can sustain municipal services over a 25-year period, rather than chasing short-term residential development charges.

- **Opportunity for Improvement:** We suggest the City adopt Saskatoon's "True Cost of Doing Business" metric within the TBL. This would involve analyzing the long-term infrastructure and service costs of "residential-only" clusters compared

to balanced, mixed-use developments that contribute more robustly to the City's fiscal health.

Good Governance

Good governance is oriented toward long-term outcomes and evidence-based decision-making. The *Development Activity Bulletin* is an excellent monitoring tool, but it must be used to trigger policy pivots. If the data shows the "More Housing Faster" approach has resulted in a glut of unbuildable, investor-grade condos and a lack of family housing, good governance demands we change the framework.

- **Opportunity for Improvement:** The Committee should move toward a "Quadruple Bottom Line" decision-making tool. This would involve a transparent matrix where every major policy change is scored against its impact on the 25-year city horizon, moving away from "units started" as the only measure of success.