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May 5, 2026

City of Toronto  
Planning and Housing Committee  
c/o Nancy Martins  
100 Queen Street West  
Toronto, ON  
M5H 2N2

Dear Councillor Perks, and Members of Planning and Housing Committee,

**Re: Mid-Rise Housing Implementation Initiative – Proposals Report  
Planning and Housing Committee Agenda Item No. 2026.PH30.8  
464 Royal York Road  
Wycliffe Royal York Limited**

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Goldberg Group, acts on behalf of Wycliffe Royal York Limited, the “**Owner**” of the property legally described as ‘Part of Lots 131, 132, 133, 134, and 135, Registered Plan 1007’, and municipally known as 464 Royal York Road (the “**subject property**”). The subject property is located south of Oxford Street and the Queen Elizabeth Expressway, west of Royal York Road and presently supports a vacant industrial building.

In a decision dated October 30, 2025, the Ontario Land Tribunal approved applications to amend the City of Toronto Official Plan and Zoning By-law to permit the redevelopment of the subject property with a 12-storey apartment building containing 112 purpose-built rental apartment dwelling units. The implementing instruments are now in effect as Official Plan Amendment No. 853, and Amending By-law 1574-2025. An application for Site Plan Control Approval was deemed complete on December 23, 2025 as City File **25 267825 WET 03 SA** (the “**SPA**”).

A recent resubmission through the SPA process contemplates a revised proposal to increase the height of the building to 14-storeys, supporting 198 dwelling units. Revisions to the supply of amenity space and other requirements of the By-law are incorporated, commensurate with the increased height and unit count. Relief from the approved site specific exception will be necessary to permit the revised built form through a Minor Variance process.

We have reviewed the Proposals of Staff and support many of the recommendations. Generally, our Client is supportive of any initiative which will allow greater flexibility in the policy framework applicable to mid-rise development, and reduce the timeline needed to achieve approval and begin construction.

In this regard, we provide the following comments and recommendations on behalf of our Client:

**Amenity Space:**

Consider broadening what may be considered an ‘amenity space’ for the purposes of satisfying the required rates of the By-law. For example, an enlarged bicycle maintenance area or workshop

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could also serve a social function for building residents, while making efficient use of bicycle storage rooms or parking levels.

**Bicycle Parking:**

Consider expanding options for how bicycle parking may be provided. Within the Zone Exception applicable to the subject property, we have included an exception to allow a wall mounted bicycle parking space to encroach into the vertical clearance of a parking space, thus making more efficient use of the volume of same to serve dual purposes. This measure effectively allows each parking space provided to count as 2 spaces – 1 for a vehicle, and 1 for a bicycle, thus reducing the floor area that must be devoted to long term bicycle parking.

**Bike Share:**

Permit Bike Share docks as an ‘in-kind’ Community Benefit Charge contribution ‘as of right’. This would expand the provision of the system, while reducing the financial impact on a proposed development.

**Lot Coverage:**

Consider eliminating lot coverage, gross floor area, and/or floorspace index requirements for all mid-rise buildings, and instead focusing on built form aspects of a proposal. Eliminating these provisions from consideration, and focusing on the resulting impacts of built form will help to streamline review and approvals, potentially eliminating the need for relief from the By-law.

**Green Infrastructure**

It is our experience that it is often difficult to achieve the soil volumes required by the City for lands intended for high-density redevelopment, including mid-rise buildings. We suggest that consideration should be given to relaxing these requirements to optimize opportunities to provide this housing type. We also suggest that it is necessary to increase the variety, size, and cultivars of trees that are considered acceptable in what is intended to be a highly urban condition, recognizing that all trees still provide benefit to the public, but may not require the same space to thrive. We understand this is a similar approach to that recently implemented by the City of Oakville.

We also suggest that discussions should be held with the City Engineering Department to allow the provision of low impact development (LID) measures within the City right-of-way to reduce development costs, and make more efficient use of all lands available for mid-rise buildings for stormwater management purposes.

**Action on Climate Change**

It has been our experience that the costs of the necessary upgrade to achieve higher performance levels of the Toronto Green Standard (TGS) exceed the incentives provided by the City through reduced development charges. Unfortunately, this is compounded by the fact that the market often does not recognize, or place value upon, increased sustainability when it results in higher housing costs.

Accordingly, we suggest that a review is needed to implement a more comprehensive and holistic approach achieving sustainability goals to ensure that a full suite of potential incentives are provided, such that there is no net increase, or preferably a decrease, in project costs.

**General**

We note that prior efforts from the City to streamline approvals through the Expanding Housing Options in Neighbourhoods (**EHON**) process have been limited in impact as a result of previously existing site or area specific exceptions. It has been our experience that these more recent City initiated amendments do not supersede these restrictions, thus still requiring relief through a Minor Variance or By-law Amendment process.

Additionally, consideration should be given to altering the methodology through which height and setbacks are governed within site specific exceptions. Presently, buildings are 'shrink wrapped' quite tightly, eliminating opportunities to modify built form in response to market or other conditions without further Minor Variance or By-law Amendment processes.

The need for these additional processes can be both timely and costly. Further, where Committee of Adjustment is involved, the results are neither guaranteed, nor is it certain that a decision will be consistent with the stated intent of Council where community opposition is encountered.

We request to be notified of any future actions, reporting, or decisions related to this matter. If you have any questions or require additional information, please do not hesitate to contact the undersigned at ext. 2101.

Yours truly,



Adam Layton, RPP, MCIP

cc. Wycliffe Royal York Limited