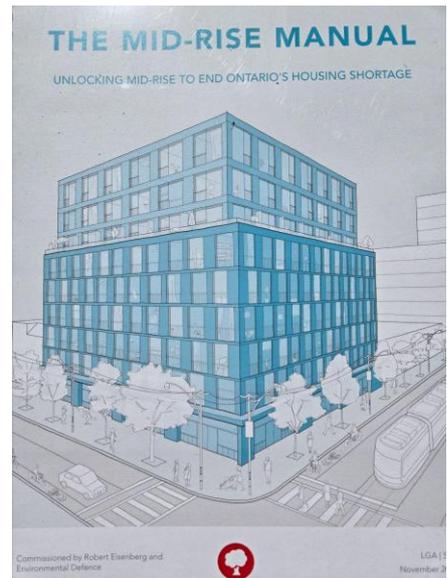


Submission for the City of Toronto's Planning and Housing  
Committee meeting, Dec 3, 2025  
Via phc@toronto.ca

## Re: PH26.4 - Housing Action Plan: Avenues Policy Review Phase Two: Initial Study of Wards 9 and 11

From the Mid-rise Advocacy Group  
Members listed as signatories



Dear members of Toronto's Planning and Housing Committee,

The City of Toronto has already taken some direction from the Mid-rise Manual (<https://www.svn-ap.com/insight/the-Mid-rise-manual>); we appreciate the focus on the issues it identifies. Current laws and policies prevent Ontario's builders - whether public or private - from realizing the intrinsic construction cost, environmental, and labour-efficiency advantages of Mid-rise infill housing. Prohibitions and restrictive policies have artificially made what should be the cheapest, fastest, and most efficient way to build housing more expensive than conventional "tall or sprawl" options. As Ontario's housing crisis and unemployment worsen, it's vital that we get this right.

In addition to the technical advice provided through the City and Batory's Mechanics survey, this group wants to provide some points to consider that will help to create conditions in which Mid-rise can thrive:

1. Delivering an approvals process that cuts the approvals timeline down from two to three years to six months. We are happy to see progress on this in the updated Development Review Service Excellence Charter and Service Standards. Further, consider the following points a, b, c and d:
  - a. Create an interdivisional mechanics and process team to achieve the above;
  - b. Consider bumping up the site plan exemption for Midrise (now ten units or less);
  - c. Consider streamlined approval process streams for small buildings, (up to 30 units), medium (up to 60 units) and large (up to 90 units);
  - d. Provide staff with delegated authority for approving minor variances for Mid-rise;
2. Continue as-of-right zoning on Major streets and Avenues;
3. Consider reducing amenity space requirements and introduce optionality, using creative ways of meeting amenity requirements, with neighbourhood context and users' specific needs in mind, especially for small buildings;
4. Create clear performance-based standards for building mechanics;

5. Extend the Type G garbage room exemption to buildings up to 60 units, from its current 30;
6. Consider optionality to the upper level step back, especially in consideration of site orientation;
7. Provide simplified and standardized prescriptive solutions for smaller midrise developments to comply with stormwater management requirements;
8. 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.

The City appears willing to change some requirements and processes, but we should be clear, to truly move the needle, other actors must also come along and meet the moment by removing barriers to, and funding, missing middle Mid-rise housing in our existing communities. Changes to Toronto Hydro requirements, changes to the Ontario Building Code to allow single staircases in some types of buildings, and financing incentives for Mid-rise are all needed to increase the range of housing options available to people of varying income levels.

We are likely at an inflection point in Ontario real estate and home building, at which cost constraints are driving changes towards simpler, less expensive products and processes. This does not need to come at the expense of excellent building design and public realms. Indeed, the professionals in our group want to spend more of their project's time and money on making excellent homes and buildings at all price points, instead of on lengthy processes.

We have been talking with some residents' associations and young people involved in housing advocacy. We heard support for more Mid-rise, in contrast to the dominance of very tall and sprawl housing. Interestingly, some of the most enthusiastic voices were those who had been forced out of Toronto, or couldn't live here though they wanted to. One of the important demographics for this housing, young workers and their families, is leaving the GTA, driven out by housing costs and limited options. The Toronto Board of Trade calls this "*a massive threat to our economy.*" It is important to continue to support Toronto's strength as a place of enormous employment opportunity by ensuring we can house young workers.<sup>1</sup> We believe Mid-rise building is part of the solution.

