



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH17.12 Minor Variances for Additional Height and Density on Related Zoning By-law Amendments

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 position of staff on PH17.12 - Minor Variances for Additional Height and Density on Related Zoning By-law Amendments. The Committee of Adjustment is currently best positioned to evaluate the context of each application and to determine whether a variance is minor. Separate definitions for large-scale apartments are not necessary and could inhibit the Committee's ability to deliver on the intent of the Official Plan, including allowing more housing options, particularly purpose built rental, affordable and multi-bedroom options.

The report is largely in agreement with [our previous submission for PH9.13](#). In that submission, we identified several recent applications where minor variances allowed more homes, including affordable housing. Since then the City of Toronto itself made use of the Committee of Adjustment to apply for a minor variance for its Housing Now site at 777 Victoria Park. This site was approved for a site-specific zoning by-law amendment in 2019 for two apartment buildings of 23 and 11 storeys. Following delays and changing market conditions, in July 2024, the City sought minor variances, including new heights of 35 and 15 storeys, in an effort to "unstick" the site, make the project viable and get construction started. The Committee of Adjustment approved the variances, permitting 705 new rental homes (35% affordable). A specific definition of "minor variance" might have ruled out these sorts of height increases and required the City to go through another lengthy rezoning process that would have delayed 777 Victoria Park Ave further.

In this report, staff identify that similar factors are likely holding up construction on other sites around the City, where minor variances might allow them to proceed. Recent provincewide data back this up, with falling housing starts resulting from recent economic conditions that affect project viability. The Committee of Adjustment should be permitted to evaluate minor variances for such projects, which could "unstick" them and allow construction on these needed homes to move forward if they meet the four tests.

We reiterate that adding separate requirements and definitions for large-scale apartment buildings seems likely to make it even more difficult to get large-scale apartments built in Toronto. The report notes that no other municipality has enacted such a by-law. For the City of Toronto to be the first would send a poor message at this critical time as the City aims to partner with other levels of government to address the housing crisis.

We view residents' confusion and frustration about the Committee of Adjustment as downstream from the wide variety of aims in the Official Plan and outdated zoning by-laws that are not always consistent with some of those aims. Although the title of Chapter 1, Making Choices, is evidence that different policy aims sometimes conflict with one another, requiring prioritization and judgement, the prescriptive and detailed nature of many City policy documents gives the impression that they are unbreakable rules that are meant to be followed regardless of the outcomes they produce. Similarly, the "harmonized" by-law still shows signs of pre-amalgamation Toronto, with height restrictions, R zone definitions or the FSI falling along old city lines, not to mention large numbers of site-specific exceptions. Rather than doubling down with more rules and quantitative definitions, we feel that the Committee of Adjustment would be better served by continuing the work of re-evaluating and updating the existing zoning by-laws to better align with the housing aims in the Official Plan and the repeated statements by the Mayor and Council that housing is a priority.

Council has recently taken several important steps to permit more housing forms as-of-right across the city (e.g. multiplexes in Neighbourhoods, small apartments and townhomes on major streets, mid-rise design guideline updates). This work will assist the Committee of Adjustment in evaluating proposals and balancing local input against broader citywide goals, including proposals for minor variances to large-scale apartments. Staff's recommendation to continue to allow the Committee of Adjustment to exercise its judgement is consistent with this. We thank staff for this thorough report and hope that you will receive it for information without further action on minor variances for large-scale apartments.

Regards,
Colleen Bailey,
More Neighbours Toronto