



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH13.4 - Housing Action Plan: As-of-Right Zoning for Mid-rise Buildings on Avenues and Updated Rear Transition Performance Standards - Proposals 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 welcomes this proposal to implement the policies of the Official Plan as-of-right, and we support proceeding with public and stakeholder consultation. We ask that More Neighbours Toronto be included in the list of stakeholders being considered.

We are pleased to see the proposal for simplifications to the development standards for rear transitions in the CR zones. These are a significant improvement over the current angular plane requirements which are wasteful and expensive to construct. We would like to see Planning staff consider further simplification by aligning the proposed Performance Standards 5A and 5B, as we do not believe that minimizing shadow on parks and open spaces should take priority over the housing for people who will use them.

We support increasing height permissions, and while we also support the proposal to align the maximum mid-rise building height with the Avenue right-of-way, we would like staff to consider further increasing the height permission.

We would also like to consider removing the proposed floor space index maximums from the areas being studied. With the proposed setbacks, stepbacks, and height restrictions, the proposal has already created a form-based envelope for development along Avenues, and further restrictions on density are redundant. While a rationale has been provided for maintaining floor space index to allow control of the residential and commercial split on a site, we think that the pandemic has shown that more flexible rules for building use are beneficial.

We encourage City Planning Staff and the Planning and Housing Committee to continue their work to simplify our Zoning By-law and allow more housing as-of-right to avoid the lengthy and expensive rezoning process. We urge City Planning Staff to be bold with the final report, to help ease the housing shortage which is exacerbating homelessness and financial hardship in our City.

Regards,
Damien Moule,
More Neighbours Toronto