December 5, 2022

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

Dear Minister Clark,

**RE: ERO 019-5872 – Keele-St. Clair Secondary Plan**

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 increased costs and environmental burden for a new generation of aspiring residents.

**More Neighbours Toronto believes that Toronto is squandering an opportunity to make progress on the housing crisis with its approach to the Keele-St. Clair secondary plan**. Both the City and the province have voiced support for transit-oriented development, with mixed income communities supported by inclusionary zoning. However, the land use policies in the delineated areas do not address the urgency of the housing crisis. **The minister should modify the secondary plan to permit significantly more density throughout a larger area of the secondary plan.**

While the City of Toronto's official plan amendment (OPA) does allow for tall buildings up to 45 storeys immediately next to the station building, the maximum heights in the rest of the secondary plan area are insufficient. Policy 8.6, for example, sets a height limit of 5-10 storeys along St Clair West, while at the same time mandating large setbacks. From our experience in public consultations along other avenues, this height limit is insufficient to render most housing projects feasible. **We recommend the minister amend policy 8.6 to permit at least 15 storeys along St Clair West, and make similar changes to other policies that set low height limits. We recommend that the minister delete policy 8.5 as it may unnecessarily restrict tall buildings throughout the secondary plan area.**

Sincerely,

Jacob Dawang

More Neighbours Toronto