



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH12.1 - Update Downsview: Secondary Plan, Zoning By-law, Urban Design Guidelines and Master Environmental Servicing Plan - 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 Update Downsview: Secondary Plan. We are excited by the vision presented by staff and look forward to welcoming 115,000 more neighbours to Toronto. The Downsview lands represent one of the largest city-building opportunities in recent memory and it is vital that the City designs and executes on their vision for a green neighbourhood that supports its residents and workers. In particular, More Neighbours Toronto is supportive of:

- The planned affordable housing targets throughout the secondary plan area
- The planned higher density areas close to Wilson, Sheppard West and Downsview Park stations
- The regeneration of the Wilson South district from a series of parking lots and big box stores to a place where people can live and work
- The vision for the neighbourhood to be supported by active transportation and not private vehicles

However, More Neighbours Toronto has two major concerns:

1. The timeline proposed to implement the secondary plan
2. The lack of transit planning which has led to planned lower densities further away from subway stations

The Timeline

Canada is in a housing crisis. Toronto, as Canada's largest city, must be at the forefront of solving the housing crisis. More Neighbours Toronto is supportive of the City's plan to use publicly owned land to help confront that crisis. The City and Council have rightly called on senior orders of government to use their land within the city's boundaries to assist in this goal. The Canada Lands portion of Downsview Park represents the single largest contribution that the federal government can make to solving our housing crisis and they have already made it. It behooves the City to act and act quickly.

The timeline as outlined in the draft secondary plan envisions a build out over a 30 year time horizon. While More Neighbours Toronto understands that a project of this scale is not going to be built overnight, we would support efforts to accelerate this timeline and get shovels in the ground as soon as possible. The City has provided a creative incentive under section 12.6.1.d that increases the amount of affordable housing required in the Wilson and Allen Road area should a district plan not be brought forward within one year of the passing of this Secondary Plan. While More Neighbours Toronto reserves our opinion on this specific measure, we applaud the spirit of the measure. Why is this measure only applied to the lands outside of Downsview Park? Could the same or similar measures be applied to the Northcrest and Canada Lands properties in the Park?

A home in 2051 doesn't help a Black or Indigenous person sleeping on the street or otherwise dealing with housing insecurity in North York tonight. More Neighbours Toronto urges the City, staff and council, to act with greater urgency to see homes built as quickly as possible. We are in a crisis. We must act accordingly.

Transit Planning

More Neighbours Toronto is not a transit advocacy group. However, we do seek to advocate for the future residents who will live in new neighbourhoods like the updated Downsview. There is also a direct connection in the minds of planning staff, as outlined in the draft secondary plan, between transit access and the ability to support more homes and people. More Neighbours Toronto would like to see the opportunity for greater density in neighbourhoods outside of major transit station areas. Therefore, More Neighbours Toronto is disappointed that a more complete surface transit plan was not developed as part of the mobility network. The secondary plan contemplates at 4.1.3.e "introducing a local bus priority network, as determined through further study". This should have been part of the plan before you today. District plans are already in advanced planning stages for several districts in this secondary plan area, including districts where a new street grid will be implemented. By not defining where and how the TTC will operate electric buses in the area, the City is failing to plan. In so doing, it is planning to fail on

its vision of delivering “climate resilience and environmental sustainability.” How far is the City going to let district and block level plans advance before a plan for a bus network is developed?

More Neighbours Toronto would support the following additional recommendation that this committee and council:

“Ask the Board of the Toronto Transit Commission to request the Chief Executive Officer, Toronto Transit Commission to work with the General Manager, Transportation Services on delivering a surface network plan to support the vision of the Update Downsview: Secondary Plan with a report to the appropriate board or committee no later than Q2 2025.”

More Neighbours Toronto is concerned that by not having a bus network plan in place, the City runs the risk of creating market conditions that will demand more parking in both the residential and employment areas of the secondary plan. Parking is expensive to build and, once in place, fosters car dependency and discourages active transportation. This is in direct conflict with the stated goals of the draft secondary plan to build affordable housing and encourage active mobility. The only way to avoid overbuilding parking is to provide a clear vision for transit in the area along with the excellent active mobility provisions outlined in the report.

Other Concerns

More Neighbours Toronto is also concerned with the following provisions which may limit the potential for housing in the area:

- The unnecessary restrictions on the placement of towers, including the provisions in the Downsview Urban Design Guidelines at 3.4.8
- The widths of the major street rights of way and the shadow-related restrictions on height
- The excessive protection of heritage properties within Downsview Park. The City should prioritize a small number of heritage buildings to reflect the area’s history instead of trying to protect all the buildings on a blanket basis.

We thank staff and the committee for its hard work on the secondary plan before you. Notwithstanding the concerns noted in this letter, we urge you to approve the item so that we can move forward with building out the homes that we desperately need.

Regards,

Aaron Ginsberg

More Neighbours Toronto