



May 6, 2026

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins

RE: PH30.8 Mid-Rise Housing Implementation Initiative – Proposals Report

Dear Chair Councillor Gord Perks, and Members of the Planning and Housing Committee,

The Federation of North Toronto Residents Associations (FoNTRA) wishes to express our concerns regarding the directions outlined in the Proposals Report. While we support the goal of increasing housing supply in Toronto, we are deeply-concerned by the apparent fundamental shift in the City's land use planning methodology as represented by this report—from the sound, design-led principles of the 2024 Mid-Rise Design Guidelines to a framework dictated primarily by short-term economics and private-sector profitability.

The Parcel Economics Report explicitly states that its goal is to **"inform how mid-rise projects could be better positioned to achieve financial feasibility"**.

The Report acknowledges:

- Even the most aggressive combination of "levers"—including the total removal of amenity spaces and loading requirements— only reduces the target sales price by an average of \$60 per square foot compared to a market (rule-of-thumb) pricing of about \$1,000 per square foot. This would result in projected savings of 6% to prospective buyers, perhaps incentivizing some uplift in total sales.
- Whether these marginal cost efficiency estimates will be passed on to the homebuyer or tenant **depends entirely on the "appetite of developers," rather than being a structural requirement of the policy.**

This approach treats essential residential infrastructure—such as indoor amenity space, contiguous outdoor space, and secure bicycle storage—as mere "levers" for profitability and shifts responsibility to address the housing issue onto the taxpayer.

Fundamentally, this approach neglects what economists call “externalities.” These “reforms” aim to curb *internal* costs to sellers and buyers. But that *internal* saving is at *external* expense. It costs the neighbours, and the physical environment, and the whole city, in both material and immaterial ways, like esthetics and reputation, and tourist draw and even civic and social life. Unfortunately, it is very hard to cost out the damage done.

We all share the goal of building a livable, vibrant city for all residents, and we recognize the urgency of the current housing crisis. However, the solution should not be the systematic dismantling of the very standards that ensure Toronto remains a world-class city to live in.

We recommend that:

- **The Planning and Development Committee defer approval of this report and the tacit endorsement of the 15 items recommended for action until the full research findings and data sets used by Parcel Economics are disclosed and a series of technical briefings are held for members of City Council and all interested parties.**

We urge the Planning and Housing Committee to direct staff to return to the design-led principles of the 2024 Guidelines and to conduct a more balanced, transparent, and technically rigorous consultation process before any of these 15 items are implemented.

Sincerely,

Geoff Kettel

Geoff Kettel

Co-Chair

Attachment: Proposals- Summary and Key Issues

- c.c. Jason Thorne, Chief Planner and Executive Director, City Planning
Svetlana Lavrentieva, Project Manager, Strategic Initiatives, Policy and Analysis, City Planning
Graham Haines, Senior Project Manager, Land Economics, Strategic Initiatives, Policy and Analysis, City Planning
Michael Hain, Program Manager, Transportation Planning, City Planning
Rong Yu, Project Manager, Urban Design, City Planning

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 35 member organizations. Its members, all residents' associations, include at least 250,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.

Attachment: Proposals - Summary and Key Issues

Summary

- **Economics-Led Planning:** The City has pivoted from Land-Use Planning to Land-Use Economics, using *pro forma* profit metrics rather than design excellence as the primary driver for zoning changes.
- **Private Sector Gain and Public Cost:** The initiative focuses on marginal improvements to developer profit margins that may not change the trajectory of housing starts, yet will have a profound impact on community livability for the next 25 years.
- **Threat to the Public Realm:** Proposals to remove **Type-G loading and waste collection** requirements to increase a building's sellable floor area that transfer private operational costs onto the public
- **Omission of Architectural Expertise:** The financial feasibility analysis by Parcel Economics Inc. was conducted without an architecture firm, resulting in "test fits" that lack qualitative rigour regarding livability and the physical reality of construction.
- **Stakeholder Engagement Imbalance:** There is a disparity between the intensive technical engagement with the development industry and the "sparse" survey-based engagement with the public.
- **Procedural Concerns:** The "Interim Report" presents substantive policy directions without disclosing the full research findings or providing the public with the technical briefings required to evaluate complex economic claims.
- **Tenure and Economics:** The report makes the tacit assumption that Mid-Rise development is inherently private market-driven, whereas there is also a significant sector comprising Public housing (CreateTO, etc.) and Not-For-Profit (NFP) organizations like Co-ops and Life Lease. These alternative tenure models tend to be focused on meeting the needs of the occupants, not just profit and the dictates of the proforma. Were these consulted?

