

June 24, 2025

Toronto City Council

100 Queen Street West

Toronto, Ontario, M5H 2N2

Attn: Planning & Housing Committee

Submitted by email to [councilmeeting@toronto.ca](mailto:councilmeeting@toronto.ca)

**Re: Item – 2025.PH22.8 – Housing Action Plan: Avenues Policy Review – Phase Two Work Plan**

Dear Mayor Chow and Members of Council,

Thank you for the opportunity to provide feedback on the Avenues Policy Review (agenda item PH22.8). We would like to formally submit [The Mid-Rise Manual](#) for review and record as part of the Avenues Policy Review.

The Mid-Rise Manual is a toolbox created to expedite the creation of more housing along Toronto's Avenues and Major Streets in a form that is urban but human-scaled, that helps to activate and beautify Toronto's commercial thoroughfares, and that provides a housing type that caters to households at all stages of life. The Mid-Rise Manual is aligned with the Council-endorsed Housing Action Plan, specifically the Avenues, Mid-rise and Mixed Use Areas Study, and complements the Expanding Housing Options in Neighbourhoods (EHON) initiatives. The goal is to meet Ontario's housing needs with a gentle density solution combining affordable and equitable housing, as well as market housing, in mid-rise buildings along Avenues and Major Streets.

The manual aligns with Council's priorities and policy objectives; it recognizes the work that has been underway over the last 2 years including the review of the Mid-Rise Guidelines, as-of-right-zoning, and expanding the Avenues designation.

We are in full support of extending mid-rise permissions across the new Avenues and Major Streets, with the potential of delivering 545,000 new homes.

A key recommendation in the Manual, critical to unlocking mid-rise to end Ontario's housing shortage, is to simplify mid-rise development regulations and establish a Mid-rise Priority Review Stream with dedicated staff to curate specialized expertise in mid-rise development in order to streamline/right-size the approvals process for this scale of development.

To quote the opening three paragraphs of the attached Executive Summary:

Adding large numbers of mid-rise buildings to major streets in existing built-up areas is the optimum approach to provide the urban density prioritized by Ontario's growth strategy.

It is not novel; it's neighbourhood friendly, makes urban living more affordable, friendly and safe, and can be delivered quickly and efficiently at a scale that can accommodate population growth in Ontario for the next 20 years.

### **Neither tall nor sprawl**

Mid-rise apartments provide an alternative to urban sprawl and to towers that dominate and overshadow the single-family neighbourhoods they abut. There is a place for towers, of course, such as major streets like Bay or Yonge. However, the missing middle provides a more gentle, sophisticated transition on major avenues in neighbourhoods that adds enormous capacity, is economical to implement, expands pedestrian amenity, enhances the use of public transportation, and beautifies our streetscapes.

We urge Council to look beyond the planning rules to unlock the potential of mid-rise development. Permissive zoning is just one piece of the puzzle; if we are serious about making mid-rise happen then we need to think about right-sizing the application requirements, the approvals process, financial tools, and other construction standards that currently inhibit the construction of mid-rise buildings across the city.

Sincerely,



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## Contact Us

The Mid-rise Advocacy group can be reached via the signatories above, or through [Claire.Malcolmson@gmail.com](mailto:Claire.Malcolmson@gmail.com)

**The Mid-Rise Manual**, 2024 prepared by LGA and SvN on behalf of Environmental Defence  
<https://environmentaldefence.ca/report/mid-rise-manual/>

## APPENDIX 1

### **Executive Summary The Mid-Rise Manual**

#### **Recommendations to unlock and expedite the delivery of Mid-Rise Housing**

The goal: To deliver 1.5 to 1.7 million homes in Ontario by 2031

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#### **Obstacles to mid-rise development**

- **Building code**
  - Fire and life safety measures for mid-rise are unnecessarily stringent.
  - Two means of ingress and egress is not required.
  - Heavy timber and modular construction restrictions are too onerous.
- **Infrastructure**
  - Infrastructure capacity is insufficient to avoid costly, piecemeal development.

–Street occupancy permits, road closures, parking, and other infill-related costs are too onerous.

- Approval process

–Single approval body is required – Mid-rise Approvals Priority (MAP) – to replace multiple municipal department approvals and reduce approvals process from an average of 32 months to six.

–Requirement for site plan approval is unnecessary

–Number of consultants' reports is unnecessarily onerous

–Unappealable, as-of-right floor count and height limitations along major streets is required.

- Zoning

– Zoning By-laws and the Official plan must provide unappealable as-of-right provisions to permit mid-rise accommodation and mixed use along main streets and avenues with exceptions specifically designated.

- Sundry

–Hydro and electrical service oversizing needs to be replaced by performance-based load requirements certified by electrical engineers.

Pre-approval process should be established.

–Development charges, permit fees, municipal fees, warranty fees, density payments, and parks levies are major impediments.

