

December 22, 2023

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Re: Expanding Housing Options in Neighbourhoods: Major Streets Study

Dear Brooke Marshall:

On behalf of the 76,000+ REALTOR® Members of the Toronto Regional Real Estate Board (TRREB), I am writing to provide input on the Major Streets Study proposed amendments to the Official Plan Amendment (OPA) and Zoning By-law 569-2013 to allow for townhouses and small-scale apartment buildings in all Residential Zones, including the RD and RS zones, but limited to those properties that abut major streets in Neighbourhoods as identified on the Policy Area Overlay Map. We continue to remain strong supporters of the City of Toronto's (City) goal to increase market housing supply mix and choice in neighbourhoods through the various Expanding Housing Options in Neighbourhoods (EHON) initiatives.

TRREB believes that enabling gentle densification within the "Yellowbelt" will help to create an inclusive, equitable, productive, and livable city that is sustainable. Small-scale apartment buildings are an important element in achieving this objective. Additionally, due to it being a relatively denser form of housing in comparison to existing neighbourhood choices, this typology directly supports *market* housing affordability. This has been identified as a provincial objective and is also supported by TRREB.

In order to tackle housing affordability challenges, we should concentrate on measures that focus on addressing the inadequate diversity in the mix of housing types and a lack of overall housing supply available to residents in neighbourhoods. Increasing the opportunity to unlock potential sites to expand the supply of "missing middle" type housing is critical to meeting the demands of Toronto's growing population.

Restrictive zoning requirements in much of Toronto's Yellowbelt has unfortunately led to a decline in population in many of these neighbourhoods. With an increasing demand from all levels of government to focus on making housing more attainable, we need to ensure that more is done.

We applaud the removal of floor space index as an additional regulatory requirement on buildings in favour of simplifying the zoning by-law to focus on form-based measures.

We encourage City staff to consider our following recommendations when bringing the results of the Major Streets Study to council next spring.

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## 1. Adopt Less Restrictive Parameters to Encourage Uptake and Supply

We believe that staff should loosen their approach to maintaining similar-sized setbacks to fit in with the existing surrounding neighbourhood. This cautious approach may be too restrictive to the financial feasibility of the types of mid-rise housing EHON is explicitly trying to incentivize with this particular initiative along major streets.

We also recommend reviewing the 30-unit cap for low-rise buildings on major streets. We believe focusing on existing building length, height, and setback requirements are sufficient to regulate the size of potential developments. The building code requirement to include a loading dock in buildings with over 30 units acts as a disincentive on its own that doesn't need replication via this cap.

In addition, TRREB encourages the City to relax the angular plane requirements placed on mid-rise buildings in neighbourhoods – meant to minimize the creation of new shadow cover – as they restrict building design type, add costs, and ultimately result in less units brought to completion.

TRREB recommends that the City review the proposed minimum individual 6-metre (for dwellings with a front driveway) and 5-metre (for dwellings without a driveway) frontage and townhouse width permissions to ensure that this doesn't unnecessarily restrict developments (e.g., if shorter widths can be accommodated and can facilitate development on smaller lots, then this should be considered).

## 2. Ensure Small-Scale Building Development Is Economically Feasible

TRREB recognizes that if implemented, small-scale apartment buildings along major streets in neighbourhoods could help to unlock much needed missing middle supply. Nevertheless, uptake is likely to be incremental, and economic considerations may prevent development of these projects. As the City is undertaking a financial feasibility analysis to assess the impact on a project's viability and potential uptake based on differences in location, land values, and value-add additions to the proposed design (including affordable and family-sized units, and Toronto Green Standard Tiers), we continue to advocate for the following, which should make small-scale apartment building development more *economically feasible*:

*Financing* – in light of the current challenging interest rate environment, coupled with labour shortages and increased costs for supplies, homeowners and small-scale developers are facing increased challenges obtaining financing to bring these projects onto the market. We urge the City to consider financial incentives and/or innovative solutions, such as modular, timber frame construction, and pre-fabricated options, that cut down on construction time and costs to ensure project viability. Any specified design parameters should encourage and allow accommodations for these new approaches.

*Soft landscaping* – recognizing the impact of real estate on the environment, we are in favour of utilizing green construction processes where possible. We are also aware of the acute lack of housing diversity within neighbourhoods and the need for more low-rise gentle density choice within the housing spectrum for residents at reasonable cost. We therefore advocate for a flexi-

ble and contextual approach which doesn't inadvertently become too pedantic and unnecessarily restrict supply or raise costs, and consequently prices, to an extent that prevents diversity and equity within neighbourhoods. We urge the City to offer a variety of alternative soft landscaping solutions and allow developers to select which option works for their particular project design.

*Development guides* – the City should consider creating a live concierge program or a one-stop interactive web portal with all necessary information, including fire safety standards, building codes, contact information for all relevant City departments, etc. This is something which we have recommended for other EHON initiatives. We also suggest that terminology be simplified, where possible, to assist a lay person to understand requirements.

*Standardized designs* – recognizing that homeowners and small-scale developers face additional costs for architectural designs, we recommend that the City, as part of the development guide, provide standardized designs to simplify the process and ensure that townhomes and low-rise apartment buildings follow the Building Code requirements.

*Urban design modelling* – it is important that the results of the financial feasibility analysis which the City is conducting be fed back into and inform the urban design modelling component. The financial feasibility analysis may indicate that further changes to design parameters, including setbacks, heights, widths, depths, and physical context, are required to ensure projects are viable. If the analysis surfaces these issues, we trust that the City will incorporate changes where necessary to ensure viability.

### 3. Public Education Needed

In order to limit local opposition and appeals, we recommend that the City undertake a public education campaign highlighting the benefits of EHON initiatives to homeowners, neighbourhoods, and the City overall. In this regard, TRREB will be pleased to work with the City to educate our REALTOR® Members on the small-scale apartment buildings and townhouses on major streets in neighbourhoods and all other EHON initiatives. REALTORS® can then educate their clients and Torontonians to take advantage of these opportunities.

We urge City staff to move forward with the Major Streets Study, ensuring a more simplified process that will facilitate the creation of much needed missing middle housing while maintaining the ambition necessary for the proposal to make a substantive impact on housing supply in our neighbourhoods.

TRREB continues to welcome any opportunity to work with City Council and staff on the EHON program. We hope you find TRREB's views helpful.

Sincerely,



Paul Baron  
President

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