



July 3, 2023

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins

RE: PH5.5 Housing Action Plan; Zoning Bylaw Simplification and Modernization for Low-rise Residential Zones – Proposals Report

Dear Chair Bradford and Members of the Planning and Housing Committee

FoNTRA supports the objectives of the Housing Action Plan and looks forward to participating in the upcoming consultations related to implementation of the objectives of “simplification”, “harmonization” and “modernization”.

The report notes that “A key objective of the Plan is that new development be sensitive, gradual and “fit” the existing physical character to respect and reinforce the general physical patterns in *Neighbourhoods*.”

We agree that this must remain the overriding objective for the consultation process, which is to begin shortly. All neighbourhoods are not all alike and their differences are important in making our City a great place to live.

The report sets out three broad objectives for the new bylaw provisions – simplification, harmonization and modernization.

Simplification

The report describes this as: “*Proposed changes to reduce confusion, remove redundant provisions, and simplify wording where appropriate.*” And “The proposed ‘simplification’ changes include updating and clarifying zoning regulations to eliminate confusion and duplication regarding secondary suites and multiplexes.”

We agree that this objective is important in the development of any regulation. ‘*Where appropriate*’ is key. Different provisions may be needed in different places. One size does not fit all. More complex regulations may be needed to ensure more appropriate development a different neighbourhoods.

Harmonization

The report describes this as: “*Proposed changes to align regulations between building types and zones, as appropriate, to reflect current best practices.*” Proposed ‘harmonization’ changes aim to align regulations, such as main wall height provisions between building types.” “ To ensure a city-wide building standards with respect to building types.”

We agree that this objective is important. But do we need City wide standards? “As appropriate” is essential. Different building types in different neighbourhoods and different variations on the regulations. What are “best practices”? Other municipalities may have certain practices related to their history and needs, but may not be relevant to Toronto. We need “best practices” that are useful tools to achieve our objectives. We need to look at what can we learn from others to meet these objectives.

Modernization

The report describes this as: “*Proposed changes to modernize zoning regulations and move towards a more form-based approach to land use regulation.*” “The proposed ‘modernization’ changes aim to implement current best practices for regulations, such as alternatives to regulating Floor Space Index (FSI) and moving the city-wide Zoning By-law towards a more form-based approach focusing on the external characteristics of a building.”

“Modernize” seems to focus on getting rid of FSI. Why? FSI is a useful form based tool that provides for flexibility. Yes, the FSI limits may be obsolete in many areas but they can be changed to reflect current situation. The former suburban municipalities used only built form regulations which are easier for developing subdivisions and houses can all look similar. The older municipalities were subject to zoning long after they were built up and provide flexibility. Also FSI applies to other uses.

Consultation

We are pleased to see that consultation with residents is listed as we assume these sessions will be adapted to residents across the City. We recommend the following:

- Different sessions with residents of different types of neighbourhoods so they will understand the impacts on their areas. For examples for people who live in FSI areas,
- Provision of drawings showing the different types of changes possible in the many different neighbourhoods across the City. Use real neighbourhoods. Show the results of former regulations compared with new.
- In person sessions as they provide interactive discussion.
- Making the most of the short time frame for these important consultations.

Geoff Kettel
Co- Chair FoNTRA

Cathie Macdonald
Co- Chair FoNTRA

CC: Gregg Lintern, Chief Planner and Executive Director, City Planning Division

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 200,000 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.

