



May 8, 2024

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

**RE: PH12.3 Expanding Housing Options in Neighbourhoods: Major Streets Study - Final Report**

Dear Chair Gord Perks and Members of Planning and Housing Committee,

FoNTRA hereby submits the following comments in regard to the Major Streets Study and the draft OPA 727 and amendments to 569-2013.

FoNTRA supports the general intent of the Major Streets initiative as being a logical framework to pursue opportunities for increased density in Neighbourhoods. However the proposal is presented as “one size fits all”, and no effort has been made to determine if the framework works in the varied street and settlement configurations, transportation infrastructure, and cultural landscapes across the City. The methodology is not like that of an area planning study; it is simply an overlay of a standard set of permissions on the Official Plan Map 3 that shows road width.

In addition, there is a major concern that as a result of provincial Bill 23, residents opposed to an application to the Committee of Adjustment for “minor” variances, for example beyond the 6 storeys as of right permission, if allowed by the Committee will not be able to appeal to the Toronto Local Appeal Board (TLAB) whereas the applicant facing refusal of an application does have right of appeal.

Numerous questions arise, regarding the proposal, including the following:

**1. What properties are affected?**

**a. What is a Major Street?**

- Map 3 Major Streets is based on road width; and has not been updated from maps prepared by pre-amalgamation municipalities.
- Road width is too limited a consideration. Other considerations are the amount of traffic, transit availability and use, and bike infrastructure.
- The opportunities map included in the Q4 2023 consultations show candidate sites that are schools, and heritage buildings, that should not be considered<sup>1</sup>
- Using only lot width, a number of streets are included that are of widely variable traffic conditions<sup>2</sup>

**Recommendation:** That a revised map be developed that show where Major Street intensification is proposed.

**b. How will the public know which properties are affected?**

- Finding a property by looking at OP Map 3 and then a the Map showing the yellow Neighbourhoods areas is not helpful

**Recommendation** – A new series of maps should be provided as above to show the proposed affected areas that are on Major Streets and that are designated as Neighbourhoods.

**c. Are area specific existing policy and regulations affected?**

- An example is the comprehensive Townhouse Guidelines for a large section of Bayview, developed in consultation with local residents.

**Recommendation** – Clarify whether such area policy and guidelines remain or are they superceded?

**d. What properties will allow 6 storey apartment buildings ?**

- Permitting 6 storey buildings in Neighbourhoods is contrary to existing Neighbourhoods policy. Many residents have concerns about permitting 6 storey buildings, while 4 storeys are permitted generally in neighbourhoods. Some sites may be acceptable because of the ability to create large enough lots and others not. The recommendations include new specific regulations for these buildings.

---

<sup>1</sup> See Attachment - FoNTRA - Case Studies Major Streets Mapping

<sup>2</sup> For example, a section of Avenue Road south of Oxtan which has minimal traffic compared to Avenue Road to the north is part of a “major street” that continues east on Oxtan and south on Oriole Parkway back to Avenue Road.

**Recommendation** – Provide illustrations as to how the regulations for 6 storey buildings will operate in determining where such a building would be permitted and how it would relate to its neighbours.

## **2. How will the many proposed Official Plan and Zoning Bylaw changes affect local sites?**

The report includes a wide range of proposed requirements, essentially the same as the Q4 2023 report but with some good additions – such as processes for tree protection, special setback requirements for primary windows, soft landscaping, a requirement that buildings face the major street. But there is no information about how the proposals will result in buildings that fit an actual lot.

- The same abstract illustrations used in the Q4 2023 report are used in the Final Report to show some of the proposals. Updated illustrations on various different types of lots are needed.

**Recommendation** – Provide real site examples for different neighbourhoods.

- Parking is not required to be provided, but on what basis? There will be some level of need that should be provided for. Otherwise neighbours will, be impacted or the new housing not used.

**Recommendation** – Consider parking requirements, street permit parking and complete street improvements including bike lanes.

## **3. What approval process is needed?**

This not a “normal” planning initiative that has clearly defined application - it is not clear which are Major Streets, where the proposals are actually located, and which neighbourhoods across the City are affected!

**Recommendation** – Develop maps of the affected lands to show the affected properties at an appropriate scale to be easily read and understood by residents..

### **Overall Recommendation –**

- **That PHC recommend that City Council direct staff to report to each of the Community Councils on the feasibility of the Major Streets proposal with respect to the specific major streets in the Community Council Area.**

Yours truly,

Geoff Kettel  
Co-Chair

Cathie Macdonald  
Co-Chair

Attachment: Case Studies Major Streets Mapping

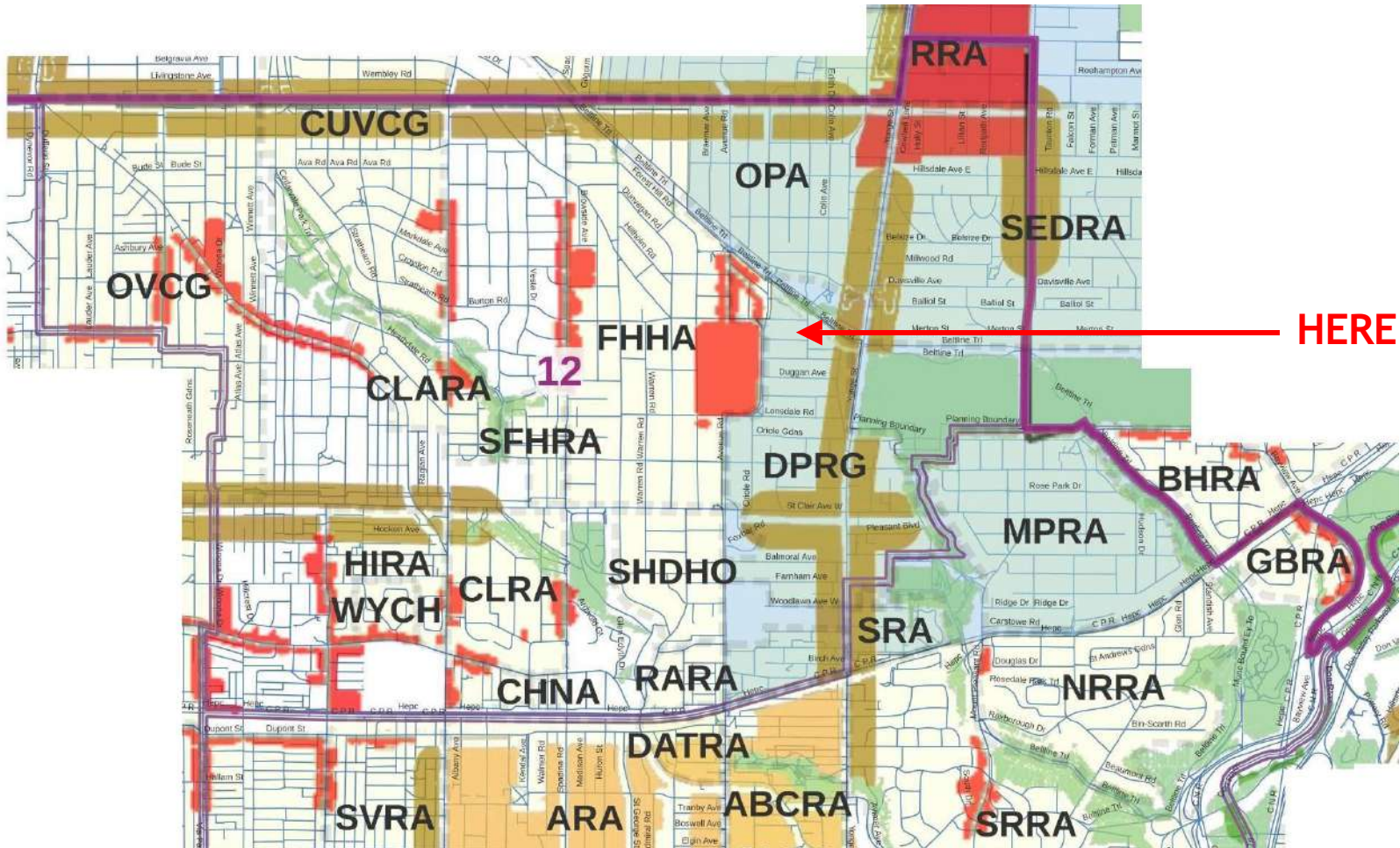
Cc: Kyle Knoeck, Director, Zoning and Secretary-Treasurer, Committee of Adjustment, City Planning Division,  
Brooke Marshall, Senior Planner, Zoning Section, City Planning Division  
Kerri A. Voumvakis, Interim Chief Planner and Executive Director

**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 250,000 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.

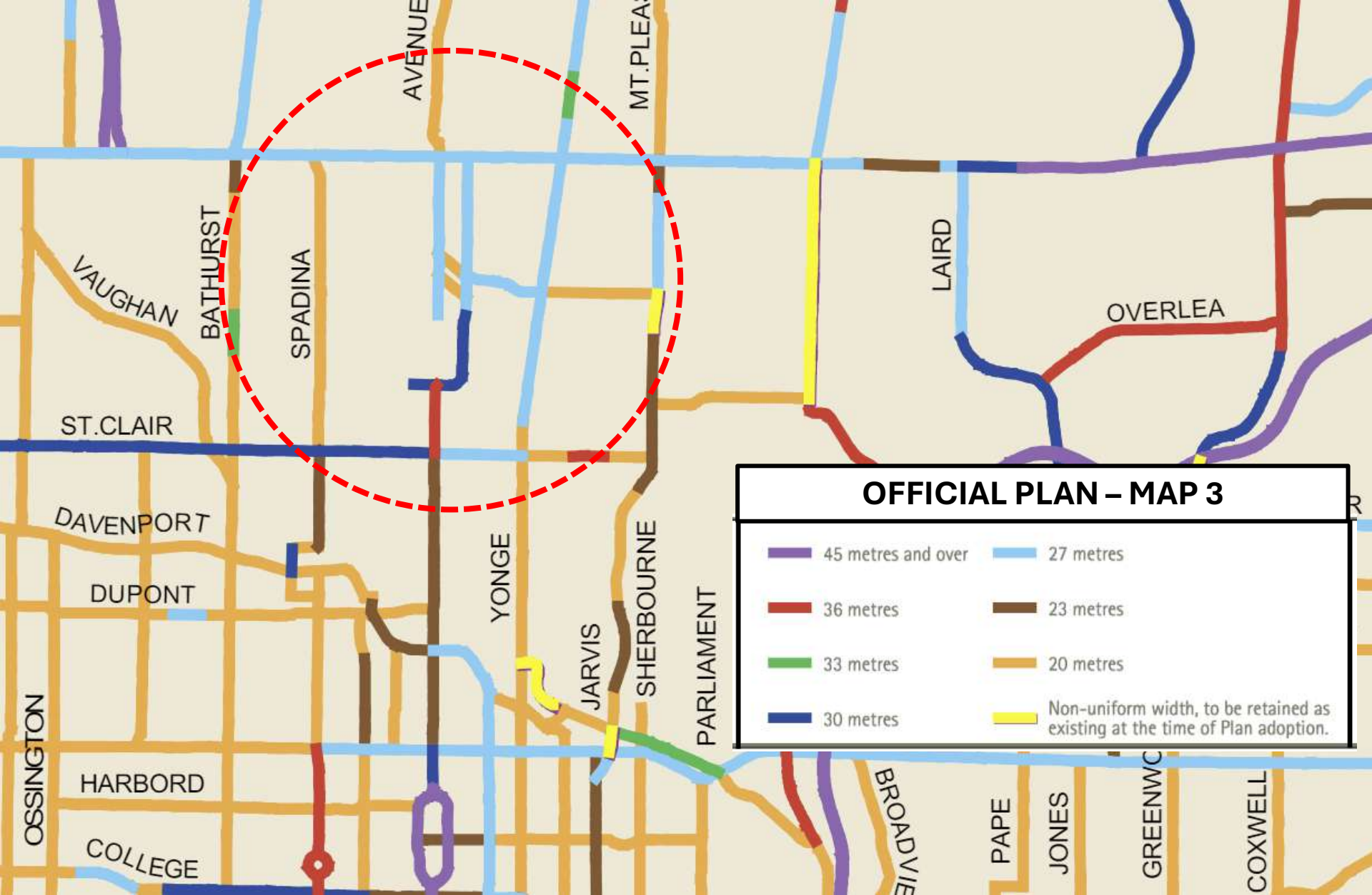
# Major Streets Study

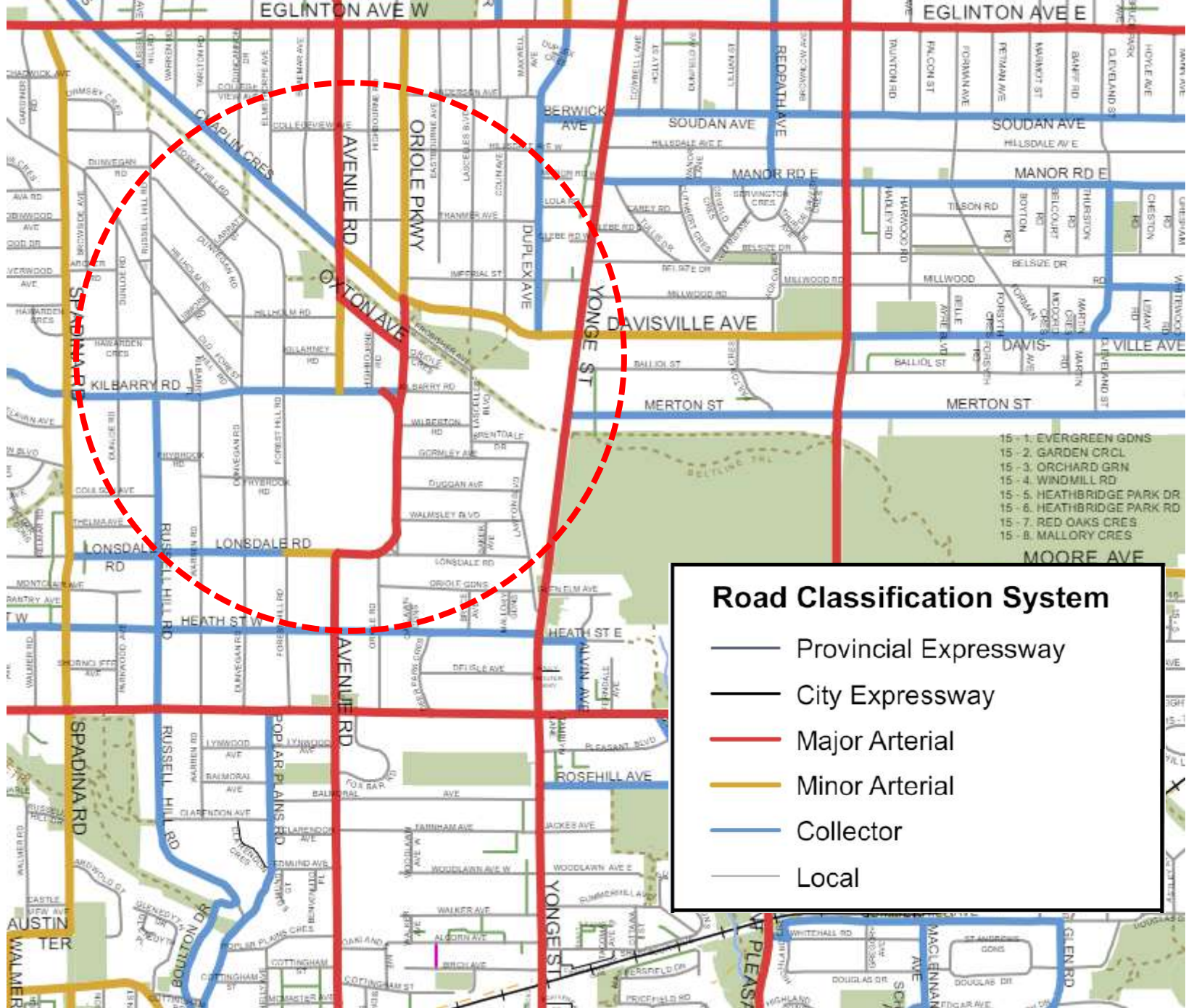
Problems with Deer Park (West)

