



Ontario Association of Architects

February 29, 2013

City Clerk, Attention: Frances Pritchard
Planning and Growth Management Committee
Toronto City Hall
100 Queen Street West
10th floor, West Tower
Toronto, ON, M5H 2N2

Dear Councillor Milczyn and members of the Planning and Growth Management Committee,

The Ontario Association of Architects (OAA) City-Wide Zoning By-law Task Group, as detailed in Appendix A, has repeatedly tried to express concerns and recommendations regarding the proposed City-Wide Zoning By-law (CWZBL) via formal submissions, presentations, meetings, and assorted communications, to the Planning and Growth Management Committee (the Committee), Acting Director Joe D'Abramo; and other City of Toronto Staff.

On June 4, 2012, a Staff Report from the Acting Chief Planner and Executive Director of City Planning acknowledged the OAA Task Group's submission of May 16, 2012, but ultimately dismissed our objections and recommendations. This report wrongly concluded that:

- 1) our perceived conflicts between the Official Plan and the CWZBL were taken out of context
- 2) despite our cumulative and extensive experience and expertise, the City of Toronto is right and the CWZBL may actually "lead to fewer minor variances"
- 3) the goal or underlying reason behind our objection was to protect our interest in building "overly large homes", something the CWZBL intentionally seeks to prevent

Contrary to the conclusions of the Staff Report, The OAA Task Group does not feel that this response, nor the CWZBL, satisfactorily addresses our concerns. The OAA Task Group maintains that the CWZBL is in conflict with the Official Plan; that the CWZBL will increase the need for minor variances delaying development and increasing costs for clients and residents; and that new restrictions imposed by the CWZBL will unnecessarily limit architectural design. Regarding the latter, the OAA Task Group's objection to the CWZBL far exceeds restrictions on the size of a house that were previously represented in any of the former by-laws. For instance, green roofs, as advocated for in the Green Roof By-law, as well as other sustainable energy efforts such as solar panels, will all but disappear due to the new restrictions on roof design. Finally, even if "overly large houses" were a contentious point, no evidence has been provided that they are a problem, or that the CWZBL will solve this purported problem.

As a result of these outstanding concerns, the OAA Task Group again reiterates the following objections and recommendations to the Committee:

- Gross Floor Area (GFA) Restrictions:** Current regulations in parts of the city, including the former municipality of North York, did not restrict the GFA and instead dealt with issues such as lot coverage and the building envelope. The CWZBL introduces restrictions on GFA and imposes them throughout the city. The Official Plan declares that “Zoning by-laws will contain numerical site standards...to ensure that new development will be compatible with the physical character of established residential neighbourhoods” (Official Plan, p. 4-5). Limiting floor area must not be confused with limiting building size which should be (and is) limited by height, coverage, setbacks, length, and other parameters. Physical character refers to the externalities of buildings which are apparent to the public, whereas hidden characteristics such as floor area cannot be observed by the public and are not appropriate for inclusion in a zoning by-law.

Recommendation: The OAA Task Group recommends that restrictions on GFA be removed as the interior of the building is not an externality apparent to the public and is not appropriate for inclusion in a zoning by-law. A wide range of floor areas can be accommodating within a given building size.

- Measuring Residential Height (sloped roofs):** According to current by-laws in the former municipalities of Toronto and York, height limits were measured to the mid-point of the roof between the eaves and the highest point. The CWZBL proposes to instead measure height as the distance between the elevation of established grade and the highest point of a peaked roof (Section 10.5.40.10).

Recommendation: The OAA Task Group recommends that the CWZBL method of measuring residential height instead be replaced by the mid-point measurement as specified by the by-laws of the former Toronto and York municipalities, or that the maximum residential heights be raised to allow for the change in methodology of measurement.

- Restricting the Height of Flat-roof Houses:** Current zoning by-laws in the former cities of Toronto, Scarborough, East York and York currently have the same height limit for flat-roofed houses and sloped-roof houses. The new CWZBL proposes restricting the height of flat-roofed houses to 7.2M, while peaked-roof houses have a building height allowance of 10M (equivalent to an entire floor of a house). Discrimination against houses with flat roofs in favour of those with peaked roofs also contradicts with the Official Plan, which seeks to create “a city with beautiful architecture and excellent urban design which astonish and inspire” (Official Plan, pg. 1-2). Zoning which prefers peaked-roof buildings does not support the full range of architectural expression which the Official Plan intends.

