



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH8.3 Housing Action Plan: Zoning By-law Simplification and Modernization for Low-rise Residential Zones - Phase 1 Final 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 PH8.3 and urges the City to be bold in Phase 2.

The simplification and harmonization zoning changes recommended by staff are a welcome step towards removing the barriers and complexity which limit the opportunities to convert existing homes to multiplexes and low-rise apartments. We are happy to see alignment of setbacks and building depths for low-rise apartments and townhouses with the existing requirements for detached and semi-detached houses and the move towards a more "form-based" approach to zoning.

We support the inclusion of a review of the use of Floor Space Index (FSI) as part of Phase 2 of Zoning By-law Simplification and Modernization for Low-rise Residential Zones. We encourage staff to consider the complete removal of FSI from the Zoning By-law.

As outlined in the Housing Action Plan for 2022-2026, the Phase 2 study "*will bring more lands into the City-wide Zoning by-law and enable the full range of missing middle housing permissions and the new parking regime city-wide.*" **We recommend that the Phase 2 study consider the following options for further simplification, harmonization, and modernization** of the Zoning By-law:

Simplification to reduce the number of low-rise residential zones

We recommend that staff study reducing the number of residential zones to simplify the Zoning By-law. The existing residential zones are outlined in Table 1. The five separate low-rise residential zones include significant duplication that is not necessary to achieve the policies in the Official Plan. For example, Chapter 3 of the Official Plan applies the same policies to townhouses and low-rise apartment buildings and Chapter 4 policies 4.1.9 and 4.1.10 outline the policies for in-fill development to ensure continuity with the existing

physical character of the neighbourhood. Therefore, it is not necessary for the Zoning By-law to have separate R, RT, and RM categories.

Building Type	Number of Units	Zones				
		R	RD	RS	RT	RM
Detached House	1 (plus 1 secondary suite)	✓	✓	✓	✓	✓
Semi-Detached House	2 (1 per side) (plus 1 secondary suite per unit)	✓		✓	✓	✓
Multiplex (Duplex, Triplex, or Fourplex)	2, 3, or 4	✓	✓	✓	✓	✓
Townhouse	3+ (plus 1 secondary suite per unit)	✓			✓	
Apartment Building	5+	✓				✓

Table 1: Building type permissions in Low-rise Residential Zones in Zoning By-law 569-2013

Harmonization of residential areas subject to former municipality zoning by-laws

Significant areas of the city remain subject to the zoning by-laws of the former municipalities which were amalgamated into the City of Toronto. These former zoning by-laws are often not consistent with the policies which have been adopted since amalgamation, and this limits the reach and effectiveness of those new policies. The existence of multiple applicable zoning by-laws within the city also adds unnecessary complexity which limits public understanding of the applicable rules within their neighbourhoods. We recommend that staff study the harmonization of these areas into Zoning By-law 569-2013.

Modernization to eliminate unit caps

In order to move towards a modern, form-based approach to zoning, we recommend that staff study eliminating the use of unit maximums as part of the Zoning By-law. The existing regulations on height, building depth, and setbacks are sufficient to satisfy the policies outlined in Chapter 3 and 4 of the Official Plan, and further limits on the number of units are not necessary.

Modernization of height limits in residential zones to at least 13.0 m

As part of PH8.3, staff have recommended that the height limit in areas within the R zone in the Old City of Toronto which currently have a height limit of 12.0 m should be increased to 13.0 m to align with recent Ontario Land Tribunal decisions. There is however an opportunity for further modernization. As shown in Figure 1, significant areas of the City have height limits below 10 m. These limits were often established by the by-laws of the former municipalities which were amalgamated into the City of Toronto, and are now out of step with current City policies to allow gentle density into existing neighbourhoods. These height limits also do not apply to multiplexes, which have a height limit of at least 10.0 m city-wide. We recommend that staff study a minimum height of 4 storeys/13.0 m city-wide to allow for the

full range of low-rise building types within neighbourhoods without the need for an amendment application to the Zoning By-law.

Residential Zones with Height Limits (m)

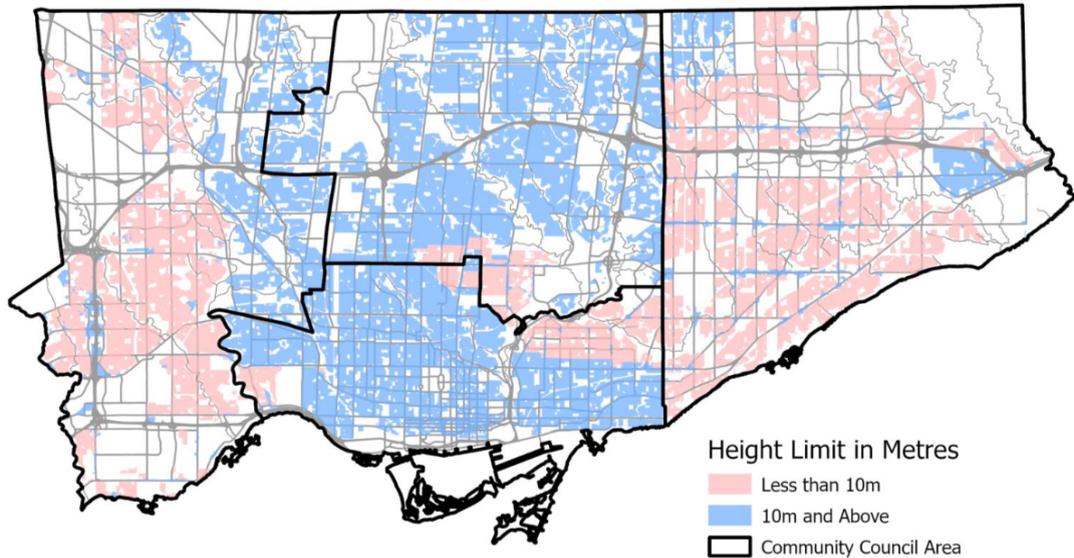


Figure 1: Residential Zone Height Limits within the City of Toronto

As staff continue to work through the Housing Action Plan priorities for the 2022-2026 term of council, we encourage them to be bold and to propose changes which meet the scale of the housing crisis the City is experiencing.

Regards,
Damien Moule,
More Neighbours Toronto