

Marh 19<sup>th</sup> 2025.

Ms. Olivia Chow
Mayor
Toronto City Hall
100 Queen St. W.
Toronto, ON M5H 2N2
mayor chow@toronto.ca

Re: Opposition to EX21.13 – Supporting Ownership Housing Developments

Dear Mayor Chow and Members of the Executive Committee,

I am writing on behalf of **Neighbourhood Pods TO (NPTO)** to express our **strong opposition** to the recommendations in **EX21.13 – Supporting Ownership Housing Developments**, specifically concerning the **deferral of development charge payments** for condominium projects. We believe that **public funds should not subsidize for-profit developments**; instead, these resources should be **redirected to public build programs** that directly address Toronto's housing affordability crisis.

## **Concerns with Deferring Development Charges**

# 1. Financial Implications for the City

The proposed deferral could result in a **maximum of \$182.1 million in deferred cash flow and \$28.3 million in foregone investment returns**. While it's stated that this can be accommodated without impacting planned capital investments, such a substantial deferral poses significant **financial risks**. Development charges are essential for funding infrastructure and services that support new developments. Deferring these payments undermines the City's ability to maintain and expand the necessary public amenities that enhance residents' quality of life.

## 2. Precedent of Subsidizing Private Developers

This proposal mirrors previous initiatives, such as the \$325 million incentive for purpose-built rental housing, which included deferrals of development charges and property tax reductions. Such measures effectively transfer financial burdens from private developers to the public sector, prioritizing private profits over public interest. This approach is neither sustainable nor equitable, especially when the need for affordable housing is so acute.

## 3. Impact on Housing Affordability

Deferring development charges for condominium projects does not guarantee affordability for residents. Without stringent affordability requirements, these incentives may lead to the proliferation of high-priced units that remain inaccessible to the average Torontonian, thereby **exacerbating the housing affordability crisis**.

## **Advocating for Public Build Programs**

Instead of providing financial concessions to private developers, the City should focus on **public build programs** that leverage publicly owned land for affordable housing development. **Build Toronto**, now operating under **CreateTO**, was established to develop underutilized City real estate assets to unlock their value and regenerate neighbourhoods. By investing in such public initiatives, the City can:

- Ensure Affordability: Developments on public land can be mandated to include a significant
  portion of affordable units, directly addressing the housing needs of low- and middle-income
  residents.
- Maintain Control: Public build programs allow the City to retain control over development projects, ensuring that community benefits, such as green spaces and community centers, are integral components of new developments.
- **Promote Sustainability**: Public developments can prioritize sustainable building practices and equitable urban planning, aligning with the City's environmental and social goals.

#### **Recent Positive Developments**

We acknowledge and commend the recent \$2.55 billion agreement between the City of Toronto and the Government of Canada to build more rental homes faster. This landmark agreement aims to deliver 4,831 rental homes, including a minimum of 1,075 affordable rental units. Such initiatives demonstrate the potential of public investment in addressing housing needs effectively.

#### Call to Action

NPTO urges City Council to:

- Reject the proposal to defer development charge payments for condominium developments under EX21.13.
- **Reallocate resources to public build programs** that utilize City-owned land for affordable housing projects, ensuring long-term affordability and community benefits.
- **Enhance transparency and public engagement** in housing development decisions to ensure that policies align with the needs and aspirations of Toronto residents.

By focusing on public build programs, Toronto can take a decisive step toward resolving the housing crisis, ensuring that public funds serve the public good, and fostering a more equitable and inclusive city.

Thank you for your attention to this critical issue. We look forward to your leadership in championing housing solutions that benefit all Torontonians.

Sincerely,

Walied Khogali Ali

Coordinator

Neighbourhood Pods TO (NPTO)

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The Neighbourhood Pods TO (NPTO) embodies a consortium of grassroots organizations, community workers, and advocates, all rallying under a unified mission to bolster the economic livelihoods and enhance the overall well-being of low-income individuals and communities across Toronto.