With regard to the City's current consultation, we very much appreciate the quality of the work that is being done. However, more lead time before community engagements would lead to more participants, and more ability of groups like ours to get people engaged. Having reviewed the community's comments, it's clear that Toronto is ready for Mid-rise, supports

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<sup>1</sup> " According to a recent [Missing Middle Initiative report](#), between 2018 and 2023, the Greater Toronto Area lost more than 80,000 residents per year to other parts of Canada.

Last year, the three largest 5-year cohorts leaving the region, on net, are those under the age of 5, and those between the ages of 25-29, and between the ages of 30-34. Losing young parents — often people in the prime of their working career — is a massive threat to our economy." Toronto Board of Trade, Your Talking Points this week: Housing. November 27, 2025.

medium density housing, wants to protect much existing fine-grained retail, and more affordable and family housing options.

## **Comments on the Chief Planner's Report for Action**

City Planning on Housing Action Plan: Avenues Policy Review Phase Two: Initial Study of Wards 9 and 11

<https://www.toronto.ca/legdocs/mmis/2025/ph/bgrd/backgroundfile-260227.pdf>

### **1. Existing conditions / exemptions**

We appreciate that staff included the comment that 43% of eligible Avenues in wards 9 and 11 are being “excluded from the analysis as existing site and area specific policy or secondary plan area, were already studied for mid-rise permissions as part of the As-of-Right Zoning for Mid-rise Buildings on Avenues study, or were within open space areas,” (p. 9, Report for Action).

We need to balance preserving the character of neighbourhoods with equity, and the need to make best use of our transit system for all commuters. In Toronto we already have an ironic misalignment of housing costs around transit, the result being most low and middle income workers need to commute long distances to reach their low paying jobs. The opposite holds true for wealthier homeowners who can access transit easily whether they need to or not. Our advice is to balance equity and heritage needs as much as possible across the City. In wards where access to transit is very good, we need more Mid-rise, and that is going to have to come at the expense of some heritage, existing site and area specific policy or secondary plans. In this case, in our opinion, preserving older, busy, street-oriented retail areas should be the priority. In wards where development is newer there won't be as many heritage districts. But there may be a desire to protect a retail area, or a stretch of two to three story retail / residential buildings. Please balance both housing and heritage needs fairly across the City in the roll out of this agenda.

There is concern among our professional colleagues that the patchwork approach to Zoning and result is going to frustrate Mid-rise development. It creates challenges for interpretation as there are a patchwork of rules that apply to these otherwise similar main street conditions. Also, it doesn't leave room for these streets to evolve over time. Why are we designating / zoning only one side of Christie for retail? There are existing retailers / non-residential uses on the east side. Similarly, Ossington has a patchwork of designations. If one of the underlying objectives of this work program is to get planning "out of the way" so that Mid-rise projects can move faster, this approach could ultimately frustrate that.

As this phase concludes and staff are looking at what they have learned, the extent of the patchwork is something to examine. As well, staff could articulate the rationale for these end results; perhaps community consultation strongly favoured this outcome. It would be helpful to understand how this outcome was reached.

## 2. Small, oddly shaped lots

Rather than retaining the existing land use designation on small, oddly shaped lots, (p. 10, Report for Action) we encourage the City to support creative solutions for small, oddly shaped lots. Mid-rise builders want to be creative, and we believe we can if the amenity and servicing requirements are flexible.

## 3. Water / Wastewater

We do not question the need for the coordination of water and wastewater servicing, but our request is that the city, not developers, address this. The City should make existing studies already submitted, available to new applicants, to more efficiently determine the available water / wastewater capacity. Better still, the City could establish a proactive work program for reviewing, monitoring, and upgrading municipal infrastructure on Avenues and Major Streets. If you build it they will come.

In conclusion, we want to reiterate our support for this timely initiative. We believe that the Mid-rise Manual recommendation for the Mid-rise building sector will increase housing choice and may contribute to lower ownership or rental costs for residents, increase density on our major streets, add vibrancy and safety to our City, and reduce commuting and car pollution pressures.

We appreciate Council and staff's efforts to expand housing options, and the support of the public for this type of Missing Middle housing.

Respectfully submitted,



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Mid-rise Advocacy Group Project Manager

**About Us:** We are a group of planners, architects, construction managers and builders working together to advance the solutions that can make Mid-rise building more viable in Toronto and across the province. This Mid-rise Manual, commissioned by Environmental Defence and former infill developer Robert Eisenberg, is a step-by-step guide to achieving this. Our goals and recommendations for all three levels of government are in our Mid-rise Manual: <https://www.svn-ap.com/insight/the-Mid-rise-manual> We thank the Mid-rise Manual's authors for this timely and practical report.

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