



April 10, 2026

Mayor Marianne Meed Ward and Members of Council  
426 Brant St.  
Burlington, ON  
L7R 3Z6

RE: 13.2 - Draft Housing Community Improvement Plan Amendment (DGM-27-26)

**Public Meeting**  
**April 14**

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Dear Mayor Marianne Meed Ward and Members of Council,

The Building Industry and Land Development Association (BILD) is in receipt of Item 13.2, Draft Housing Community Improvement Plan Amendment (DGM-27-26), scheduled for the April 14 public meeting. On behalf of our members, thank you for the opportunity to provide comments through this correspondence.

BILD members appreciate the City's continued commitment to exploring creative tools to support housing delivery. This type of initiative is helpful given current market conditions, and we commend staff and Council for advancing it.

However, after reviewing the draft ownership grant program, in detail and assessing it against active projects in the City's development pipeline, many of our members have expressed concern that the current parameters may be overly restrictive and difficult to implement in practice. As drafted, the program risks limiting participation rather than enabling it, which we understand is not the intended outcome.

Many projects currently in the pipeline are already at advanced stages of design. Requiring proponents to meet highly specific program criteria at this stage would require significant redesign, reconfiguration, and additional analysis. These changes would introduce added costs and delays that are not feasible to absorb in the current environment, ultimately discouraging uptake.

In addition, certain thresholds appear rigid in a way that may unintentionally exclude projects that otherwise align with the program's objectives. For example, a development that delivers a strong mix of family-sized units, including both two-bedroom and three-bedroom units, may not qualify under the current framework if it does not meet specific targets for each unit type. This effectively penalizes one form of family-sized housing over another, despite both contributing meaningfully to the City's housing goals. This highlights the need for greater flexibility in how criteria are applied. As currently structured, the program will not work for many projects in the approval pipeline that have the greatest potential to advance to construction in the next two years.

While we strongly support the City's efforts to implement a Housing CIP, it is critical that the program be structured in a way that is practical, flexible, and responsive to the realities of development. **To that end, we recommend that staff and Council engage directly with interested industry stakeholders who have active projects in the development pipeline to better understand the level of flexibility required to make the program workable. One on one meetings with these companies will be constructive while these parameters remain in draft form.**

A one-size-fits-all approach will not achieve the desired outcomes when building complete communities. Greater flexibility will be key to ensuring the program is both effective and widely utilized.

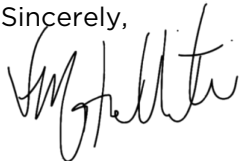
In addition to the above, and as noted in previous conversations and correspondence, BILD has consistently underscored and reinforced the need for Federal and Provincial funding for development charge related infrastructure in support of housing delivery. Recent welcomed announcements from both levels of government have now provided assurances that funding will be available to municipalities that take action to reduce development charges.

In this context, we thank and applaud Mayor Meed Ward for her leadership in spearheading the fulsome discussions that have occurred to date around development charge relief, and feel it is an opportune time for the City to continue its leadership by advancing development charge relief for all residential development outside of the CIP.

BILD supports the City in making any reductions conditional on confirmed funding, and this approach can be maintained while awaiting further implementation details expected following the March announcements. This would ensure that when implementation measures are finalized, the City's development charge reduction program is ready to proceed.

In closing, BILD and its members remain committed to working collaboratively with the City of Burlington to advance policies and programs that meaningfully support housing delivery. The success of the Housing CIP will depend on its ability to be implemented in real world conditions, and we encourage the City to refine the program to ensure it is accessible, flexible, and effective. We appreciate the opportunity to provide input at this stage and look forward to continued dialogue as the program evolves.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria Mortelliti". The signature is fluid and cursive, with a large initial "V" and "M".

Victoria Mortelliti, MCIP, RPP  
Director, Policy & Advocacy