



**MORE NEIGHBOURS**  
**TORONTO**

Dear Members of the Planning and Housing Committee,

**RE: PH30.3 - Our Plan Toronto: Protected Major Transit Station Area Delineations - Downtown and City-wide Interpretation Policies - Final Report; and PH.30.4 - Our Plan Toronto: Bloor-Danforth Corridor Draft Delineations for Protected Major Transit Station Areas**

***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.

***Position***

More Neighbours Toronto believes that the City is squandering an opportunity to make real progress on the housing crisis with its approach to the Protected Major Transit Station Areas (PMTSAs). While we appreciate that the PMTSA delineations, corresponding Official Plan Amendments (OPAs), and the Official Plan review in general, are an exercise to demonstrate conformity with the provincial requirements, they are also opportunities for the City to change the land use policies that have caused and exacerbated the housing crisis. We ask that you take this opportunity to review and change land use in the PMTSAs to allow more density, encourage transit-oriented development and allow IZ to reach its full potential.

Unfortunately, the approach taken by the City thus far has been to evaluate what is currently built and currently permitted, show that it meets the targets and conclude that nothing substantial needs to be changed. In some PMTSAs where the City does not already meet the targets, the City intends to request lower targets instead of changing land use policy. City staff have argued that the density targets are minimums, not maximums and nothing prevents

surpassing these targets through the usual development application process or local area studies.

Let us be clear: the provincial density targets are a bare minimum and showing that the City already meets them should not be cause for celebration. Likewise, the current process of permitting more density through local area studies or spot rezonings for each development application can take years and has contributed to Toronto's housing crisis.

It is imperative that we recognize that current land use and processes are broken and need rethinking.

The lack of any changes to current land use designations is especially mystifying given Council's approval of Inclusionary Zoning (IZ) last year. IZ mandates that a certain percentage of units in new developments in some PMTSAs include affordable housing, but only if they are over 100 units. If the City wants to build more affordable housing faster, it needs to amend land use to permit 100+ unit developments on every plot in PMTSAs.

Take the example of the draft Broadview PMTSA, which is eligible for IZ. The vast majority of the Broadview PMTSA area is proposed for 0.5 Floor Space Index (FSI) or 3 units minimum development density (see attachment 1). Maximum zoned densities will not be updated in any significant way (see attachment 2). There are even RD (single detached homes only) zones just steps from Broadview Station that will not be reviewed. No development in the 0.5 FSI areas will be eligible for IZ because the City will not permit enough density to meet the 100 unit IZ threshold.

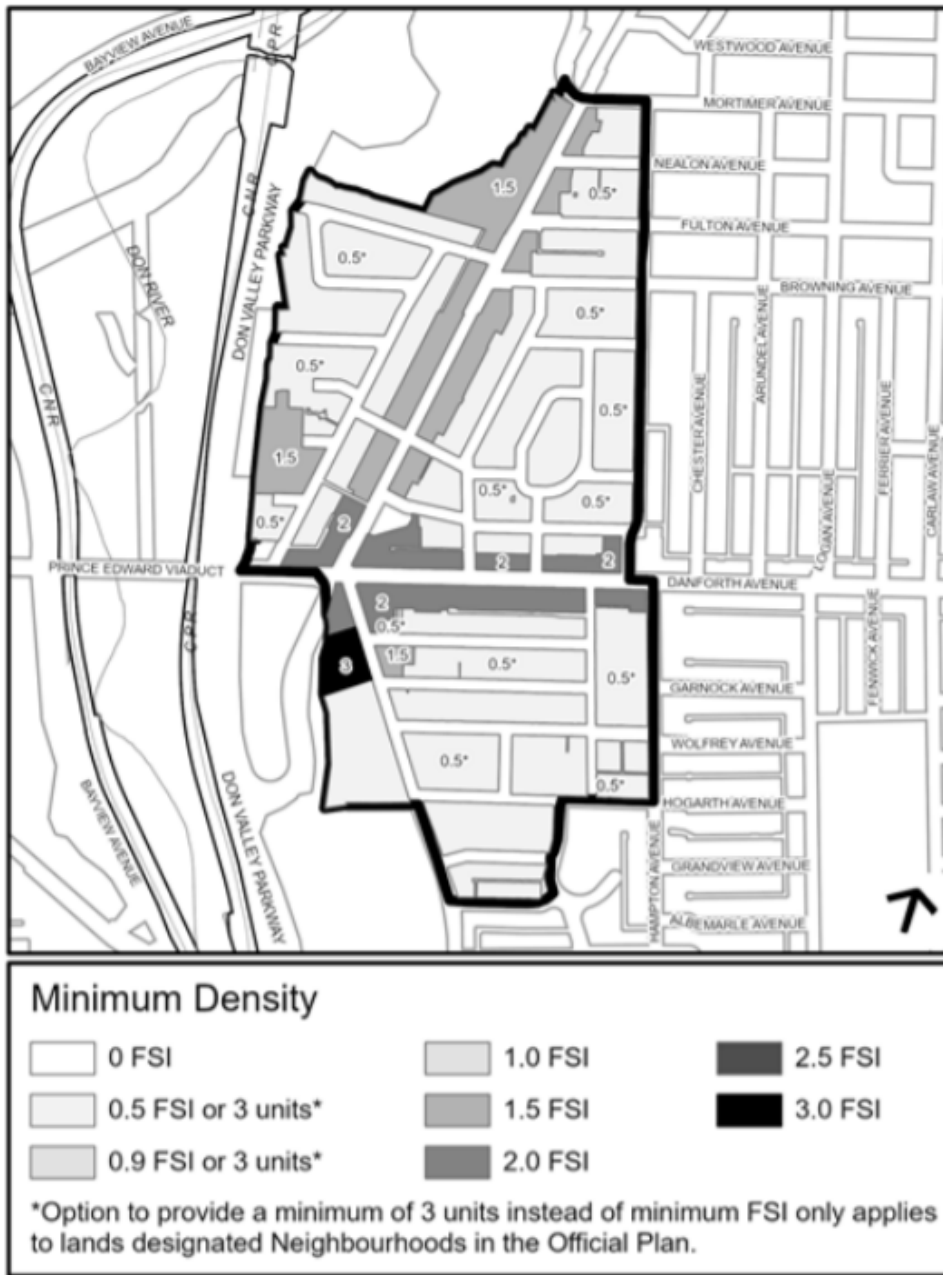
The PMTSA delineations illustrate to all of us how Toronto's best connected land is underutilized. In line with new goals for Inclusionary Zoning, the city should be ambitious in reclassifying land to welcome growth, end the housing crisis, and deliver new affordable housing options. Instead the city has chosen to protect homeowner interests and landed money at the expense of future residents and the environment.

Regards,

Jacob Dawang  
More Neighbours Toronto

**Attachment 1: Broadview PMTSA Minimum Densities (from the staff report)**

**Map 2 – Minimum Densities, Broadview Protected Major Transit Station Area**



Attachment 2: Broadview PMTSA Zoning Map (from [interactive map](#))

