

Councillor Perks, Chair, Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto, ON
M5H 2N2



Re. PH31.12 - Overview of **Bill 98** Implications with Respect to Planning Matters

<https://secure.toronto.ca/council/agenda-item.do?item=2026.PH31.12>

June 8, 2026

Dear Chair Perks and members of the Planning and Housing Committee,

Thank you for the opportunity to comment on the impacts of the passage of Bill 98. We appreciate understanding what these changes mean for the City's Development Review Division.

Environmental Defence has taken a [position on Bill 98](#), and is not in support of the priorities it establishes, nor its handcuffing of some municipal initiatives. Instead of removing barriers and disincentives to building Missing Middle Housing in existing settlement areas, the Bill forces uniformity in Official Plans across the province. This requires the City to stop and update its Official Plan and its work on Site Plan control, to conform to new rules.

We want to support a streamlined development approval approach, nonetheless.

Reducing the length of time required to get approvals is one of the core recommendations in the [Mid-rise Manual](#) which guides our advocacy. More specifically, the Mid-rise Advocacy Group recommended the creation of a priority review stream for Mid-rise with the following advice to Planning in 2025:

Mid-Rise Priority Review Stream

If Mid-rise buildings on Avenues and Major Streets are a development priority, then City Planning should curate specialized expertise in the various considerations that are unique to Mid-rise buildings. Many of these are identified in our report and include:

- Providing an active public realm interface, an urban aesthetic, and comfortable sidewalk conditions;
- Maximizing liveable, family-oriented units in a human-scaled built form;
- Right-sizing infrastructure and utility requirements;
- Optimizing energy performance and sustainability; and

- Minimizing cost and delays in the development approvals process that are a significant risk to project viability

All of these priorities can be efficiently addressed through a dedicated team that is focused on approving mid-rise buildings and getting them built. It should include Planning, Urban Design, Engineering, and various other departments. Similar to the City's existing Priority Development Review stream for affordable housing applications, this group would work closely with applicants from the pre-application stage to accelerate the approvals timeline and proactively address issues before they become a cause of delay.

Key areas where the Mid-Rise Priority Review Stream could improve mid-rise development outcomes include:

- Scoped application requirements for site plan applications - the dedicated team would already have an understanding of key issues along the City's Avenues and Major Streets, and with pre-zoning there would already be an understanding of built form and infrastructure impacts
- Proactive problem solving around key development constraints including electrical servicing, stormwater management, and waste collection
- Creative urban design solutions that can be co-developed with applicants to realize City objectives while working within site constraints

We would like Toronto to create an as of right approval stream for the size of Mid-rise Building that we are most likely to see, and that is 60 units and six storeys on Major Streets and Avenues. This should encourage builders to build on this scale, and ideally repeatedly. Given the fact that Mid-rise is already quicker to build than towers, fast tracking this size of building should advance Toronto's housing objectives faster than other approaches. This "right-sizing" approach chips away at the costs that make Mid-rise artificially expensive to build. We appreciate this way of thinking.

-

Further, the [Province's ERO consultation on site plan changes](#), which has now closed, identifies streamlining site plan approvals according to typology as one option for reform. We supported this, stressing the importance of allowing municipalities to identify the streams. This permission already exists and is being used effectively in Brampton, Ottawa, and Guelph.

Streamlining development application review is an ongoing effort that must better integrate utilities like water and Hydro. Our Mid-rise Advocacy Group is providing practitioner - informed advice to Toronto Hydro in an effort to right-size their processes and offerings for the Missing Middle housing typologies. It would help if both Toronto Hydro and Toronto Water worked with Planning to streamline timelines and processes in order to reduce the

burden of report writing and information-gathering on the proponent. Providing timely information about area water and electrical capacity, opportunities and constraints, helps prospective buyers and developers make decisions efficiently. Finally, if both Hydro and Water would create publicly accessible data bases that indicate the existing infrastructure available across the city, this would assist everyone in identifying a potentially substantial development cost up front. This is an area of need that supports the effort in the proposed site plan as of right stream for Mid-rise.

Finally, we support the Toronto Green Development Standard and appreciate that staff are finding ways to implement what they can, and that Toronto's own building projects will continue to be held to the Standard.

We appreciate Council and staff's efforts to expand housing options, thank you.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Claire Malcolmson'.

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.