



Palmerston Residents' Association

Planning & Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

November 30, 2023

Dear Members of Planning and Housing Committee,

Re: PH8.2 - Recommended Amendments to Zoning By-laws for Bars, Restaurants and Entertainment Venues as part of the Night Economy Review - Final Report

As members of the Palmerston Residents' Association, we represent the interests of residents residing in the area bounded by Grace and Bathurst Streets to the West and East and College and Bloor Streets to the South and North.

We are writing in support of the zoning by-law amendments (the “**Proposed Amendments**”) described in the Report of the Chief Planner and Executive Director, City Planning dated November 16, 2023 (the “**Report**”). We agree with Staff that current by-laws are not in line with modern attitudes or the creation of vibrant neighbourhoods.

The Proposed Amendments Foster Cultural Diversity and Support Small Business

A significant part of what makes the Palmerston area unique and desirable are its bars, restaurants and music venues and the cultural diversity that is displayed by these venues. Walking along College or Bloor Streets one will come across karaoke bars, live music venues and night clubs. By increasing the permitted maximum ancillary entertainment area inside eating establishments, the Proposed Amendments enable businesses to offer live entertainment in a way that will only make our community, and communities across Toronto, more lively and desirable.

It has been difficult to operate a small business in Toronto in recent years. The Proposed Amendments enable small business owners to employ more innovative business models to help these venues flourish. A restaurant that operates primarily as a traditional sit-down restaurant can provide live music on certain nights to attract business. More broadly, the Proposed Amendments make compliance and understanding of the law more straightforward for business owners. A business owner who, prior to the amendments, wanted to host live music may have had difficulty determining what constituted 6% of the area of their business. This likely had the effect of dissuading innovation or resulting in unwitting by-law violation. By increasing the limits to a quarter of floor space, the Proposed Amendments make compliance with the law more straightforward.

Concerns about Noise Have been Extensively Addressed by the Report

Critics of the Proposed Amendments cite noise as a reason to vote against these recommendations.

Firstly, and in a fundamental sense, cities – including and especially world-class cities – entail noise.

Second, concerns regarding noise have been extensively addressed by Staff in the Report and its Proposed Amendments. Staff recommend maintaining the requirement that nightclubs be permitted only on the first storey of a building, thereby ensuring that noise does not travel to nearby residential structures. Staff recommend maintaining the limitation of one nightclub per building, thereby preventing overcrowding outside of venues. Staff recommend that the Proposed Amendments do not come into force before licensing requirements which provide for Noise Control and Patron Management Plans are in place.

For these reasons, criticisms about the noise associated with the Proposed Amendments are not well founded.

Further Amendments of This Kind Are Necessary

We welcome the Proposed Amendments and are appreciative for the hard work of staff in drafting the Report.

Indeed, we believe there is more that can, and should, be done to further foster a vibrant nightlife. This includes running TTC subway service past the end of alcohol service. Doing so would allow for safe and efficient travel for many residents to partake in night life while also decreasing the likelihood of impaired driving. City council has identified issues surrounding ride share services in recent months and extending TTC subway service beyond “last call” would give Torontonians a safe, efficient and sustainable way to get home.

Concluding Thoughts

We would like to conclude with a few words from one of Toronto’s most esteemed former residents, Ernest Hemingway:

“Night life is when you get up with a hangover in the morning. Night life is when everybody says what the hell and you do not remember who paid the bill. Night life goes round and round and you look at the wall to make it stop. Night life comes out of a bottle and goes into a jar. If you think how much are the drinks it is not night life.”

Despite being lauded by contemporary Toronto, Hemingway hated the Toronto that he knew. Hemingway’s Toronto was a deeply conservative one. If the Torontonians of the 1920s had known what an arcade machine was, even a 20,000 square metre building wouldn’t have been sufficient.

The current City of Toronto – and what the current City of Toronto aspires to be – bears little resemblance to the Toronto which created the archaic regulations that the Proposed Amendments seek to remedy. Toronto prides itself on being inclusive, pluralistic, and international and the Proposed Amendments serve this purpose.

Regards,

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Co-Chairs
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