

Dear Planning & Housing Committee,

I am writing to you in support of the More Neighbours Toronto submission to amend PH 12.3 - Expanding Housing Options in Neighbourhoods: Major Streets Study - Final Report to ensure that this program will truly produce more housing options. Toronto needs more housing in all neighbourhoods and the citywide survey identified “more housing opportunity” as the most important principle for this work. This proposal lays a good foundation by:

- Allowing townhomes and six-storey apartments in Neighbourhoods on Major Streets
- Supporting lot assembly
- Regulating density through form-based zoning rather than floor space index, building on the work done for multiplexes.

However, it includes several direct contradictions to the primary goal of Major Streets: increasing density in Neighbourhoods and increasing housing supply in the city. Some requirements may also undermine the aim of allowing for more large, family-sized units. In addition, the City’s own financial feasibility study demonstrates that these requirements will not support rental options and will put any new apartments - ownership or rental - at risk if construction costs increase.

In order to truly expand housing options in Neighbourhoods and make new homes viable on Major Streets, please consider the following amendments:

- Remove the 30-unit maximum, and deal with site-specific loading and waste requirements through site plan approval.
- Make side yard setbacks 1.8 m in all zones, with an adjustment to 2.4 m when there is a primary window. There is no need for different setback requirements in the R versus RD zones, or in cases with a through lot. Multiplex setbacks are 0.9 - 1.2 m and the city must end the practice of providing outdoor amenity space by adding ever more stringent requirements onto apartment residents and reducing their available floor space. Similarly, any lot coverage and landscaping requirement should be based on the need for drainage and stormwater management, not used as a substitute density regulation. A 50% lot coverage maximum, or a requirement for landscaping on 30% of the entire lot when no such requirement exists for detached homes, is not in line with the Major Streets aims for Neighbourhood intensification, nor the City’s equity principles, nor with the public comments and survey presented in the report.
- Direct staff to continue work to add new streets to the Major Streets classification, so that those streets can also benefit from more housing. If the goal is increased density near existing transit service and amenities, there are streets that are not included in Map 3 that meet these criteria and would benefit from these changes.

Toronto committed to expanding as-of-right permissions for missing middle housing as part of its Housing Accelerator Fund application and its Housing Action Plan. This work is an important component of those plans, but it must be designed for Toronto’s future, to produce new housing options and intensify Neighbourhoods. Please pass this amended item in order to not only make Major Streets a success, but to make them a key component of a more affordable and prosperous Toronto.

Thank you,

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