

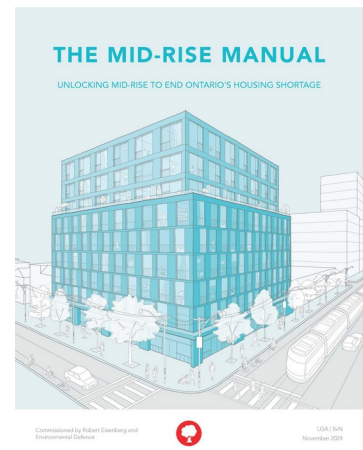
Feedback on Site Plan Application Fee Review

Submission for the City of Toronto's Planning and Housing Committee meeting, July 16, 2026

Via phc@toronto.ca

From the Mid-rise Advocacy Group

Re: PH32.8 <https://secure.toronto.ca/council/agenda-item.do?item=2026.PH32.8>



July 15, 2026

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

In addition to the [comments we provided](#) to PHC at last month's meeting about site plan streaming, the Mid-rise Advocacy Group would like to express support for the "Minor Application Stream" as proposed as it would support as-of-right Mid-rise development. Reducing approvals time is one of the core recommendations in the [Mid-rise Manual](#) which guides our advocacy.

As noted in the report appendix as an example, we understand that should a Mid-rise building conform to the zoning for Major Streets and Avenues, has secured Committee of Adjustment approval of any variances required first, and has addressed other additional reviews (like being on table lands, for instance, among other possible "land triggers"), the development receives the benefit of:

- A shorter, more attuned development review and approval process, with delegated authority to staff to manage minor issues as a delegated approval;
- \$0 GFA per square foot fees;
- Maximum \$32,704 fee total.

More complicated projects would not benefit from these reduced fees and processes, and would pay fees more in line with the staff effort involved in processing a more complex application. This is an appropriate and welcome approach that defines the entire initiative described in the staff report.

Combined with the Development Charge Cut of 60% for apartments and condominiums with two or more bedrooms, the incentives start to look good for building more Mid-rise. However, we should expect limited construction activity in the coming years for a number of reasons including the overall poor economic conditions (which are beyond the City's control) affecting most building segments.

The combined impact of the City's efforts (zoning, "Minor" or As-of-Right stream, lower fees for applications, and DC break for three years) should support a pivot to Mid-rise where developers own lands and are eager to build; where land assemblies can come together quickly; or where a builder with capital wants to build their first Mid-rise.

We are keen to work with the City to support the operationalization of the "Minor" or As-of-Right stream. Some things to consider:

- When we say it is *Zoned for Mid-rise* are we talking about all of the Major Streets and Avenues identified for Mid-rise in the Official Plan regardless of their designation or location, and can we clarify the applicability of these reforms to projects already permitted in Wards 9 & 11 that have been through parcel by parcel zoning?
- There is plenty of opportunity to build Mid-rise in the City's Major Transit Station Areas; but has the zoning happened, is it going to happen, and if so, when?

Our requests:

1. The City plans to roll this new fee structure out in January 2027. We note that this is generally the same time period when we anticipate report backs on flexibility for amenity space, bike parking, and Type G loading (waste) (previously reported as Q1 2027)). If Toronto Councillors are serious about providing homes for seniors downsizing in their neighbourhoods, or young families staying close to relatives, we need to pull out all the stops. That means approving the above proposed changes in January 2027 to align with the DC break on apartments and condominiums with more than two bedrooms.

2. Produce or facilitate the production of a "How To Build Mid-rise Guide" as soon as possible. There are new builders with money who want to build Mid-rise but have little knowledge about the pitfalls, traps, and incentives (CHMC financing, Building Code triggers etc.)

Something like this for Mid-rise is essential at this time:

<https://www.toronto.ca/city-government/planning-development/planning-studies-initiatives/multiplex-housing/considerations-when-building-multiplexes/>

3. Consider broader shifts in taxation and timing to allow builders to better plan their cashflow. This meets the City's stated need for more permanent reforms that bring down building costs rather than relying on government incentives. The following recommendations are detailed in the Mid-rise Manual (page numbers listed):
 - a. Reform the Municipal Land Transfer Tax as a Real Estate Capital Gains Tax (including primary residences) as a more effective tax on profits rather than transactions. (p.40)

- b. Use property and other taxes, rather than development charges, to proactively upgrade capacity along major streets. (p.40)

In closing, we appreciate Council and Planning staff's efforts to support Mid-rise building. We truly understand that there are challenges across the board for building and that almost nothing is getting built without subsidies of some kind. We should continue taking this opportunity to make an excellent policy environment that has adapted to the current need to reduce costs structurally. When it is viable to build, we believe we will see more Mid-rise development than the City has previously experienced.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Claire Malcolmson', written in a cursive style.

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.