



**MORE NEIGHBOURS  
TORONTO**

Dear Mayor Chow and Members of City Council,

**RE: MM13.27 - Federal Housing Accelerator Fund - Supporting Generational Transformation of Toronto's Housing System**

***About More Neighbours Toronto***

[More Neighbours Toronto](#) (MNTO) is a volunteer-only organization of housing advocates that believe in building more multifamily 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.

***Position***

The City's proposed response to Minister Fraser is inadequate, unambitious and fails to meet the moment. The Minister must consider whether this response satisfies the Housing Accelerator Fund's aim to "drive transformational change within the sphere of control of the local government regarding land use planning and development approvals" and has "System Impact."

In particular, the enhancements proposed in response to the Minister's letter of November 22, 2023, seem to suggest that the City considers their existing actions to be largely sufficient. What, one then wonders, would the Minister be awarding Toronto money for doing? Other jurisdictions, such as [Vaughan](#) and [Mississauga](#), have addressed the Minister's requests by directing staff to prepare zoning bylaw amendments. Unless major modifications are made to the draft responses as we have detailed in this letter, and substantive moves are made to address the requests, we believe the City will not receive money from the Housing Accelerator Fund.

**To substantially address the requests from Minister Fraser, MNTO recommends amending the City's response as follows:**

- Direct city staff to work with the Ministry of Municipal Affairs and Housing staff to increase height and density permissions in every MTSA to be at least what British Columbia recently implemented for its transit station areas: up to 20 storeys within 200m, 12 storeys within 400m and 8 storeys within 800m. Failing this, direct city staff to work on an Official Plan Amendment to this same end.

- Direct staff to bring forward zoning amendments to permit heights of at least 12m, approximately 4 storeys, as-of-right, across the City for all multiplexes and apartment buildings.
- Direct staff to replace the “no net new shadow” policy with a policy that considers the housing created by additional height relative to the overall shadow in nearby areas.
- Direct staff to bring forward amendments to remove minimum parking requirements for multi-tenant housing across Toronto.

*Federal Request #1 - Increase minimum allowable density and minimum allowable height within walking distance to transit. Consider the merits and opportunities of the legislation introduced by the provincial government in British Columbia and advocate alignment with Ontario’s approval of Toronto’s Protected Major Transit Station Area (PMTSA) Official Plan.*

**MNTO recommendation:** explicitly direct city staff to work with the Ministry of Municipal Affairs and Housing staff to increase height and density permissions in every MTSA to be at least what British Columbia recently implemented for its transit station areas: up to 20 storeys within 200m, 12 storeys within 400m and 8 storeys within 800m. Failing this, direct city staff to work on an Official Plan Amendment to this same end.

The City’s proposed response leans almost entirely on its Official Plan Amendments (OPAs) for PMTSAs. However, the vast majority of the City’s plans for its PMTSAs in fact do not increase density permissions at all, as MNTO pointed out to city staff during public consultations and in letters to the Planning and Housing Committee dated [January 11, 2022](#) and [October 18, 2021](#). As staff write on page 5 of their [report](#) on the Bloor-Danforth PMTSAs: “Delineation of MTSA’s and minimum density targets **do not propose any changes to existing maximum development permissions.**” In fact, in both the [October 18, 2021 report](#), and in a [July 19, 2022](#) council agenda item amendment, staff and council have sought **lowered** minimums.

