



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH22.8 - Housing Action Plan: Avenues Policy Review - Phase Two Work Plan

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 supports proceeding with the work plan for Phase Two of Avenues Policy Review. We recognize that this plan will require a significant amount of staff time and effort to complete and we appreciate the effort from staff to introduce more mid-rise zoning to Avenues as-of-right.

That being said, the effort required in this work plan highlights the absurdity of Toronto's housing policy. With Avenues Policy Review and related projects, the council direction was to simplify and expand Avenues Policy in order to reduce the time, effort, and study requirements needed to build along the Avenues. By the time Avenues Policy Review is completed in 2027, it will have taken 4 years and thousands of hours of staff time. The irony cannot be lost on the Planning and Housing Committee or the unfortunate City Planning staff who have to do the work.

The revised Avenues policies developed in Phase One were good: allow development on Avenues to be up to the height and scale of a mid-rise building. This was a simple and clear policy that could have been implemented easily by staff were it not for Toronto's other layers of complex and contradictory policies.

Avenues are meant to be one of the few designated Areas for Growth in Toronto. The allowed height along the Avenues could have simply been updated to match the right-of-way width of the street, consistent with the Mid-Rise Guidelines, so that growth could proceed along all the Avenues. Instead, staff will need to evaluate each lot on the Avenues one at a time to determine if there's an existing Avenue Study, Secondary Plan, or Site and Area Specific Policy which stops that growth.

Avenues are meant to be vibrant, walkable main streets. The land use designation along the Avenues could have been set to Mixed Use to allow these main streets to adapt and evolve to the needs of their communities over time. Instead, staff will need to evaluate each lot on

the Avenues one at a time to ensure that lots with existing Neighbourhood and Apartment Neighbourhood designations don't accidentally allow main street commercial activity.

The lot by lot evaluation requires significant staff time and effort, leading to the staged approach being proposed. From the summary of community consultations performed in the lead up to this work plan, the proliferation of phases, stages, and study areas as part of the Avenues Policy Review is confusing members of the public and other stakeholders. Consultation participants don't seem to understand what new items are being studied at each stage or what type of feedback they are being asked to provide.

To be clear, we do not blame staff for the complexity of the work plan. What they are proposing is consistent with direction from City Council and the Official Plan. It is just ridiculous.

We hope that the Planning and Housing Committee and City Council will recognize the fundamental issues with our housing policies and work to fix them quickly. When the Avenues Policy Review is complete, the housing crisis will have been raging for nearly two decades. More urgency is needed if the City is going to solve the crisis and prevent it from happening again.

Regards,

Damien Moule,
More Neighbours Toronto