



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

**RE: PH35.3 - Expanding Housing Options in Neighbourhoods: Multiplex Study -
Proposals Report**

About More Neighbours Toronto

[More Neighbours Toronto](#) is a volunteer-only 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 committed to counterbalancing the anti-housing agenda that has dominated 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

More Neighbours Toronto supports the proposed Official Plan Amendment in anticipation of the legalization of multiplex housing throughout Toronto, although it is unclear what will be accomplished in the additional proposed consultations. Delays are not a neutral choice. Even under the growth plan's minimum population increase of 700,000 people by 2051, this report projects a deficit of 42,000 ground-related homes at current rates. [New CMHC projections](#) suggest that the need for new housing is much greater: Ontario alone needs to build 2.6 million homes in the next eight years just to get back to 2003 levels of affordability.

The status quo perpetuates inequalities and drives people out of the city or out of safe housing altogether. Toronto cannot reach its full potential while continuing to "protect" two-thirds of residential land from change. The proposed amendment will provide new options for seniors, families and young professionals in Neighbourhoods, and help address climate change with more efficient land use. **Please support the adoption of this Official Plan Amendment so that the City can move forward on more inclusive neighbourhoods.**

Position

Zoning for single family neighbourhoods is a [policy rooted in exclusion](#). The intention of zoning may no longer be to limit housing options for particular racial groups or income levels, but this

outcome is evident in maps of the city's demographics, with large disparities between those living in Toronto's Neighbourhoods and growth centres (see below, as well as Toronto City Planning's [Neighbourhood Change and Intensification Bulletin](#)). Although the City's existing policy is for stable Neighbourhoods, many of these areas are [decreasing in population](#). Meanwhile, low and middle income residents compete for limited homes in the small share of the residential land that allows growth and Toronto City Council upholds the zoning that insulates wealthy Neighbourhoods from change. When policies limit multi-family homes to a few busy streets and preserve single family homes a few blocks away from major transit hubs, this insulation from noise and pollution becomes literal, with lower income residents used as a barrier. If zoning is truly intended to ensure that we use and plan infrastructure and land use in our city wisely, the status quo is failing.

A key part of this report's proposal is the change in Official Plan language around "reinforc[ing] the existing physical character" and "prevailing building types" in Neighbourhoods; the current language limits new multiplexes to areas where multiplexes already exist. Along with the Neighbourhood land designation and Residential Detached zoning, this perpetuates exclusive and stagnant neighbourhoods. It also conflicts with other Official Plan policies to provide a full range of forms, tenures and affordability within neighbourhoods throughout the City for current and future residents. Rules about a building's external appearance can be used to conceal concerns about who might live inside; built form rules then become a way to subvert discrimination laws. Toronto has a duty to prevent this and the proposed changes to allow for planned character will help produce a more consistent Official Plan.

In addition, we support the changes to prioritize resident safety in the placement of unit entrances, to allow the possibility of additional density in the zoning bylaw for buildings with more than two dwelling units, and the encouragement of universal access for ground floor units.

The proposal for more consultation after the years of work that the EHON team has already carried out is disappointing. The completed consultation has been excellent, using many different media to explain the program and solicit feedback, including more than 20 consultations since February 2022. There have been high levels of support for this initiative (>70%) across age groups, income levels and areas of the city from the early survey through to the email responses for the draft Official Plan Amendment. Further consultations with residents associations and other groups will mean more young families leave the city, more seniors grapple with whether to stay in unsuitable homes that they struggle to maintain or leave their neighbourhoods, and more people displaced from apartments during teardowns for replacement in the only areas of the city where building is allowed. This may be a politically challenging proposal but one that is vital for resolving the housing crisis. Delays have implications for many residents facing difficult life decisions right now.