Recommendation: The OAA Task Group recommends that the CWZBL restriction of a lesser height for flat-roof houses be replaced by the same maximum height allowance

for a peaked-roof house, as is contained in the current zoning by-laws of the former cities of Toronto, Scarborough, East York and York.

- **Width of Dormers in a Roof Above Second Storey:** The width of dormers is not generally regulated in current zoning by-laws. However, the CWZBL proposes to limit the size of dormers in Residential and Residential Detached zones in terms of the total width to 40% of the width of the side or front walls of the building (Section 10.10.40.10(5) and 10.20.40.10(7)).

Recommendation: The OAA Task Group recommends that the CWZBL restriction on dormers be removed and no such restriction be put in place as the width of dormers was not generally regulated in current zoning by-laws.

- **Maximum Height of Specified Pairs of Main Walls:** Provisions 10.10.40.10(2), 10.20.40.10(2), and 10.40.40.10(2) of the CWZBL restrict the maximum height of the exterior portion of main walls to 7M above established grade or 2.5M less than the permitted maximum height. This has the de-facto outcome of causing homes in a residential zone to have peaked roofs and will reduce the variety of building forms which, again, contradicts with the vision of the Official Plan, page 1-2.

Recommendation: The OAA Task Group recommends that this provision be removed as the height of main walls was not generally regulated in current zoning by-laws, and the inclusion of this provision is in the discipline of design control and does not belong in a zoning by-law.

- **Restrictions for a Detached House with a Flat or Shallow Roof:** Section 10.20.40.10(4) of the CWZBL links the slope of roofs to the height of the building, and has the de-facto effect of causing there to be a preponderance of roofs which are exactly 1:4 slope. Section 10.5.40.40(1) of the CWZBL also links the height of attic spaces to the floor area of the building. To avoid an exceedance to gross floor area, this also has the de-facto effect of causing a preponderance of houses with shallow sloped roofs to maximize space. This again contradicts with the vision of the Official Plan, page 1-2.

Recommendation: The OAA Task Group recommends that this provision be removed as this provision is in the discipline of design control and does not belong in a zoning by-law.

- **Inclusion of Attic Space as Gross Floor Area:** Section 10.5.40.40(1) of the CWZBL links the height of attic spaces to the floor area of the building. This provision reduces the ability to maximize floor area and exceeds the Official Plan which states: "Zoning by-laws will...ensure that new development will be compatible with the physical character of established residential neighbourhoods" (Official Plan, pg. 4-5). Physical character refers to the externalities of buildings which are apparent to the public, whereas hidden characteristics such as floor area cannot be observed by the public and are not appropriate for inclusion in a zoning by-law.

Recommendation: Restrictions on interior floor area should not be defined by the CWZBL as a wide range of floor areas can be accommodated within building size limits of height, coverage, setbacks, length, etc. There is no increased impact on the surrounding neighbourhood with increased density in a roof and, as this is not an externality apparent to the public, it is not appropriate for inclusion in a zoning by-law. The OAA Task Group recommends the clause including attic space as gross floor area should be removed.

- **Roof Slope Restriction for a Detached House:** Section 10.10.40.10(4) of the CWZBL specifies the maximum slope of a roof may not exceed 5.0 vertical units to every 3.0 horizontal units. This, in combination with the measurement of height to the peak of the roof, is redundant and unnecessarily restricting the architectural style of homes.

Recommendation: The OAA Task Group recommends that this provision be removed as this provision is in the discipline of design control and does not belong in a zoning by-law.

- **Setbacks:** Section 5.10.40.70(2) of the CWZBL introduces the restriction that building setback also apply to all parts of a building or structure below grade, excluding footings. As previously mentioned, the OMB specifies that zoning by-laws cover physical character of established residential neighbourhoods. Parts of a building or structure below grade are not an externality apparent to the public and are not appropriate for inclusion in a zoning by-law.

