



November 12, 2025

Mayor Chow and Members of Council  
City of Toronto  
Toronto City Hall  
100 Queen Street West  
Toronto, ON  
M5H 2N2

Via Email: [councilmeeting@toronto.ca](mailto:councilmeeting@toronto.ca)

Re: November 13<sup>th</sup> Toronto City Council, Agenda Item EX18.2: Expanding Incentives for Purpose-Built Rental Housing (Ward All)

---

Dear Mayor Chow and Members of the Toronto City Council,

This letter is submitted on behalf of The Building Industry and Land Development Association (BILD), representing the voice of the land development, home building, and professional renovations industry in the Greater Toronto Area and Simcoe. At BILD, our members are deeply committed to the economic vitality of new construction, including condos, mixed-use developments, commercial properties, and purpose-built rental (PBR) projects.

Further to our November 4<sup>th</sup> letter to the City of Toronto Executive Committee on the same topic, we would like to thank you again for the opportunity to submit these further comments on agenda item EX18.2: Expanding Incentives for Purpose-Built Rental Housing (Ward All). As you many know, BILD and its members have been heavily involved in the consultation aspect of this review and we would like to take this opportunity to reinforce our overall sentiments and recommendation, as follows:

We appreciate the efforts that the Mayor and the City have made to engage the provincial and federal governments on this matter for necessary financial support, as the city cannot solve our housing crisis alone. Our industry has been actively involved in similar advocacy. We hope that BILD and the City can continue to work collaboratively to advocate for an incentive program that unlocks the more than 30,000 residential units currently stalled.

We acknowledge that in the City's reporting, Phase 1 of this program unlocks a select number of PBR projects. We share the City's understanding that the high cost of construction is a significant barrier to advancing housing projects, even those that benefit from federal funding and access to lower-cost land. We also commend the City's investment in these projects, particularly through the deferral of development charges under certain conditions and a discount on property taxes. We believe additional support from other levels of government is essential to fully address the broader supply challenges.

In the interest of increasing housing supply and choice, we strongly believe that Phase 2 of the rental incentive program should be expanded and include all residential development types. We understand the city is facing significant financial challenges and has limited resources. As such, we are not asking the City to bear the financial burden of this expansion but are hopeful that financial contributions from other levels of government can help support this critical initiative. BILD remains committed to working alongside the city as a partner to bring Phase 2 of the city's recommendations to fruition, ensuring a comprehensive and inclusive package that supports housing development across the City.

In our continued efforts, BILD and its members have completed a thorough review of the October 30<sup>th</sup> Staff Report and has had a chance to digest and reflect on its findings. We have a few thoughts on the sentiments of the report to assist our collective understanding, going forward.

Page 1 of the Staff Report states that, "As governments stepped back from investment in new purpose-built rental homes, new private investment in condominiums increased, leading to a situation where 85% of all new rental homes created in Toronto in the past 10 years are from the secondary market (wherein condominium investors rent out their units). These homes provide less security for renters than purpose-built rentals, and on average have rental rates that are over 40% higher than existing purpose-built rental homes."

We have received further data that suggests differing evidence regarding the assertion that condominium rentals are less secure and more expensive. According to an October 19, 2023 CBC article titled "Applications for personal use eviction are up 77% in Toronto, worrying advocates," from January to September 2023, there were 1,767 evictions for personal use in Toronto, which implies approximately 2,356 evictions per year. In 2022, there were 1,312 evictions. The City's Housing Data Book (page 48) notes that as of the 2021 census, there were 558,000 rental units in the City, and after removing PBR, approximately 301,000 units in the secondary market across condos, basement units, homes, etc. Based on this, in 2022, 0.4% of rental units owned by investors faced eviction for personal use, and 0.8% in 2023. We also believe these percentages are overstated, and they do not account for completions in 2022 or 2023, which have added to the total housing stock.

Additionally, according to Zonda data (dated October 2024) shared with BILD, the average rent for new purpose-built rentals in Q3 2024 was \$3,133, while for new condominiums it was \$2,724, displaying a consistent trend of comparable rents between the two sub-markets.

Page 19 of the Staff Report states that "Staff analysis of the rental housing feasibility tool shows the financial viability challenges of purpose-built rental housing developments in all geographic areas of the city, even after accounting for GST/HST waivers and existing development charge rental discounts. The model also demonstrated that any affordable rental housing requirements (even after accounting for a full suite of city benefits for affordable rental housing) had a negative impact on the financial viability of purpose-built rental housing projects." BILD asserts that this is true for both PBR and condominium development projects. We are in complete agreement with these sentiments.

The report goes on to say that "Staff analysis found that the financial viability of purpose-built rental housing projects that include at least 20% of units as affordable rental for at least 40 years can be realized when all orders of government stack funding, low-cost financing, and exemptions of development fees and charges for both affordable and purpose-built rental homes within the development." We also agree that support from other levels of government are necessary to deliver a feasible incentive package. As staff are aware, we worked very closely with our own consultants to review and cross-check the underpinning assumptions of the analysis. We are requesting an opportunity to review the final rental housing feasibility tool that led to this conclusion.

Thank you once again for considering our perspective on this matter. Should you have any questions or require further information, please do not hesitate to contact the undersigned.

Sincerely,



Dave Wilkes  
BILD President and CEO