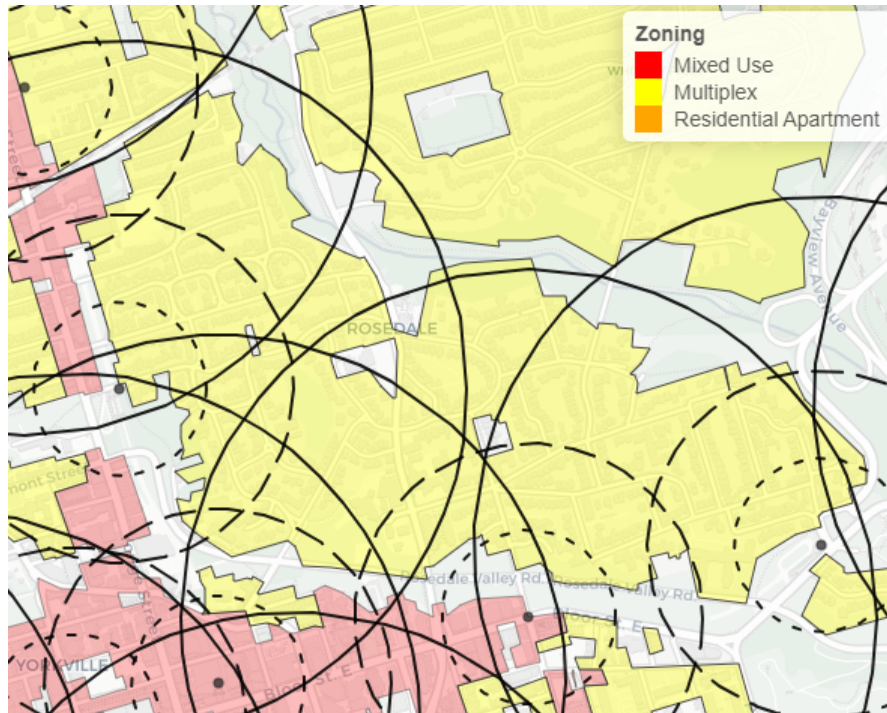
Minister Fraser’s letter explicitly asks the City to consider BC’s recently passed legislation. However, the City’s proposed response does not even mention BC’s legislation. For reference, we have provided a summary chart of this legislation below.

### Transit Oriented Development Areas – Policy Framework

TOA Type	Transit Hub Type	Prescribed Distance	Minimum Allowable Density (FAR)	Minimum Allowable Height (Storeys)	Type of Building
TOA Type 1 (Metro Vancouver)	1A) Rapid Transit	200m or less	Up to 5.0	Up to 20	Condo Tower
		201m – 400m	Up to 4.0	Up to 12	High Rise, Mid-rise
		401m – 800m	Up to 3.0	Up to 8	Mid-rise
	1B) Bus Exchange	200m or less	Up to 4.0	Up to 12	High Rise, Mid Rise
201m – 400m		Up to 3.0	Up to 8	Low-rise, Townhouse	
TOA Type 2 (Victoria/Kelowna/Other Medium-Sized Munis)	Bus Exchange	200m or less	Up to 3.5	Up to 10	Mid-rise
		201m – 400m	Up to 2.5	Up to 6	Low-rise/Townhouse
TOA Type 3 Other qualifying areas	Bus Exchange	200m or less	Up to 2.5	Up to 6	Low-rise
		201m – 400m	Up to 1.5	Up to 4	Townhouse

BC's Transit Oriented Development Area Policy Framework (source: [BC gov](#))

There is a humongous gap between BC's policy and what the City submitted for its MTSAs. For example, even though almost all of southern Rosedale is within 800m of multiple subway stations, the City's plans for its MTSAs would limit development in this area to 3.5 storey multiplexes. If Toronto were to adopt BC's policy, the entirety of southern Rosedale would permit 8 storeys as-of right and a significant proportion of the area would have even more density permitted.



Southern Rosedale with current zoning, 800m, 400m and 200m radii from nearby subway stations (source: [Jacob Dawang](#))

The proposed response by staff celebrates new permissions for multiplexes, garden suites, and an ongoing initiative to maybe permit 6 storey apartment buildings on a few major streets. These are all great, but are not examples of permitting adequate density in entire areas within walking distance of transit. Currently, City Planning is not working on any initiative that would even come close to achieving the new bar set by BC. This is why it is confusing and worrying that the City's draft response makes no mention of the new legislation, even when directly asked by Minister Fraser to do so.