–Realty tax differences between rental accommodation and condominium accommodation should be rationalized to avoid discouraging the former.

–Fees, taxes and charges that are applied up-front to infill mid-rise buildings even where much of the infrastructure they utilize is already in place, and even though their future occupants will contribute though property taxes are obstacles.

–Specialized low-cost, long-term financing for mid-rise buildings is lacking.

## Guiding Principles

The cost of *creating* mid-rise housing must be low enough

- to be competitive with high-rise towers;
- to incentivize the development of affordable housing for rent or sale; f
- to efficiently deploy public funding to provide optimum unit sizes and attractive street-related accommodation;
- to provide the most humane, environmentally friendly, and cost-effective way to meet the immediate need to rapidly increase Ontario's housing supply without creating urban sprawl.

## Conclusion

Current laws and policies have *artificially* made what should be the cheapest, fastest, and most efficient way to build quality housing *more expensive* to build than conventional "tall and sprawl" units.



The Mid-Rise manual provides a toolbox to help all levels of government work together to make the necessary changes to the building code, zoning, and the approval process to eliminate the constraints that prevent mid-rise construction from exploiting its natural competitive advantage. If Ontario is to deliver the 1.5 million new homes the province will need by 2031, implementing the Manual's recommendations is a good place to start.

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#### APPENDIX 2: Environmental Defence's Top Takeaways from the Mid-rise Manual (2024)

<https://environmentaldefence.ca/wp-content/uploads/2024/10/The-Mid-Rise-Manual-EDC-Top-Takeaways.pdf>

ENVIRONMENTAL DEFENCE'S TOP TAKEAWAYS FROM  
**THE MID-RISE MANUAL**

# **FIVE STEPS TO UNLOCK MID-RISE HOUSING AND END ONTARIO'S HOUSING SHORTAGE**



# THE STATE OF HOUSING

Ontario is currently facing a serious housing shortage. We're not building enough homes fast enough to meet the need.

Focusing construction on building mid-rise apartment buildings (5-11 storeys) on existing avenues and residential streets, which currently only allow low-rise buildings, is now the only approach efficient enough to deliver the 1.7 million new homes Ontario will need by 2031 to end the housing shortage.

## **The only Hope of Delivering “More Homes, Faster”**

Ontario is failing to build fast enough to keep up with demand because our laws and government policies push both market and non-market builders and investors to squander construction labour, equipment and materials on the least efficient building types and building locations.

It is mid-rise building formats that can safely bring together a combination of building materials, building designs and construction methods that together are faster and more labour-efficient than the alternatives.

Deploying those formats on avenues and residential streets throughout existing suburbs, towns and cities, means they can use existing roads, sewers and school capacity, with less construction wasted building infrastructure from scratch.





### **Our Last, Best Chance to Fix Existing Neighborhoods**

The good news is that focusing construction efforts on mid-rise buildings is also the best approach for protecting farmland and wildlife habitats, meeting climate goals and increasing quality of life for those who live in existing towns and cities.

Almost all of Ontario's currently low-rise urban, suburban, and rural neighborhoods need rapid injections of new homes, workplaces, and residents. Increasing density in these neighbourhoods will reduce car-dependency and resulting greenhouse gas emissions and increase housing options for people where they want to live. Unlocking mid-rise is also

a necessary lynchpin of any serious plan to accomplish this high-speed retrofit.

The problem is that Ontario's governments are preventing mid-rise infill housing by banning mid-rise heights outright on almost all existing residential lots. They also add design rules, approval processes and government charges that destroy their natural efficiencies and make them too expensive to build.

For lawmakers, activists, voters and planning staff in Ontario, the Mid-Rise Manual is the step by step guide to policy reforms that must be delivered to clear obstacles, unlock mid-rise housing and end the housing shortage.

# Obstacles and Solutions for BuildingB Mid-Rise ApartmentsB

To unlock mid-rise Ontario's governments must do more than remove the outright ban on mid-rise heights. They must make it legal to build safe and comfortable mid-rise apartments for every household type at a cost

low enough to allow for "market" rents and sale prices people will pay, and low enough to make it politically feasible for governments to pay for all the non-market, deeply affordable apartments Ontarians need.

## ❌ **Obstacle: Land Costs**

## ✅ **Solution: Create as-of-right permission to build mid-rise in places where it is viable to build**

Even in many municipalities that purport to support mid-rise development, "exclusionary zoning" creates competition for a limited subset of development sites - commercial strips with fast-moving car traffic - or the same downtowns, "MTSAs", and large brownfield parcels where taller buildings are viable.

