



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH 3.2 - Ready, Set, Midtown: Zoning Review - City Initiated Zoning By-law Amendments for Select Low-rise Areas - Decision Report - Approval

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.

Position

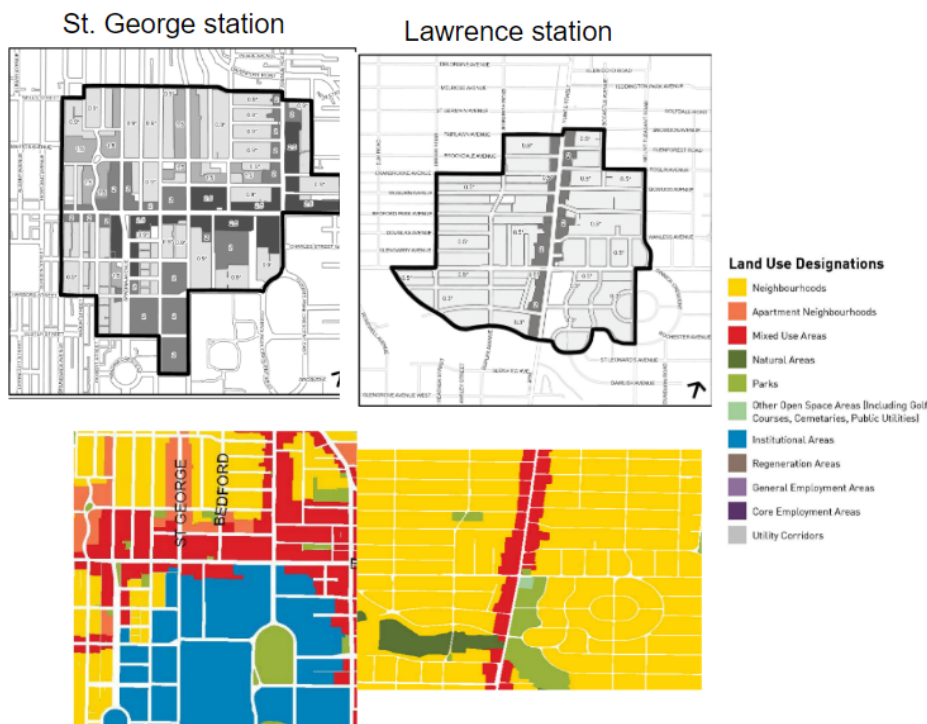
We are writing today regarding the low-rise land use designation in the Yonge-Eglinton Secondary Plan. This designation, the result of a process that began in 2012 and that was itself subject to public consultation in 2018, limits the scope of the zoning review and means that these residential areas, which range in distance from 150 to 470 metres from existing subway or proposed LRT stations, can be zoned for four storeys at most.



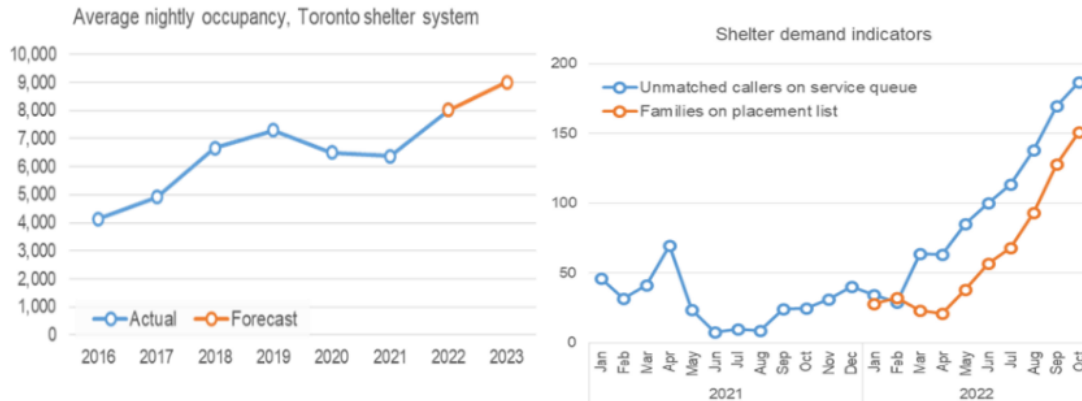
Approximate locations of the four areas that are part of the midtown zoning review. The numbers indicate the distance to a nearby subway or LRT stations, ranging from 150-470 m.

These areas also fall within proposed Protected Major Transit Station Areas (PMTSAs). If approved by the Minister of Municipal Affairs and Housing, they would be eligible for Inclusionary Zoning, but unlikely to meet the 100-unit threshold required for a percentage of affordable homes.

These are far from the only PMTSAs with low-rise residential land use designations in them. Even the major hub of St. George station has a significant portion of land dedicated to yellow low-rise residential. Lawrence station is another example but the list is long.



In the case of the Yonge Eglinton secondary plan, the plan was passed before the Inclusionary Zoning by-law and therefore made without consideration for the loss of affordable housing opportunities. It was also conceived before the worsening of the housing crisis, before a large increase in visible homelessness, and before climate events became so prominent in the news. Based on the public consultations, it seems that priorities in the community have shifted for many people, but the plan is too rigid to account for this.



Toronto 2023 budget notes (SSHA)

The current process seems heavily skewed to preserving the status quo that is failing so many people. Long timelines, more consultation or delays are not neutral choices devoid of costs and consequences. If we do not want homelessness and we do not want sprawl, we should plan for something else. Allowing more homes near midtown transit stations, where billions in public money has been invested, seems like a good place to start.

We are pleased to see the move toward form-based zoning but would ask the Committee to consider:

- (1) If approved by the Minister, the PMTSAs should undergo a review of their land use designations to find opportunities for affordable housing and transit-oriented development.
- (2) To consider ways to reduce the time from secondary plan to zoning review in order to make the planning process more responsive to the housing crisis, climate crisis and community needs.

Regards,

Colleen Bailey
More Neighbours Toronto