# Where is Deer Park (West)?







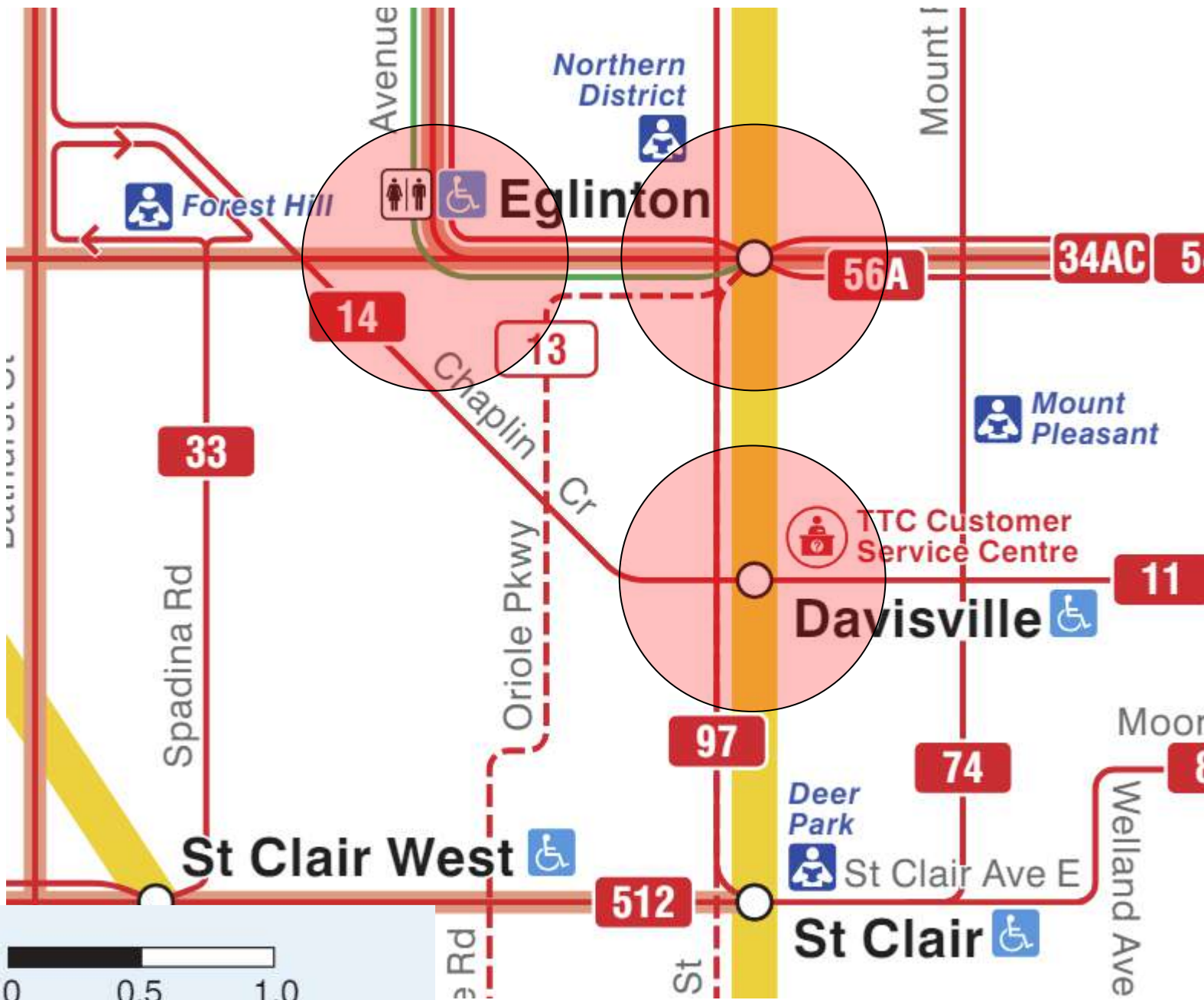


### Road Classification System

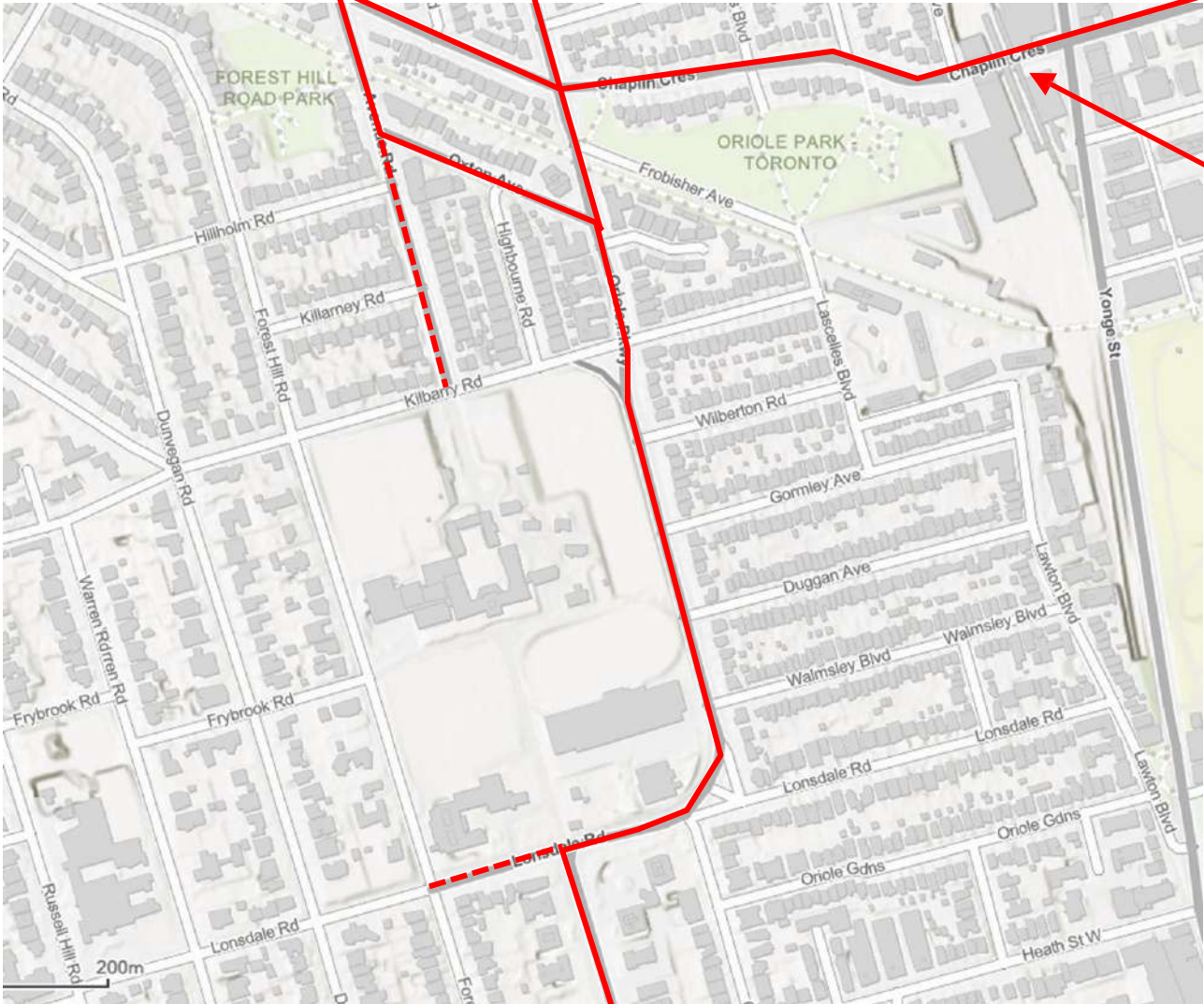
- Provincial Expressway
- City Expressway
- Major Arterial
- Minor Arterial
- Collector
- Local

- 15-1. EVERGREEN GDNS
- 15-2. GARDEN CRCL
- 15-3. ORCHARD GRN
- 15-4. WINDMILL RD
- 15-5. HEATHBRIDGE PARK DR
- 15-6. HEATHBRIDGE PARK RD
- 15-7. RED OAKS CRES
- 15-8. MALLORY CRES