To rectify this issue, we recommend that the City's response to the minister include an explicit direction to staff to increase density permissions around MTSAs to *at least* what BC has now permitted, either through talks with the provincial ministry or an OPA.

*Federal Request #4 - Significantly increase the percentage of land in the City with 4-storey as-of-right zoning.*

**MNTO recommendation:** explicitly direct staff to bring forward zoning amendments to permit heights of at least 12m, approximately 4 storeys, as-of-right, across the City for all multiplexes and apartment buildings.

The proposed response refers to the City's policies for its MTSA's. But, as previously mentioned and noted in staff reports, the vast majority of MTSA policies do not actually increase density permissions at all and will not actually significantly increase the percentage of land in the City with as-of-right 4 storey zoning. Similarly, the Major Streets initiative will obviously only apply to major streets which actually comprise very little of the City's residential land, as do Avenues.

*Federal Request #5 - Commit to reducing restrictions requiring angular planes and rules regarding the "no net new shadow" policy that restricts apartments to areas further from parks and schools.*

**MNTO recommendation:** direct staff to replace the "no net new shadow" policy with a policy that considers the housing created by additional height relative to the overall shadow in nearby areas. Net new shadow is not a reasonable way to evaluate the quality of a park or schoolyard, where shade is often welcome, nor does it consider that small amounts of shadow for several minutes makes little difference in the overall park experience, but could make a large difference to those in the dozens of homes that might be provided.

Recently, the additional affordable units facilitated by extra height at 931 Yonge St. were considered alongside their relationship to shadow on nearby public spaces, resulting in a recommendation for increased height. The public should be made more aware of these tradeoffs and Toronto's policies should inform these discussions rather than imposing a one-size-fits-all approach. Toronto's shadow policies were one reason that fewer homes were allowed at 200 Queens Quay West, a site that is likely to be of particular interest to the Minister because these surplus federal lands were sold with the City requesting conditions for affordable housing but then their own policies limited how much could be built.

Council and planning staff have made a conscious effort to make new apartment buildings welcoming to families, primarily through mandates for a percentage of two and three bedroom units in every building. This is a welcome effort to ensure age diversity in our vertical neighbourhoods. However, that policy has been frustrated by shadow impact policies that prevent apartment buildings from being built in close proximity to schools and their adjoining school yards. Minister Fraser wisely included the mention of schools in his request. It is disappointing that the city's response makes no mention of this issue nor identifies any efforts to improve the situation. If the city wants parents to raise their kids in apartment buildings and to avoid losing schools to under-enrollment, the city and their partners in the local school boards must ensure that parents can walk their kids to school.

If the "no net new shadow" policy is truly used sparingly, then the effect of re-examining its use should likewise be minimal. The work that the City has been doing to revisit angular planes is good and should move forward, but the same commitment should be made to re-evaluate "no net new shadow" to meet the Minister's request.

*Federal Request #6 (clarified following letter from the Minister dated November 22, 2023) - Introduce processes and policies that enable the faster approvals and greater options of housing for students, including both apartment and dormitory style units on- and off-campus, whether owned by post-secondary institutions or the private operators; and eliminate parking*

*requirements for such units within walking distance of a campus, while leveraging existing parking lots to redevelop into housing for students.*

**MNTO recommendation:** direct staff to bring forward amendments to remove minimum parking requirements for multi-tenant housing across Toronto.

The proposed City response is correct that Toronto removed parking minimums for new residential development, with one exception, multi-tenant homes, for which Council chose [to impose parking minimums](#) last year. In many areas of the City, many students live car-free in multi-tenant housing, yet parking is still mandated. Parking minimums drive up rents for students who cannot afford it and do not need it. We recommend that the City follow through with the request from Minister Sean Fraser and remove parking minimums for multi-tenant homes across the City.

Sincerely,

Colleen Bailey  
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CC Minister Paul Calandra, [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca)