



March 26, 2019

12th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
Attention: Marilyn Toft  
Email: [councilmeeting@toronto.ca](mailto:councilmeeting@toronto.ca)

**RE: PH3.1 As-of-Right Zoning for Secondary Suites**

Dear Mayor Tory and Members, City Council

This correspondence concerns an amendment to the proposed “As of Right” Zoning (for secondary suites) By-law that was recommended to Council by Planning and Housing Committee at its March 20 meeting:

1. City Council amend the draft Zoning By-law Amendment included as Attachment 1 to the report (February 25, 2019) from the Chief Planner and Executive Director, City Planning as follows:
  - b. to permit a pedestrian entrance to a secondary suite in a front wall of a detached house and semi-detached house.

The staff recommended by-law would allow such entrances in row houses and town houses but not single or semi-detached houses. The Official Plan Neighbourhoods Policy provides that the character of streets and neighbourhoods be maintained. Front entrances for secondary suites may “fit” in some neighbourhoods and not in others. In our opinion, consideration should be given to the character of a specific site. Front entrances may be a part of the character of some streets, such as in some older neighbourhoods that already have them, but not in others, but where side yard access is common and where setbacks can work well to accommodate handicapped access.

Simple regulations can be developed for some areas and for others, the appropriateness of front access can be determined through a Committee of

Adjustment application. In our opinion the matter is nuanced and may not be amenable to a blanket policy to allow or not allow such entrances.

As such we recommend:

- **That Council refer the pedestrian entrance to a secondary suite matter to staff for further consideration, and report back to Council**

Respectfully submitted,

Yours truly,

Geoff Kettel  
Co-Chair, FoNTRA

[REDACTED]  
Toronto, Ontario

[REDACTED]

Cathie Macdonald  
Co-Chair, FoNTRA

[REDACTED]  
Toronto, ON

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Cc: Gregg Lintern, Chief Planner and Executive Director, City Planning,  
Michael Mizzi, Director, Committee of Adjustment and Zoning, City Planning

**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of over 30 member organizations. **Its members, all residents' associations, include** at least 170,000 Toronto residents within their boundaries. **The residents' associations that make up** FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.