



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH17.11 - Housing Accelerator Fund: Expanding Permissions in Neighbourhoods for Six Units and Four Storeys - Preliminary 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 is pleased to see the City move forward on plans for six-unit, four-storey buildings and that financial feasibility and the current development charge framework will be key considerations in this work. However, it is disappointing that the timeline for even a proposals report is so long and that initial plans still appear to focus on changes least likely to upset existing homeowners in established Neighbourhoods rather than creating a plan to help address the housing crisis. We hope that the Committee will direct staff to take six units and four storeys as a starting point without adding extra limitations into the scope of the work before stakeholder consultations for the proposals report have even begun.

Examples from other cities

We are pleased to see staff exploring changes in other cities. We note that in Edmonton, a much smaller city, most residential areas permit up to eight units. In addition, this section of the report focuses on alternate methods of regulating units. This is certainly important as the City considers how its 5-unit definition of an apartment works with this six-unit request and with development charge definitions and CMHC financing. However, it mostly leaves out discussion of height permissions in other cities. Despite the report's claims about the limitations of the Ontario Building Code, several Ontario cities permit four storeys in "neighbourhood" areas. These include London's recent changes to permit four storeys on neighbourhood connector streets and eight storeys on major streets in neighbourhoods.

Given that Toronto first committed to exploring six units and four storeys as a condition for federal Housing Accelerator Funding (HAF), it seems worth considering what other cities in the country have done. Toronto is a larger city with a greater housing shortage and affordability issues, but has taken a year to produce a report that outlines a work plan for another year to produce a proposals report as other cities have moved forward with bylaws

to permit four storeys. It would be wonderful to see Toronto leading the way so that there is no question about its commitment to achieving its HAF milestones.

What should be in scope?

The report mentions taking the recent multiplex changes as a baseline. During these consultations, members of the public asked about exploring more units, low-rise apartments and other possibilities but were told that this went beyond the scope of what Council had asked for. While staff made important changes with some additional depth allowed for multiplexes and the replacement of floor space index with form-based density measures, there was a sense that development should largely remain within the same "box" that was already allowed. Staff did not seem to feel that they had permission to consider public input for larger deviations.

We would suggest that one of the lessons from the multiplex process is that the public are very interested in ways of supporting more housing in Neighbourhoods, increasing housing supply and housing choice. The proposal is already limited to consideration of six units and four storeys. Suggestions to make these buildings more liveable and feasible should not be deemed out-of-scope because of what Council or staff presume residents might envision or accept in Neighbourhoods (eg. changes to the prevailing scale or specific building massing).

Particularly concerning is that the report seems reluctant to fully consider heights that would permit four storeys throughout the city because of current limitations of the Ontario Building Code. Firstly, parts of the Old City of Toronto and City of York already permit these heights in Neighbourhoods, as do other cities in Ontario. Secondly, Toronto should be leading and proactive on housing. If it takes a year to develop the proposals report and consultations begin after that, the building code might change. British Columbia's recent building code amendments provide a framework and the report acknowledges that there is ongoing interest at both the provincial and federal levels, as well as the City's own examination in PH14.7. Stating that "further consideration" will be given to expanding height permissions only after building code changes is an unnecessary limitation on the scope of the consultations at this stage, although certainly worth including in the financial feasibility study.

Lot fabric, existing permissions and planning Toronto's future

How should the Toronto of the future look? Should 2/3 of the residential land still have the lot fabric and height limits from before amalgamations, while new apartments are restricted to a few growth areas? Increasing the permissions for the number of units in Neighbourhoods does provide more housing units and works well right now because many Neighbourhoods have been declining in population and have underused space. However, it will have diminishing returns as more units within the same permitted building size eventually means less space. Toronto already has a problem with young families leaving the city because they cannot find suitable housing. More ground-related housing with sufficient space for multi-bedroom units will be needed as we grow.

This means gradually increasing the height limits that have existed in some Neighbourhoods for decades. It means more flexibility on setbacks and it might mean allowing lot assembly or lot splitting in some areas of the city that previously had odd lot sizes. The City began some of this work on Major Streets but still seems reluctant to make changes to the permitted building size in the remaining Neighbourhood areas. An incremental approach does not

necessarily mean large changes in any of these things, but the further out that these changes are pushed, the larger the change that will need to happen at once. The proposals report is a chance to begin that process sooner and more incrementally.

Conclusion

The Housing Action Plan, HousingTO Plan and Official Plan all have increased supply of housing as a priority. The Mayor has also identified housing as a priority. The City should consider whether spending a year developing a proposals report that preserves the existing scale and format of the low-rise Neighbourhoods that cover most of the City's residential land reflects that priority, as well as the City's commitments to other levels of government.

Regards,
Colleen Bailey,
More Neighbours Toronto