



**MORE NEIGHBOURS  
TORONTO**

Dear Members of the Planning and Housing Committee,

**RE: PH16.2 - City Comments on Proposed amendment to Ontario Regulation 299/19  
ADDITIONAL RESIDENTIAL UNITS, made under the Planning Act**

***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 encourages council to disregard staff comments which oppose the proposed amendments to provincial regulations. We believe these changes to regulations regarding ARUs as proposed by the Province are better aligned with the values expressed in Chapter 1 of the City's Official Plan than the approach indicated in these staff comments. Further, they have the opportunity to substantially reduce the complexity involved in constructing new ARUs, which in turn will help to expand the supply of residential units in line with the city's EHON initiative.

We believe that a more complex regulatory environment with regards to built form hinders construction of the new residential units which are desperately needed to address the city's housing crisis. The proposed changes to provincial regulations provide a rare opportunity to equalize these regulations across the entire province, which will make it easier for builders to construct new housing as opposed to limiting construction to those who are familiar with each municipality's idiosyncratic regulatory environment. It may also enable expansion of the housing stock in neighbouring municipalities which have historically been more resistant to such development, furthering regional solutions to the housing crisis.

We take particular issue with staff comments regarding changes to Angular Plane and Building Distance Separation regulations. Justifications for the staff position appear to focus on mitigating impacts of ARUs on neighbours. We believe these concerns about impacts are misguided given the environment that ARUs exist in: lots where there is already a residential building to block sunlight and impede on neighbours' privacy. The concern further seems inconsistent given the City's adoption last year of the Official Plan and Zoning By-law amendments permitting

multiplexes citywide. Now that 3 storey multi-family buildings are allowed by-right on all Residential lots, it does not seem like elimination of angular plane restrictions or reduction in building distance restrictions would present much further impact over what is already allowed by-right with the City's rules regarding multiplexes.

The specific comments from staff regarding changes to Building Distance Separation seem emblematic of the overly restrictive approach which the City takes to built form, in opposition to the city's stated EHON goals. While it may be true that only 5.5 percent of Garden Suite applications which the City has received involve applications for minor variations to separation distance, *we do not know how many applications were never made in the first place* due to either the additional cost or uncertainty involved in a minor variance application. Without an understanding of these impacts, the costs of built form restrictions with regards to EHON may be severely understated.

While the City has made excellent progress with regards to the EHON initiative, it is clear that more work needs to be done to meet the needs of existing and future residents in a housing market that remains unaffordable to many. The lacklustre adoption of ARUs indicates existing restrictions may be presenting too many barriers to building new units. This provincial regulation presents a unique opportunity to reduce those barriers in a way which levels the playing field across all municipalities in the province, which could have significantly more benefits than an initiative taken on by the City alone. For these reasons, the City should be supportive of these proposed changes.

Sincerely,

Ashlyn Clarry  
More Neighbours Toronto