



**MORE NEIGHBOURS  
TORONTO**

Dear Members of the Planning and Housing Committee,

**RE: PH26.4 - Housing Action Plan: Avenues Policy Review Phase Two: Initial Study of Wards 9 and 11**

***About More Neighbours Toronto***

[More Neighbours Toronto](#) is a volunteer 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 rezonings proposed in the Initial Study of Wards 9 and 11. This will enable and allow for more housing on our main streets and avenues, through gentle density in mid-rise buildings. We commend the staff for their hard work on developing these proposals to allow for a greater variety of options in our neighbourhoods, which will make housing more affordable for everybody.

At the same time, we wish to highlight that this process further highlights the immense amount of staff time and energy that is wasted engaging in this lot by lot review of every Avenue in this Ward (not to mention the other upcoming Wards). Staff had previously indicated that this study would be a test and lessons would be learned that could be applied to ongoing work. This slow, confusing process cannot be the way Toronto rezones the remaining Avenues, especially when housing starts have collapsed and urgent action is needed more than ever. Missing Middle and mid-rise housing is the type of housing we need the most, and it does not take thousands of man-hours from staff reviewing every lot in every ward in Toronto to discover that mid-rise buildings are acceptable in Avenues. We once again urge the Committee and Council to rip off the bandaid and move forward the rezoning for the remaining Avenues in one go.

Additionally, what was supposed to be a process that simplified rules and made it straightforward for builders has become steadily more byzantine as special carve-outs are identified for specific lots throughout the City, often with minimal justification. We highlight three issues in particular that stand out.

***Removal of West Side of Bathurst from Study Area***

The west side of Bathurst Street from Dundas Street to Ulster Street appears to have been removed from the study area, without any clear justification for doing so. With the

implementation of RapidTO across Bathurst Street and its proximity to Bathurst Station, this is a prime area for intensification. It makes no sense to implement the Avenues rezoning for the east end of Bathurst while leaving out the western portion. In the spirit of simplification and consistency, we urge the Committee to include this area back in the study area.

### ***Approach to Heritage Conservation Districts***

The Rosedale Heritage Conservation District appears to have been entirely excluded from the rezonings proposed. While there may be heritage value in a few specific buildings in the Rosedale area, there can be no justification for excluding the entire District from the rezonings proposed, especially for an area so close to the subway and the downtown core. These are precisely the areas with declining population and stagnant neighbourhood forms with the greatest need for intensification, to more equitably distribute change among neighbourhoods.

### ***Exclusion of Areas Within 300m of Employment Lands***

It is unclear why areas within 300m of Employment Lands should be excluded from the rezoning process. It is worth noting that these areas are *already residentially zoned*, meaning that there is no issue with the existence of residences on those lands. Allowing for more homes in areas where residents can walk to work is a positive and should be further encouraged.

### ***Next Steps***

While this study is a positive first step, we again encourage Council to act with urgency and take a more comprehensive look at rezoning Avenues in one go, rather than having to subject staff and the public with complicated rezonings with lot by lot studies. In this vein, we further oppose the need for yet another study to develop a “Residential Apartment Avenues Zone” which simply adds unnecessary complications and further delays. A simple approach can be to permit buildings where the ROW exceeds 20m to also have heights more than 20m.

Additionally, we urge the Committee and Council to look beyond rezonings and identify other measures that can be taken to enable Missing Middle and mid-rise housing along Avenues. These reforms, and others, have been identified in the Mid-Rise Manual created by Environmental Defence. Some of them include removing mandatory “step-back” requirements for mid-rise buildings, providing simplified solutions for stormwater management requirements, developing compact garbage collection requirements, expediting approvals, and reducing fees and charges.

With the collapse of the condo market, Toronto has a genuine opportunity to develop mid-rise housing - the type of housing we all want to see - at scale. We call on this Committee to seize the opportunity to approve this study and further accelerate the process for all wards across Toronto, so that we do not face a collapse in the housing market in 2028 / 2029.

Regards,

Hongyu Xiao,  
More Neighbours Toronto