



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH 17.14 - Our Plan Toronto: Draft Delineations - Protected Major Transit Station Areas and Major Transit Station Areas (9 Stations) - Proposals 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 was eagerly anticipating staff's response to Minister Fraser's request to review British Columbia's Transit-Oriented Areas. We are extremely disappointed to read staff's commentary and ask the Planning and Housing Committee to ask staff to do more work to identify how the TOA approach may be incorporated into existing zoning reform efforts. More Neighbours Toronto believes that the TOA approach should be applied in every PMTSA in the city. Specifically, we believe the TOA approach is a suitable model for:

1. Providing a minimum density on all avenues near transit stations in keeping with the approach outlined by staff in ongoing public consultations
2. The Transition Zones work identified in the Housing Action Plan

With the ongoing budget crunch facing the city's capital plan and the ongoing political uncertainty in Ottawa, it is crucial that Toronto continue to act in good faith on zoning reform.

Response to New Proposed MTSA's

While we will focus most of our commentary on Appendix 5 of the staff report, More Neighbours Toronto will comment briefly on the nine proposed MTSA's and PMTSA's before the committee in

this report. We believe these maps represent a continuation of Toronto's deeply conservative approach to MTSA's and PMTSA's. Like all of the MTSA's and PMTSA's that have come before council previously, there are no proposed zoning by-law amendments required to implement these measures. Not a single additional square centimetre will be permitted as-of-right because of the MTSA's and PMTSA's in front of committee today. Instead, the proposed minimum densities reinforce council's existing failed official plan, secondary plans and related regulations.

The proposed maps do not reflect true walksheds of the associated transit stations, as intended by the Province, but rather have been carefully constructed to meet the bare minimum standards outlined by the Province without any zoning reform. This isn't new nor are the examples before you today particularly egregious compared to some of the earlier maps approved by council. It is, nonetheless, disappointing.

Differences in Goals Between MTSA and TOA

While similar in appearance, Ontario's MTSA regime and British Columbia's TOA regime were designed with different goals in mind. Ontario's MTSA system, as staff correctly identified, is to ensure that neighbourhoods around major transit stations have the density required to facilitate a large number of boardings and alightings at every stop. This is a noble goal and is in keeping with Toronto's climate and congestion goals. However, it is not explicitly a housing policy. Rather, the MTSA regime is indifferent to whether a station supports housing or employment. There were also carve-outs put in place for stations that act as a hub for surface transit in the area. This is a reasonable approach when your focus is ridership.

Contrary to staff's assertion, the TOA regime in British Columbia is not primarily about ridership. It is a direct response to the housing crisis. Yes, it seeks to add housing in a way that is both responsible from a climate perspective and will minimally impact congestion, but at heart it is a housing policy. The design reflects this. There are no carve-outs for surface transit hubs. In fact, surface transit hubs, with no higher order rail, are targeted for increased density under the TOA regime. The more progressive approach to zoning reform taken in British Columbia, blind to the wealth of the neighbourhood, reflects this focus on solving the housing crisis through shared responsibility and collective action.

Comparison with St. Patrick PMTSA is Misleading and Inaccurate

The final table of this report, Table 3 at the bottom of page 30, is titled "Population Yield in Vancouver TOA Compared to an Ontario PMTSA". With such a title, we would have expected a fair comparison between the two. Instead, we get a grossly misleading table. In the interest of brevity, we will take staff at their word for the planned density of the Vancouver TOA. They calculate that between the three rings of prescribed density, a Vancouver Skytrain station could reasonably expect to yield a population (persons living in the TOA) of 130,000 to 140,000. They compare this to a specific PMTSA in Toronto, St. Patrick Station. However, their comparison is not apples to apples. As noted in the explanation above Table 3, the estimate of 250,000 reflects the "future planned density... of people and jobs". As noted above, the TOA regime is focused on housing. While undoubtedly, British Columbia wants employment around its transit

stations, it is not part of the TOA policy. Jobs numbers are not included in the TOA estimate. They are around St. Patrick.

