



November 30, 2023

Chair Perks and Members of the Planning and Housing Committee  
Toronto City Council  
City Hall  
100 Queen Street West  
Toronto, ON  
M5H 2N2

Sent via email to: [phc@toronto.ca](mailto:phc@toronto.ca)

RE: Planning and Housing Committee Meeting 8 - November 30, 2023  
Agenda Item PH8.7 - Implementing Bill 109 - 2023 Annual Update

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Dear Chair and Committee,

The Building Industry and Land Development Association (BILD) is in receipt of the staff report and attachment for agenda PH8.7 - Implementing Bill 109 - 2023 Annual Update and we offer you the following comments for consideration at the November 30<sup>th</sup> Planning and Housing Committee meeting.

Over the last year, the City has engaged BILD and its membership on the City's response to Bill 109, the *More Homes for Everyone Act, 2022*. While we have not been supportive of all City implementation measures, we have maintained an imperative - open dialogue. As you know, Bill 109 represents part of the Province's implementation of the recommendations of the Ontario Housing Affordability Task Force Report, meant to reduce overall cost, delay and cut red tape to achieve the goal of delivering 1.5 million new homes over the next 10 years. BILD fully supports the Provincial goals to deliver more homes (and Council's own commitment to deliver 285,000 new Toronto homes by 2031) and the need to reduce approval timelines to ensure this can happen.

BILD acknowledges that its members' experiences in 2023 mirror what staff have identified as the "unintended consequences" attributed to Bill 109 and the resulting changes in practices: the ability for staff and applicant to work together has been diminished and the decision-making process has been altered in ways which have resulted in further delays.

Through this reporting, we would also like to take this opportunity to express our clear opposition to the "use it or lose it" mechanism for development approvals. In the midst of a generational housing crisis and challenging economic times, we need all levels of Government to do their part in making positive and succinct changes to get homes built as quickly as possible. An expiry date on approvals is counterintuitive to this objective and will only serve to create additional risk and potentially add time and cost to existing projects if an approval is lost and needs to be re-applied for. This concept further erodes affordability. Instead, all levels of government should incentivize projects with approvals to proceed or investigate the delays and support the applicant to completion.

We have a shared goal to attain a more efficient and effective development approval process for the timely delivery of much needed housing. In response to the Bill 109 2023 Annual Update, BILD confirms its commitment to work with the City, in particular, on the consideration of potential legislative change and further implementation tools to ensure

the goals of Bill 109 are realized in a manner that addresses both the needs of the industry and the City.

We thank you for the opportunity to submit these comments. Please feel free to contact the undersigned with any questions.

Sincerely,



Danielle Binder, RPP MCIP

Director, Policy and Advocacy, BILD