



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH22.5 - Housing Accelerator Fund: Apartment Infill Study - Residential Infill 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 supports PH22.5 to expand housing options in Apartment Neighbourhoods and encourages the committee to move forward with work exploring more as-of-right permissions and/or a Community Planning Permit System. These changes will support infill development for additional homes on sites owned by private, non-profit and co-op housing providers.

The proposal to permit townhomes in the RAC zone applies to a relatively small amount of land (15% of Apartment Neighbourhoods, or about 0.5% of Toronto's total land) and brings permissions in line with the R and RA zones in Apartment Neighbourhoods. As stated in the report, in all rezoning applications submitted for infill development in the last ten years, "at least one additional infill building was proposed, being midrise in scale or taller." This suggests that townhouse-only applications are unlikely and it is not clear from the data presented that the proposed change will allow for viable as-of-right applications on its own, but this work does clarify that townhouses are an acceptable use in RAC zones.

The proposed rules for interior space conversion preserve the existing units and amenity space, which we support.

Most Apartment Neighbourhoods are found outside of the downtown core and have historically not had access to higher order transit, although many have frequent bus service due to high numbers of transit users. Transit is set to change for some Apartment Neighbourhoods with the apparently imminent opening of the Eglinton LRT and plans for the Ontario Line. This indicates the importance of expanding transit and active transportation in the inner suburbs, but also the need to update the zoning by-law regularly. Many areas have not seen updates since before

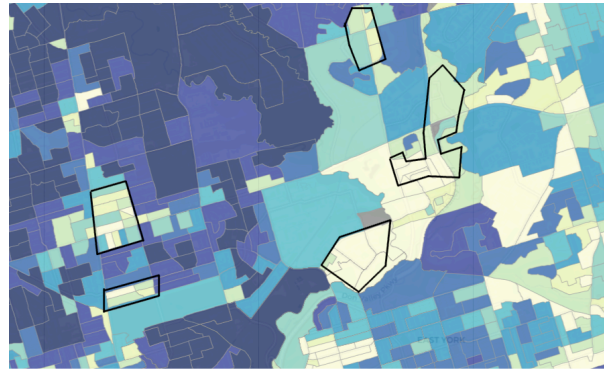
amalgamation. The current proposal preserves existing parking spaces, but there may be areas where allowing reduced parking makes sense in the future, not only allowing for more housing, but improving the street interaction of buildings in these areas.

In all of this, it is worth noting that, despite the small fraction of land dedicated to Apartment Neighbourhoods, they make up some of the most affordable and vibrant communities in Toronto. While the slab apartment forms that dominate these areas violate much of the current planning wisdom, including Toronto's tall building guidelines, the larger, multi-bedroom units that they contain make them home to high numbers of children and families. Census data demonstrate that these areas provide much of Toronto's market rate housing for low and middle income renters. However, these areas are also more likely to be overcrowded as people struggle to find housing options in the limited amount of Toronto's land that allows apartments and, particularly, apartments of this type.

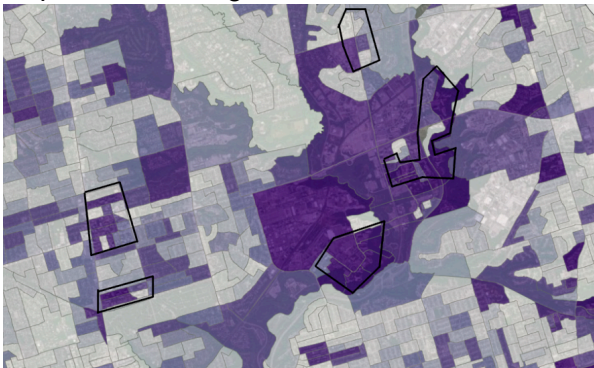
Toronto land use map with apartment neighbourhoods in orange, outlined in black



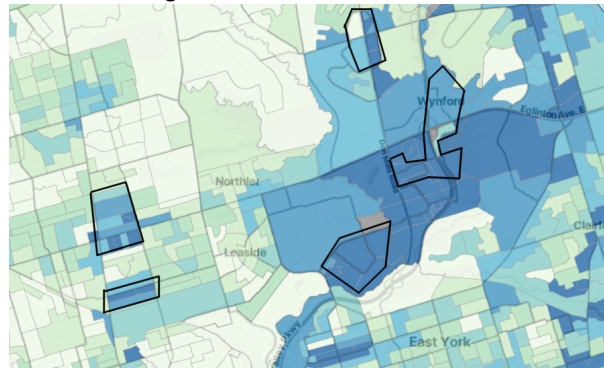
Maps of median income for the same area from censusmapper.ca



Map of children Aged 0-14



Map of people per bedroom demonstrating overcrowding



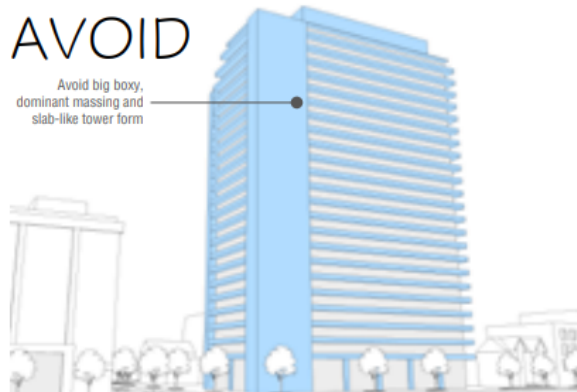


Figure 2: Large, elongated floor plates cast long shadows and create an inappropriate scale at street level.

Screenshot from Toronto's [Tall Building Guidelines](#) discouraging buildings like those found in Apartment Neighbourhoods.

It will be a challenge to update permissions on land that serves such an important part of Toronto's population, but has such varying levels of transit and other services. In the Apartment Neighbourhoods near Yonge and Eglinton, which are in a growth area due to transit proximity, demolition of older buildings is common despite many City programs aimed at preserving existing affordable housing. The changes proposed in this item provide alternatives to demolition, including conversion of non-residential interior space or building in the space between existing buildings. These recommendations are a good first step on apartment infill. We look forward to seeing the future phases of apartment infill and what might be possible as-of-right or through a Community Planning Permit System.

Regards,

Colleen Bailey,
More Neighbours Toronto