### **Municipal governments shouldB**

- proactively amend zoning bylaws to provide as of right permission for mid-rise development up to six storeys, without step-backs, on all "avenues" and on all residential major streets, including those in currently-low-rise areas (p.18).
- proactively amend official plans to identify avenues and major residential streets inside presently low-rise areas as strategic locations for growth and intensification, where significant physical change is to be promoted (p.24).
- use new statutory tools as set out in O.Reg. 173/16. to establish fixed criteria for permitting mid-rise building heights in excess of six storeys in pre-defined circumstances and locations (such as the intersection of two major streets) without rezoning (p.24).
- update existing performance standards or guidelines for assessing proposed amendments to existing zoning to permit mid-rise development in excess of six storeys to focus on actual performance, rather than prescribing certain building geometry (p.24).

### **The provincial government shouldB**

- designate avenues and major residential streets inside presently "low-rise" areas as strategic locations for growth and intensification through Provincial planning policy (p.20).
- amend provincial planning laws to provide as of right permission for mid-rise development up to six storeys, without step-backs, on all of Ontario's "avenues" and on all residential major streets, including those in currently low-rise areas (p.20).
- amend provincial planning laws to mandate permissions for mid-rise development on all "avenues" (or equivalent) and on all residential major streets in greenfield development (p.20).

### **The federal government shouldB**

- require municipalities to allow mid-rise development on both avenues and major residential streets as a condition of federal housing and infrastructure funding.



## ❌ Obstacle: Construction Costs

## ✅ Solution: Legalize labour-efficient designs and methods for mid-rise

Mid-rise buildings can safely redeploy “low-rise” construction labour and materials to deliver far more units, but outdated laws force builders to meet the same costly and labour-intensive requirements as high-rise development.

### Municipal governments should

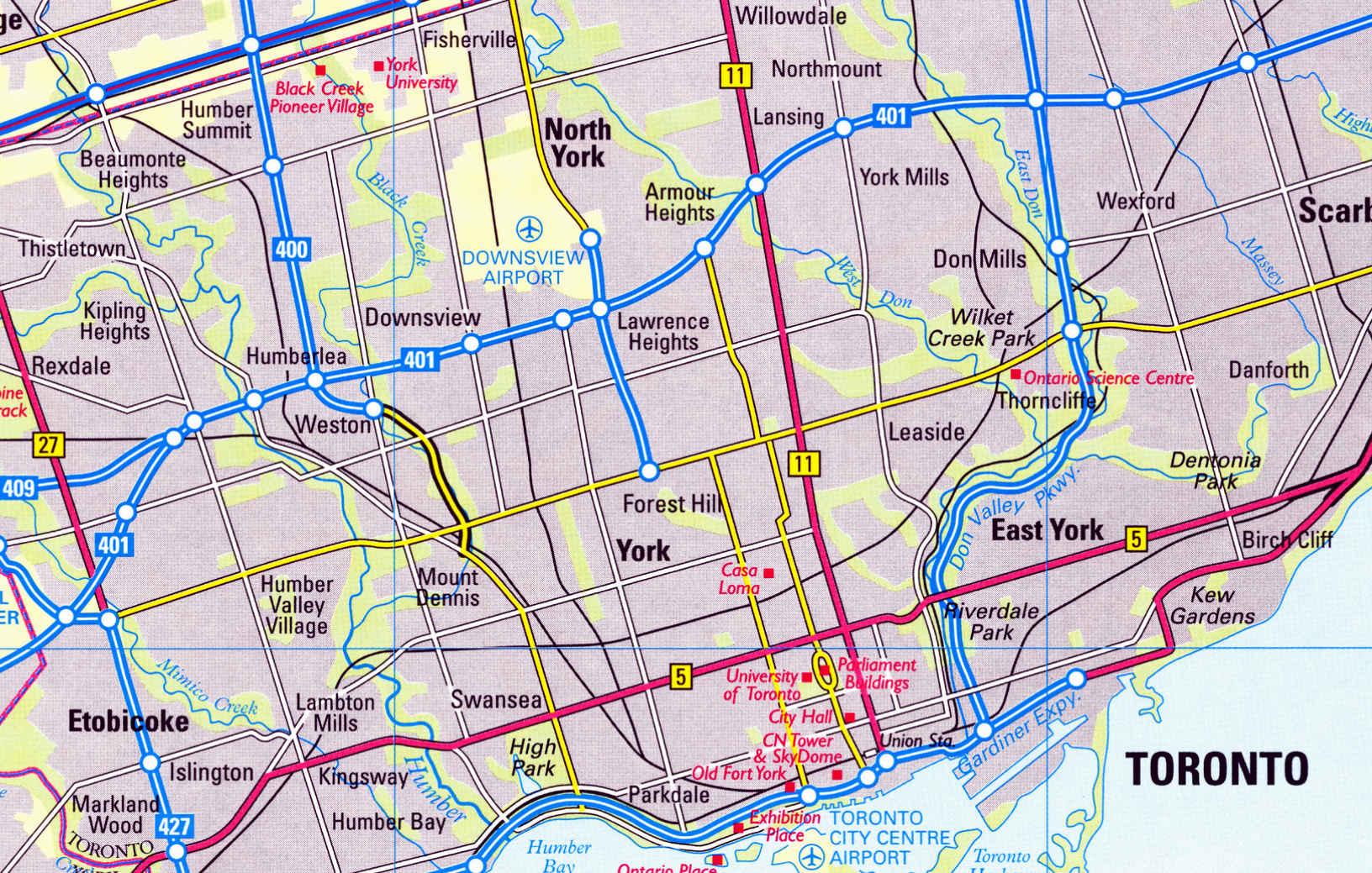
- remove mandatory “step-back” requirements for mid-rise buildings (p.22).
- provide simplified and standardized prescriptive solutions for smaller mid-rise developments to comply with stormwater management requirements (p.57).
- request or require local electricity distribution system operators to publish a design standard for optimized electrical service to smaller mid-rise buildings to reduce costs, delays and over-engineering (p.58).
- develop compact and less onerous garbage collection and loading bay requirements for mid-rise buildings (p.59).