# City Map of Deer Park (West)

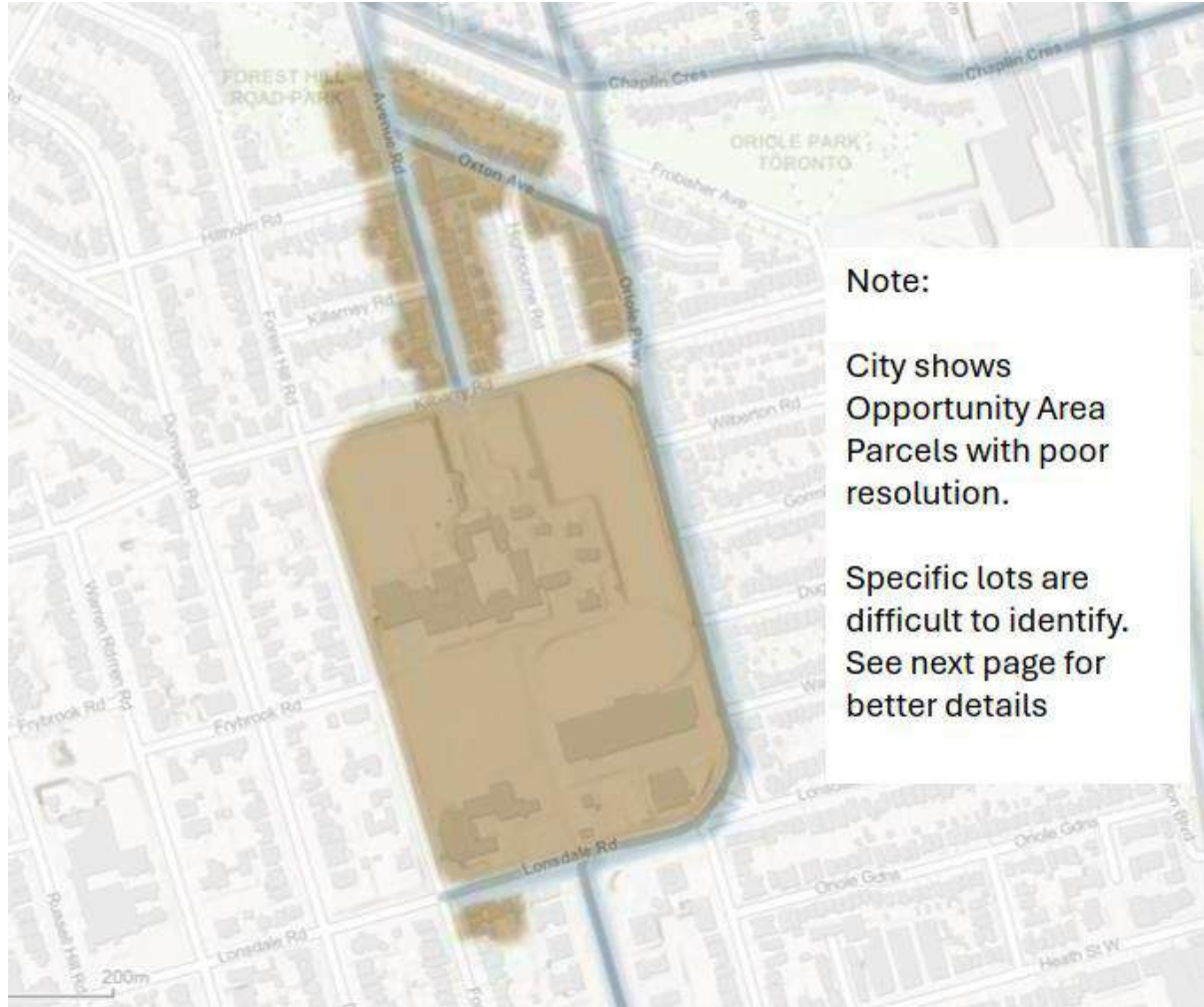


Major Streets

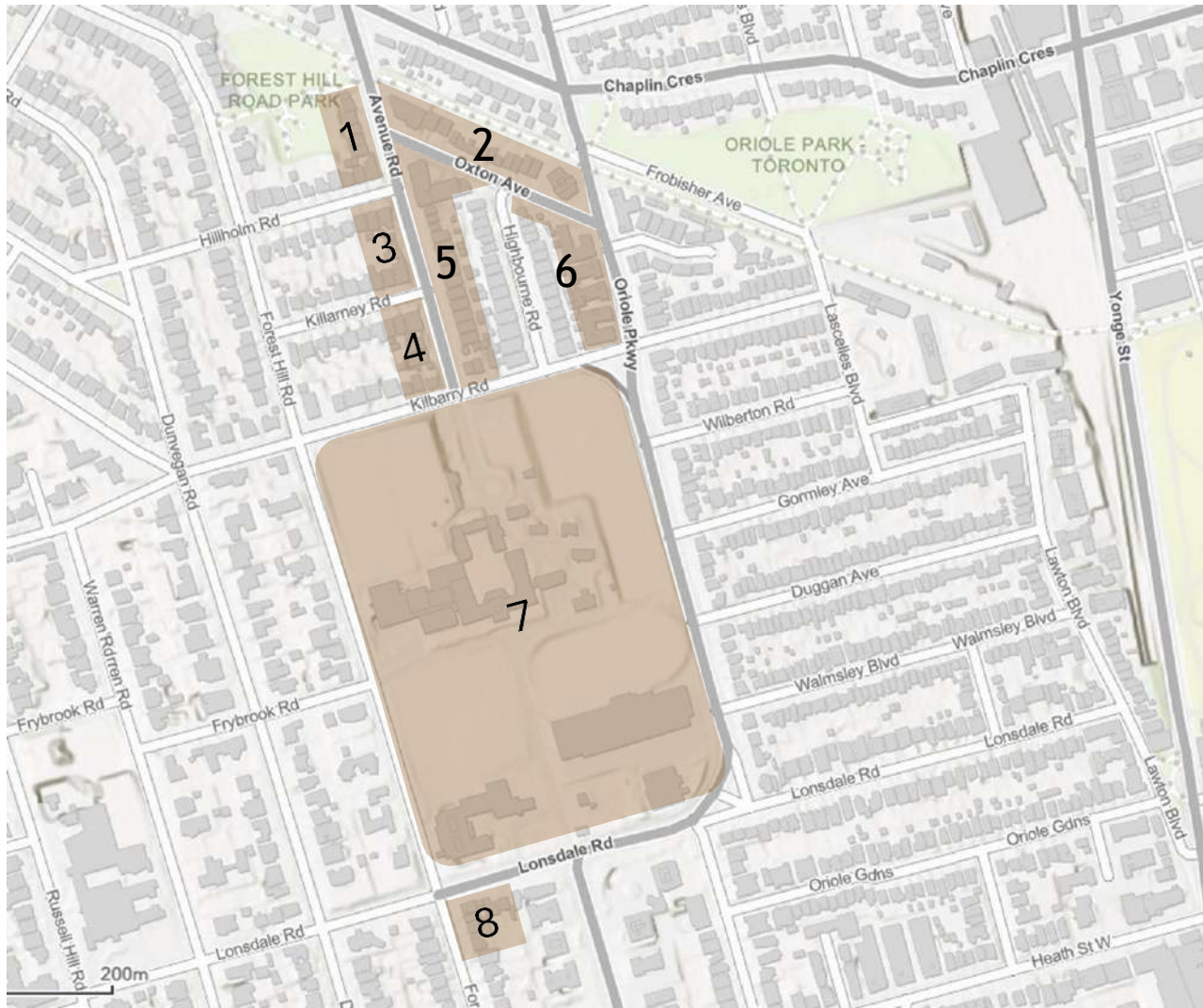




# City Map with Opportunity Area Parcels



# City Map with Opportunity Area Parcels





# Analysis: Problems with City Proposal

- There are seven parcel groups in the review area
- Parcel Group #1
  - Properties abut a public park.
- Parcel Groups #2
  - Properties abut a linear public park.
- Parcel Groups #3, #4, #5
  - Not clear whether this segment of Avenue Road is a Major Street
  - Street abruptly ends at Kilbarry Rd

# Analysis: Problems with City Proposal

- Parcel Group #6
  - Properties on westerly side of the street
- Parcel Groups #7
  - Not clear if residential dwellings can be built in a private school yard?
- Parcel Groups #8
  - Not clear whether this segment of Lonsdale Road is a Major Street

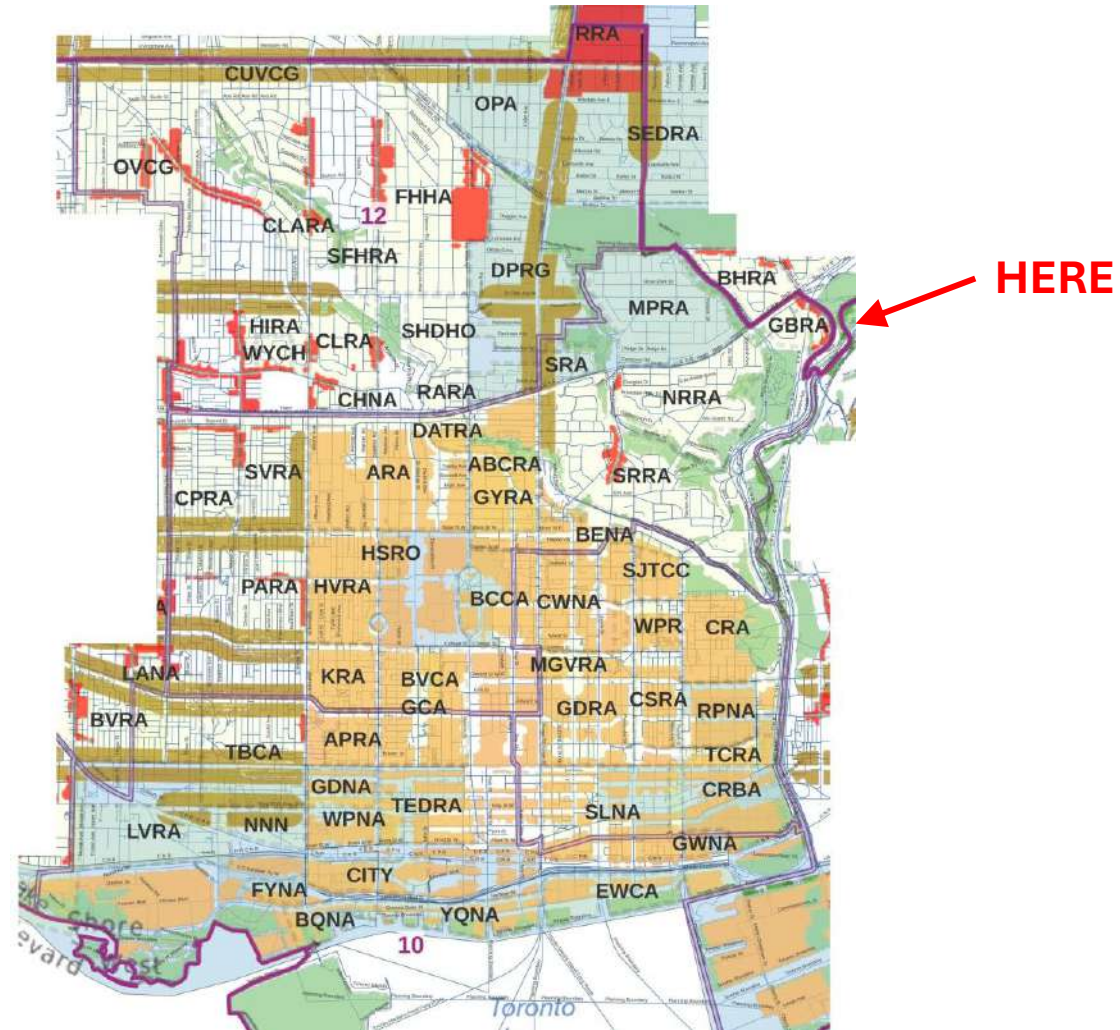
# Recommendation – Need to vet the City Map

- Parcel Maps provided by City are inadequate for analysis
  - Detailed analysis reveals various issues.
- Major Street designations are out-of-date:
  1. Avenue Road is narrow at its intersection at Kilbarry Rd
  2. Lonsdale Road is narrow on the western segment
- **Recommendation:**
  - Major Streets are a designation for transportation. Major Streets are not suitable for planning decisions
  - Review and update Major Streets designations before approval of planning decisions base on these designations.

