



November 4, 2025

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

Via Email: exc@toronto.ca

Re: Agenda Item 18.2 EX18.2: Expanding Incentives for Purpose-Built Rental Housing (Ward All)

Dear Mayor Chow and Members of the Toronto Executive Committee,

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, we are deeply committed to the economic vitality of new construction, including condos, mixed-use developments, commercial properties, and purpose-built rental (PBR) projects.

Thank you for the opportunity to submit comments on agenda item EX18.2: Expanding Incentives for Purpose-Built Rental Housing (Ward All). Recognizing the key challenges in the housing market including population growth that is not matched with housing supply efforts, difficult economic conditions, a lack of government support and the increasing cost to build – the report aims to respond to the City’s housing crisis.

We acknowledge that report recommends—deferring development charges with a requirement for 20% affordable housing and a 15% property tax relief discount for new purpose built rental development projects.

The report’s recommendations are a limited solution to a much larger, and growing problem—the cost to build crunch in the City of Toronto. While the proposal acknowledges the rising costs of construction, the specifications of the proposed solution are so tightly defined that they would only be applicable to the City’s own Housing Now projects or projects that have received a federal subsidy through its Apartment Construction Loan Program. The vast majority of rental and condominium projects, including the 29,000-37,000 units that are currently stalled in the development pipeline, will not qualify.

As noted in the report, through the consultation meetings, our industry indicated that to unlock the 18,000-26,000 PBR units that are sitting on the sidelines, we recommended:

- A full exemption from development charges for all units for 2 years.
- A full exemption from property taxes for all units for at least 20 years.
- No affordable housing or rent control provisions be required for projects.

We also expressed concerns about the 11,595 stalled condo/secondary rental units and requested that the City provide incentives, specifically;

- A full development charge waiver for condo units for two years, to support housing supply and choice.

Alongside these recommendations, we conducted financial modeling, which was reviewed in technical meetings with senior staff. Despite the facts and data that we provided during these discussions, we were surprised to learn that the final report pivots away from providing any condo/secondary rental market relief and very limited incentives for PBR.

We urge the Mayor to collaborate with other levels of government to effectively increase the supply of all rental and condominium housing in Toronto. Given the ongoing housing crisis, we hope for timely action in the staff's report to the December Council meeting.

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,

A handwritten signature in black ink, appearing to read "Dave Wilkes", with a long horizontal stroke extending to the right.

Dave Wilkes

BILD President and CEO