



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH 6.4 - Expanding Housing Options in Neighbourhoods: Major Streets Study - 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

We are writing today to support continued advancement of the Major Streets Study. We would like to encourage City Planning staff to maintain a high priority on this item. Under EX3.1 Housing Action Plan 2022-2026- Priorities and Work Plan, the proposals report was scheduled for Q2 2023 with a final report delivered to the Planning and Housing Committee in Q4 2023. Given the limited time left in 2023, we ask that City Planning staff rapidly conclude and summarize the results of further consultations to maintain the Housing Action Plan schedule.

We applaud staff for permitting lot assembly and for favouring form-based measures of density over floor space index. We would like City Planning staff to consider the following revisions to the Major Streets report and accompanying Official Plan and Zoning By-law amendments:

- Remove the proposed unit maximum of 30 for apartment buildings abutting Major Streets. The proposed building length, depth, height, and setback requirements are sufficient to provide a form-based standard for apartment buildings. The concern that buildings above 30 units would be subject to loading requirements does not necessitate limiting buildings to 30 units, as the loading requirements themselves are a disincentive to construct buildings with more than 30 units.

- Consider raising the height limit for apartment buildings abutting Major Streets above 6 stories/19m. As noted in Attachment 3 of PH6.4: EHON Major Streets Study and Analysis, 70% of the Planned Right-of-Way (PROW) widths considered in the study were 27m or greater. The study noted that the Midrise Guidelines for Avenues sets a maximum height as a ratio of 1:1 to the PROW for the street. The rationale provided to recommend using a lower ratio for Major Streets is simply that Major Streets currently have a smaller existing built form than Avenues. But we recommend that City Planning staff do not prematurely limit the housing options in Neighbourhoods due to the limited existing housing options in Neighbourhoods.

Conclusion

The housing crisis continues to worsen in the City of Toronto. We encourage City Planning Staff and the Planning and Housing Committee to continue to meet this crisis with the urgency, creativity, and bold action that is required to address it.

Regards,

Damien Moule
More Neighbours Toronto