



**MORE NEIGHBOURS  
TORONTO**

Dear Members of the Planning and Housing Committee,

**RE: PH 5.5 - Housing Action Plan: Zoning By-law Simplification and Modernization for Low-rise Residential Zones - Proposals Report**

***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 simplification, harmonization and modernization of the low-rise residential zone by-laws. This will help Toronto to meet its goal of 285,000 new homes by 2031 and create more walkable communities.

In particular:

- We strongly support the harmonization of performance standards for low-rise apartments and townhouses with the more recent multiplex standards. It does not make sense to have more restrictions on apartments, which are capable of housing more people.
- We strongly support form-based measures of density. This avoids the redundancy of having these measures in addition to floor space index (FSI) and makes a wider variety of low-rise forms more viable. It also harmonizes how density is regulated across the whole city. We also support the move toward planning based on infrastructure rather than via indirect density limits.
- We support the move away from definitions based on number of units and internal configuration of the building and basing definitions more on external form. However, it should be considered that affordable housing projects may become more feasible with density bonuses that alter the external form of the building. Where possible, the zoning by-law definitions should avoid creating additional barriers for these projects.
- We welcome the inclusion into Zoning By-Law 569-2013 of: sites still zoned under pre-amalgamation by-laws, sites subject to secondary plans (these are often more restrictive than the base zoning for those areas), and active planning applications.
- Expanded low-rise apartment permissions in some neighbourhoods are crucial to promoting infill housing and avoiding sprawl. In addition to major streets, transition

zones and MTSAs, we encourage the City to review any low-rise areas within 500 m of the TTC's 10-minute network that may not already be included in these areas.

Toronto needs to increase housing supply to address our affordability and climate goals. Making denser low-rise forms more viable and widely available is a key part of this plan and will expand options for renters, create more equitable communities and help to preserve existing affordable mid-rise and high-rise apartments throughout Toronto. We look forward to the consultation and encourage the City to move with the urgency that the crisis requires.

Regards,

Colleen Bailey  
More Neighbours Toronto