### The provincial government should

- prohibit municipalities from mandating on-site parking.
- legalize fire-safe, performance-based alternatives to non-combustible side wall construction (p.48).
- legalize fire-safe “exposed mass timber” construction up to 8 storeys (p.49).
- legalize fire-safe “single egress” construction up to 6 storeys (p.50).







## ❌ Obstacle: Carrying and procedural costs

## ✅ Solution: Simplify and speed up approvals processes

### Municipal governments should

- provide “as of right” zoning for mid-rise development of at least six storeys without any further rezoning, in every location where mid-rise development is intended (p.18).
- expedite planning approvals, even where proposals don’t fully comply with the regulation, by enabling Staff to make decisions on minor deviations from the regulation using a list of prescribed criteria, as set out in O.Reg. 173/16 (p.24).
- simplify planning application requirements, especially where the development proposal conforms to the “as-of-right” built form regulation (p.26).
- establish a dedicated team within planning and buildings departments to curate specialized expertise in mid-rise development (p.26).

- develop a centralized database of existing conditions information, so that this can be relied upon by development proponents and City Staff and not re-investigated for each project (p.27).

### The provincial government should

- provide municipalities with permanent funding for planning staff to support mid-rise development on major streets and avenues.
- Amend provincial planning laws to provide as of right permission for mid-rise development up to six storeys, without step-backs, on all of Ontario’s “avenues” and on all residential major streets, including those in currently low-rise areas (p.20).



## ✓ Reduce the cost burden of government fees, taxes and charges

### Municipal governments should

- fund many of the General Services currently funded through Development Charges using property taxes instead (p.38).
- harmonize residential property tax rates between residential and multi-unit residential to remove a disincentive for purpose-built rental housing (p.40).
- reform the Municipal Land Transfer Tax as a Real Estate Capital Gains Tax (including primary residences) as a more effective tax on profits rather than transactions (p.40).
- use property and other taxes, rather than development charges, to proactively upgrade capacity along major streets (p.40).

### The provincial government should

- encourage fiscally responsible compact urban development patterns that allow municipalities to balance their budgets by eliminating incentives for urban sprawl and diversify LVC funding mechanisms to reduce the need for Development Charges (p.37).
- require municipalities to impose significantly lower general services development charges for all mid-rise in existing built up areas than for single- and semi-detached and greenfield development (p.38).
- direct MPAC to update property assessments to ensure property taxes are equitably distributed and accurately based on current property values (p.40).
- reform the Provincial Land Transfer Tax as a Real Estate Capital Gains Tax (including primary residences) as a more effective tax on profits rather than transactions (p.40).
- prohibit municipal governments from charging higher property tax rates for rental housing than ownership housing (p.40).

## ✓ Transition small-scale infill developers and low-rise construction subtrades to mid-rise development

### Municipal governments should

- simplify mid-rise approvals processes and provide support to non-professional and less-experienced mid-rise developers.

### The provincial government should

- support new builders of small-scale mid-rise development, with supportive financial and legal structures as well as procedural support and guidance for non-professional and less-experienced developers (p.42).
- offer low-cost, long-term fixed-rate financing for construction of mid-rise buildings (p.42).

### The federal government should

- incentivize citizen-led development, by prioritizing the creation of financial and legal structures, procedural support and guidance for non-professional and less-experienced developers.
- offer low-cost, long-term fixed-rate financing for construction of mid-rise buildings.



# ACKNOWLEDGEMENTS

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Commissioned by ENVIRONMENTAL DEFENCE and Robert Eisenberg, with input from Land Use and Land Development Program Manager Phil Pothen, Executive Director Tim Gray, and Robert Eisenberg.

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