



September 27, 2023

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

**RE: PH6.4 Expanding Housing Options in Neighbourhoods: Major Streets Study - Proposals Report**

Dear Chair Councilor Perks and Members of the Planning and Housing Committee,

FoNTRA supports intensification of Major Streets and looks forward to the upcoming consultations. This initiative is a very important part of the EHON program and will have a major impact on the growth of the City.

We also believe that the rules for intensification should be carefully considered and not be a blank cheque. Not all locations are appropriate for the same levels of intensification. For example the proposed 6 storey height allowance is contrary to the Official Plan Neighbourhoods designation where the maximum has been set for 4 storeys. Where a 6 storey building may be appropriate consideration should be given to redesignating the street to Mixed Use.

FoNTRA provides the following comments on the Proposals, which are intended to assist in ensuring positive impacts on Major Streets across the City.

**Main Streets Study and Analysis**

This is the key section of the report that should provide the rationale for the proposed OPA and Zoning changes and other related proposals and should be the first topic discussed in the consultation sessions. It will help frame the issues and opportunities to be considered and further topics should be added. We therefore propose the following considerations for the consultation sessions:

- Sustainability objectives – Given the increasing importance of these objectives due to the fast pace of climate change, (noting that New York City is the

- hottest city due to climate change because of a lack of greenspace and trees), the consultation should consider whether the proposed objectives are strong enough and whether the aspects to be considered are sufficient to the need.
- Street width – The consultations should include consideration of reducing the paved street width in order to provide green boulevards, and space for trees, or be used for parking.
- Increasing the height of buildings based on road width – This is one consideration but also important is the impact on existing buildings and on other permitted housing forms, and on open space for trees and greenspace and permeable soli.

### **Urban Design**

- The massing model pictures show how out of scale a 6 storey height limit can be. The scale of the abutting neighbourhood should also be considered. Four storeys has been considered the appropriate limit for Neighbourhoods, which will already result in higher buildings. This is a critical consultation topic - where is 6 storeys appropriate and where not?
- Use of site plan control for buildings on Major Streets is an excellent idea. Consultations should include what are the clear objectives to be met and what criteria should be provided for site plan applications. A standardised list of requirements should be developed and a short and timely review process must be established.
- For rear facing lots, comments from current residents on possible neighbouring lots must be considered re increased heights. Will the impacts of 6 storey buildings be acceptable here? But the heights on the interior street must be less, such as 3 storeys, to better fit the scale of the neighbourhood street.

### **Mapping of Major Streets**

- The Official Plan map must be reviewed for errors. Consultations should request comments on the accuracy of the map and errors corrected.
- For example, in the Deer Park area and area to the north of it, the major “Avenue Road” route is - Avenue Road north to Lonsdale, then around Oriole Parkway to Oxtown Avenue, then north on Avenue Road to Eglinton. The map appears to show it going straight north and through the Upper Canada College property!! The part of Avenue Road north from UCC to Oxtown is not a major road: this need to be corrected on the Major Streets map and the Opportunities Map. Last year’s report on major streets the OP map only showed the error of including Avenue Road south from Oxtown to Upper

- Canada College. This part of Avenue Road does not carry major traffic and is a quiet residential street.

### **Proposed OPA**

- The proposed policies and especially 12. to 14. re development criteria provide an effective general policy context but there is a lack of detail as to how the proposed Zoning Bylaw implements them.
- As climate change considerations are increasingly critical and must be made stronger. Ensuring adequate trees cover and greenspace is essential.

### **Proposed Zoning Bylaw**

- The consultations must include impacts of the proposals and other options of different locations and conditions. Drawings and photos and options should be used based on actual different types of locations for the different issues to be addressed.
- No rationale is provided for the 6 storeys limit. (This rationale is also missing in the Report on the elimination of the angular planes.) How is 6 storeys acceptable beside typical neighbourhood houses that are generally a maximum height of 2 ½ storeys. In existing neighbourhoods where there are low rise apartment buildings and town houses, these are generally 4 storeys or less.
- What are the impacts of increased building depth and reduced rear yard setbacks on lack of greenspace and space for trees to thrive? The consultations must include detailed discussion of this.
- Lots are proposed to be at least 30m. in depth, but should this be increased, since apartment buildings can be 4m. deeper than adjacent houses? Is this depth enough to provide for adequate rear yard landscaping and provision of trees?
- Examples must be provided in the consultations to show the impacts of the proposals re shadow and overlook, as well as to provide locations for new trees or to protect existing trees. Climate change considerations are now imperative.
- What are the proposed parking requirements and how can they be met? Consultations should include transportation planning considerations for what is needed and considerations of parking onsite versus through street permits or parking relief etc.

## Consultation events

- Holding in person events is important for this critical initiative. Photos of different situations and neighbourhood walking tours would be useful.

Respectfully submitted,

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Co- Chair FoNTRA

Cathie Macdonald  
Co- Chair FoNTRA

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