



**MORE NEIGHBOURS  
TORONTO**

Dear Members of the Planning and Housing Committee,

**RE: PH9.13 Committees of Adjustment and Minor Variances**

***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 opposes PH9.13 to create additional and separate criteria for large, multi-storey developments at the Committee of Adjustment.** The City and other levels of government already impose many additional barriers and costs onto multi-storey apartments when compared to detached, low-rise dwellings. These include making far less land available for apartments through zoning, exemptions for low-rise and detached buildings from site plan approval, grant programs for basement flooding for homeowners while bathtubbing requirements for apartments are mandatory and unsubsidized. On top of that, larger multi-storey developments are more likely to face organized community opposition, resulting in greater time and expense in going through rezoning or Committee of Adjustment. **Separate definitions and requirements for apartments at the Committee of Adjustment would be yet another barrier in a long line of inequities that the City creates for midrise and highrise apartments compared to other built forms.**

In addition, **the City should consider the way in which such restrictions would affect affordable housing.** Recently, on a minor variance application for [394 Symington](#) that More Neighbours supported, adding six storeys onto a 17-storey rezoning allowed the creation of six affordable units that will be operated by WoodGreen. This application was also supported by the City's Housing Secretariat. Councillors often lament the lack of tools that they have to negotiate for affordable housing. Passing this motion would put one of the remaining avenues at risk. In another example, at 128 Havelock, the Neighbourhood Land Trust received a minor variance for an addition to a detached dwelling that allowed them to create ten affordable dwelling units.

Many of these same Residents' Associations have opposed proposals in the past based on neighbourhood character or context. While 10x the units or 35% more floors might sound significant in isolation, the relevant context is that these changes created net new affordable homes in a city that desperately needs them. In our view, this is precisely the sort of context

that the Committee of Adjustment should consider, along with the character defined by the other buildings, services and amenities in the area. We would object to any specification of what does or does not constitute a minor variance based solely on the percentage increase in height without considering the housing and affordability that a variance would facilitate.

More Neighbours sympathizes with the frustration underlying the motion. Because of the long timeframe for zoning approvals (see PH9.2), some buildings take years to get through the process and then find that projects are no longer economically feasible. These sites will either need to go through the process again or sit undeveloped. **Making appropriate use of the Committee of Adjustment for minor variances to allow construction to proceed should remain an avenue that is open for consideration.**

However, all of this is an inevitable result of our current planning and development system, which requires frequent site-specific exceptions that often fall to a small number of people to approve or deny. It is this system that risks undermining public confidence in land use decision-making, not the lack of separate rules for multi-storey buildings. **We would support a motion to re-evaluate this process, examine the reasons why so many rezoning and minor variances seem to be required, and to support the creation of a more transparent, rules-based system that allows more homes as-of-right** and will adapt to Toronto's future housing needs. **However, we cannot support a motion that singles out larger apartment buildings** and seeks to apply yet more conditions that will limit where they can be built in Toronto, reduce the City's ability to negotiate for affordable housing and add costs by creating additional hurdles for what should be one of the more affordable types of housing.

Regards,  
Colleen Bailey,  
More Neighbours Toronto