



**MORE NEIGHBOURS  
TORONTO**

Dear Members of the Planning and Housing Committee,

**RE: PH 12.3 - Expanding Housing Options in Neighbourhoods: Major Streets Study - 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 is supportive of the Major Streets initiative but has concerns that some of the requirements will reduce the options for larger multi-bedroom units and decrease project viability. City Planning's survey identified "more housing opportunity" as the most important principle for this work, but [their financial feasibility analysis](#) suggests that, even with the recent HST removal, **purpose built rental will not be viable under these conditions**. Why is this initiative not designed to provide housing opportunities for renters? Even ownership models will become infeasible in places like Etobicoke if construction costs rise. If Toronto truly wants to expand housing options in Neighbourhoods, the changes must make new homes viable to build. **MNTO therefore suggests several amendments related to unit maximums, lot coverage and setbacks, to make this a bigger transformation that unlocks housing opportunity.**

We **support** the following staff recommendations:

- **Open up more Neighbourhoods** for townhomes and six storey apartments as housing options
- **Support lot assembly** along Major Streets
- Regulate density through **form-based zoning rather than floor space index**. This aligns the policies for apartments in Neighbourhoods with those for multiplexes and generally moves towards the goal of unifying and simplifying zoning.

To enable appropriate intensification to actually become a reality, we **recommend amending** this item as follows:

- **Remove the 30-unit maximum.** If lot assembly is allowed and there is variation in lot sizes throughout the city, apartments meeting the depth, setback and lot coverage requirements will have different sizes and be able to accommodate different numbers of units. Furthermore, the height, depth and other requirements already restrict the built form; the number of units in the building does not affect its exterior appearance. The main justification given for this maximum was to accommodate loading and garbage pickup. However, this can be addressed during site plan approval, which is already required for apartments with more than ten units.
- **Remove the lot coverage and landscaping requirements, or adjust them to what is needed for drainage and stormwater management.** These requirements were not in the draft bylaw presented in PH6.4, and the survey results found that a majority were comfortable with 30% of a site for vegetation (the survey did not ask about comfort with lower levels of landscaping and some percentage of those “uncomfortable” may have preferred lower). There is no support for this idea presented in the summary of public feedback, while there were several comments noting that specific policies related to tree preservation and permeable surfaces would be more valuable than an overall landscaping requirement. In addition, several comments asked that the need for housing be considered when thinking about open space.

A 50% lot coverage maximum in most zones and a landscaping requirement of 30% of the lot discourages denser housing forms, reduces the available floor space and reduces the likelihood of larger units (a goal of this policy, as outlined in the draft OPA, 4.1.12 a). It appears that reducing density is the goal of the lot coverage and landscaping requirements since the justification given in the report is to create a “consistent scale.” **This is not aligned with the Major Streets policy goals to increase density, nor with the public feedback demonstrating widespread support for intensification and increased housing options.** If the front, rear and side yard setbacks are not sufficient for drainage and stormwater management, a separate lot coverage restriction could be justified. However, the lot coverage should not be used as a substitute density restriction that recreates floor space index and undermines the entire goal of the Major Streets program! We should not be aiming to maintain suburban lot coverage patterns for apartments as a part of Toronto’s urban future simply because that is what was present in the past.

- **Make side setbacks for apartments 1.8 m in all zones, and 2.4 m when there is a primary window.** For multiplexes, the side setbacks are 0.9 - 1.2 m. It is not clear why a 2.4 m side yard setback is needed for apartments in the RD zone but not the R zone, nor why there is a separate requirement for through lots when there are no windows. It seems likely that this was introduced as a result of concern for adjacent properties with lower density, but Toronto should move toward a fairer system where neighbourhoods of detached homes are not given special treatment.

The City used 12 m x 38 m lots in its [financial feasibility study](#) for Etobicoke and Scarborough; a 5.5 m side yard setback for primary windows means that one would use almost the entire lot to accommodate these setbacks rather than building any new apartment floor space! Requiring extra outdoor space from apartment residents at the expense of indoor living space is part of a concerning pattern where the City sacrifices apartment residents' space in an attempt to appease lower density neighbours.