# Major Streets Study

Problems with Governor's Bridge

# Where is Governor's Bridge?





# Aerial view – Governor's Bridge

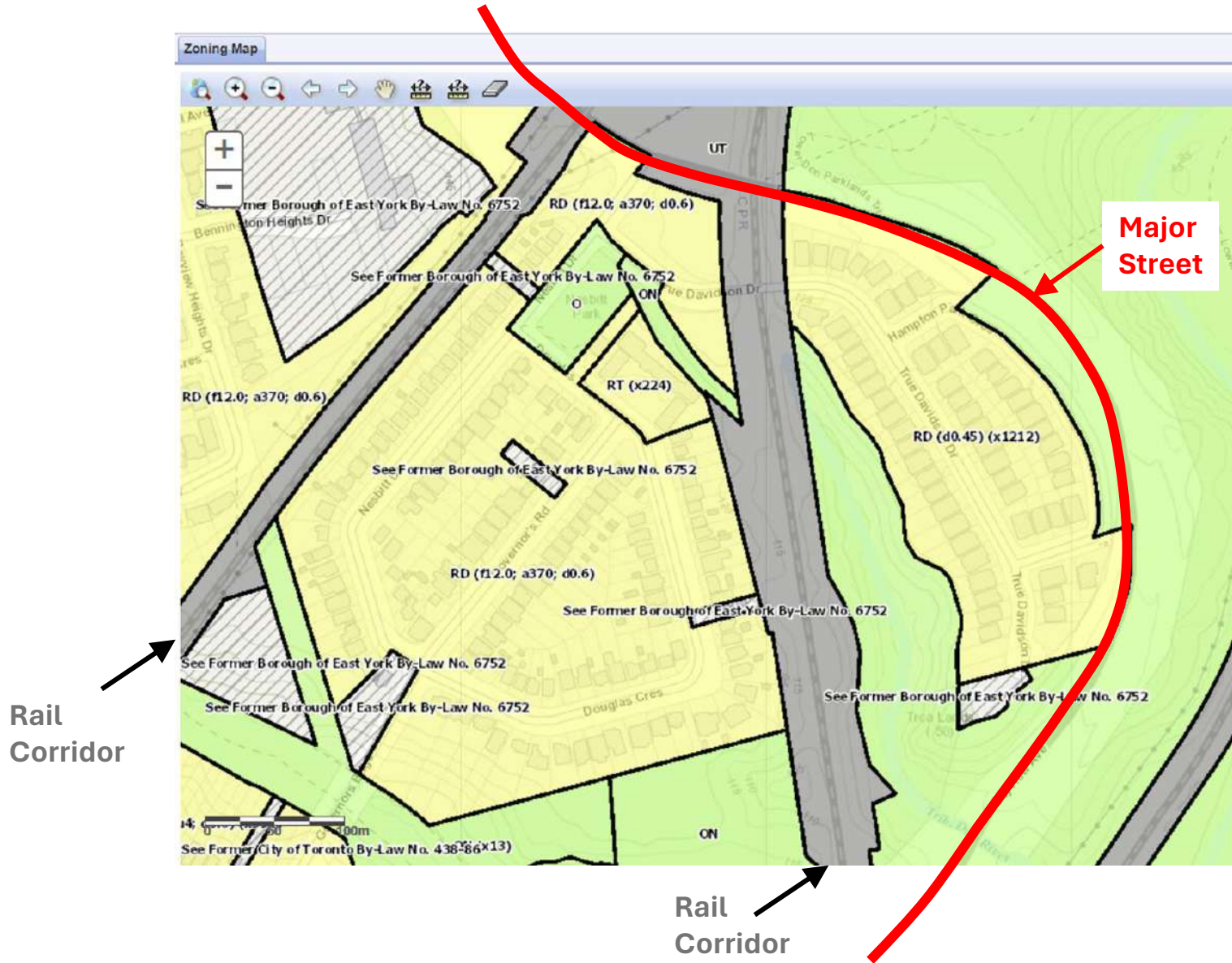




# City Map – Ravine Protection Bylaw

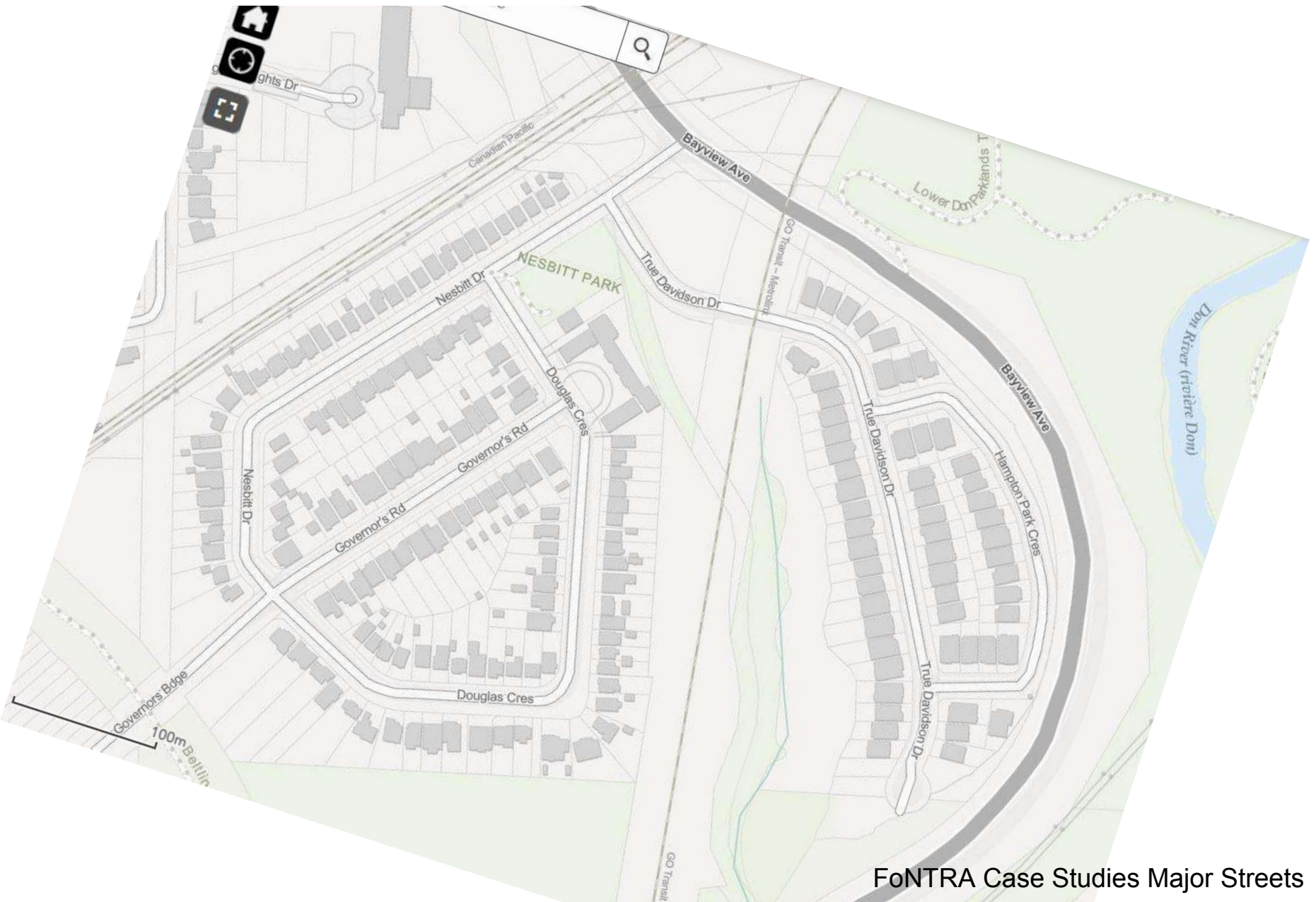


# City Zoning Map – Zoned Regions





# City Map of Governor's Bridge



# City Map with Opportunity Area Parcels



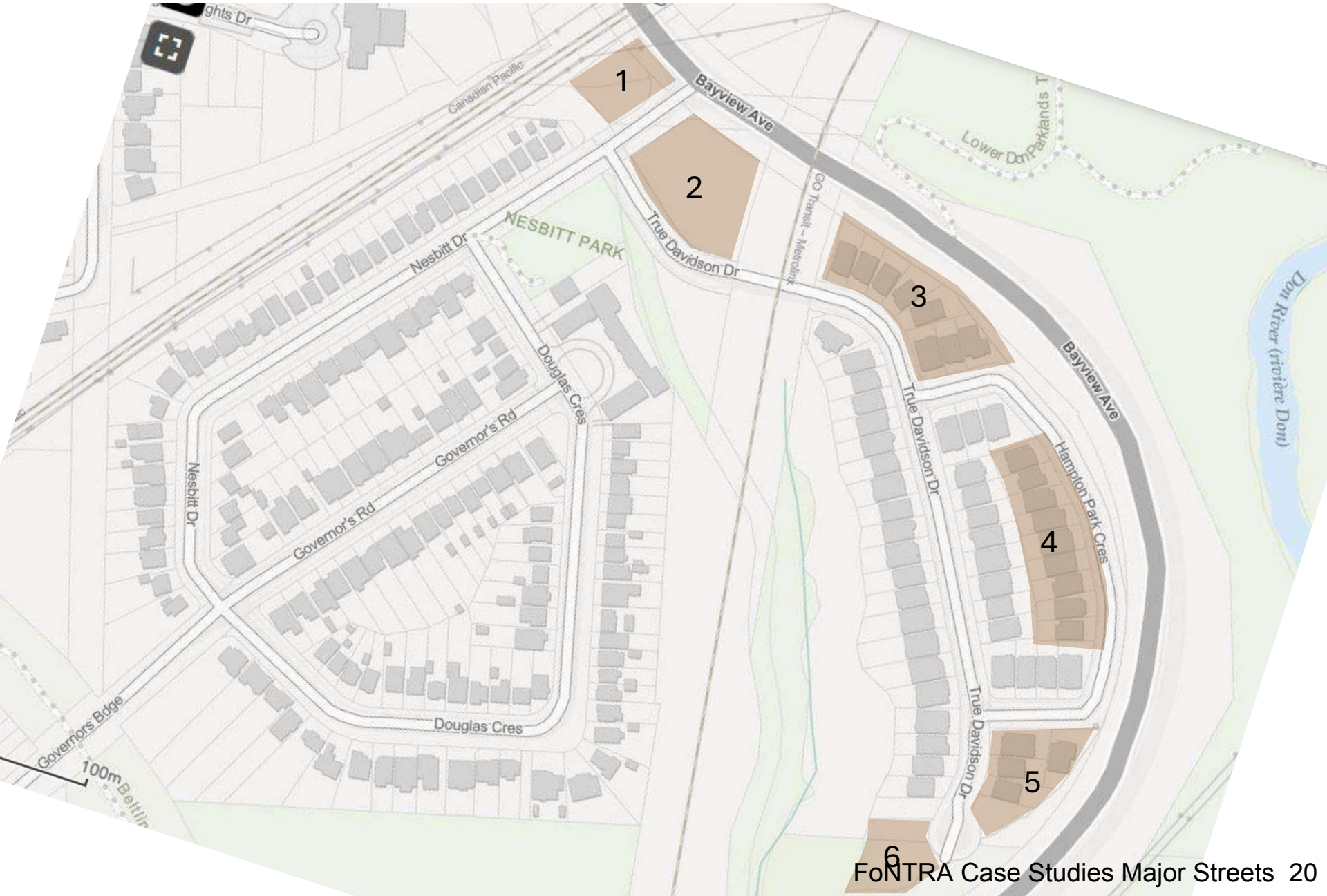
Note:

City shows  
Opportunity Area  
Parcels with poor  
resolution.

Specific lots are  
difficult to identify.  
See next page for  
better details



# City Map with Opportunity Parcels – Estimated Locations



# Analysis: Problems with City Proposal

- There are six parcel groups in the review area
  - Review area covered by Ravine Protection Bylaw
- Parcel Group #2
  - Does not abut the Major Street
  - Abuts the UT corridor
- Parcel Group #4
  - Dwellings do not abut the Major Street
- Parcel Groups #3, #5, #6
  - Access from Major Street is not feasible
  - Severe slope condition
  - High speed traffic on curved portion of Major Street

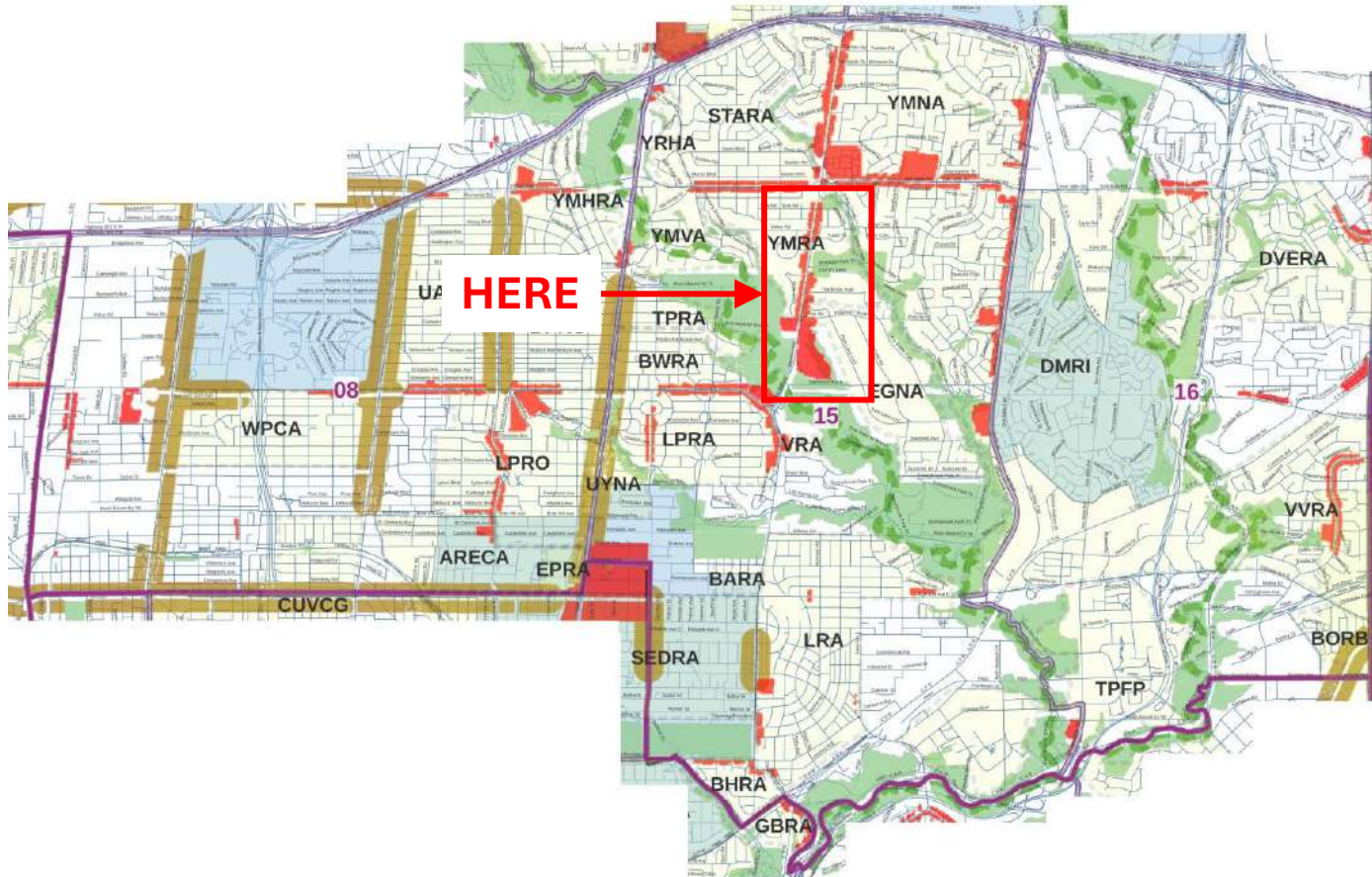
# Recommendation – Need to vet City Maps

- Parcel Maps provided by City are inadequate for analysis
  - Detailed analysis reveals various errors.
- Bayview extension is a Major Street, but the identified parcels should be excluded from this legislation, due to:
  1. Presence of Utility Corridors and Railway Bridges
  2. Severe slope in the proposed land parcels
  3. Severe curvature of the street ... blind curve
  4. Severe slope of the street ... dangerous driving conditions in winter
  5. Street is used as motor speedway ... no stoplights
- Consider excluding streets with similar conditions.

# Major Streets Study

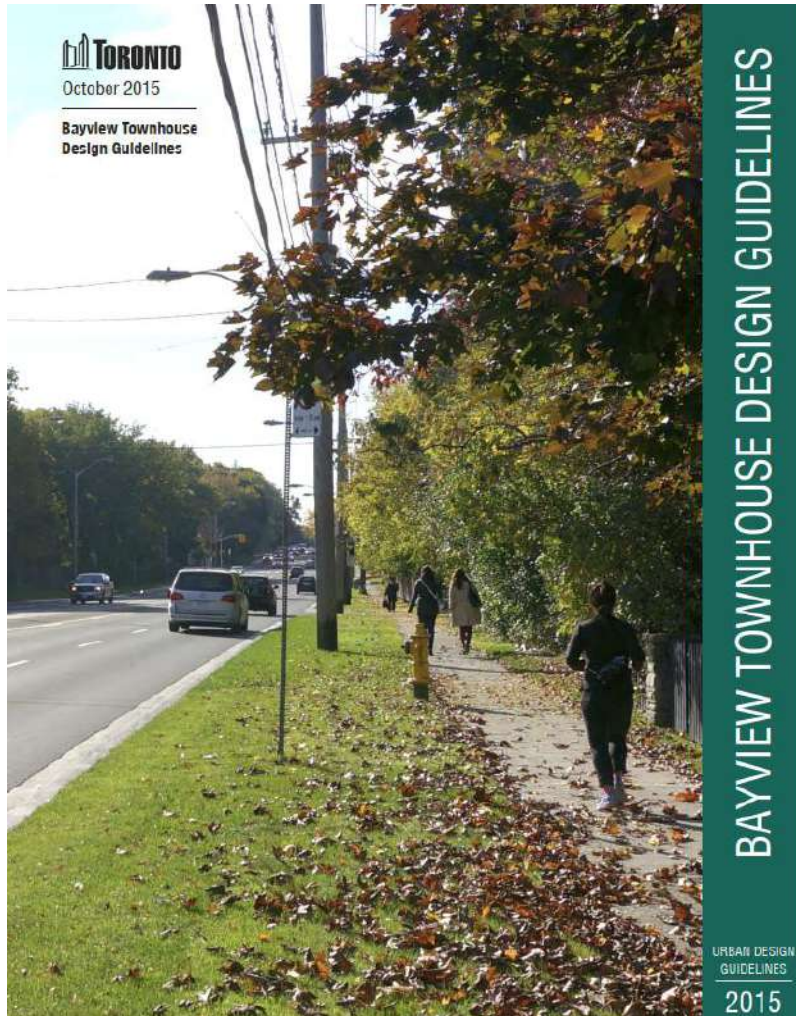
Problems with Bayview (York Mills)

# Where is Bayview (York Mills)?





# Bayview Townhouse Design Guidelines



- Bayview Avenue near the intersection of York Mills is a unique area
  - High volume of traffic
  - Wide Right-of-Ways
  - Many schools and recreation buildings
- City established townhouse guidelines after much consultation
- Townhouse guidelines work and should remain a foundational document for development



# Study Map of Bayview (York Mills)



# City Map of Bayview (York Mills)



# City Map with Opportunity Area Parcels





# City Map with Opportunity Area Parcels & Study Overlay



# Analysis: Problems with City Proposal

- The City proposal will over-ride the existing guidelines for townhouse development on this Major Street
- The townhouse guidelines are superior:
  - Address fifteen guiding principles appropriate for the neighbourhood
  - Consider the context of the neighbourhood
  - Provide guidelines based on shallow, medium and deep sites. Note there are many deep sites.

