

April 1, 2026

Infrastructure and Environment Committee
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2

Re: Item IE28.1 Congestion Management Plan – 2026 Spring Update

Dear Chair and Members of the Committee,

On behalf of NAIOP Greater Toronto (NAIOP), we are writing to express our concerns with the consideration of new fees on development activity in the right-of-way and to request to be included in the City's upcoming consultation.

NAIOP is the leading voice of the commercial real estate development industry in the region, representing owners, developers, and investors across office, industrial, retail, and mixed-use assets. Our members are responsible for a significant share of the city-building activity that supports Toronto's economy and housing supply.

NAIOP has been an active participant on the City's Construction Hub Coordination Committee and has worked with staff to identify practical solutions to reduce congestion. We strongly support the City's efforts to better manage congestion and enhance the efficiency of Toronto's transportation network.

Policy responses to congestion must be grounded in evidence and aligned with broader housing and economic objectives. Based on the City's own data, development-related activity accounts for approximately 3 to 5% of road closures. New development is not the primary driver of congestion in Toronto and NAIOP has concerns with any consideration of additional fees targeting development activity in the right-of-way.

Both the provincial and federal governments are taking decisive action to lower the cost of building new housing through the Canada-Ontario Partnership to Build, including by reducing development charges and eliminating HST on new housing. Introducing new municipal fees on development, particularly when it represents such a small share of overall road closures, would run counter to these efforts and risk undermining progress on housing delivery.

As the City advances its work with a third-party consultant to examine financial tools and incentives related to congestion management, NAIOP requests to be included as a stakeholder in that process. We remain committed to working with the City to improve coordination and reduce unnecessary disruptions.

Sincerely,



Leona Savoie
NAIOP Greater Toronto