Recommendation: The OAA Task Group recommends that this provision be removed as parts of a building or structure below grade are not an externality apparent to the public and are not appropriate for inclusion in a zoning by-law.

In light of this letter and the repeated attempts to participate in the review process, I again urge the Committee, on behalf of interested Toronto Architects and City residents who are their clients and potential clients, to carefully consider the concerns and recommendations detailed here and in prior correspondences before ratifying the proposed CWZBL. These changes to the existing by-laws will force a significant increase in applications to the Committee of Adjustment, causing delays in development, increased costs, and disagreements between neighbours. These changes also contravene the intention of the Official Plan to have an architecturally diverse and beautiful city.

I invite the Committee and City officials to consult with the Architects in our Task Group to gain a better understanding of these serious flaws in the proposed version of the CWZBL and hope that our input will help to make Toronto a better City in which to live, work, and play.

Should such a consideration not be given at this time, the OAA, on behalf of concerned Toronto Architects and residents, will continue to pursue measures necessary to seek a satisfactory resolution which may include appealing to the Ontario Municipal Board.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bob Abrahams', written in a cursive style.

Bob Abrahams, OAA

Chair

The Ontario Association of Architects Task Group for the City-Wide Zoning By-law

Cc: Peter Milczyn, Chair, Planning and Growth Management Committee, City of Toronto
Jennifer Keesmaat, Chief Planner and Executive Director, City of Toronto
Joe D'Abramo, Acting Director, Zoning By-law & Environmental Planning, City of Toronto
Members of the OAA Task Group for the City-Wide Zoning By-law

Attach: Appendix A: Communication Log

Appendix B: Correspondence dated May 16, 2012, addressed to Mr. Joe D'Abramo

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APPENDIX A: OAA and OAA Task Group Communications with the Committee and City Officials

Attempts of the OAA and OAA Task Group to participate in the review process:

- a) A discussion, occurring on January 9, 2013, between OAA Executive Director Kristi Doyle and Joe D'Abramo, where concerns over the proposed CWZBL were reiterated
- b) A letter, dated November 13, 2012, sent by OAA President Sheena Sharp to Jennifer Keesmaat, referencing the May 2012 submission regarding the proposed CWZBL as well as the additional follow-up correspondences that had occurred
- c) A discussion, occurring on November 12, 2012, between OAA President Sheena Sharp, OAA Executive Director Kristi Doyle, and Jennifer Keesmaat, where concerns over the proposed CWZBL were again reiterated
- d) A letter, dated October 11, 2012, sent by OAA President Sheena Sharp to Joe D'Abramo, reiterating concerns over the proposed CWZBL
- e) An oral presentation, occurring during the Committee meeting on June 18, 2012, by Mary Ellen Lynch, on behalf of the OAA and a member of the OAA Task Group, where concerns over the proposed CWZBL were discussed
- f) An oral presentation, occurring during the Committee meeting on June 18, 2012, by Bob Abrahams, Principal of Open Architects Inc., and Chair of the OAA Task Group, where concerns over the proposed CWZBL were discussed
- g) An oral presentation, occurring during the Committee meeting on June 18, 2012, by Graham Smith of Altius Architecture, and member of the OAA Task Group, where concerns over the proposed CWZBL were discussed
- h) A formal email submission to the Committee meeting on June 18, 2012, by Lorne Rose of Lorne Rose Architect, and member of the OAA Task Group, where concerns over the proposed CWZBL were discussed
- i) A letter sent by Bob Abrahams on behalf of the OAA Task Group for the proposed CWZBL to Joe D'Abramo, dated May 16, 2012
- j) A meeting at City Hall including the members of the OAA Task Group and former Chief Planner, Gary Wright, Joe D'Abramo, and city staff in November, 2011, where concerns over the proposed CWZBL were initially discussed

Prior to the official formation of the OAA Task Group, the OAA and a number of Toronto Architects also previously engaged City officials on multiple occasions including:

