



environmental  
defence

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Planning and Housing Committee  
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### **PH29.9 Expanding Housing Options in Neighbourhoods: Multiplex Study - Interim Report**

Attention Planning and Housing Committee Members,

I am Ontario Environment lead for Environmental Defence, a leading national environmental organization that works at the federal, provincial and municipal levels to safeguard our freshwater, create livable communities, tackle climate change and build a clean economy. I lead Environmental Defence's policy development and advocacy regarding natural heritage, smart growth and sound land-use planning in Ontario.

Environmental Defence strongly supports reforming zoning in all of Toronto's residential zones (R, RD, RM, RT) to promote the creation of *more and more compact* homes, rather than simply *larger* homes, on lots currently limited to single-detached homes, because it is an *environmental imperative*. Voting to pursue the opportunities outlined in the Expanding Housing Options in Neighbourhoods: Multiplex Study - Interim Report is the only defensible option for a Toronto City Councillor who purports to prioritize protecting farmland and natural heritage, and fighting climate change.

As a starting point, it's important to make clear that the alternative to expanding housing options in neighborhoods is *not* the status quo, or even "stability". The current path of least resistance for the kinds of lots that might become semi-detached homes, triplexes or four-plexes leads to demolition and replacement with a bulky - and very high-priced "McMansion" that - from the point of view of any normal human being, is completely out of character relative to the original state of the neighborhoods. Within 20 years, and certainly within 30 years - which is the time horizon for the current Municipal Comprehensive Review - Toronto's current single family detached zoning will render huge swathes of North York, Scarborough, Etobicoke, north Toronto and even northern East York both completely unrecognizable - and completely unattainable for the working- and middle-class families they were built to house.



Reforming zoning in Toronto's residential neighborhoods is an environmental imperative, and not just a social justice or affordability imperative, *inter alia* because:

- restrictive zoning in urban neighborhoods is directly linked to sprawl in the GTA, and
- maintaining restrictive residential zoning in Toronto is incompatible with increasing active transportation modal share and tackling carbon emissions in Toronto and the GTA, and thus utter

### **Single Family Detached Zoning Is a Direct Driver of Sprawl and the Destruction of Countryside in the Suburban GTA**

Firstly, restrictive zoning is now, more clearly than ever, the direct driver of sprawl in the suburbs, while each *additional* home - and especially each low-rise home added to residential neighborhoods in Toronto - means, in rough terms, one less section of rural farmland or natural heritage bulldozed for suburban sprawl.

The relationship between the prohibition of new units in urban neighborhoods and *permitting* them in greenfield sprawl is actually quite direct and explicit. The provincial government is forcing outlying sprawl municipalities to absorb more than 80% of population growth over the next 30 years expressly *because* it assumes that Toronto will not approve many more ground-ground related homes. People and households who are expected to want ground-related housing in Toronto are simply being *assigned* through the Growth Plan for the Greater Golden Horseshoe, to green field development in Peel, Durham, York, Halton, or even Simcoe County instead. To be clear, this is not *only* a rhetorical justification: it is built into the methodology used to generate the Growth Plan's regional growth targets.

The capacity for Toronto to *prevent* sprawl in the suburbs by adding more homes in the city also seems clear. Where Toronto's existing neighborhoods have actually exceeded the share of growth assigned to it by previous governments (often arguably as a result of successful appeals), it has diverted demand from suburban municipalities, such that they have built *less* greenfield housing, consuming and destroying much less than expected of the farmland and natural heritage already allocated to sprawl.

The relationship between sprawl in the suburbs, and a shortage of homes in the City is supported and explained by a large poll of GTA residents which Environmental Defence commissioned from Innovative Research Group. That poll showed that a strong majority of GTA residents (64%, and ~83% of those with an opinion), including residents of car-dependent neighborhoods, would much prefer to be living in a neighborhood where "I didn't need to use a car to do my shopping, recreation, entertainment or commutes to work or school." Rather than seeking out neighborhoods with a "suburban lifestyle", GTA residents are *settling for* suburbia after being unable to find homes in more central, walkable neighborhoods.



## **Maintaining Single Family Detached Zoning Would Be Incompatible with Toronto's Declaration of a Climate Emergency**

Reforming zoning to generate more and more compact homes, in much more diverse forms, within the City of Toronto's existing low-rise residential neighborhoods is also essential to tackling the carbon emissions in Toronto itself and in the GTA more broadly. Low density, car-dependent neighborhoods have rightly been described by Ontario's Environment Commissioner as "Ontario's tar sands".

