

PH31.13 Development Activity 2025

Submission by Melissa Goldstein
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Good morning Councillors,

If the objective of the Development Pipeline report is to report on urban growth and development trends and the impact of City policy, then this report really doesn't cut it. Staff should be reporting on residential redevelopment projects that involve the demolition of existing residential rental units. They should be tracking the number of such developments and their location, and the number of existing units approved to be demolished and the number of tenants implicated. And staff should work to identify whether policy and market changes are encouraging or discouraging the cannibalization of our existing rental housing supply.

When existing rental housing is demolished, even if that housing is later "replaced" in a new building, the existing tenant is displaced, often permanently, and the unit is generally replaced, eventually, with something smaller. In situations where the housing is protected by the City's rental replacement policy, the demolished affordable and rent controlled housing is replaced with a unit with time limited affordability and time limited rent control.

Demolitions of our existing rental stock represent a reduction in the diversity of our housing supply, a reduction in the affordability of rental units, and life altering harms to the health and wellbeing of tenants. While it's great that the City works to mitigate the harms of demolishing existing rental housing, what's missing is the goal that really, we want to avoid demolishing our existing rental stock as much as possible.

Planners should aim to understand how policy levers can help direct development to sites where existing rental housing and existing tenants won't be affected.

For redevelopment that involves the demolition of 6 or more rental units, we collect a considerable amount of data about rental units that are demolished and about tenants implicated in redevelopment projects. We know things like how many rental units have been approved for demolition and the number of tenants implicated, the number of units demolished and their location, but this data isn't linked to the development data we have before us today, and it isn't studied as part of the analysis of development trends. It could be and it should be.

But at least for these rental properties we have the data and some of it is tracked and incorporated into our understanding of Toronto housing issues and policy decisions.

That's not the case for EHON. The impacts of "intensifying" low-density rental housing on the rental housing supply and on the tenants who live in that housing is essentially invisible because when it comes to rental housing with fewer than 6 rental units, the City doesn't collect any data at all.

Although the Development Pipeline does not include EHON multiplex intensification, the Pipeline report talks quite a bit about EHON. The report notes that "EHON initiatives could add a significant portion of the housing starts counting towards Toronto's Municipal Housing Target of 285,000 homes by 2031, about 54,600 units or almost one-fifth (19%) of the new housing required to achieve the Target."

The entire justification for EHON is that it's supposed to improve housing affordability and help tenants access rental or ownership housing, so it's striking to see in the Neighbourhood Intensification Bulletin, staff working intently to track and predict increases to the housing supply as a result of EHON, while completely ignoring the impact that EHON is having and will have on tenants and housing affordability. It's even more striking, given that in the same report, staff conclude from their modelling of neighbourhoods that the land parcels with the greatest potential for redevelopment into multiplexes are those that are renter occupied. And it's even *more* striking, given that staff note in the same report that in other cities, upzoning has led to "economic exclusivity," which is another way of saying it made them more expensive and less accessible—the opposite of what EHON is supposed to achieve.

This means that when staff in this Pipeline report celebrate receiving 2,171 multiplex building permits that will add one unit of housing without rent control to each of those properties, they are well aware—or should be—that those applications may actually represent the forced eviction of thousands of tenants who aren't protected by any City policy, the loss of thousands of affordable rental units by landlords and investors trying to increase their profits, and the worsening of our housing affordability crisis.

Working to expand EHON without first understanding the impact it is having on tenants and on housing affordability is irresponsible, to say the least.

If the City's goal is to alleviate, and not worsen, our housing affordability crisis, then reports like this must include tracking and analysis of changes to the city's housing supply, including rental housing demolition, rental replacement, and changes to housing affordability. We need to start tracking, analyzing and reporting on housing outcomes, and not just housing outputs, because otherwise we'll never know if we're making things better or if we're making things worse; if we're making things better for real estate investors, while making things worse for everyone else.

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