- k) A meeting on July 5, 2011 between Gary Wright, Former Chief Planner and Executive Director of City Planning; Carlton Grand, Former Manager of the Development Application Review Project; with the OAA President Sheena Sharp; Bob Abraham; and Gary Pask, a member of the OAA Staff
- l) Meetings, occurring on February 3, February 17, and March 10, chaired by Councillor Michael Walker with Joe D'Abramo, two city planners, and concerned Toronto Architects (some of whom now sit on the OAA Task Group)

APPENDIX B: Letter, sent by Bob Abrahams on behalf of the OAA Task Group, providing objections to the proposed HZB (now CWZBL) to Joe D’Abramo, dated May 16,2012



Ontario Association of Architects

May 16, 2012

Mr. Joe D’Abramo
City of Toronto, Planning and Growth Committee
Metro Hall
22nd Floor, 55 John Street
Toronto, ON M5V 3C6

Dear Mr. D’Abramo,

The Ontario Association of Architects has formed a Task Group for the Toronto Harmonized Zoning Bylaw, (the “Task Group”) in order to bring the views of interested Toronto Architects to bear on the Planning and Growth Committee.

The Task Group has serious concerns about the Harmonized Zoning Bylaw (HZB). These concerns were gathered from the Task Group’s member Architects who work in Toronto and are familiar with both the old zoning bylaws and the repealed HZB. These Architects submitted extensive commentary and criticism, which has been reviewed and compiled. Through the variety of concerns and criticisms expressed, we noted three common themes:

- 1) The HZB would diminish the quality of residential Architecture in the City;
- 2) The HZB would do nothing to reduce the need for variances or help improve the already unacceptable wait times for Committee of Adjustment;
- 3) The HZB would conflict with the Official Plan.

The following is a detailed discussion of these three criticisms:

1) The HZB would diminish the quality of residential architecture in the City

A. The charm and beauty of Toronto’s best streetscapes and historical housing stock would be threatened by the HZB.

This is because the HZB would not permit many desirable characteristics of houses. The HZB would require houses to be designed within a very narrow range of building forms to the detriment of Toronto’s most successful streetscapes which feature houses with a variety of Architectural forms and styles. This is no accident; according to City Planning, the residential portions of the HZB attempt to cause typical neighbourhoods to be comprised of two and a half storey peaked roof houses.

For example, broad dormers, turrets, upper decks, gambrel roofs, perpendicular gable roofs, mansard roofs, flat roofs and more would all be curtailed or eliminated by the HZB. Many alterations to existing buildings would not be able to maintain

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and extend the existing Architectural style under the HZB. Many of Toronto's great streetscapes would not be allowable under the HZB.

B. Steep roofs will become scarce for houses built or altered in accordance with the HZB.

The height restrictions in relation to sloped roofs and the curtailment of flat roofs, in combination with unrealistically low limits on floor area would cause designers to create roofs which are as flat as allowable (1:4) in order to maximize the third floor area under sloped roofs. The predominance of such roofs would completely change the character of historically rich streetscapes and would seldom result in good architecture.

Steep roofs help create the charm of many older houses and can express a distinguished and upscale look. These roofs will become scarce for houses built or altered in accordance with the HZB. This is because building height is measured to the peak of the roof, and so the ability to occupy the space under a steep roof while still remaining within the height limit is diminished. Today's building code, which requires deeper floor structures and thicker insulated roofs further impairs designers' ability to provide three usable stories under a steep roof.

Designers wishing to provide a third storey will not be able to provide as generous a third floor as families demand, since the HZB requires that the majority of the roof of a three storey building be sloped, and that dormers (which can increase the usable area under a sloped roof) are limited. The probable result for a large proportion of houses is three stories with low sloped roofs which meet the minimum requirement of 1:4.

C. The variety of building forms in Neighbourhood streetscapes would be diminished.

The HZB, through limitations such as main wall height and roof slope, effectively encourage houses to have a narrow range of building forms by penalizing the allowable height for buildings with other forms.

Most Architects and Toronto citizens would agree that streetscapes with a variety of housing forms and styles are preferable to ones dominated by repetitive forms. The HZB severely limits the ability of designers to provide elements characteristic of many historical styles such as large or numerous dormers, gables on more than two sides of a house, houses which do not have a rectangular based floor plan, flat roofs, gambrel roofs, mansard roofs, vaulted roofs and upper decks.