First, adding a lot of new homes to existing lowrise residential neighborhoods is an indispensable part of retrofitting them for much lower per-capita carbon emissions. Even factoring-in plans for a transition to electric vehicles, tackling Toronto's carbon emissions will require a significant shift away from private automobile use. However, large swathes of Toronto's residential neighborhoods, and particularly those in the Single Detached zone, have population densities that are simply too low to sustain key amenities within easy walking distance and to make active transportation (including transit) the dominant means of getting around. In the GTA, a majority active transportation modal share is almost always associated with population densities in excess of 90 or 100 people and jobs per hectare, far in excess of what is typical of, or readily within the single detached zone. By contrast, the required densities can be and are readily achieved in neighborhoods which allow semi-detached homes, triplexes and fourplexes, and/or townhomes.

Second, even comparing neighborhoods of similar density and type, displacing people and households who would prefer to live in Toronto to outlying municipalities multiplies the carbon emissions of the people we displace, because it increases their propensity to get around using private automobiles. Each household displaced increases the GTA's carbon emissions by a large increment. Cumulatively, moreover, the assumption that Toronto's exclusionary single detached zoning will cause large scale sprawl in northern Peel and York Region by exiling or excluding tens of thousands of households from existing Toronto neighborhoods is the lynchpin of the purported "business case" for destructive suburban megahighways like the Holland Marsh Highway and Highway 413, which this Council has voted to oppose.

## **Torontonians Support Changing Zoning to Add More Homes to their Neighborhoods**

This April, Environmental Defence conducted extensive polling on housing preferences and attitudes towards "intensification" in the GTA. This polling revealed that adding more and more diverse housing to existing residential neighborhoods is something residents - and especially City of Toronto residents - overwhelmingly support. 73% of City of Toronto residents believe that "People who want to be able to get by without a car should not be priced out of the neighbourhoods where



that is practical". Beyond this moreover, Torontonians are ready to embrace the concrete physical changes required to make it happen. Of particular relevance to the present proposal: an large majority (69%, versus only 9% opposed) support adding more semi-detached homes to *their own* neighborhoods. A very solid majority (62% overall, vs. just 11% opposed) support the more broad proposition of adding more homes "In buildings of 1 to 3 storeys". A clear majority (55% in favour, vs. 17% opposed) support adding "more homes in buildings of 4 to 6 storeys" to their own neighborhoods. Whatever the historical propensities of Torontonians, "YIMBYs" now outnumber "NIMBYs" by a crushing margin. Today, the homeowners who insist on locking down low-rise residential neighborhoods as the exclusive preserve of "single-family homes" are now now just a very noisy, overly-pampered minority trying to drowned the much larger group of residents who prioritize ensuring that they, their children, and everyone who wants to live in a complete community, can find a suitable home in Toronto.

### **Removing Legal Obstacles Is An Indispensable First Step**

It is clear, based on Environmental Defence's analysis of the dynamics underlying sprawl and car dependency in the Greater Golden Horseshoe that reforming zoning to add a large number of semi-detached homes, townhouses, duplexes, triplexes and other lowrise and missing middle housing to what are now single detached residential neighborhoods is (alongside mid-rise along avenues and high-rise in major transit station areas) the single most impactful action that Toronto City Council can take to protect the environment. Removing the legal prohibitions that stand in the way of these compact, land-efficient housing forms would be a large and indispensable step in the right direction. However, simply "getting out of the way" is not enough to maximize the environmental benefits. In addition to the opportunities outlined in the Interim Report, Environmental Defence recommends as follows:

- Zoning within all residential zones should be amended to ensure that the path of least resistance, when an existing single detached home is being redeveloped, leads to low-rise homes for *multiple* households, rather than to one larger and more expensive house as is currently the case. The total floor space permitted as of right for semi-detached homes, townhomes and multiplexes on a given lot should be considerably greater than the total permitted floor space for a single detached home on the same lot. Moreover, any reduced setbacks, relaxed height restrictions or other formal accommodations designed to facilitate housing types other than single detached dwellings in residential neighborhoods should *not* be available for single detached dwellings.
- The intention to promote an increase in the number of homes within low-rise residential neighborhoods should be made explicit in the Official Plan itself. This intention should be included in the description of each residential zone. Moreover, the creation of a large number of new homes in neighborhoods should be reflected in a substantial increase to Toronto's overall population projections for 2051, and to projections regarding the number of duplexes,



semi-detached homes, townhouses, and other ground-related homes in Toronto 30 years from now.

- Toronto should proactively notify the Ministry of Municipal Affairs of Housing of its commitment to accommodate substantially more people and households within the City than assumed in the Growth Plan for the Greater Golden Horseshoe, and request the population targets for suburban municipalities be reduced by a corresponding degree.

Environmental Defence would welcome the opportunity to participate in *Expanding Housing Options in Neighbourhoods* consultations with a view to helping Toronto capitalize on the opportunity to make its neighborhoods more liveable and sustainable.

Sincerely,

Philip Pothen  
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Environmental Defence