



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH25.3 - Community Within Reach: Expanding Housing Options in Neighbourhoods (EHON) Neighbourhood Retail and Services Study - Phase Three Final Report

About More Neighbours Toronto

[More Neighbours Toronto](#) is a volunteer-led 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 the expansion of small-scale retail, service, and office uses in Neighbourhoods. We urge the Planning and Housing Committee and City Council to adopt the proposed Zoning By-law amendment.

More Neighbours has long supported making the Zoning By-law more permissive, especially in residential Neighbourhoods. The strict separation of uses in Toronto's Zoning By-law, whether retail or different types of housing, has been a major factor in producing the housing crisis. It is time to undo this quirk of our zoning and revert to the more traditional mixed neighbourhoods that Toronto was built around.

Making Major Streets Work

We note that the majority of new retail permissions that this study proposes to add are to areas classified as Neighbourhoods along Major Streets. This is the second piece of the EHON initiative, along with the Major Streets Study, which is reliant on development along Major Streets to expand the options in Neighbourhoods.

It is therefore crucial for the success of the EHON initiative that new buildings actually be built along Major Streets. To that end, it is important to assess residual barriers to the construction of apartments along Major Streets.

We encourage City Council and City Planning to investigate the reduction of required setbacks and amenity requirements in Residential Zones along Major Streets. This would reduce land costs, and make it more economical to build along Major Streets.

Toronto's traditional mixed retail and residential buildings, which in many cases are now the focus of heritage preservation, did not have large setbacks, especially at the front and sides

of the building. Restoring the permission to build the City's traditional form could be a major benefit of this study. But only if the City allows it.

We also encourage City Council and City Planning to study a simplification or elimination of Site Plan Control for smaller apartment buildings of the scale now permitted along Major Streets. Many of the Site Plan Control requirements are designed for large buildings in Downtown and the Centres with hundreds of units. Many of these requirements are excessive for smaller buildings.

Reducing the required studies to something more appropriate for the smaller scale of the buildings along Major Streets would reduce the cost for these buildings which the City is trying to encourage. It would also reduce the time needed for development application review, which would reduce the cost both to the City and to the developer.

Next Steps After EHON

More Neighbours has strongly supported the EHON initiative. Each step has involved a beneficial expansion of the zoning permissions in Neighbourhoods. This work was long overdue to bring growth to our shrinking residential areas and to chip away at exclusionary zoning. But with the closing of EHON, it is time to start looking ahead to make room for the next generation of residents.

With the expansion of permissions to Neighbourhoods, the Residential section of the Zoning By-law has become quite complex, which adds increased effort to both development applications and development reviews by the City. It also makes public understanding of the Zoning By-law much more difficult.

The Neighbourhood land use itself has become conceptually stretched to the point of incoherence. Neighbourhoods must now allow a greater diversity of uses while still remaining largely physically stable and not being major areas for growth. They have stopped making sense as a category. And with the Regeneration Areas now largely redeveloped, established residential areas will need to take a larger and larger share of growth in the City.

We encourage City Council to request City Planning undertake a new program to rework the Official Plan's land use categories and Zoning By-laws. Zoning should be modernized to allow a wider mix of building types and uses in more areas and land use categories should be developed which support growth widely and fairly across the City.

Regards,

Damien Moule,
More Neighbours Toronto