



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH 4.7 - Mid-Rise Buildings Rear Transition Performance Standards Review & Draft Update

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

More Neighbours Toronto supports this re-examination of the rear transition performance standards. In seeking to strike a "balance" between new mid-rise homes and assuaging concerns about sunlight and transition, the existing policy has not met either aim. Not only has mid-rise construction been limited by the challenging economics resulting in part from the performance standards, but a small group of residents continues to object to mid-rise buildings at public meetings due to concerns about sunlight and overlook, despite the performance standards. This system is not making anyone happy and it is making housing more expensive and less energy efficient. As such, now is the moment for re-evaluation.

We applaud the work that City Planning has already undertaken to examine the economic challenges facing mid-rise construction and the carbon emissions of different built forms. These data on the added costs, construction difficulties, mass timber possibilities and heat loss are important for designing a new policy and will help the public to understand the tradeoffs during consultation. The relatively ambitious timeline for consultation recognizes the urgency of the housing and climate challenges facing the city. The possibility for lot consolidation to allow mid-rises on some shallow lots is also exciting. Understanding that this is just one part of a series of reviews that will include other performance standards and the ongoing Municipal Comprehensive Review, there are several important points to consider.

1. Mid-rises: not just for Avenues

Recently, the City has focused on allowing mid-rises on Avenues. Placing apartments along wider, busier, more polluted streets while reserving quieter streets for the low-rise forms that tend to be more expensive is difficult to reconcile with the City's equity goals. What's more, performance standards that relate building height to right-of-way width actually mean that we house more people on [more dangerous streets](#). We encourage the City to consider transition

zones and other options for apartment residents to live on safer, quieter streets as part of the Municipal Comprehensive Review.

Indeed, there are already many excellent examples of mid-rises off of Avenues throughout Toronto (see below). These often have a boxy form that might not meet the draft performance standards, yet they are an important part of their communities.



640 Roselawn Ave



450 Winona Drive



245 Lake Promenade

Mid-rises have a place in many areas of the city, not just on Avenues. In combination with transit expansion and RapidTO initiatives, mid-rise is a powerful tool in city-building that should be considered for some quieter streets that run alongside major transit routes.

2. The framing of “perceived impacts” on existing residents as an equal consideration to the real impacts on housing costs and the environment

Although this work acknowledges that there are increased construction and energy costs associated with the existing performance standards that motivated the development of new draft standards, the report includes several suggestions that “perceived impacts” on surrounding areas and “minimizing impact on adjacent low rise areas” are of similar priority. This does not meet the seriousness of the moment. Real impacts must outweigh perceived ones.

While mid-rises may be allowed alongside some parks, the performance standards require them to be smaller than similar buildings along Avenues. This seems unnecessary for some larger parks where the main area of use is away from the bordering residential buildings. Performance standards are not requirements but are sometimes treated as such. It would therefore be useful to acknowledge that there are cases where additional shade is not detrimental and some days more shade appears to be needed as residents cluster under the limited existing shade. This need is likely to increase as the summers become hotter.

In addition, we note that the City's policies on shadows in parks make it less likely that apartment dwellers can live immediately adjacent to these spaces (and, as explained above, the preference is for them to live along wider Avenues). In aiming to prioritize people's relationship with the public realm, we are limiting certain people's ease of access to it. Similar arguments apply to concerns about overlook and how it is prioritized.

Since housing affordability is a key city priority, consultation with non-profit developers and incorporation of this information into the public consultation presentation would be extremely useful for residents trying to make an informed contribution. Would a simple 10-storey box form allow the inclusion of more affordable units and, if so, how many? Could the inclusion of

affordable housing then be a consideration in how to apply the performance standards and when they might be relaxed?

3. Rear transitions written into the zoning

Discussion of mid-rise in Toronto regularly points to Eglinton Ave, Mount Pleasant and the Danforth as areas where this form will be allowed “as-of -right” in the zoning. In fact, these zones have numerous restrictions, [including the requirement for rear transition](#) that was identified as having worse emissivity and creating barriers to mid-rise construction in this report. If these areas are to be examples of successful as-of-right mid-rise policy, the setback standards in the zoning must be re-examined, either as part of the Municipal Comprehensive Review or by other appropriate means.

Conclusion

As this report acknowledges, the City’s priorities have shifted since the original approval and update of the mid-rise performance standards. We need to address housing supply, including affordability, and climate change. The review of the performance standards - starting with rear transition - is an important part of this change. More Neighbours looks forward to a robust consultation. We encourage staff to once again cast a wide net in order to hear from future potential residents of an area in addition to existing residents, while still moving with the urgency necessary.

Regards,

Colleen Bailey
More Neighbours Toronto