



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH16.3 - Expanding Housing Options in Neighbourhoods - Beaches-East York Pilot Project - Official Plan and Zoning By-law Amendments - Decision Report - Approval

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 proposed Official Plan and Zoning By-law Amendments. We also applaud Councillor Bradford, City Council and City Planning for this project, which is collecting information about the on-the-ground realities of approving and building missing middle housing in Toronto. This report provides reliable, publicly accessible information about the challenges that these projects face, which provides a path for finding solutions.

This project highlights the important work that this Committee and City Council did removing parking minimums to make projects like this viable. It also highlights the good decisions made with multiplex legalization, including the replacement of floor space index with form-based density measures. And it demonstrates that the recent update to the mid-rise rear transition performance standard will help projects meet the Toronto Green Standard by reducing the surface area of exterior walls, although heights above six storeys would require a setback.

It also demonstrates the work that remains to be done. For example,

- The apartment building is not allowed as-of-right and exceeds the four-storey maximum for Neighbourhoods. From the January 2021 approval of the idea and process for this project to this Official Plan and Zoning By-law Amendment, has taken over 3.5 years and \$630,000 in costs to consultants.
- The 19.5 metre height (23.5 metres with mechanical penthouse) exceeds that proposed for "as-of-right" apartments that were approved on Major Streets earlier this year.
- Although this project is in a PMTSA and staff describe it as an "appropriate example of intensification" and "respectful of the adjacent low-rise detached houses," it is nowhere close to meeting the 100-unit minimum needed for inclusionary zoning, if the MTSA's

ever be approved by the province. This is true of many Neighbourhood areas in the City-defined PMTSAs where land use was not updated when PMTSAs were submitted to the Minister.

We would particularly note the staff statement on indoor amenity space:

The provision of indoor amenity space for a small-scale building is difficult to achieve due to limited space. In this case, the provision of indoor amenity space would have required the loss of units, larger buildings or the provision of amenity space underground...

Contrast this with the statements about amenity space from the recent as-of-right permissions for apartments on Major Streets, where indoor amenity space was declared to be so vital that it was required in every project. Here, it is stated plainly that this policy does result in a loss of units. The more flexible decision allowed here - trading off indoor and outdoor space, will allow for more housing and better tree preservation and canopy growth.

All of this is related to the fact that the City's Official Plan contains many aims that often conflict with one another - support growth, provide housing options with more bedrooms, but limit impacts on Neighbourhoods and reduce massing, while also preserving trees, etc. The title of Chapter 1, "Making Choices," implies that we have prioritized these different aims or designed policies with the flexibility to adapt to different conditions. In reality, policies usually mandate strict requirements across the City and those requirements rarely prioritize housing.

However, steps to address some of the challenges that are identified here have already been requested by this Committee. We encourage you to focus on this work and ensure its timely completion. This includes:

- The report on 6-unit, 4-storey permissions for Housing Accelerator Funds (MM13.27)
- The remaining mid-rise performance standards (Motion 1a of PH4.7)
- The report on simplifying and removing redundancies in the list of required studies for Planning Applications, which could reduce the \$630,000 in consultant fees (PH8.8)
- Allowing more homes in transition zones (EX3.1). City Planning's rules about Neighbourhoods and its reluctance to change land use designations near older stations on the Danforth line mean that six storey buildings are not being built here, steps from Woodbine station, while newer transit stations in North York and Scarborough regularly see rezoning applications for 40 storeys. Transition zones are the smallest step toward changing this.

Thank you again to everyone who helped make this happen. Good government requires good information, publicly available for transparency and accountability. This includes costs, timelines and an honest assessment of likely obstruction points. This report provides that and can now be used as a blueprint for making more missing middle homes feasible in Toronto.

Regards,
Colleen Bailey,
More Neighbours Toronto