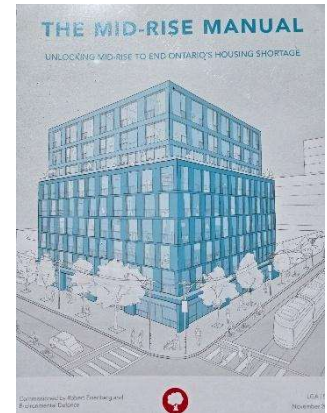


Submission to City of Toronto Council

City of Toronto
100 Queen Street West
Toronto, ON
M5H 2N2
councilmeeting@toronto.ca

From the Mid-rise Advocacy Group

Re: CC43.9 - Implementation of the Development Charges Reduction Program



July 29, 2026

Dear Mayor Chow and Toronto Councillors,

I am writing on behalf of the Mid-rise Advocacy Group to support the implementation of the Development Charges Reduction Program. These reductions stated aims are to lower development costs, improve project viability and support increased housing supply.

1. We support the allocation of 60% Development Charge (DC) rate reduction to the following building typologies and bedroom numbers:

Ownership housing types :

- Single and Semi - Detached
- Multiples 2+ Bedrooms
- Apartments 2+ Bedrooms
- Dwelling Room

Rental housing types:

- Multiples 2 Bedrooms
- Multiples 3+ Bedrooms
- Apartments 2 Bedrooms
- Apartments 3 Bedrooms and Large

While we understand that this agreement has been made, and we are not challenging it, we do not think that a 40% DC cut is as beneficial for bachelor and single room units unless the intent is to support affordable housing. That can be re-considered in the future based on an assessment of Toronto's housing needs.

2. There appears to be a policy debate underway which considers the overall benefit of removing infrastructure costs from individual developments and placing the burden on the general tax base or other funding approaches as the source of funding for capital infrastructure expenses. A holistic new approach or formula has not yet been reached, and this DC cut program is an example of an interim solution meant to support continued residential building when the sector needs support. But this is not sustainable in the long run. Therefore, it is important that the DC breaks are tied to clear public policy outcomes. Here, we particularly support the selection of two plus bedroom units in rental, or non rental, in multi-unit buildings. This is a solid choice as it will help Toronto deliver the housing it needs, which is family-sized units at all price points.

3. As Council considers these issues, we want to suggest that future DC reduction programs target and support the most cost - efficient building types, the most sustainable, and those that are the most efficient at delivering infrastructure improvements. To that end, we propose that Mid-rise building typology is the most efficient. Now that Toronto is zoning its Avenues and Major Streets for Mid-rise, has an [As of Right approval stream for Midrise up to 6 storeys and 60 units](#), and is contemplating [other flexibility for Mid-rise](#) including for amenity space, bike parking, and garbage rooms, the efficiencies are lining up.

4. We recommend that Toronto conduct an analysis or literature review of the cost effectiveness or cost per residential unit, or cost per new bedroom, of infrastructure upgrades. We understand that there is a significant amount of uncertainty for developers where it comes to paying for upgrades to infrastructure. At times, the cost is prohibitive and effectively cancels the project. If Toronto is to incent development, it does need to better consider the cost effectiveness of various building typologies, other than construction costs (as reported by the Altus Guides, for example.)

5. In closing, we intend to submit a more detailed response about Toronto's Development Charge program in August, but our high-level comments are as follows:

A future DC reduction focus on Mid-rise building on Avenues and Major Streets accomplishes the following:

- a. Provides housing across a variety of neighbourhoods that already have services;
- b. Is ideal for many who want housing in their neighbourhoods: downsizing seniors, first time home buyers, and young families renting or buying;
- c. Reduces neighbourhood conflict around parking and trees as Major Streets have transit options and fewer on-site trees;
- d. Housing more residents on transit - supportive roads meets the City's need to increase TTC transit ridership;

- e. Transit supportive development and building efficiency also support the City's climate and Net Zero objectives;
- f. Is inherently more sustainable than towers for greenhouse gas intensity;
- g. Is a more efficient construction, labour and land use approach than other building typologies.

Respectfully submitted,



Claire Malcolmson, MES
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.