2) The HZB would not reduce the need for variances nor help improve the already unacceptable wait times for Committee of Adjustment

A) "Toronto is not an as-of-right City"

Variances are intended to provide relief when the Bylaw creates a hardship. The fact that so many reasonable building proposals such as small home additions would not comply with the HZB is not the fault of Toronto's home owners, but the fault of the HZB's authors.

Compliance with laws and regulations should be possible for well meaning, reasonable, typical citizens. Unfortunately, the types of building which can be considered as part of the normal course of building alteration, re-use and adaptation to meet the needs of regular folks is not permitted by the HZB. Small additions and alterations to existing houses to accommodate normal peoples' normal needs too often require variances. Normal sized houses (by today's Canadian standards) are not permitted on small City lots.

Toronto City Planning has stated to us recently that "Toronto is not an as-of-right city", meaning that the Zoning is intentionally written in such a way as to require a large number of applications to seek relief from Zoning and so to be scrutinized by the City and the Community on a case-by-case basis. This discretionary review makes housing construction and alteration subject to inconsistencies in the taste and sentiment of neighbours, instead of established legal limits. Whereas we should expect that regulation is applied consistently and without bias, the philosophy that Toronto is not an "as-of-right City" is a blatant repudiation of this principle, inviting unequal treatment based on the tastes and prejudices of neighbours. COA hearings can be an arbitrary form of justice in which local residents are able to show up and object about anything they don't like about a proposed project.

B) The HZB governs too many parameters

The building parameters which the HZB attempts to control are so numerous and so confining that seeking relief through the variance process will continue to be the norm rather than the exception. Furthermore, these parameters are often of no consequence in terms of the public good as described by the Official Plan. For instance:

- a. The height of the first floor above grade;
- b. The size and number of upper decks in an RD zone;
- c. The maximum slope of a roof;
- d. The minimum slope of the majority of the roof of a three storey building;
- e. The size of the floor area within a given building;
- f. The width of dormers
- g. The height of two opposite main walls (but not two other main walls)
- h. The height of an attached garage's door threshold above the driveway entrance;

Many Architects believe that meeting these requirements does not necessarily make better Architecture or better streetscapes. As a result of the numerous and confining requirements which designers are required to meet, an inordinately large number of applications seek relief from Zoning, and this creates an unmanageable workload for City Staff and the COA, unacceptable wait times, and a drag on the City's economy with no benefit to the built form of the City.

3) The HZB would conflict with the Official Plan

A. The HZB effectively standardizes building forms in neighbourhoods

Whereas the Official Plan (OP) "is grounded on principles of... diversity and opportunity", (OP p. 1-2) the HZB attempts to standardize the look of the

Architecture of residential neighbourhoods. According to the City of Toronto's Planning and Growth Committee, the residential portions of the HZB deliberately attempt to cause typical neighbourhoods to be comprised of two and a half storey, peaked roof houses. It was noted that this was an explicit goal, formulated through consultation with the small sub-set of citizens who were affiliated with existing neighbourhood groups and who were on councillors' contact lists.

The HZB's control of residential building form envisions uniformity and conservatism, whereas "The vision of the (Official) Plan is about creating... a city with beautiful architecture and excellent urban design which astonish and inspire" (OP p.1-2). The Architectural profession's viewpoints about the housing of today and of the future is extremely diverse. The HZB's narrow minded limitation on building form certainly would not allow Toronto's neighbourhoods to move into the future based on these diverse viewpoints, nor based on changing needs and customs.

"As in nature, diversity is the key to our social, cultural and economic life". (OP, p.1-3). The control and standardization of building form is not in keeping with this OP vision either.

"People enjoy freedom of conscience... and opportunities for such enjoyment are supported." (OP, p. 1-3). Again, the control of building form, insofar as it prefers certain styles over others, flirts with the discredited notion that matters of taste are actually matters concerning the public good. The HZB again conflicts with one of the OP's core principles.

