



**MORE NEIGHBOURS  
TORONTO**

Dear Members of the Planning and Housing Committee,

**RE: PH16.1 - Housing Action Plan: As-of-Right Zoning for Mid-rise Buildings on Avenues and Updated Rear Transition Performance Standards - 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 supports the final report for As-of-Right Zoning for Mid-rise Buildings on Avenues and Updated Rear Transition Performance Standards, and we recommend that the Planning Housing Committee and City Council adopt the draft Zoning By-law. The draft By-law is an improvement over the existing status quo on Avenues.

That being said, we are disappointed that the suggestions [we provided](#) in response to the Proposals Report in item PH13.4 were not considered for the Final Report. The proposed heights and continued use of FSI will limit what can be built along Avenues without additional rezoning. And the new performance standards, while an improvement, still give too much priority to reducing shadows as opposed to housing people.

We hope this marks the beginning of an increased use of as-of-right zoning by City Planning for more areas of Toronto. This would be a welcome shift to proactive planning for growth instead of the reactive and slow rezoning for individual lots that is the norm today. We encourage the Planning and Housing Committee to direct staff to study as-of-right zoning for all areas designated for the growth in the Official Plan, including Downtown, and Centres.

Regards,  
Damien Moule,  
More Neighbours Toronto