# Recommendation – Retain Existing Guidelines

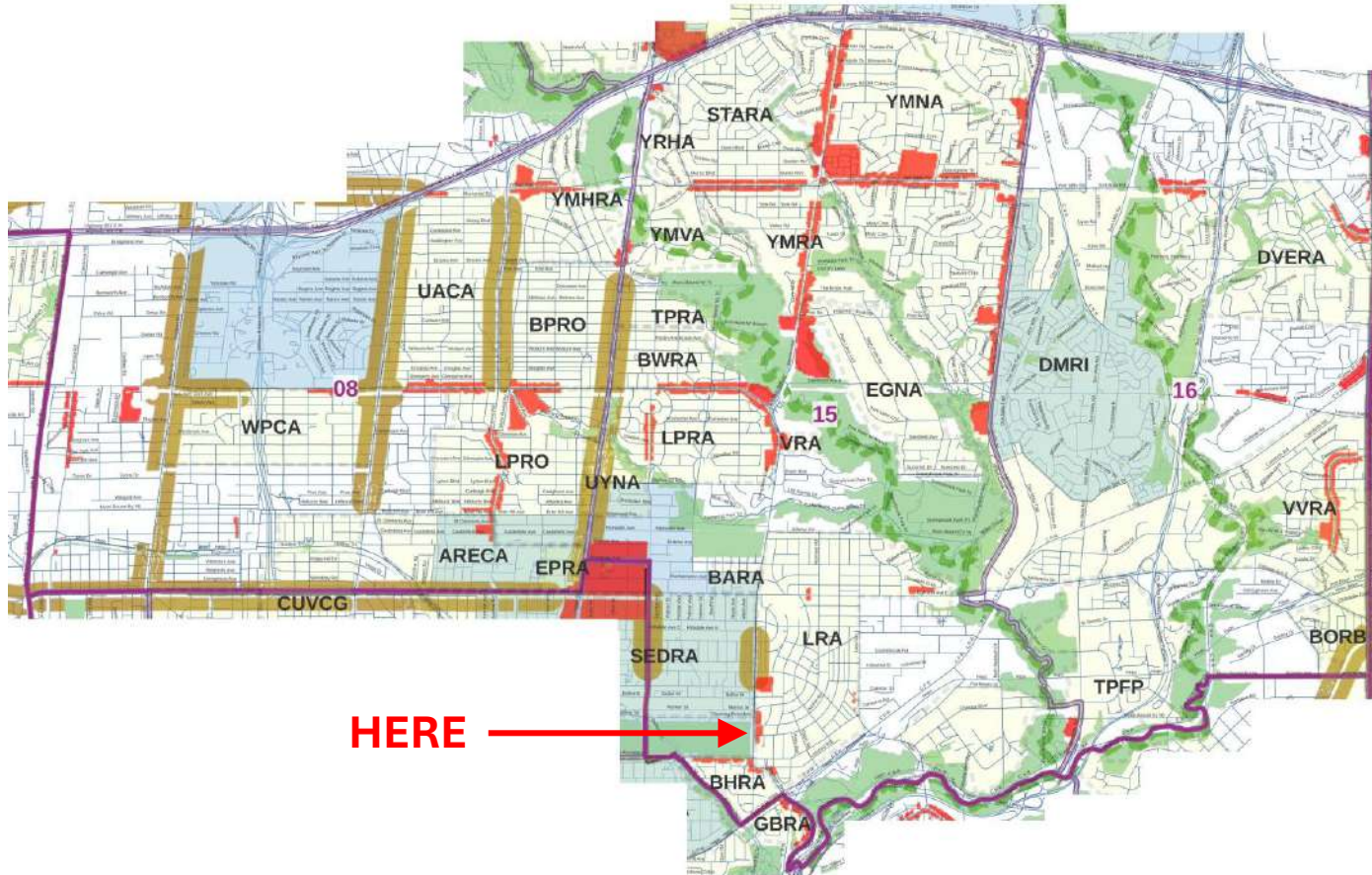
- City-wide analysis for Major Streets is driven by Major Street maps
  - The Bayview-York Mills guidelines are supported by detailed planning work and community consultations
  - The Bayview-York Mills study can be considered the gold standard as it reflects the neighbourhood context
- Recommendation:
  - The Major Street Study excludes areas covered by existing Secondary Plans
  - The Bayview Townhouse Design Guidelines should be given the same status as a Secondary Plan.
  - The City's proposal with respect to Apartment built form could proceed as an overlay for this Major Section although an additional detailed study would be the ideal solution.