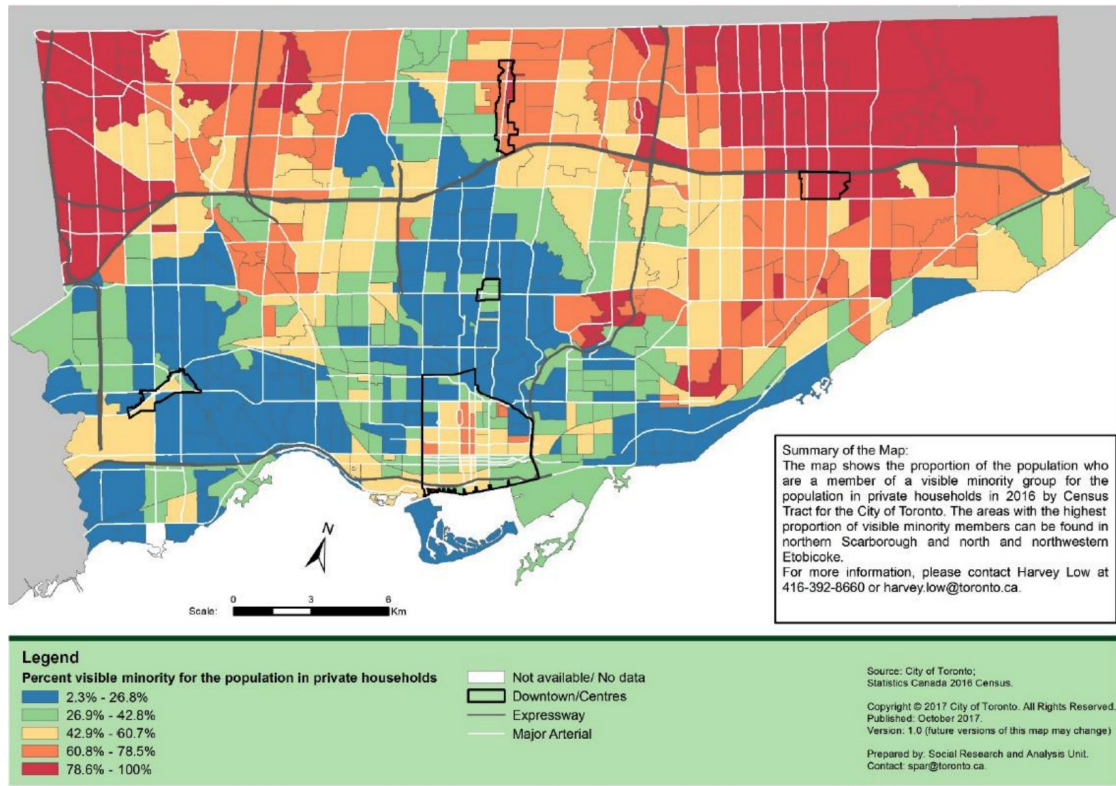
Delays also have environmental implications: we cannot afford to make more environmentally sustainable forms of housing and construction illegal while fighting climate change. As staff note in their report, "density within built-up areas enables low carbon transportation choices, such as walking, cycling, and public transit. Housing built in Toronto also reduces sprawl and reduces

transportation-driven GHG emissions regionally." The application of the Toronto Green Standard will encourage the use of sustainable building materials, energy efficient designs, and salvage and reuse practices. **We encourage the City to adopt these green standards for all new developments, including single family homes**, to ensure that single family homes are not inadvertently made more profitable than multiplexes, despite being more environmentally damaging in the long term. Finally, legalizing multiplexes is a prerequisite for the tree equity approach to planning that Council committed to in the 2021 Tree Canopy update ([IE26.6](#)). Toronto's existing tree canopy aligns with the Neighbourhood land use designation (see Figure below), and exclusionary zoning means trees are inequitably distributed along income and racial lines. Poor tree cover is associated with localized urban heat island effects where tall buildings are not dense enough and, in 2013, [heat contributed to an estimated 120 premature deaths](#) in Toronto. This is likely to worsen as extreme temperatures become more common. Particularly given the restrictions that Council has placed on public parks - including fenced off areas, security presence, lack of public washrooms and permit requirements for many activities - allowing multiplexes in neighbourhoods will make more trees easily accessible to more neighbours and relieve pressure on high-density neighbourhoods.