Key Issue 1: Using Land Economics to Determine Design Guidelines

The role of City Planners, as defined by the Provincial Planning Statement (PPS) and Toronto's Official Plan, is to ensure the long-term health, safety, and livability of the city—not to advocate for the elimination of zoning regulations to improve the profit margins of specific building market segments.

The Parcel Economics report explicitly states that its goal is to "inform how mid-rise projects could be better positioned to achieve financial feasibility." This approach treats essential residential infrastructure—such as indoor amenity space, contiguous outdoor space, and secure bicycle storage—as mere "levers" for profitability. Furthermore, the

feasibility study was conducted without the involvement of an architecture firm, raising serious questions about the "test fits" used to justify the removal of standards. There is no evidence presented that reducing these standards will achieve the goal of more *affordable* units; rather, it appears the savings will primarily serve to shore up private-sector *profitability* in a challenging market.

Opportunity for Improvement: Design guidelines must remain the domain of Land-Use Planners and Urban Designers. Any economic analysis must be secondary to the 2024 principles of "harmonious fit," sunlight access, and high-quality living conditions.

Key Issue 2: Complexity and Lack of Detail in the Report for Action

The 2026 Report for Action lacks the transparency and depth required for a policy shift of this magnitude. While the **2024 Mid-Rise Design Guidelines** were the result of a 113-page comprehensive analysis, the current 30-page **Report for Action** introduces 15 items for review that have not been adequately socialized with the community or put into plain language.

The information provided is "thin" and relies on high-level summaries of the Parcel Economics analysis while withholding the granular data and research reports necessary for informed public debate. Furthermore, there is a clear imbalance in the consultation process: the City conducted 12 intensive interviews with 25 industry stakeholders (i.e., developers, architects, and planners), while the public's input was limited to a generic survey of 260 residents. This process fails to meet the City's Public Consultation Guidelines, which mandate meaningful outreach and the provision of "all supporting materials" to allow for a fair assessment of the implications.

Opportunity for Improvement: The City should pause the advancement of these 15 items until the full research findings and data sets used by Parcel Economics are disclosed and a series of technical briefings are held for Members of City Council and interested residents.

Key Issue 3: Challenges with Public Consultation on a Complex Subject

The proposed changes to the Mid-Rise Design Guidelines will have a profound impact on the fabric of our communities for a planning horizon of 25 years or more. However, the City is treating this as a minor regulatory "cleanup" rather than a fundamental policy shift.

The current focus is on marginal improvements in profitability that may not change the current trajectory of housing starts, which is driven by macroeconomic factors (e.g., interest rates and global trade) beyond the City's control. Public consultations must

move beyond online surveys and "open houses" toward interactive workshops and technical briefings.

Residents deserve the opportunity to engage in a detailed discussion of how the 100% Payment-in-Lieu for bicycle parking or the removal of Type G loading will affect their local sidewalks, street trees, and building maintenance fees. Without this, the "less red tape" narrative pushed by industry lobbyists will drown out the informed debate required for responsible city building.

Opportunity for Improvement: The City must implement a multi-stage consultation plan that includes area-specific workshops and opportunities for residents to present alternative solutions that support housing starts without sacrificing the 2024 standards.