



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Infrastructure and Environment Committee,

RE: IE26.16 - TransformTO - Critical Steps for Net Zero by 2040

About More Neighbours Toronto

[More Neighbours Toronto](#) is a new volunteer-led organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are nevertheless committed to counterbalancing the anti-housing agenda that dominates Toronto's politics, created an affordability crisis, and has cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

Summary of Position

The staff recommendations to accelerate Toronto's climate targets and the corresponding recommended actions required to meet Net Zero by 2040 are a good first step. However, we are concerned that there is only a short note and no key actions recommended on reforming land use and zoning, which is the single most important action the City can take to fight against climate change and must be included in any credible plan to fight climate change. There is also no mention that the City's urban design guidelines promote using carbon-intensive materials and energy inefficient designs in new buildings. Additionally, as the economic and population centre of the Greater Toronto Area (GTA), the City's planning decisions have downstream regional impacts on the efforts of other municipalities in the GTA to reach net zero that need to be accounted for. Specifically, Toronto's restrictive zoning is a direct cause of sprawl and destruction of greenspace in the GTA, impeding the efforts of the entire region to fight climate change.

We therefore request that you:

- Direct City staff to include an evaluation of downstream regional impacts, where relevant, when applying a Climate Lens to decision-making, as part of Action 25 of the Short-Term Implementation Plan 2022-2025.

- Include zoning reform and intensification as a key action to meet the City's TransformTO climate goals.
- Include reviewing urban design guidelines, such as angular planes, setbacks and stepbacks, under a Climate Lens as a key action to meet the City's TransformTO climate goals.

Position

Toronto's restrictive zoning is a plan to pave over the Greenbelt

As the economic and population centre of the GTA, it is impossible to deny that Toronto's decisions have a spillover effect on the entire region. Because of the immense demand for housing in Toronto and our inability to build enough homes to meet that demand, there is [a net intraprovincial migration](#) out of Toronto, towards outlying suburbs where they can actually find housing. Unfortunately, some regional governments of these outlying suburbs, such as York Region, are [more than happy](#) to expand their urban boundaries for growth, thereby paving over the Greenbelt and agricultural lands. While some regional governments, such as Hamilton's, have [voted against urban boundary expansion](#), the provincial government has signalled that [it may overrule those plans](#) and force suburban sprawl in greenfields anyway. Besides the destruction of greenspace, suburban sprawl will perpetuate car dependence in the region. The province has already signalled that it will service suburban sprawl with [Highway 413 and the Bradford Bypass](#). Toronto can prevent this suburban sprawl from occurring only if the City reforms zoning to add more homes in its existing urban neighbourhoods.

People generally do not want to leave Toronto. People do not want to leave their family, friends, and community. People do not want to live far from the jobs they can get only in Toronto. People are leaving because Toronto is not able to build enough housing in urban areas to meet the demand. The GTA's population will grow over the next few decades; that's a fact. If Toronto does not step up, lead by example and allow more density in existing urban neighbourhoods, then regional growth will happen on the province's terms: in the Greenbelt, on agricultural lands and serviced by new highways to bake-in car dependence.

Decisions in the City of Toronto have regional effects. Evaluating downstream impacts, especially planning and land use decisions, must be a part of applying a Climate Lens to decision-making.

Reforming zoning and simplifying urban design guidelines is essential to increasing energy efficiency

The City's current zoning directly counteracts its efforts to make buildings more energy efficient. According to the staff report, energy used in Toronto's buildings make up 57% of local greenhouse gas (GHG) emissions. Yet, the City reserves 65% of its Neighbourhood land for the least energy efficient form of housing: single-family residential detached homes. According to [Statistics Canada](#), on a per-household basis, single-detached homes consume 30% more

energy than duplexes, more than double the energy of low-rise apartment buildings and more than triple the energy of high-rise apartment buildings.

In areas where denser, more energy-efficient building types are permitted, the City's design guidelines actively mandate less efficient building designs. For example, angular planes and stepbacks that are mandated for a wide variety of building types act to increase surface area of buildings. Operationally, more surface area means more energy is needed on an ongoing basis to heat and cool a building. Material-wise, more surface area means a need to use more carbon-intensive materials such as concrete and steel. The most carbon-friendly building type is middle-density housing built out of wood. The City needs to simplify its urban design guidelines to permit this kind of housing to be built.

Retrofitting existing single-detached homes is a necessary but not sufficient step to fight against climate change. The City must reform zoning and simplify its urban design guidelines to permit denser, more energy efficient building types in every neighbourhood.

Reforming zoning is essential to achieving the TransformTO transportation modal share goal

Infill density in existing lowrise residential neighbourhoods will also be an essential step to reducing transportation emissions and achieving the City's TransformTO goal of 75% of trips less than 5 km walked or cycled by 2030. The fact is that large areas of Toronto are currently not dense enough to sustain walking, cycling or even transit as the main form of transit, because they are zoned to remain that way. If the City is to achieve its goal of shifting transportation modal share towards active transportation and transit, it will be necessary to achieve the required densities to sustain these modes by permitting denser building types, such as multiplexes and low-rise apartment buildings in every neighbourhood.

Regards,

Jacob Dawang
More Neighbours Toronto