

May 7, 2024

Planning and Housing Committee
City of Toronto
100 Queen St. W., 13th Floor
Toronto, Ontario M5H 2N2

RE: Expanding Housing Options in Neighbourhoods – Major Streets – PH12.3

I am a Professional Planner who has worked for more than a dozen of my twenty-six year career as a planner on smaller-scale development projects in Toronto. I have been engaged with the EHON initiative from the start, and am very glad to see this next phase of it arrive at Planning and Housing Committee. I support the comments submitted by More Neighbours TO, Environmental Defence and Habitat for Humanity GTA.

The proposed changes through the proposed Major Streets Official Plan Amendment and Zoning By-law Amendment will have a demonstrably positive effect on the provision of new, appropriately scaled apartments throughout the City. While I personally would have liked to see even bolder steps taken in this program, I am extremely satisfied that the proposed changes will result in more housing in more neighbourhoods that in no way disrupt the low-rise character of the respective areas.

Notwithstanding that this is an important initiative that should receive the full support of Planning and Housing Committee and Toronto Council, I have the following suggested revisions to ensure the project is a success. I have provided these comments to EHON staff.

- 1) The current draft of the Major Streets by-law will create a scenario whereby a townhouse containing one unit vertically can be 13m tall, but a multiplex containing 4 units vertically can only be 10m tall. I agree with staff that 13m is reasonable height on a major street, and strongly recommend that similar permissions be extended to multiplexes. Similar permissions should be extended to Main Wall Heights and number of storeys in the multiplex by-law provisions.
- 2) I can think of no reasonable justification for the proposed 30 unit cap. As best I can tell, the limit is because this was the old standard for requiring a loading space and garbage pickup space. But the city now allows up to 60 units without them. There should be no cap and let developers figure out how many units are required, given the increased requirements for more units (amenity space, loading, etc). By including a cap, it creates a scenario, for example, whereby R-Zone apartment buildings NOT located on a major street can have more units than one on a major street.
- 3) Why have a maximum building length for an apartment building? This unnecessary requirement is then compounded by a maximum 50% lot coverage. Building massing should be regulated by yard setback



requirements, notably the rear yard setback. Some lots won't be able to reach 25m at all, and some deep lots can hold longer buildings. If a 7.5m rear yard setback is deemed appropriate by the by-law, allow it to be achieved. Allow a building to fit the lot it is on.

- 4) FSI shouldn't apply to any townhouse or apartment building on a main street at all, regardless of the number of units. We should get away from using FSI at all.
- 5) What is the justification for a 6m front yard setback on a through lot, but half that for a non-through lot? Allow the streetscape to evolve and not be tied to the existing built forms.
- 6) Why does an apartment building on a through lot have to have more side yard setbacks than a building not on a through lot? They should be the same. The 7.5m side yard setback beyond the required building depth should be eliminated, along with the maximum building depth itself. A 3m side yard setback on corner lots is also excessive and should be reduced to the minimum allowable under the building code.
- 7) As previously stated, a 50% maximum lot coverage excessive and unnecessary. Allow buildings to be constructed to the lot setbacks permitted by the by-law.
- 8) Clarity should be provided in the Official Plan Amendment that within a Major Transit Station Areas that density beyond 6 storeys and 30 units is anticipated and appropriate. Such direction is important given that the city's approved MTSA Official Plan Amendments did not create any such permissions. We do not want a scenario wherein properties within MTSA's are expected to accommodate the same level of development as properties located far from such areas and with no relationship to higher order transit.

Conclusion

The proposed changes, as augmented by my suggested revisions above, will result in much less work for consultants like me, because if you don't need variances you don't need me to help you get them approved. But it will mean more homes for more people in more neighbourhoods. I'm absolutely fine with this.

I fully support the EHON Major Streets initiative and the staff recommendations before Planning and Housing Committee and Council as a first step to allowing for more apartments and townhouses across Toronto.

Kindest regards,
GALBRAITH & ASSOCIATES, INC.

Sean Galbraith, MCIP, RPP
President/Principal Planner