



environmental  
defence

May 6, 2026

Planning and Housing Committee  
% Nancy Martins  
10th floor, West Tower, City Hall  
100 Queen Street West  
Toronto ON M5H 2N2

### **PH30.8: Mid-Rise Housing Implementation Initiative - Proposals Report**

Attention Planning and Housing Committee Members,

I am Counsel, Land Use & Development Program Manager and Ontario Environment Program Manager for Environmental Defence. I lead Environmental Defence's policy development and advocacy regarding land-use planning, smart growth, housing supply and the protection of farmland and habitat in Ontario.

Environmental Defence is broadly supportive of the reforms recommended in this report, because they would increase the number of mid-rise developments that are feasible to build, and reduce our laws artificial inflation of construction costs as compared with "low-rise" formats.

As you will have heard from us before, it's absolutely vital, for anyone who cares about the environment, the housing shortage, or preventing economic segregation, that Toronto's homebuilders *actually* deliver more than 450,000 net new family-sized homes inside our "neighbourhoods".

That is not just because every one of those homes that we *fail* to build here costs indispensable habitat and prime farmland. It is also because Toronto's existing "neighbourhoods" would be, in the absence of artificial government-imposed costs and barriers the most efficient and environmentally low-impact place to build our region's new family homes.

While 4- or 6-plexes are an important option, the only format that *can* be efficient enough to deliver the huge number of extra family homes our neighbourhoods need are midrise buildings - especially six storeys. That is why Environmental Defence has been pressing you for reforms to actually make mid-rise viable to build.

That is why we urged you during the previous municipal election, and Mayor Chow during her Mayoral byelection to commit to legalize six-storey apartment buildings as of right on the major streets inside our residential neighbourhoods.



That is a promise Mayor Chow and many of the rest of you gave. The initial 2024 amendments which repealed the outright ban on mid-rise in these locations was the biggest, most important step, but we told you at the time that we'd need to go further to make building financially feasible.

That is why, with Robert Eisenberg, whose representative has made a separate submission, we co-commissioned the Mid-rise Manual to spell out the most important changes, some of which are included in this report. However we have also encouraged staff to address other practical barriers to feasibility that emerge through their consultations. This report represents precisely that kind of pro-active effort. We urge you to vote in favour of it and keep moving forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Philip Pothen', with a horizontal line drawn through the middle of the signature.

Philip Pothen  
Ontario Environment Program Manager,  
Environmental Defence