



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Executive Committee,

RE: EX3.1 - Housing Action Plan 2022-2026- Priorities and Work Plan

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 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

More Neighbours Toronto supports the general directions for the Housing Action Plan in the staff report. Systemic, comprehensive, transformational change in planning is needed and this report shows that City staff and City Council are beginning to treat the housing crisis seriously. We believe, however, more must be done as part of the Housing Action Plan. We have the following recommendations, listed under their corresponding headings from the staff report when applicable.

Avenues and Mixed Use Areas

Include the following in the review of [Mid-Rise Building Guidelines](#):

- Review and update the front facade angular plane standards (standards 4A, 4B, 6).
- Review and update of the side property line angular planes (standards 8C and 8E).
- Review and update other performance standards that increase costs (standards 9 and 13).
- Apply updated mid-rise standards to every planning study that inherits from them (not just on Avenues).

While the staff report focuses on rear transition, there are other problematic standards in the guidelines that increase costs and kill housing, such as front transition angular planes. These need to be included and updated in the review. Housing should be prioritized over shade reduction on streets. We have a housing crisis, not a shade crisis.

Transition Zones

Include the following in the transition zone study:

- Re-evaluate current priorities putting shadow and view impacts over new housing, construction feasibility and energy efficiency (Townhouse and Low-Rise Apartment Guidelines 4.1b).

- Consider transition zones and expanding mixed use areas up to 250 meters from Avenues where up to 6 stories is legalized by right.
- Prioritize implementation in areas near rapid transit (including proposed RapidTO lanes) that would be eligible for the maximum top-up funding from the federal Housing Accelerator Fund. The funds could be used to incentivize affordability or to expedite construction of RapidTO projects.

Major Growth Areas

- Accelerate planning for the remainder of the Port Lands region, and advance infrastructure plans, with the goal of enabling new housing construction in the broader portlands region this decade

Increasing Permissions for Housing and Addressing Exclusionary Zoning

As-of-Right Zoning for Major Transit Station Areas

As part of the as-of-right zoning work for MTSA's:

- Expand mixed use areas. Zoning should be minimum R zone, if not CR zone throughout MTSA's.

Aligning Objectives for Complete Communities

The City's review of heritage processes should include:

- Removing bulk listing on the heritage register as an allowed practice.
- Providing a cost estimate to development of each reactive designation.
- Removing heritage views as a heritage attribute.

Heritage processes add cost to housing development which is ultimately passed on to new buyers or renters. We need to take a common sense approach to conserving heritage, not one that designates dozens of similar two-storey drycleaners, or one that prioritizes conserving a "heritage view" over building housing.

Collaboration with Post-Secondary Institutions

The student housing strategy should include:

- Expanding permissions for multi-tenant housing to allow twelve dwelling rooms and remove minimum parking requirements near post-secondary institutions.
- Expanding permissions for higher density developments in areas near post-secondary institutions.

Working with School Boards

The co-developed strategy should include

- Increasing growth, housing options and housing permissions around underutilized schools. Many TDSB schools are [underutilized](#) and operate at a fraction of capacity while others are

bursting at the seams. Making more efficient use of TDSB land needs to also include a strategy for growth around schools, even if they are not in a current area targeted for growth.

Miscellaneous Additions

In addition to the work plan laid out in the staff report, we recommend that the following be added to the Housing Action Plan implementation:

- Reviewing tall building guidelines. Like the mid-rise and low-rise buildings, many tall building guidelines such as floor plate restrictions are problematic and drive up costs, particularly for multi-bedroom units. They should be reviewed too.
- Revising development charge (DC) exemption for 4 units such that it applies to all residential buildings. For example, a small apartment with 6 units would be exempted from DCs for the first 4 units and pay DCs on the remaining 2. This eliminates the disincentive created by a sudden jump in DCs for small apartments.
- Eliminating public hearings for affordable projects that conform to the Official Plan and zoning (also included in the Housing Accelerator Fund Action Plan).

Considerations for Federal Housing Accelerator Fund (HAF) announcement

With the recent announcement of the federal Housing Accelerator Fund, it is important that the City deliver its initiatives rapidly and align the Housing Action Plan with the criteria to receive funding from the HAF. We recommend that the City:

- Prioritize initiatives that will score well on the HAF evaluation criteria and can be started and implemented quickly (within 1-2 years)
- Include, as part of the Housing Action Plan, targets to increase the average annual rate of housing stock growth by at least 20% over the current rate and/or achieve an average annual growth rate in housing supply of at least 2.5%. This will ensure that the City submits a strong plan to the HAF and is more likely to win funding.

Regards,

Jacob Dawang and Colleen Bailey
More Neighbours Toronto