

July 22, 2025

Mayor Chow and Members of Council
City of Toronto
100 Queen Street West
Toronto, Ontario
M5H 2N2

Attn to Toronto City Council – TRREB Submission on PH23.6 - Missing Middle and Midrise Housing Implementation Initiative

Dear Mayor Chow and Council Members,

The Toronto Regional Real Estate Board (TRREB) commends City Planning staff and the Planning and Housing Committee for their continued leadership in advancing the City's Missing Middle and Midrise Housing Implementation Initiative.

Shift from Permissions to Financial Feasibility Is a Positive Step

As noted in the latest staff report on PH23.6, the City has made significant progress since 2018 through the Expanding Housing Options in Neighbourhoods (EHON) initiative—bringing forward much-needed changes to the Official Plan and Zoning By-law that support more diverse, low-rise housing options across Toronto's residential neighbourhoods. These efforts represent critical steps toward addressing Toronto's growing housing needs. TRREB is pleased to see the City shifting from planning permissions to a more targeted focus on financial feasibility and implementation.

The City Planning Department's recent Neighbourhood Intensification Research Bulletin underscored the scale of opportunity tied to missing middle housing, with the potential to contribute approximately 54,600 new homes—nearly 20 per cent of the total required under Toronto's Municipal Housing Target. Unlocking this potential, however, will require ongoing policy evolution and a clear-eyed approach to the economic realities shaping housing development.

TRREB strongly supports City staff's recognition that unlocking missing middle and midrise housing is not simply a question of permissions, but also of development viability, regulatory flexibility, and cost certainty. This shift toward identifying and removing systemic barriers is both necessary and timely.

TRREB Applauds Staff for Identifying Design and Regulatory Issues

In particular, TRREB applauds staff for identifying a range of high-impact design and regulatory issues that continue to inhibit missing middle and midrise development, including the acknowledgment that the current regulatory framework—including specific site standards,

setback requirements, and building envelope constraints—adds complexity, causes delays, and increases costs. In addition, the exploration of development charge discount mechanisms could better support midrise development and offset high construction and land costs.

We look forward to the staff report expected in Q2 2026 with an update on the progress of missing middle and midrise initiatives. TRREB encourages City staff to engage industry stakeholders, including TRREB, in the upcoming process.

To support a thriving city, Toronto must approve more housing and make it practical to build and support thriving communities.

Sincerely,



Elechia Barry-Sproule
President