



**MORE NEIGHBOURS
TORONTO**

October 4, 2022

Hon. Steve Clark
Minister of Municipal Affairs and Housing
17th Floor, 777 Bay Street
Toronto, ON M7A 2J3

Dear Minister Clark,

**RE: ERO 019-5721 – City of Toronto Official Plan Amendment
(Environment and Climate Change)**

More Neighbours Toronto is a volunteer-only organization of housing advocates that believe in building more homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase the ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are nevertheless committed to counterbalancing the anti-housing agenda that dominates Toronto's politics and has created increased costs and environmental burden for a new generation of aspiring residents.

More Neighbours Toronto supports the proposed changes to the Official Plan but feels that the associated zoning and design guideline changes needed to achieve the plan should be expedited by the province in order to address the climate and housing affordability crises. As climate change effects become increasingly noticeable, it is vital that Toronto's environment and climate change plans reflect in reality what it has committed to in the abstract.

Both the [Intergovernmental Panel on Climate Change](#) and the submitted Official Plan Update recognize that urban form (density, land-use mix, connectivity, and accessibility) is critical for reducing greenhouse gas emissions in cities. Yet 65% of Toronto's residential land is reserved for the least efficient housing: detached homes. According to [Statistics Canada](#), on a per-household basis, single-detached homes consume 30% more energy than duplexes, more than double the energy of low-rise apartment buildings and more than triple the energy of high-rise apartment buildings. [A draft Official Plan Amendment](#) to allow gentle density in these residential detached neighbourhoods was delayed for more consultation and study by Toronto City Council in July. This is not a serious approach to climate or housing affordability.

While many high-level policy documents in Toronto open with aspirations of a connected, diverse city of opportunity, the details of the zoning and design guidelines mandate less efficient land use and buildings that undermine the intended outcomes. Examples include:

- A commitment to stable neighbourhoods that prevents people from living near their work, friends, shops and hobbies. This [contributes to inequality](#) and contradicts the TransformTO goals around increasing local trips and active transport. Limiting growth in Toronto is now forcing people beyond the greenbelt, resulting in leapfrog sprawl and ever longer commutes.
- A focus on building efficiency for apartments (eg. Toronto Green Standard) that ignores the inefficiency of the single family homes that occupy 65% of residential land.
- Angular planes and stepbacks that increase surface area and therefore reduce energy efficiency and increase building costs.
- Urban design guidelines that prioritize sunlight even as shade is recognized as an important component of urban climate resilience.
- Embodied carbon studies for large building demolitions that are the result of policies that confine growth to a few areas of the city that already have apartments. With more permissive land use and sensible design guidelines, wood frame middle density housing would become a viable, carbon-friendly option.
- A professed commitment to inclusionary zoning, transit-oriented development and walkable communities, while design guidelines and batch heritage listings along the Danforth and Eglinton LRT [ensure that inclusionary zoning will not apply](#).
- Two- and three-bedroom units that must fit into a 750 m² floorplate restriction, despite the many, ageing purpose-built rental apartments with larger slab-like forms from before these restrictions existed that many Torontonians call home.

The [Official Plan report](#) acknowledges these discrepancies and that the design guidelines and implementation will need to be updated but does not commit to a timeline. The city is constrained by long processes and byzantine, site-specific rules that attempt to address every complaint that emerges from public consultation rather than focusing on the solutions that would serve the city and province as a whole. Not only have these municipal processes failed to address the housing crisis, they have contributed to it.

These processes tend to be dominated by comfortable homeowners and Residents' Associations, a demographic that is not reflective of Torontonians in general. This misses the viewpoints of thousands of people priced out of the city every year: people [leaving the province in record numbers](#), workers with hours-long commutes, and young families choosing to leave the city because it is no longer affordable for them. The Minister must step in to be a voice for the little guy, the future residents that would contribute to a vibrant, innovative, and economically mobile city and province.

More Neighbours recommends the following, in line with the Housing Affordability Task Force recommendations:

- Legalize fourplexes and four storeys across the province, as of right;
- Legalize mid-rise development along key transit routes across the province, as of right;
- Set provincial standards for setbacks, stepbacks, angular planes and other aesthetic design regulations that municipalities use to make housing construction unviable or “effectively illegal” even if it is technically allowed; and
- Remove language that prioritizes the preservation of specific built forms and character in neighbourhoods at the expense of providing homes for people to live in (eg. Toronto’s OPA 320)

All of these suggestions are in line with the City’s stated climate commitments in the Official Plan, as well as the data around building and transportation emissions in cities. The [City report](#) particularly notes the widespread support for transit-oriented development and walkable cities at consultations. This is also in line with the Official Plan commitments to diversity, affordability and opportunity. Provincial action would simply expedite the process to match the urgency of the affordability and climate crises.

Closing

Municipalities have repeatedly delayed action on housing, continuing the failed policies that have priced out a generation while promising more studies and consultation. The province has the recommendations of its own Housing Affordability Task Force as an excellent guide. [New Zealand](#), [California](#) and, most recently, [British Columbia](#) have recognized that housing is a regional issue that needs higher levels of government to set standards and hold municipalities accountable. Ontario made a good start with secondary suites and accessory dwelling units that we must build on. More Neighbours is available should you or your staff wish to discuss further.

Let’s Get It Done,

Colleen Bailey
Director, More Neighbours Toronto