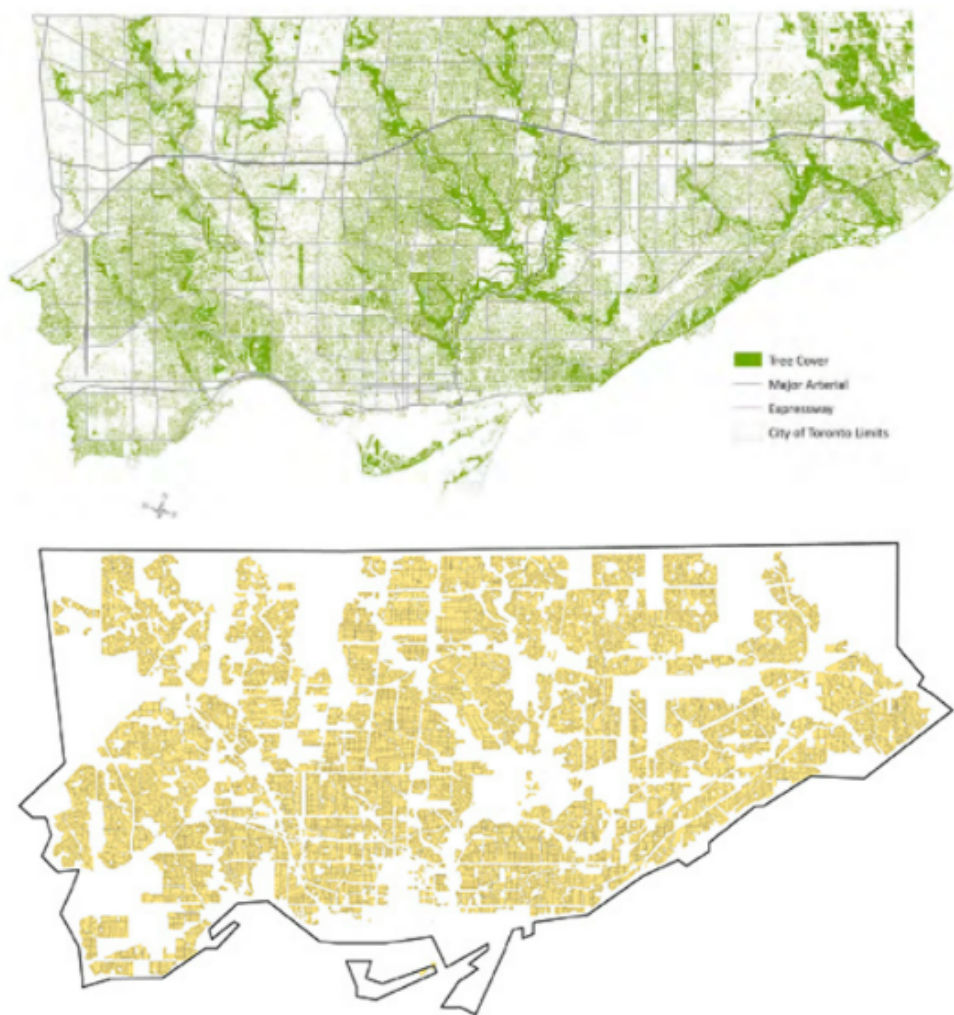
Ending exclusionary zoning has economic benefits, as noted by the [Toronto Region Board of Trade](#) and in the report for [Item PH35.23 Employee Talent, Retention and Attraction - City Planning](#) at this very meeting, which describes how high housing costs limit Toronto's ability to recruit talent given current staff salaries. Allowing multiplexes as-of-right would allow limited staff to focus on more complex applications in the short-term, while providing more housing options for families, which might allow better staff retention in the long-term. In addition, multiplexes will allow for lower-risk projects that help small and non-profit developers, and will allow homeowners to make better use of their property if they wish. **Please support the adoption of this Official Plan Amendment so that the City can move forward on more inclusive neighbourhoods.**

Sincerely,

Colleen Bailey
More Neighbours Toronto



Map of visible minority population from the City of Toronto and 2016 Census data.



City maps demonstrating the geographic correspondence between the tree canopy and Neighbourhood designation.