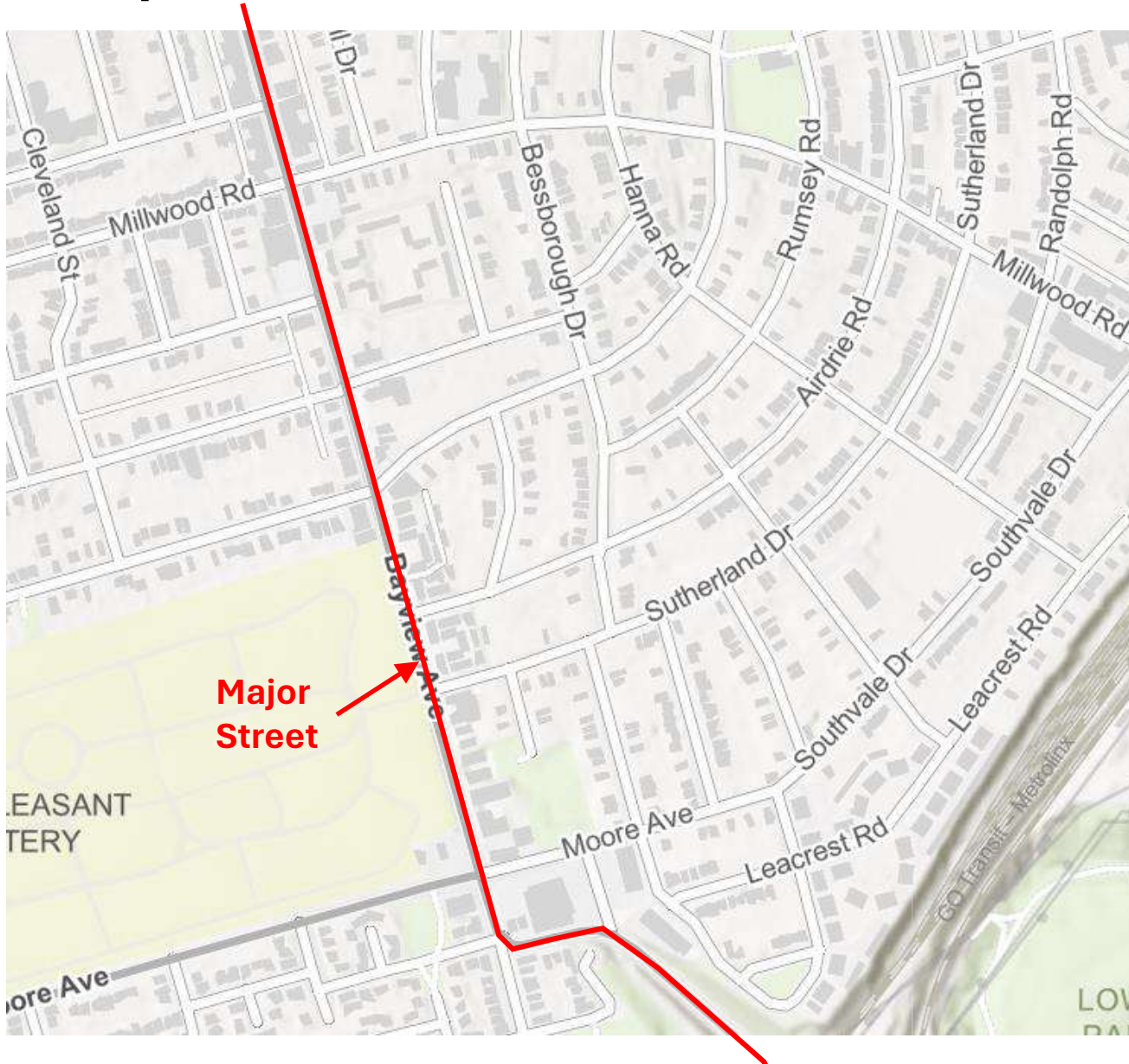
# Major Streets Study

## Problems with South Leaside

# Where is South Leaside?

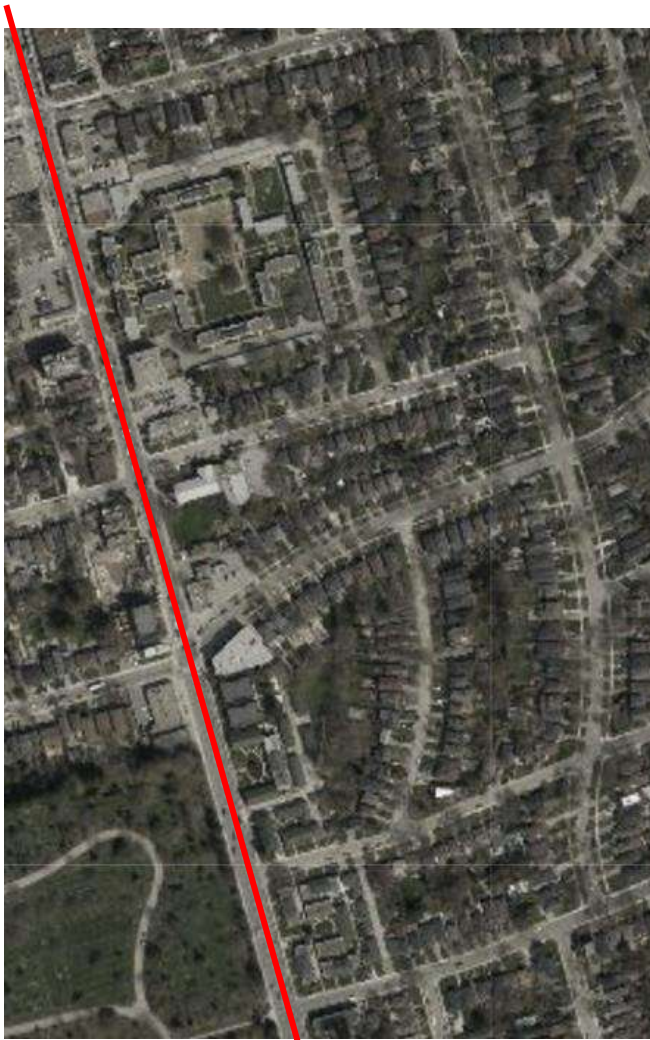


# City Map of South Leaside





# Aerial view – South Leaside





# City Zoning Map – Zoned Regions

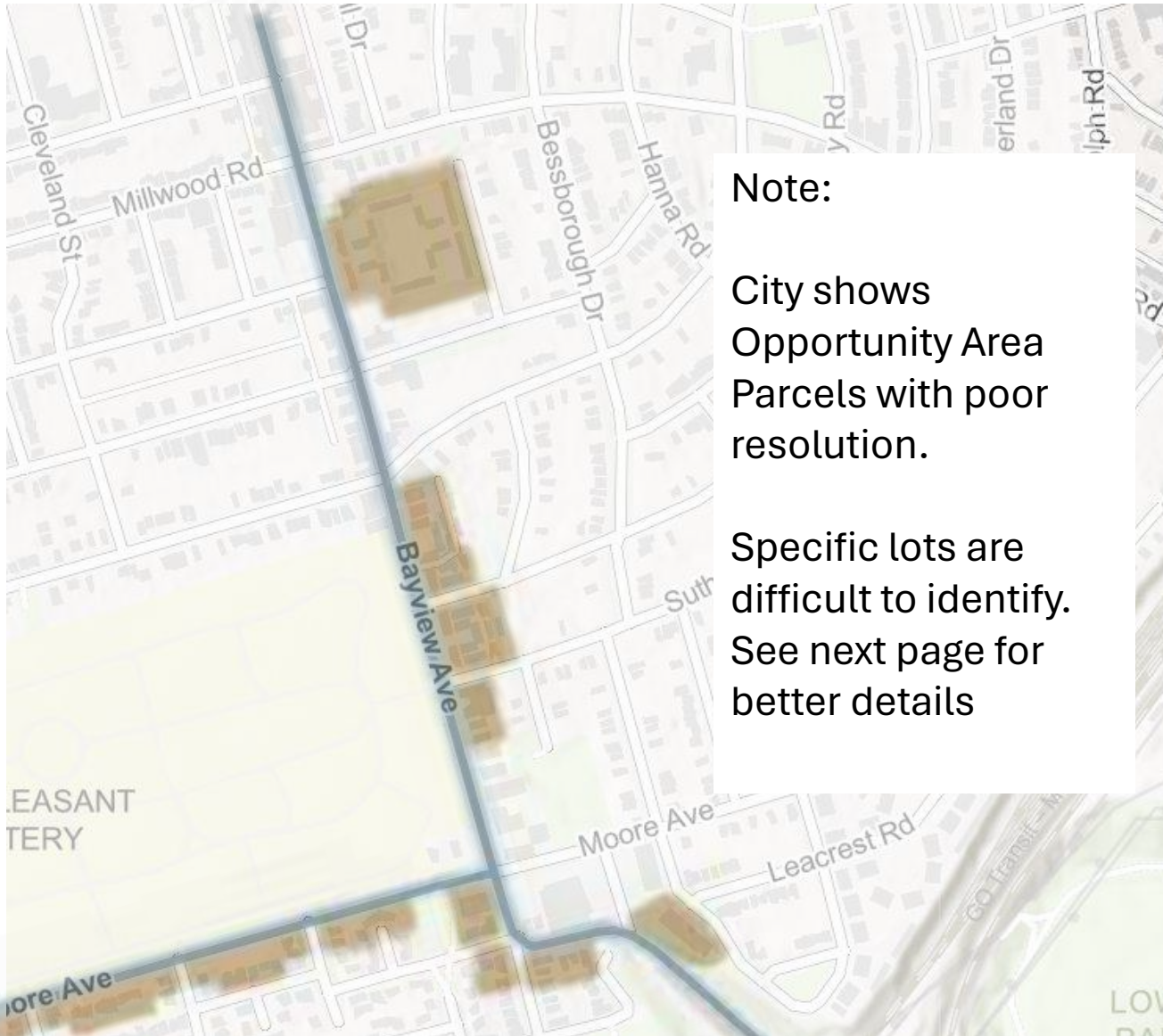


# City Map – Ravine Protection Bylaw

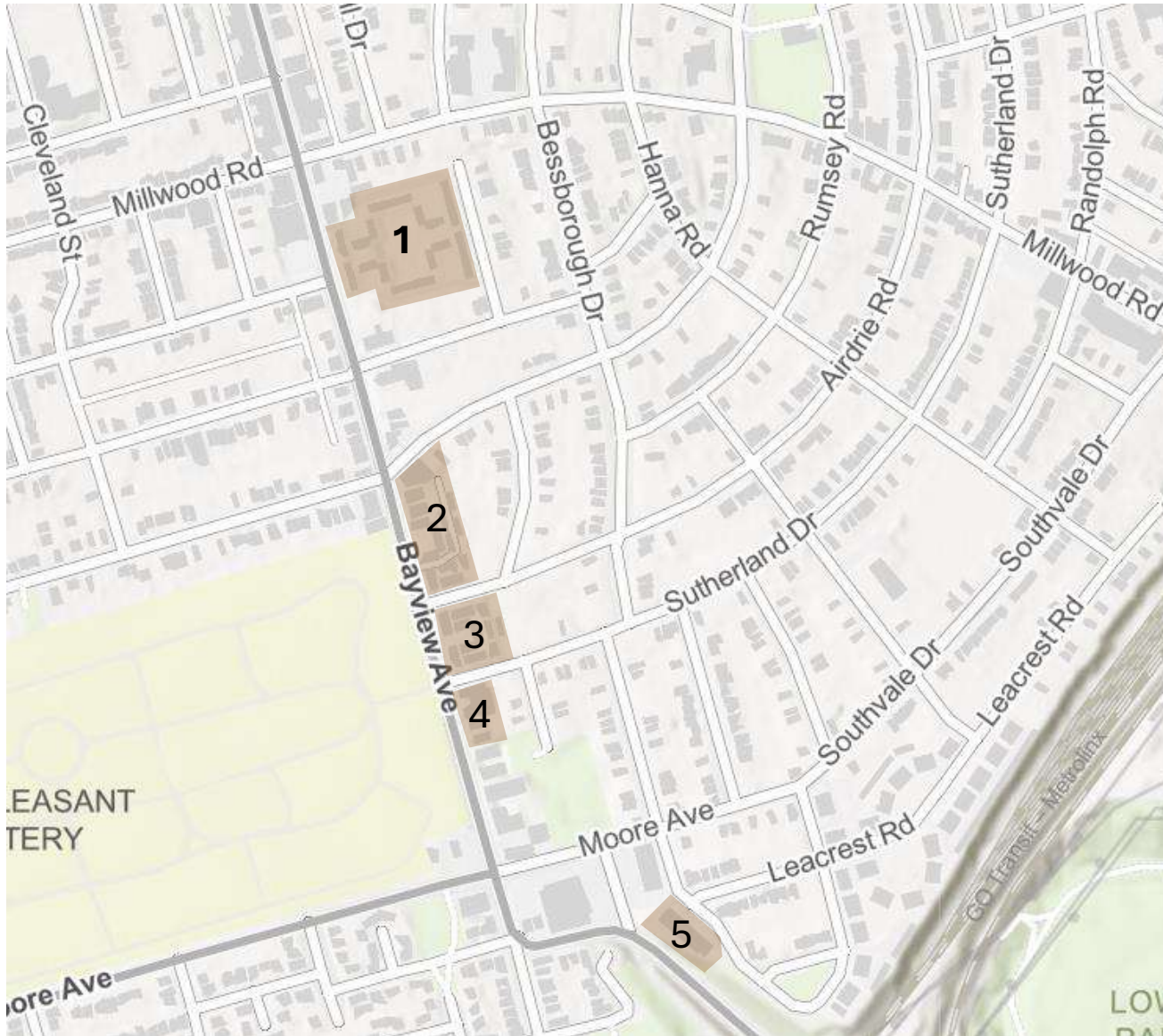




# City Map with Opportunity Area Parcels



# City Map of South Leaside





# Analysis: Problems with City Proposal

- There are five parcel groups in the review area
- Parcel Group #1
  - Heritage Registered Part IV
- Parcel Groups #2 and #3
  - Heritage Registered Part IV
- Parcel Group #5
  - Access from Major Street is not feasible
  - Severe slope condition
  - Covered by Ravine and Natural Protection Bylaw

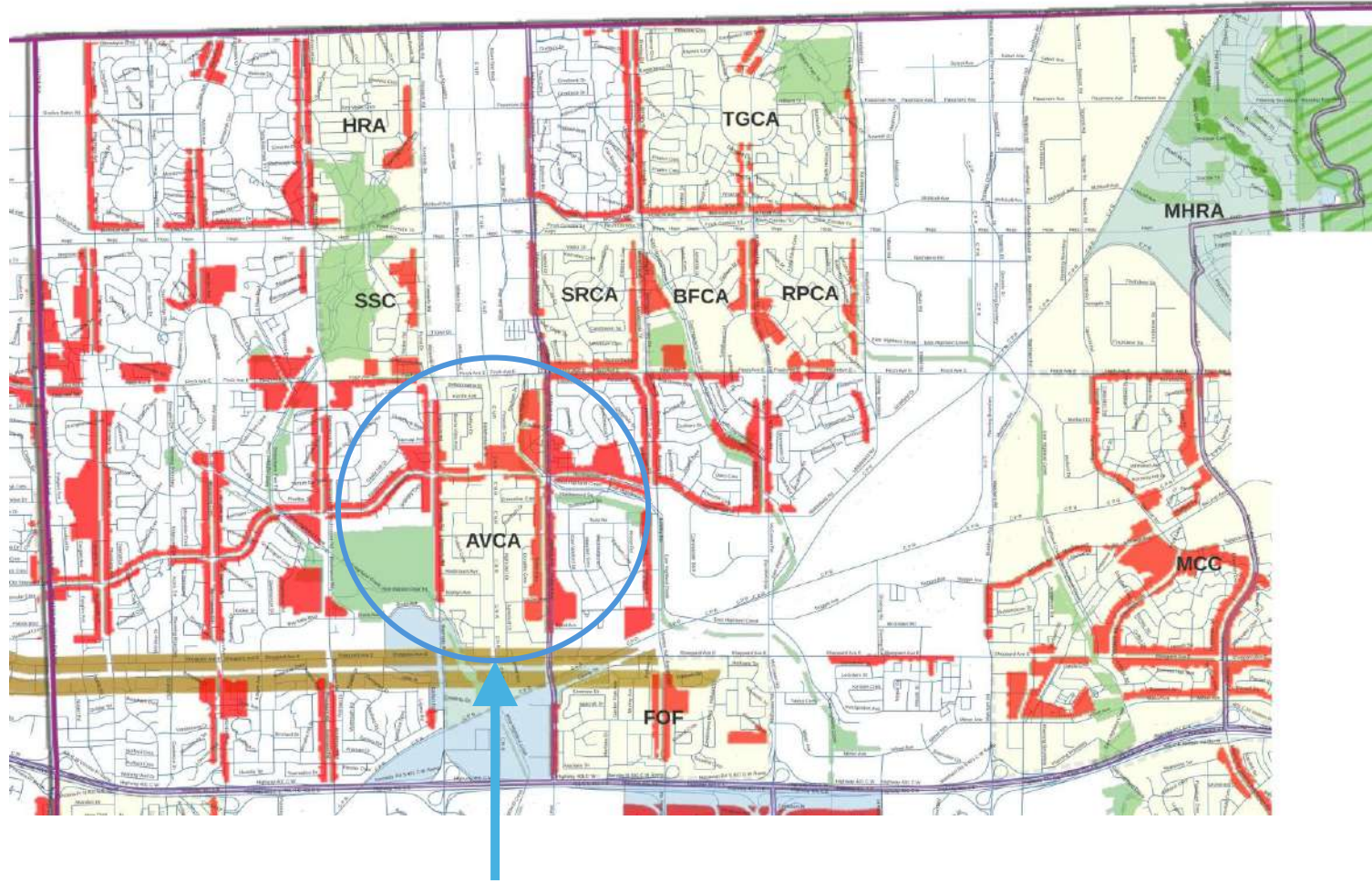
# Recommendation – Need to vet the City Map

- Parcel Maps provided by City are inadequate for analysis
  - Detailed analysis reveals various errors.
- Existing Bylaws have not been considered:
  1. Several Parcels are Heritage Registered
    - These properties are large apartment complexes
  2. One Parcel is covered by the Ravine Protection Bylaw
- **Recommendation:**
  - Published City maps for opportunity areas are not reliable for planning purposes
  - A more reliable method to identify eligible properties needs to be made available.

# Major Streets Study

Problems with Agincourt Village

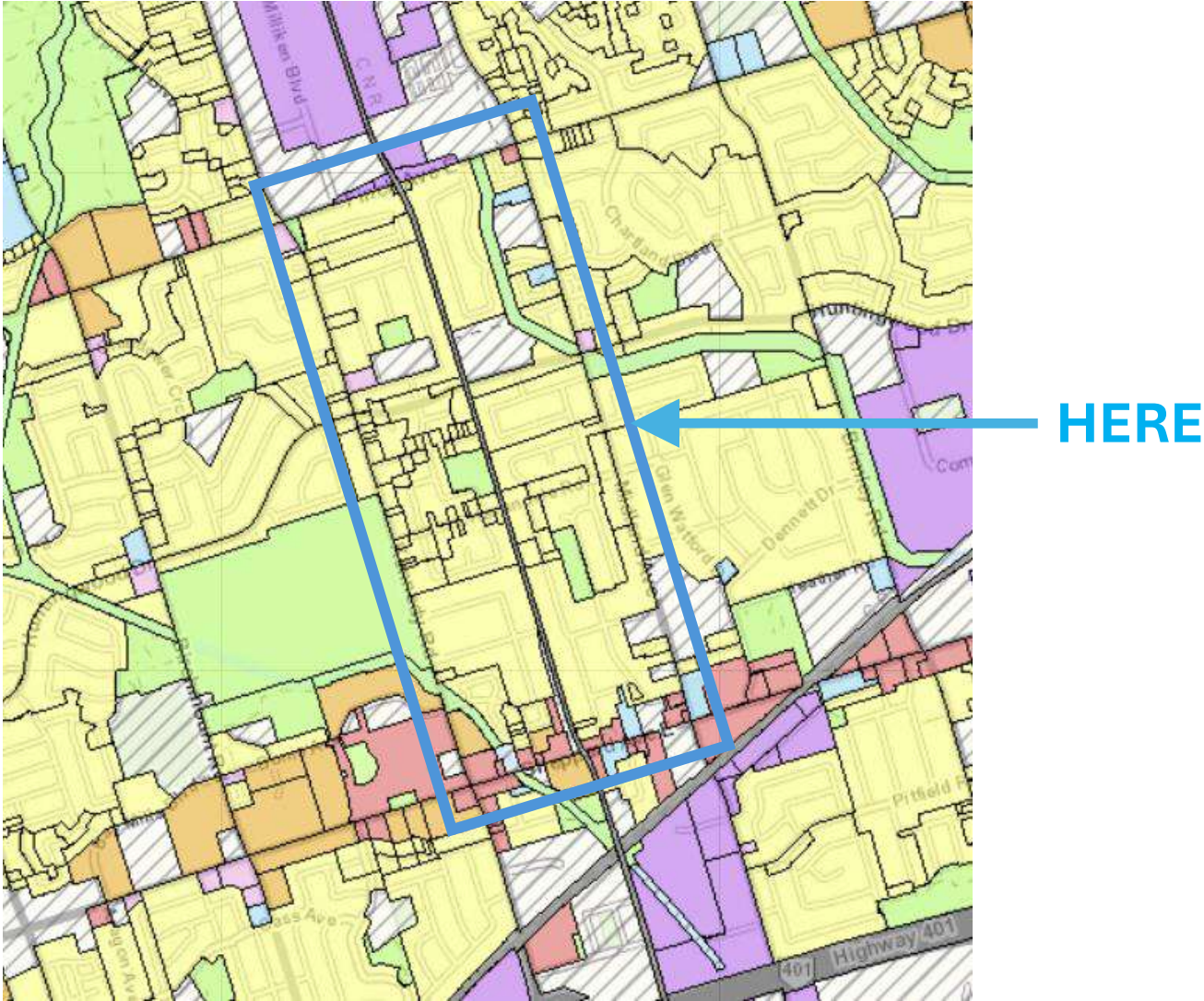
# Where is Agincourt Village?



