



February 15, 2022

10th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
Attention: Nancy Martins, Secretariat

**RE: PH31.6 Expanding Housing Options in Neighbourhoods - Update Report**

Dear Deputy Mayor Ana Bailão and Members of Planning and Housing Committee,

FoNTRA supports the **Expanding Housing Options in Neighbourhoods (EHON)** program in principle. However neighbourhoods across the City have different characteristics that must be taken into consideration in expanding building types across the City. This cannot be a “one size fits all” initiative.

We believe that an extensive public consultation at a Neighbourhood level is critical. City wide engagement is essential. There should be a review of the processes used for laneway and garden suites, and lessons learned applied. Specific local area participation must also be included and has not been so far except by some local residents associations. Ward based consultations are too broad.

The performance measure approach used for garden suites was a useful tool for dealing with different lot configurations but the upcoming initiatives to introduce different building types on major streets and interior streets will require different considerations for the different neighbourhoods. Given concerns by many about the proposal to jettison traditional measures of density, this proposal must be carefully considered and be subject to extensive public consultation.

We are pleased that the report ends with the message regarding a commitment to implementing a comprehensive engagements strategy with a broad and inclusive range of stakeholders. However, we are concerned about how the recommendations of the Ontario Housing Affordability Task Force, if adopted, for a one size fits approach and for the elimination of public consultation, will impact the EHON proposals in this report.

Please see the attachment for more detailed comments.

Yours truly,

Geoff Kettel

Co-Chair, FoNTRA

Cathie Macdonald  
Co-Chair, FoNTRA

Cc: Gregg Lintern, Chief Planner and Executive Director, City Planning Division  
Graig Uens Graig Uens, Senior Planner, Office of the Chief Planner  
Lillian D'Souza, Coordinator, Stakeholder Engagement and Special Projects,  
Office of the Chief Planner

#### **Attachment: Work program next steps - detailed comments**

- **Multiplex housing** – Changes to building types already permitted to become a multiplex is a good start, particularly using a pilot project to add additional units within an already permitted envelope. What public consultation is involved?
- **Beaches East York pilot study** – We look forward to the consultations.
- **Major Street rezoning** - We look forward to the consultations.
- **Local Neighbourhood Retail and Services** – Developing complete communities is an important component of intensifying neighbourhoods. We agree that communities must be walkable. Provision of schools must also be considered in this process.
- **Amending the Official Plan to enable increasing Missing Middle options** – Adding new housing forms will obviously change the existing character of a neighbourhood so local residents must be involved in consultations about these changes. What the street frontage looks like is key – front yards, tree preservation, form of parking, scale of the new building forms. These considerations do not necessarily incur additional costs. How are intact Heritage landscapes/streetscapes dealt with? Heritage preservation is an important part of the character discussion.
- **The Review of Parking Requirements for New Developments** to reduce requirements must take into account the locations of the new housing. Being close to good transit is an important consideration for reducing parking requirements but adequate service standards are essential.
- **Major streets** will see the most change. How are these streets chosen? Maybe some road pavement can be reduced?
- **Reduction in site plan fees** for small buildings may be required in order to facilitate these changes. Will revenue neutrality be maintained by increases elsewhere? .
- **Missing Middle Toolkit and design competitions and preapproved drawings** – These are important tools. We note the existing Post War II houses for example, (Sunshine Valley, East York) that were built using standard plans. Adding green standards is important.

- **Infrastructure capacity studies** related to increased densities in Neighbourhoods are essential.
- **Partnerships** - We note the broad range of partners involved in the CUI Roundtable, especially various community organizations. We are pleased to be selected as a representative of residents associations and given the scope and scale of the City's neighbourhoods we recommend that other community/residents organizations such as Scarborough Community Renewal Organization, the Federation of South Toronto Residents' Associations, and the Confederation of Residents and Ratepayer Associations in Toronto, as well as representation for Etobicoke-York. .
- **Amending the OP considerations** - We agree that there are many questions to be asked and investigated. Major changes as to how the City develops and grows are needed but there are many ways to do this. What works best and where? We look forward to participating in the discussions.
- **Form based approach to residential zoning** – We agree that options other than FSI should be explored but cautiously. Density measures (i.e. FSI) are really the only measure that allows for understanding and comparability of impact.
- **City Tree/House Working Group** – We would like to learn more about this but it appears to be an effective way to coordinate the ensuing of important objectives of permeable open space and tree protection with the construction of new housing units.
- **Affordability** - Given that there is huge demand for truly affordable Missing Middle housing, we need coordinated efforts to make this available. We agree that options must be explored and implemented. This will have to involve the Provincial and Federal governments. The programs extant in the 1970s provide good sustainable examples.
- **Additional Analysis** – We agree that more options must be considered and that this process must be ongoing to meet the needs of our population as they change over time.

**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.