Based on the language used, More Neighbours Toronto recreated the “future planned density” estimated by staff at St. Patrick station. We believe this is a simple calculation of the identically named “future planned density” as shown on the Toronto MTSA Dashboard in people plus jobs per hectare multiplied by the number of hectares in the MTSA. For St. Patrick Station:

1563 People Plus Jobs per Hectare x 164.6 Hectares = Future Planned Density of 257,270

This corresponds with the approximately 250,000 figure presented in the report. Notably, the same dashboard identifies that the area had employment of 123,903 in the 2016 census (the basis of Toronto’s MTSA submissions). If we simply reduce the 257,270 people plus jobs by the number of jobs, we reach a population of 133,367. This is a far different picture than the one presented by staff in Table 3 and shows that the BC approach produces roughly the same planned density as St. Patrick station.

However, the comparison has a more fundamental flaw. The TOA approach, as noted by staff, applies to all station areas, rich or poor, equitably. Toronto’s PMTSAs are not nearly as consistent. While subway stations in the core, like St. Patrick, do have equivalent planned densities, the picture is very different everywhere else in the city. We have used the same methodology we believe staff employed for St. Patrick (as outlined above) to recreate densities at the TTC’s current and under construction interchange stations. These are shown both inclusive and exclusive of jobs in the area. We chose interchange stations to avoid any appearance of cherry picking on our part. These are major, major transit station areas with some of the best transit access in the country. If anywhere in Canada should be dense, it is these stations:

Station	Total People Plus Jobs	Total Planned Population
Osgoode	402,170	170,659
Queen	336,133	155,966
St. Patrick	257,270	133,367
<i>Vancouver TOA</i>	<i>N/A</i>	<i>130,000-140,000</i>
Bloor-Yonge	143,448	93,871
Eglinton	69,438	51,810
St. George	64,033	48,163
Spadina	53,274	44,553
Finch West	40,212	37,458
Kennedy	36,736	35,597
Sheppard-Yonge	43,575	26,666
Science Centre	27,703	23,708
Eglinton West	18,040	16,935
Pape	14,976	12,580

As you can see, the population densities planned in Vancouver's TOAs far exceed Toronto's PMTSAs everywhere outside of the downtown core. We therefore reject staff's assertion that the PMTSA approach produces equivalent results to Vancouver's TOAs.

PMTSA and TOA Approaches are Not Mutually Exclusive

The staff report frames this discussion as an either/or decision. Either Toronto continues under Ontario's PMTSA regime or it adopts BC's TOA regime. However, the approaches can and should be complementary. Council cannot enact changes to provincial law. Council can amend its zoning as it sees fit. Upzoning in line with BC's TOA would be consistent with the city's existing PMTSAs. Crucially, this would include the requirement, once the MTSA's are approved, for a minimum provision of affordable housing on buildings of 100 or more units. It is also

consistent with the approach already approved this term in the work plan. The changes to permissions on Avenues are reportedly coming to the next meeting of this committee. Staff have indicated in public consultation that there are plans to increase height permissions close to transit stations, in keeping with the TOA approach. We would be supportive of such direction. A report likely to come later this term, will identify ways of creating transition zones within Neighbourhoods to create more missing middle type housing. The radial approach and heights used in BC's TOAs provides a reasonable basis for this work. We encourage staff and council to go in that direction.

Conclusion:

The request by Minister Fraser to review British Columbia's approach to density around transit stations reflects the understanding of progressive leaders across the country that today's housing crisis demands real change. BC's NDP Premier David Eby and his Housing Minister Ravi Kahlon understand that. It is time for Toronto's progressive city council to join that fight for change. We urge the members of the Planning & Housing Committee to reject the conservative ideas put forward by staff in this report. We need progressive leadership to end our housing crisis.

Regards,

Aaron Ginsberg

More Neighbours Toronto

Cc: Hon. Paul Calandra, Minister of Municipal Affairs and Housing
Hon. Sean Fraser, Minister of Housing, Infrastructure and Communities