

## Mid-rise Implementation Report feedback

Submission for the City of Toronto's Planning and Housing Committee meeting, May 7, 2026

Via [phc@toronto.ca](mailto:phc@toronto.ca)

From the Mid-rise Advocacy Group

PH30.8 - Mid-Rise Housing Implementation Initiative - Proposals Report

<https://secure.toronto.ca/council/agenda-item.do?item=2026.PH30.8>



May 4, 2026

Dear Chair Perks and members of Toronto's Planning and Housing Committee,

Planning staff and Council direction have led to many important changes in how and where Mid-rise buildings are built. Indeed, we are happy to see many of the issues that are raised in the [Mid-rise Manual](#), which guides the Mid-rise Advocacy Group, are addressed in the Implementation report.

It is critical that the City implements the staff report's recommendations. The combined financial impact of the measures outlined in this staff report, if adopted, can take up to \$75,000 off a 3-bedroom unit (pg 10), simplify or shorten development review processes, and reduce time and application costs.

There is a core need for family-sized units at multiple price points in Toronto, and Mid-rise is particularly well positioned to deliver this. The staff report identifies that "42% of mid-rise projects in the Development Pipeline feature two or more bedrooms, and approximately 26% of mid-rise units are purpose-built rental units, compared to 38% and 17% respectively for high-rise buildings" (Attachment 1, figure 7, pg 19). In a time of extreme sensitivity to cost of living issues, with a development "cliff" approaching, Council must support these directions and cost reductions. Indeed, if the City is serious about prioritizing building family-sized units, a targeted DC cut for three bedrooms plus in Mid-rise buildings would further support that policy objective.

Increasing the land available for Mid-rise by 50% from 2024 is a major accomplishment; we thank Council for endorsing the expanded Avenues Plan. Parcel by parcel re-zoning has started, but it needs to move more quickly. The work that has to be done to make this possible is an example of untangling policy to actually reduce red tape. We appreciate that staff is now trying to de-clutter the overlapping community plans, secondary plans, heritage districts, etc. We recognize

the importance of making the zoning work efficiently and request your support in keeping this initiative a city priority under EHON.

### **Detailed comments:**

#### Amenity Space (proposed actions, pg 10):

The staff report's amenity space surveys tell us that the availability of amenity space does not significantly impact overall resident experience either positively or negatively.

We support the proposed reforms:

- No longer requiring amenity space in buildings up to four storeys and under 60 units, however, we question the cut off at 4 storeys? Most builders would pursue 6 storey buildings wherever they are permitted, and that is the building height we suggest be applied to this proposed change.
- Removing the requirement that a portion of indoor and outdoor amenity space be contiguous.
- Reducing the overall amenity space requirement of 4 square metres per dwelling unit and allowing variability in the proportional distribution of the indoor and outdoor amenity space requirements.
- And permitting indoor amenity space as part of a building's mechanical penthouse footprint. With the necessary Official Plan amendment, this could encourage smaller buildings to use their roof as an amenity space.

We do believe that flexibility is important, to respond to the neighbourhood context, anticipated occupants, and price / cost expectations. And we believe residents will, as they did in the days before amenity requirements, explore their neighbourhood and support local businesses, like gyms and restaurants. This better supports local retail businesses, and likely better health and social outcomes.

That these amenity space changes alone could translate into \$20 - 40/sq ft. savings, which is minimum \$20,000 savings for a 1000 sq ft unit, is an important piece of flexibility that puts affordability ahead of frills.

Research into current use of amenity spaces (Attachment 4, pg 25), shows that proximity to public libraries and community centres is what is lacking for almost half Mid-rise building locations. These tend not to be the amenities provided in buildings.

For larger buildings that have 60 plus units, the amenity space requirement exists, but becomes more flexible. We think this is a reasonable step, but we want to ensure that many types of amenities could count towards fulfilling the requirement; for example, providing space for a local community not for profit in a building where it is helpful, should be acceptable.

#### Garbage collection and removal (pg 12):

Type G loading requires excessive amounts of space for garbage truck movement inside a building. This is no longer required for buildings under 31 units. Expanding this exemption is a very important change for affordability as it would make more small projects pencil. It also leaves the door open to more collection options for the future when there is more Mid-rise across the city (like smaller trucks and more frequent pick-ups). We would like to see solutions for buildings of 30 - 60 units as well to reduce construction costs and increase space for housing units. We appreciate that this will come back after further study through a request for proposals.

#### Bicycle parking (proposed actions, pg 12):

Bicycle parking is great, but not if it tips Mid-rise projects away from viability. We like the change that allows developers to increase the Payment-in-Lieu of Bicycle Parking eligibility from 50% to 100%, allowing them to invest in the City's amazing and growing Bike Share program instead of providing a required number of bike parking units. Other additional flexibility includes the ability to host Bike Share stations on site, and where to locate short term bicycle parking. Arguably this proposal has better public and ridership outcomes than providing as much bike parking as was originally required. If, as anticipated in the staff report, the increased flexibility for bike parking leads to fewer variance requests, this would also increase the efficiency of Mid-rise development.

#### Mid-rise Design Guidelines (pg 15):

We participated in the public consultation on Mid-rise Design Guidelines changes and think the direction the City is taking is good. The aim is to reduce the cost and complexity of building, while allowing builders the flexibility to make beautiful buildings that fit and serve the neighbourhood. We look forward to speaking to this item at your next meeting.

#### Lot coverage (pg 15):

The staff report tells us that more study will be done before making recommendations on changes to the allowed lot coverage. For an apartment abutting a Major Street the current rule is 50% lot coverage. This has contributed to the creation of buildings that some residents object to, because they see them as too tall for the low-rise context. This is a challenge - how do you change a block over time, from bungalow to six storeys? We do need public support.

The recent [Growing Space for Trees and Minor Variance Requests](#) report makes clear that to accommodate tree protection, landscaping, and softscaping requirements, that some developers are asking for variances, or seeking extra height to design a building that pencils. Easing the lot coverage restrictions to 70% and allowing more permeable materials for softscaping could be easier for residents to

swallow than six storey buildings next to bungalows. Resolving lot coverage is important for projects' viability. Consider providing a cash in lieu option for infill builders that submit projects that conform to the zoning but still need variances to put together a viable project.

Scoping and Streaming Site Plan (pg 16):  
Review for June 2026 PHC

We would like a dedicated review stream for Mid-rise to speed up development review timelines, and we appreciate the work staff is doing on this. The province appears positioned to do this, via changes to the Planning Act proposed at the end of March. It is important to us, and to you, that the City's and the Province's processes are complimentary, and we hope you will join us in making that argument to the Province.

The staff report does a good job of describing the role that Mid-rise can play in filling the anticipated development "cliff" of 2028-2029. In order to truly fast track this development form, the City should choose a stream for the ideal but viable path with the least community resistance, and we would suggest that that is for mid-size Mid-rise buildings on Avenues in particular. Lot sizes tend to be larger, land tends to be less expensive, and the ability to house a lot of people with one project is big. Buildings of up to 60 units on 6 floors would be a good category to prioritize.

Single Exit Alternative Solution (pg 16)

We do appreciate this effort, as eliminating the need for two staircases in buildings under 4 storeys would improve small buildings' business case. We are also asking the province to change the Building Code to allow this.

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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**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.