B. The limitation on the floor area of houses is not in keeping with the OP.

The floor area limitation drives people to car dependent suburbs. Whereas the OP seeks to "...reduce the rate at which the countryside is urbanized" and "...reduce our reliance on the private automobile" (OP p. 2-2), the HZB's unrealistic limitation on the floor area of houses leaves many people with no good choice but to live in car dependent suburbs.

Since typical neighbourhood floor areas are limited to a range from 0.35x to 0.6x the lot area, and since Toronto's lots tend to be significantly smaller than suburban lots, Toronto's houses built or expanded under the HZB would be smaller than their suburban counterparts.

The floor area limitation discriminates against larger families. Larger families require larger houses. Families requiring larger houses such as those with a higher than average number of children and also extended families, would experience a supply shortage under the HZB relative to smaller families. Since the OP supports the provision of housing for all family types as well as housing affordability, the limitation on floor area is an unfair restriction which is not in keeping with the OP.

The floor area limitation restricts the supply of rental housing. The conversion of houses to multiple unit dwellings increases the number of rental units, the diversity of housing types and the range of affordable housing options, all of which are

supported by the OP. Such conversions must subdivide the unrealistically low allowable floor area into two or more dwelling units. Property owners wishing to expand their buildings as part of a conversion to achieve reasonably sized dwelling units would too often be prohibited from doing so by the floor area limitations in the HZB.

The floor area limitation is not in keeping with cultural trends. Whereas the OP establishes a progressive vision for the City, the HZB's limitations on the floor area of houses is decidedly regressive. Contemporary citizens tend to demand more floor area than people did at the time when so much of Toronto's housing stock was built.

Today's citizens want more bathrooms, more storage, bigger kitchens and so on. The fact that a large portion of COA applications seek an increase in floor area supports this observation.

The floor area limitation is outside the boundaries of regulation contemplated by the OP. The OP declares that "Zoning by-laws will contain numerical site standards... to ensure that new development will be compatible with the physical character of established residential neighbourhoods" (OP p. 4-5). "physical character" includes those physical characteristics of buildings which are apparent to the public. Hidden characteristics which cannot be observed by the public and which have no public impact are not appropriate for inclusion in a zoning by-law. Floor area is such a characteristic. Floors are hidden from view behind walls and roofs. Limiting floor area must not be confused with limiting building size. Building size should be (and is) limited by height, coverage, setbacks, length and so on. Because a wide range of floor areas can be accommodated within a given building size, floor area sizes (especially of private dwellings) are irrelevant to the physical character of the City.

C. The HZB prohibits some opportunities for sustainable building features within neighbourhoods.

Whereas the Official Plan (OP) regards sustainability as one of the City's major aspirations, the HZB would prohibit a number of common sense sustainable building features.

Vegetated roofs are commonly regarded as an ecologically intelligent building element because they enhance flora and fauna, mitigate storm water runoff, clean the air, reduce urban heat islands and more. These roofs are already required by the City's green roof bylaw for large buildings. They can only be realistically installed on flat roofs. The HZB's limitation on residential buildings with flat roofs also limits the ability of property owners to install vegetated roofs. In addition, the provision of stairwells and railings to permit access to vegetated roofs is curtailed by the inclusion of these elements in the measurement of building height.

D. The HZB reduces housing affordability

Housing affordability is an important principle in the OP. The deadweight cost of variances and delays in the permit process are capitalized into the price of housing, reducing affordability. As discussed earlier, where variances are the norm and not

the exception, most dwelling units constructed or altered under the HZB will be at least several thousand dollars more expensive than if they could be built or altered by right. Where there is an appeal to the OMB, this deadweight cost can reach into the tens of thousands of dollars.

We therefore request that the Planning and Growth Committee take these issues seriously in the formulation of the revised Zoning Bylaw, and consult with the Architects in our Task Group to gain a better understanding of the serious flaws in the repealed version of the HZB. We hope that our input will help to make Toronto a better City in which to live, work and play.

Yours truly,



Bob Abrahams, OAA
Chair
The Ontario Association of Architects Task Group for the Toronto Harmonized Zoning Bylaw

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