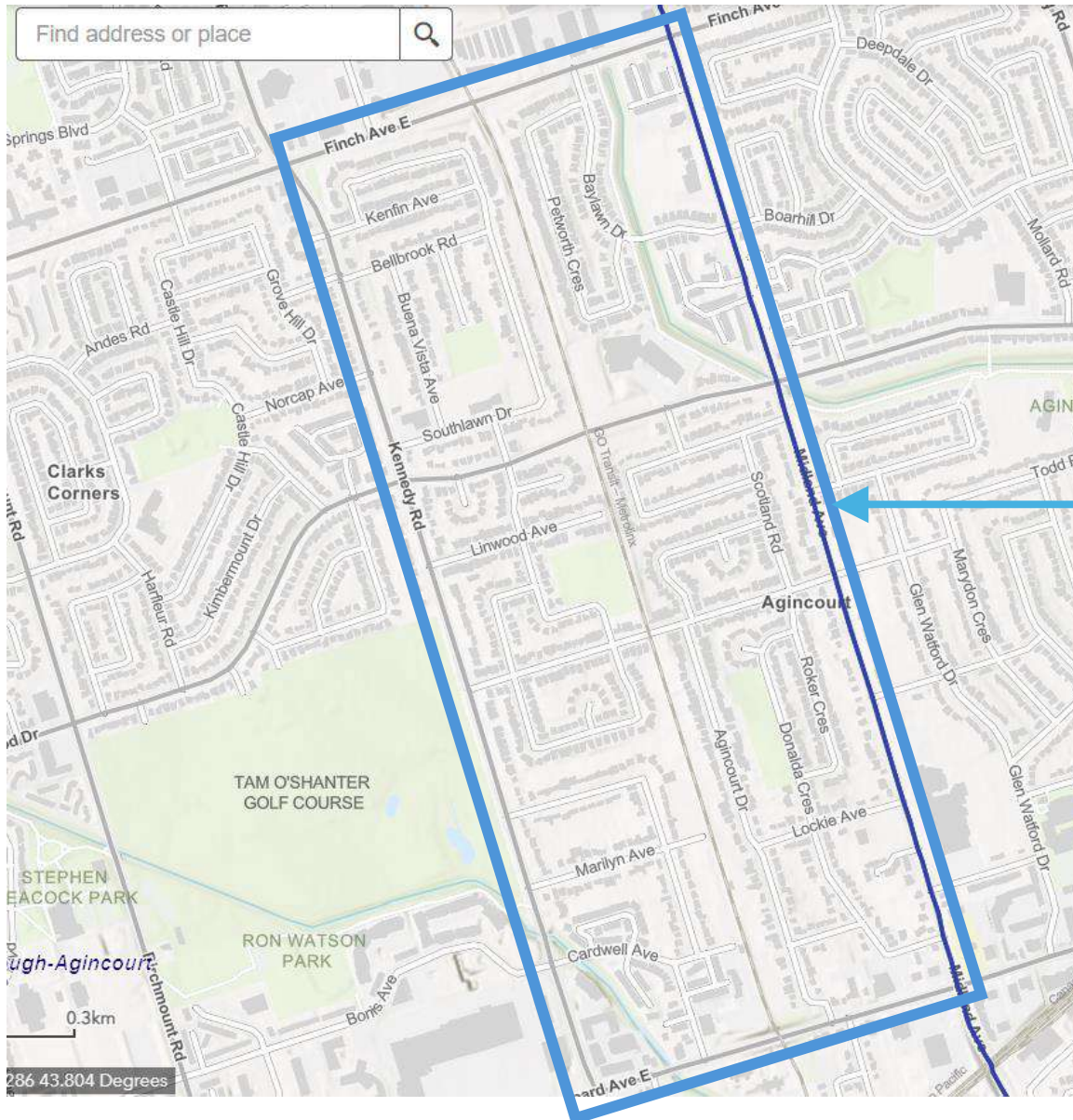
HERE



# City Zoning Map – Zoned Regions



# City Map of Agincourt Village



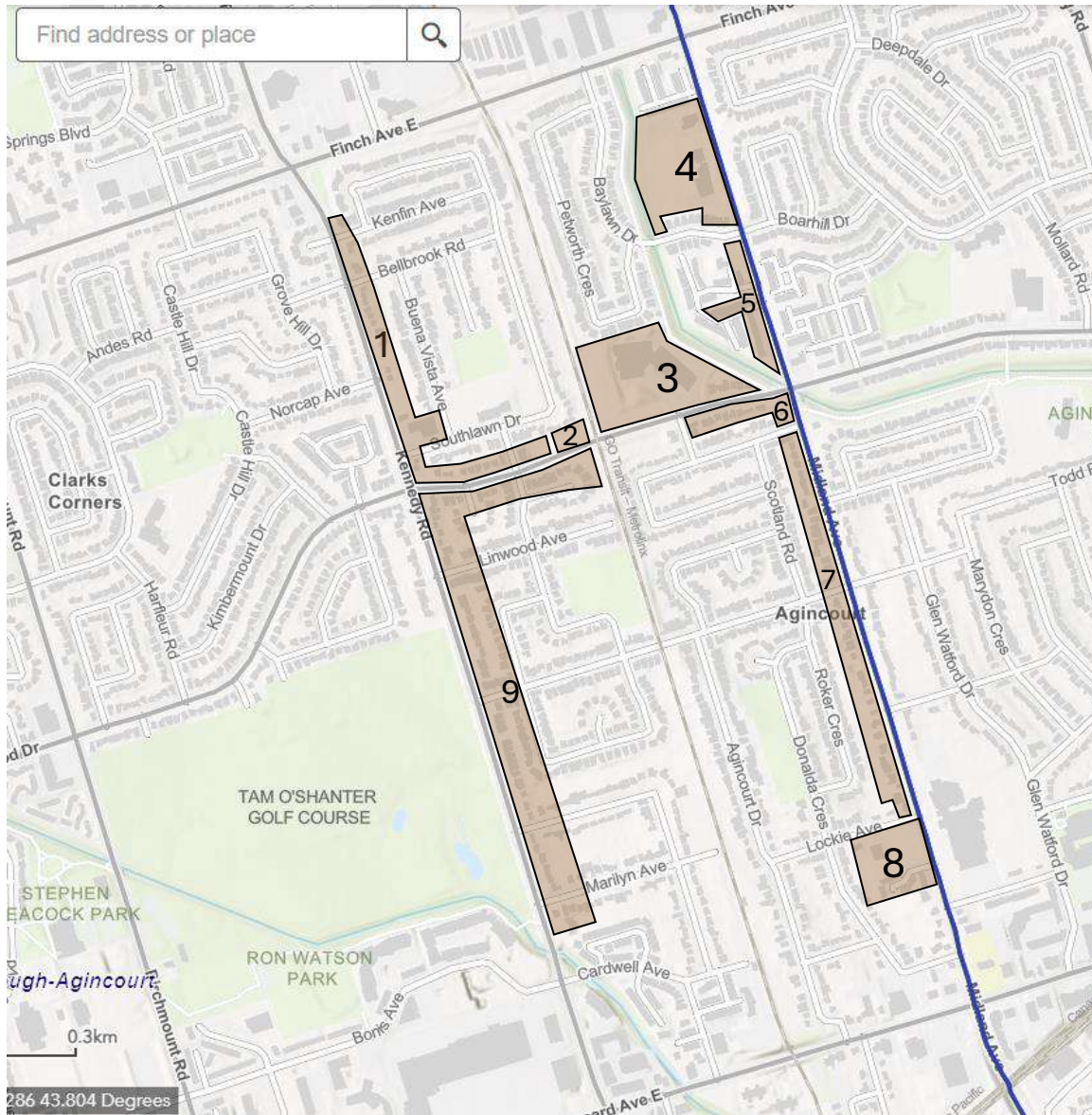
HERE



# City Map with Opportunity Areas



# City Map with Opportunity Areas (Redrawn)





# Analysis: Problems with City Proposal

- Parcel Group #1
  - Small segment – west side of the street
- Parcel Group #2
  - Small lot has the following zoning exception RD x 943
- Parcel Group #3
  - Large Lot - Zoned under Agincourt Community Bylaw 12797 (High School property)
- Parcel Group #4
  - Large Lot - Zoned under Agincourt Community Bylaw 12797
- Parcel Group #5
  - Our review shows that the parcel is much smaller than shown on the City map.

# Analysis: Problems with City Proposal

- Parcel Group #6
  - Small segment – south side of the street
- Parcel Group #7
  - Long segment – south side of the street
- Parcel Groups #8
  - Large Lot - Zoned under Agincourt Community Bylaw 10076
- Parcel Group #9
  - Long segments – west side of Kennedy Road and south side of Huntingwood Drive

# Recommendation – Need to vet the City Map

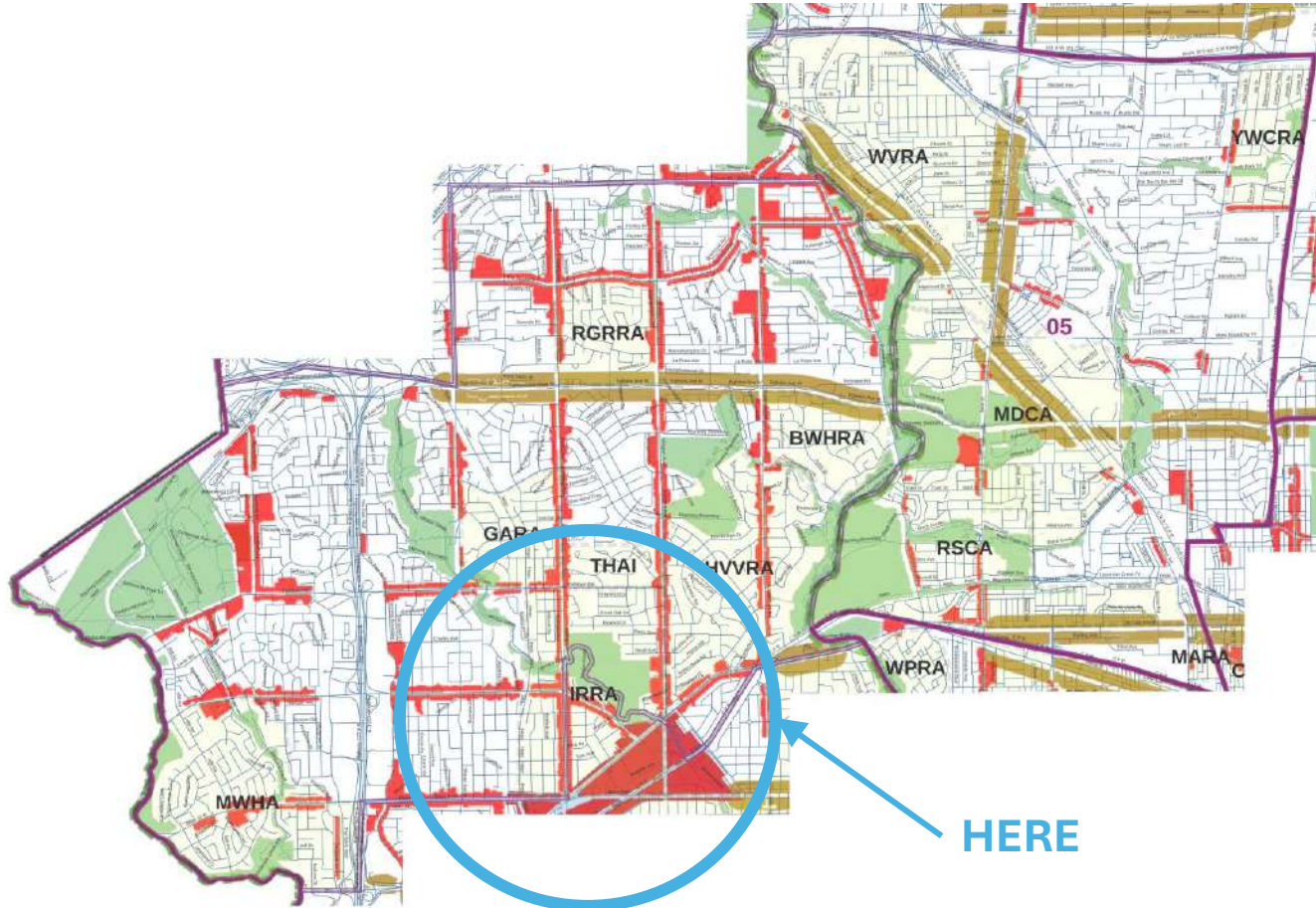
- Parcel Maps provided by City are inadequate for analysis
  - Detailed analysis can reveal various problems
- Existing Zoning conditions not properly represented:
  - Parcels should not include Community Bylaw 10076 or 12767 areas.
  - Parcels with Zoning exceptions should not be included.
- **Recommendation:**
  - Published City maps are opportunity areas are not reliable for planning purposes
  - A more reliable method to identify eligible properties needs to be made available.

