



MORE NEIGHBOURS
TORONTO

Dear Members of Toronto and East York Community Council,

RE: TE31.12 - Danforth Avenue Planning Study (Segment 2 - Don Valley to Coxwell Avenue) - City-Initiated Official Plan Amendment and Urban Design Guidelines - Final Report

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 volunteers of More Neighbours Toronto believe that the recommendations proposed in the Danforth Avenue Planning Study final report act in direct opposition to the urgent need for action in the face of a housing crisis and a climate emergency. In December 2021, City Council requested that the Chief Planner "ensure the Official Plan, Zoning By-laws, and planning policies and various Planning guidelines support the recommendations in the Net Zero Strategy". This study is one in a long list of hyper-local studies that prioritize aesthetics and "character" over housing, fighting climate change, and welcoming future residents to one of the best-served areas of the city. More Neighbours Toronto urges you to rethink these planning studies and whether they are still consistent with the City's goals of building more affordable housing, getting to net zero by 2040 and building a more equitable city. To actually achieve these goals, we need to change course with these planning studies, starting with allowing more density, relaxing urban design guidelines, and stopping excessive heritage designations.

Allowing More Density

Planning for only seven to eight stories is simply not enough during a housing crisis, driven by a shortage of homes in Toronto. In a year where Ontario's Housing Affordability Task Force is recommending that buildings six to eleven stories be legalized on frequent bus routes, permitted density needs to be much higher along one of Ontario's only subway lines.

From an Affordable Housing standpoint, the Danforth is one of the only areas in the city where Inclusionary Zoning (IZ) will apply, which mandates that building projects over 100 units will have to dedicate a certain percentage of units as affordable for 99 years. People cannot live inside a percentage and all that matters is the *absolute number* of new Affordable units built. The City must thus aim to build much bigger if it is actually serious about maximizing the impact of IZ. Even without IZ, building taller is required for making Affordable Housing viable. Take the example of the HousingNow site at 150 Queen's Wharf, where adding height a few times allowed for more affordable housing to be delivered.

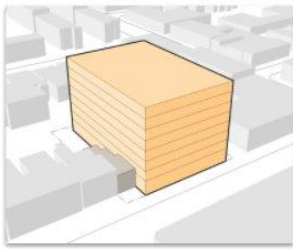
From a climate perspective, to get people out of their cars, it is essential to build more densely along transit and near existing walkable communities. Every new resident who cannot live along the Danforth is someone who is forced to move to greenfield sprawl in the exurbs and drive into the City each day. Every new resident welcomed to the Danforth is someone who can live car-free, keeping greenfields green and helping us meet our TransformTO goals.

A denser Danforth is required to even get close to maintaining its historic character: of being a welcoming, affordable place to live. Census tracts along the Danforth all lost population between 2016 and 2021, while the rest of Toronto grew by 2.3% and downtown grew 16%. The Danforth of the past welcomed new immigrants and new people, but the Danforth that we're planning for is excluding them.

Relaxing Urban Design Guidelines and Heritage Designations

We must build more buildings in the "simple box" form if we are to solve the housing crisis. This means relaxing the urban design guidelines, such as those applied to the Danforth. Angular planes, setbacks, stepbacks and various other design guidelines prioritize aesthetics over housing. As shown in the figure below, taken from a [Ryerson School of Urban Planning Studio report](#) written for [HousingNowTO](#), the mid-rise design guidelines for an 8-storey building, the maximum that will be allowed on the Danforth, lead to a loss of affordable units.

8-Storey Concepts



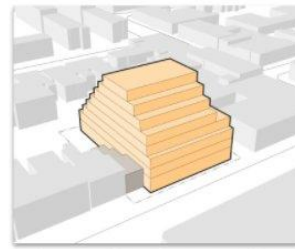
Box

97 Units (FSI: 5.3)		
Affordable Units	77	79%
Market Units	20	21%
Total Development Cost	\$ 55,420,425	



Moderate

75 Units (FSI: 4.0)		
Affordable Units	54	72%
Market Units	21	28%
Total Development Cost	\$ 45,390,957	



Follows Mid-Rise Design Guidelines

65 Units (FSI: 3.5)		
Affordable Units	42	65%
Market Units	23	35%
Total Development Cost	\$ 42,050,226	

55

If a building is heritage designated, then this makes building housing even less feasible. If the City is serious about building new affordable housing, it must relax these urban design guidelines and stop abusing the heritage designation process as a means to obstruct building housing.

Relaxing urban design guidelines is also essential to meeting the City's TransformTO goals. Angular planes and setbacks 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.

Regards,

Jacob Dawang
More Neighbours Toronto