



April 3, 2026

Councillor Fletcher, Chair, Infrastructure and Environment Committee  
Attention: Infrastructure and Environment Committee  
City of Toronto  
100 Queen Street West  
Toronto ON M5H 2N2  
Sent via email to: [iec@toronto.ca](mailto:iec@toronto.ca)

RE: IE28.1 - Congestion Management Plan – 2026 Spring Update

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Dear Chair Fletcher and members of the Infrastructure and Environment Committee,

We are writing on behalf of the Building Industry and Land Development Association (BILD), which represents land development, home building, and professional renovations in the Greater Toronto Area and Simcoe, as well as the Residential Construction Council of Ontario (RESCON), the province's leading association for residential builders. Together, our organizations represent all facets of the residential development process, from planning through to construction. We thank you for the opportunity to provide comments on the Congestion Management Plan.

We understand that the Committee will be considering agenda item IE28.1 – Congestion Management Plan – 2026 Spring Update on April 7<sup>th</sup>. You may recall that in April 2025, BILD and the Residential Construction Council of Ontario (RESCON), jointly submitted comments urging the Committee not to proceed with the investigation of a new Congestion Management Levy and to exempt residential construction projects from the Lane Occupancy and RoDARS administrative fees, as we emphasized its negative impact on housing affordability and the broader housing market. Unfortunately, the housing market continues to suffer low new home sales, stagnant residential supply, and fluctuating consumer confidence.

The Canadian housing market is experiencing an unprecedented slowdown, with the City of Toronto facing particularly severe challenges. In February 2026, only 75 new homes (condominium and single family) were sold in the city, a stark decline from the 223 homes sold in the same period in 2024.

Given these significant challenges in the market, we recognize the proposed RoDARS exemptions for Affordable and Rent-Controlled Housing Development Projects and commend the City for its commitment to removing barriers for affordable housing development. **We urge the City of Toronto to expand this program to include all housing development in order to improve the feasibility of new housing projects, and ensure greater affordability across the city.**

The current housing market — historically low new home sales, stagnant residential supply, and fluctuating consumer confidence — makes it essential to take decisive action to promote affordability for all housing types, rather than imposing additional costs on homebuyers. We appreciate the City's intention to limit the impacts of construction on congestion but find that as road occupancy for new residential construction projects represents less than 5% of total road occupancies, and prioritizes expeditious completion we respectfully **recommend that the City, even on a temporary basis, exempt**

**residential construction projects from Street Occupancy, RoDARS administrative fees and any potential Construction Congestion Management Levy.**

Without this adjustment, we risk exacerbating the ongoing housing crisis in the City of Toronto. Thank you for your consideration of our perspective on this issue. Should you have any questions or require further information, please do not hesitate to contact the undersigned.

Sincerely,



Katherine Berton, MUP  
Manager, Policy and Advocacy  
BILD

Sincerely,



Richard Lyall  
President  
RESCON

cc: BILD Toronto Forum Members