- Similarly, **the City should not require indoor amenity space when it is already collecting Community Benefits Charges**. If the Community Benefits Charges are truly growth paying for growth, then why does the City also mandate additional private building space for collective use? This is charging apartment residents of buildings with 10+ units twice for the same services. It increases costs and is not in line with the city's equity goals. This is just one more barrier to increasing the living space in apartments, which would accommodate density and larger units. Smaller-scale apartment buildings sometimes only pencil out in cost or size with trimmed-down amenity spaces.
- **Remove the requirement to break up the façade** with articulations. The built form restrictions already mean that these buildings are quite small. Toronto has many older small apartment buildings with a simple box shape that provide good, affordable options for residents and that fit in well with the surrounding neighbourhood. Articulations introduce many of the same challenges as angular planes: reducing floor space, making construction more complicated and introducing places for thermal bridging, which makes buildings less energy efficient at this critical stage in the climate crisis.
- **Update the development charge (DC) exemption** for units 2-4 so that it applies to small apartments. In 2022.EX34.1, Council wisely chose to apply DCs to only the first unit of a multiplex and not units 2-4. This would encourage conversions and small scale intensification in Neighbourhoods, a key aim of the EHON program. This makes financial sense because many Neighbourhoods have experienced declining population over the last decades and have underused infrastructure, so DCs are not needed to support growth there. However, the wording of EX34.1 capped the exemption to buildings of 4 units or less, meaning that an apartment with 5 units faces a steep jump in costs. This wording should be updated to apply the exemption to all apartments in Neighbourhoods.
- **Direct staff to continue work and consider adding new streets** - such as Willowdale or Glencairn - to the Major Streets classification. 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. As part of MM13.27, Toronto's Federal Housing Accelerator Fund (HAF) deal, Council committed to expanding as-of-right permissions for missing middle housing. The Major Streets program can be part of this work alongside four-storeys + six units in the interior of Neighbourhoods. **Although the HAF deal has not been publicly released, the one-year milestone report is likely approaching and Toronto must**

**demonstrate commitments in both new bylaws and, soon, actual outcomes to justify the next installments of funding.**

Last October, [Bruce Davis from Public Progress explained](#) to this Committee how mandating “nice-to-haves” for every apartment through zoning was detrimental to non-profit housing. He described going door-to-door and enduring racist comments in order to try to get support for minor variances so that he could build transitional housing for Indigenous men without a mechanical bike lift and 13 other unnecessary zoning requirements. This Committee seemed to agree with his assessment that “the system is broken” and we have to “clear the underbrush,” yet **here we are planning to perpetuate that broken system** with zoning requirements for amenity spaces and large landscaping percentages for small apartments. When we place additional burdens on apartments, we reduce the number of homes that become a reality.

A [recent analysis of housing in Sydney](#) suggested that if every building constructed in the last five years were moderately taller - 10 storeys instead of the average seven - that would mean 45,000 more homes, enough to reduce rents 5.5%, all else being equal. [A similar analysis in Vancouver](#) found that an additional 20% more housing in each building constructed over the last 5 years would have meant 16,363 more homes, which would have lowered rents 3.7%. **Across the city, this adds up to a half billion dollars that is transferred from renters to landlords each year as a result of reduced housing construction.**

Of course, an increase in density may not be possible on every lot, but the idea emphasizes the importance of considering future residents when setting policy. City Planning hears many perspectives during engagement, but these often focus on the immediate impacts to or prospective fears of change from existing residents. They must largely rely on their own expertise and studies like those above to envision a city that doesn't yet exist for residents who aren't yet here.

We thank City Planning staff for their work and engagement on the Major Streets initiative. Beyond the direct financial benefits to the City and all neighbours, a successful Expanding Housing Options in Neighbourhoods program will increase density, making neighbourhoods more walkable and climate friendly, as well as allowing a wider range of incomes to access housing in low-rise neighbourhoods. **Please adopt these amendments and pass the amended item in order to make a successful Major Streets proposal** and to continue the work to end the apartment ban that persists in far too much of Toronto.

Regards,  
Colleen Bailey  
More Neighbours Toronto