# Major Streets Study

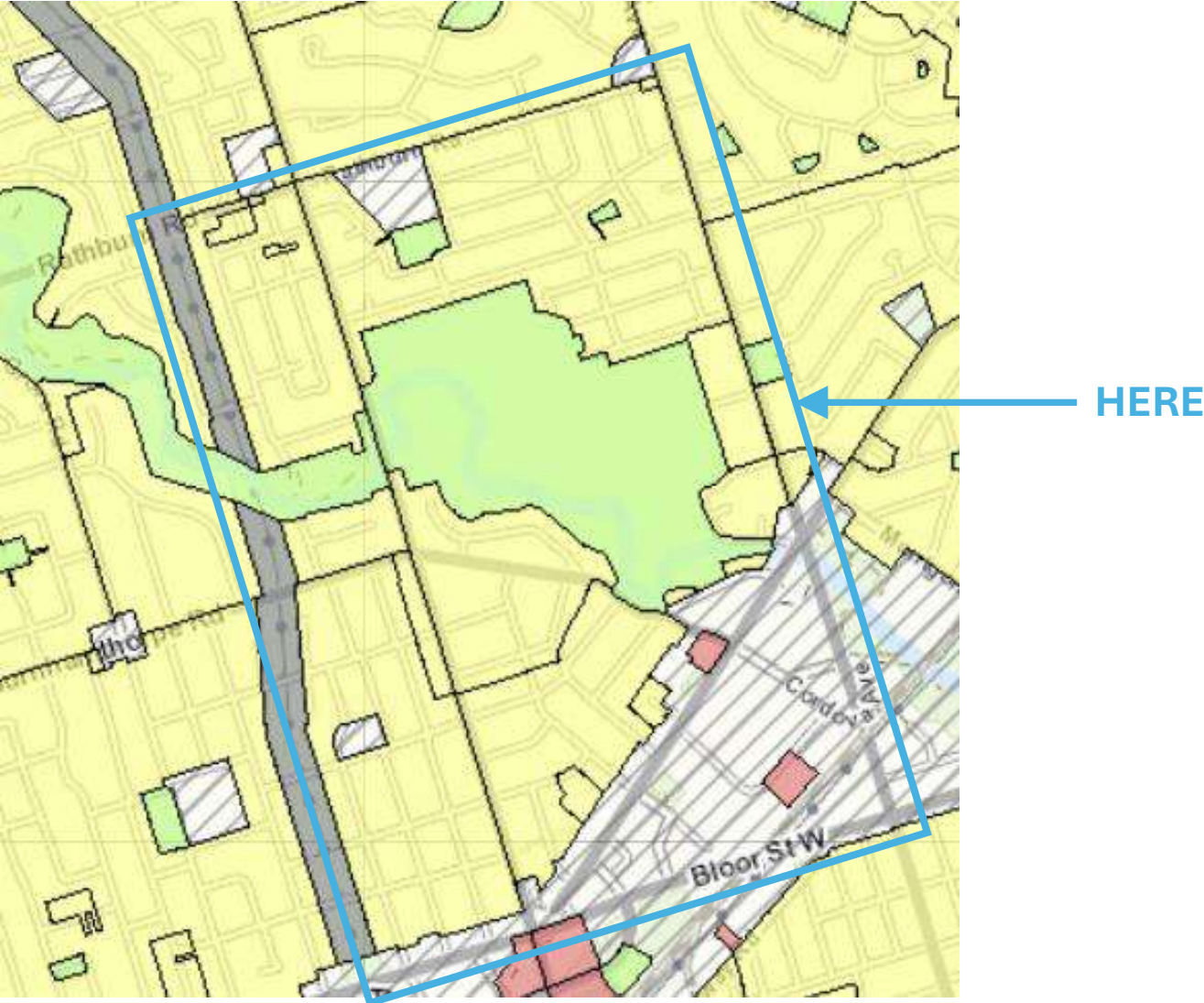
## Problems with Islington



# Where is Islington?

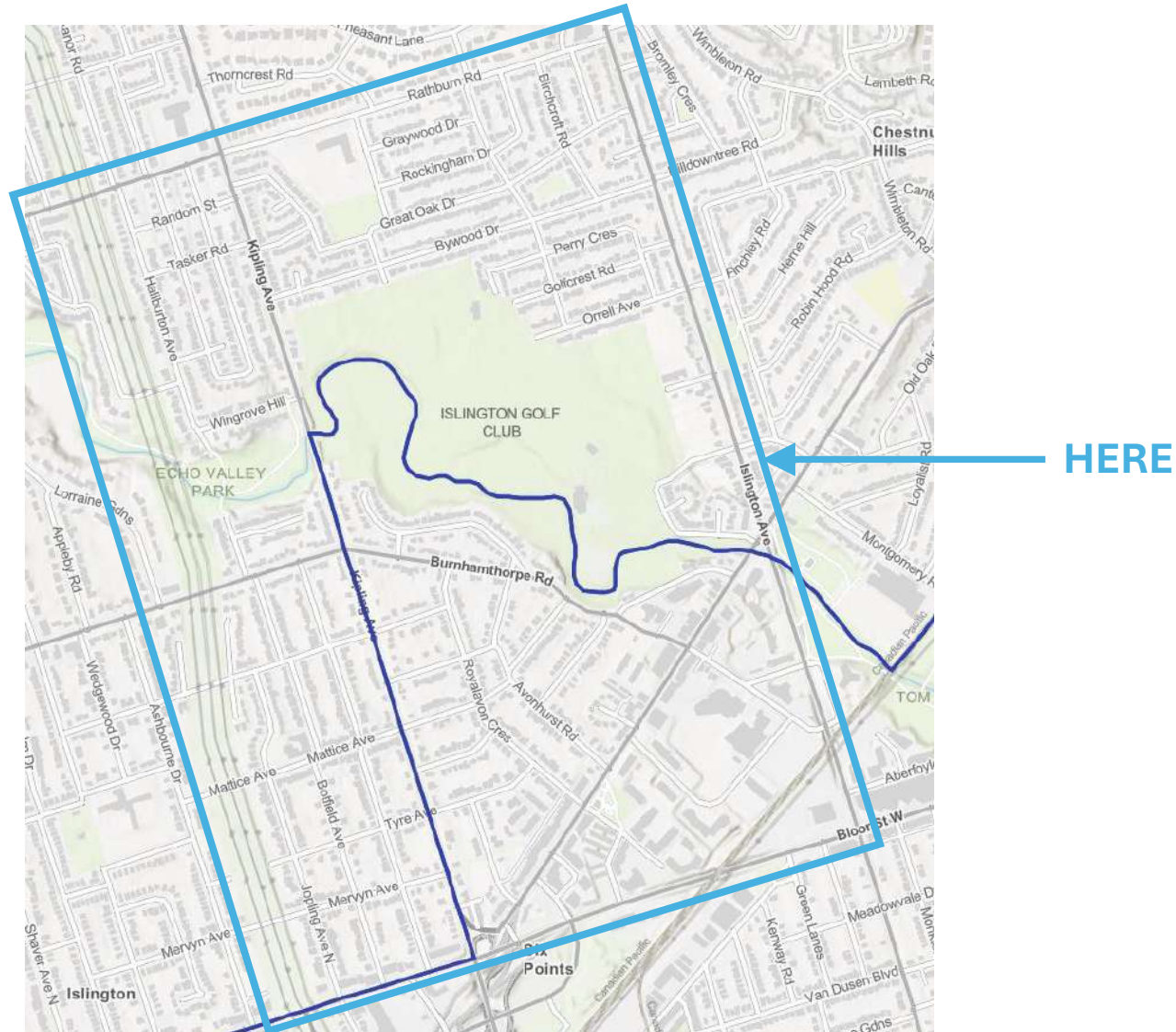


# City Zoning Map – Zoned Regions

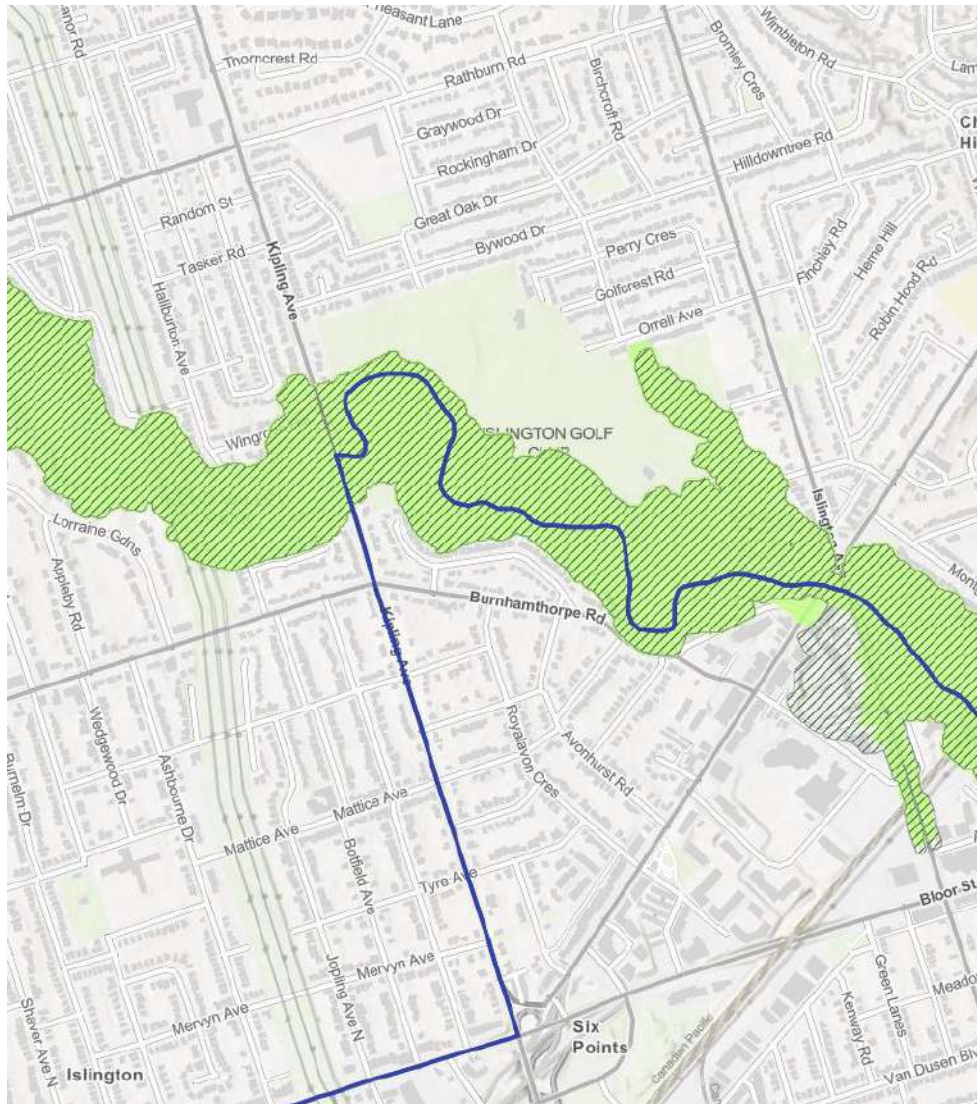




# City Map of Islington

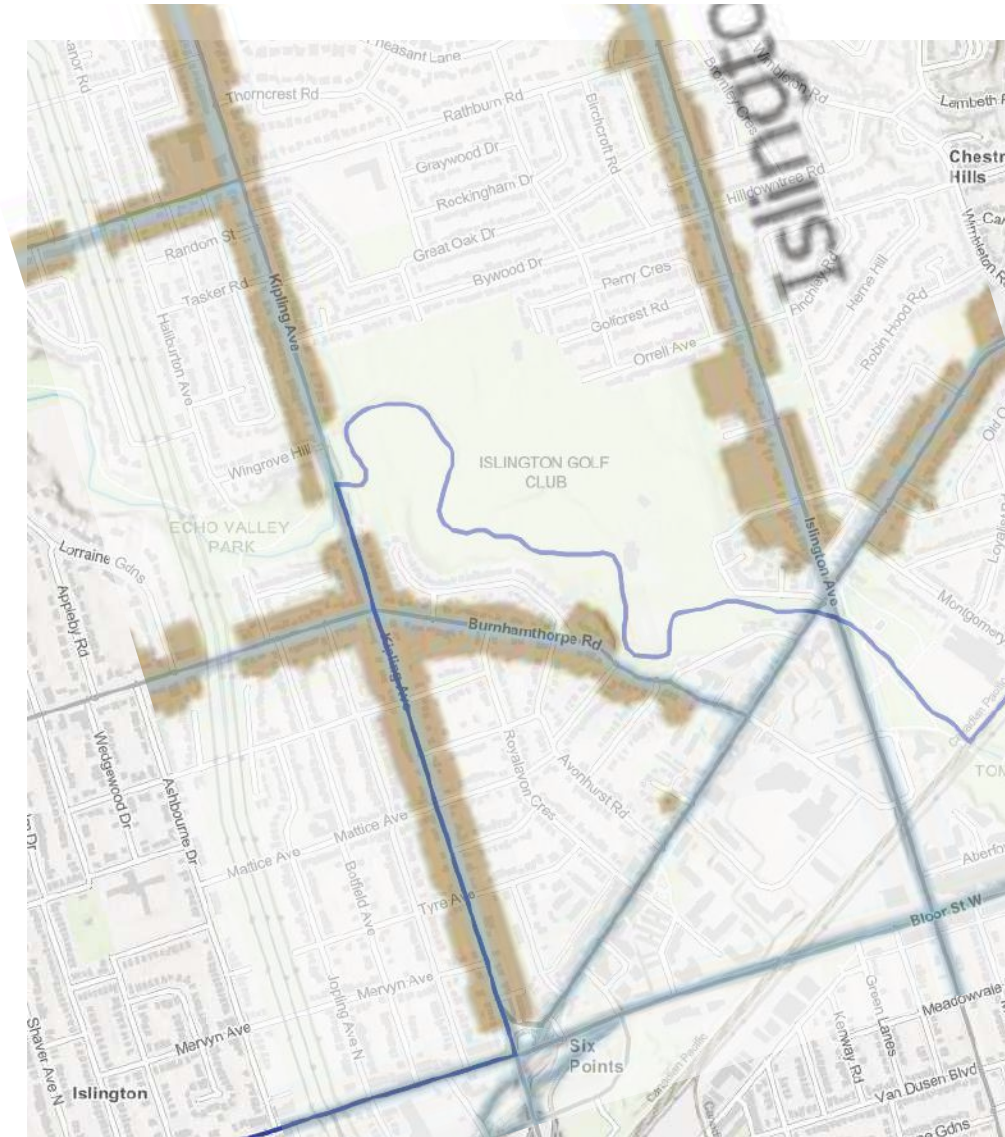


# City Map of Islington with Ravine Area





# City Map with Opportunity Area Parcels



**Note:**

City shows Opportunity Area Parcels with poor resolution.

Specific lots are difficult to identify. See next page for better details

# City Map with Opportunity Area Parcels



# Analysis: Problems with City Proposal

- Parcel Group #1a and #1b
  - Lots on Fairway Road are excluded from the proposed regulations
  - Portion of the Lots near #1b are partially under the Ravine Protection bylaw and should also be excluded
- Parcel Group #2
  - Long segment – west side of the street
- Parcel Group #3
  - Long segment – northerly side of the street
- Parcel Group #4
  - Long segment – southerly side of the street
- Parcel Group #5
  - Long segment – west side of the street

# Recommendation – Need to vet the City Map

- Parcel Maps provided by City are inadequate for analysis
  - Detailed analysis can reveal various problems
- Existing Zoning conditions not properly represented:
  - Parcels should not include areas covered by Ravine Protection bylaws
- **Recommendation:**
  - Published City maps for opportunity areas are not reliable for planning purposes
  - A more reliable method to identify eligible properties needs to be made available.



# Major Streets Study

## Problems with Cliffcrest

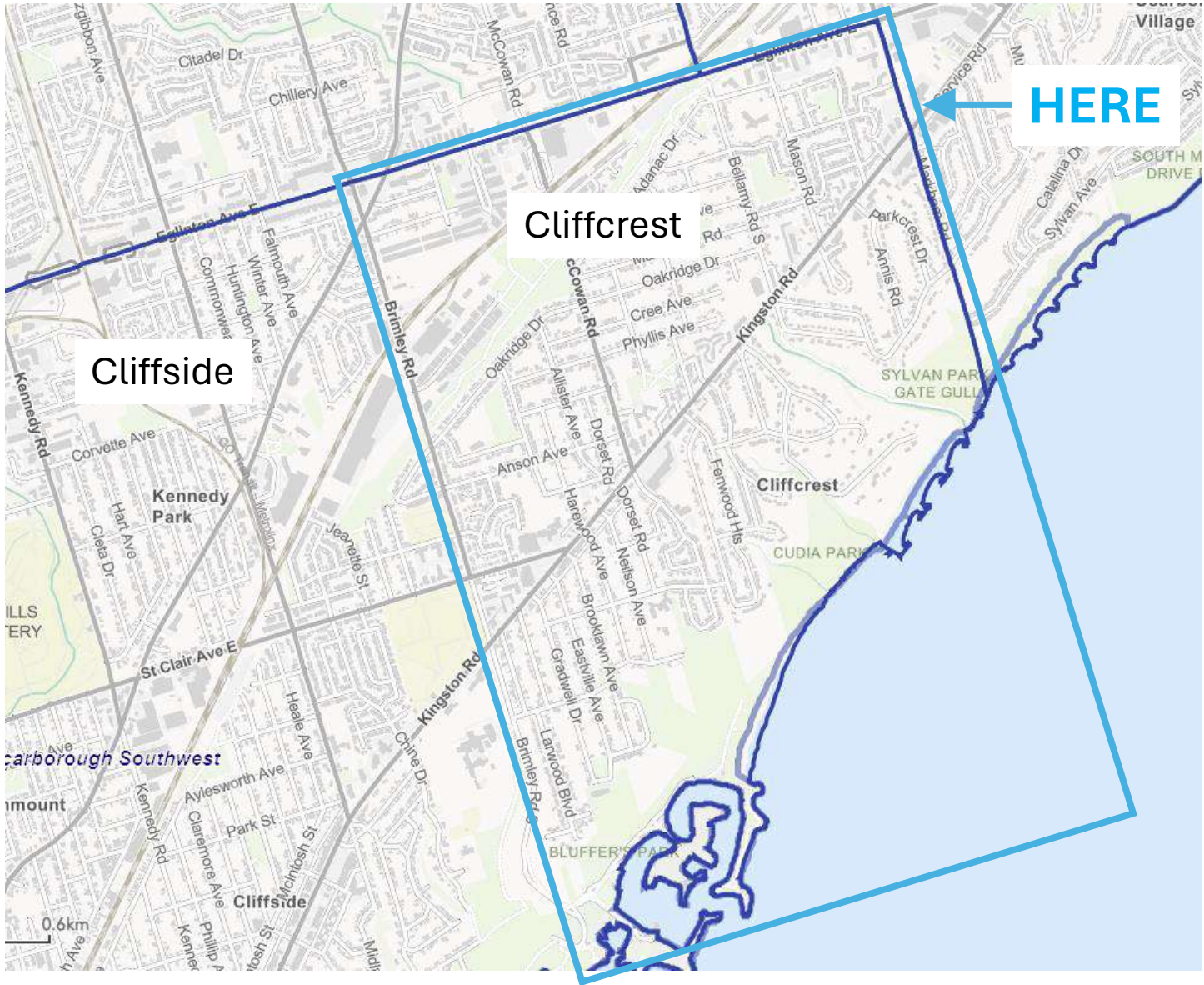
# Where is Cliffcrest?





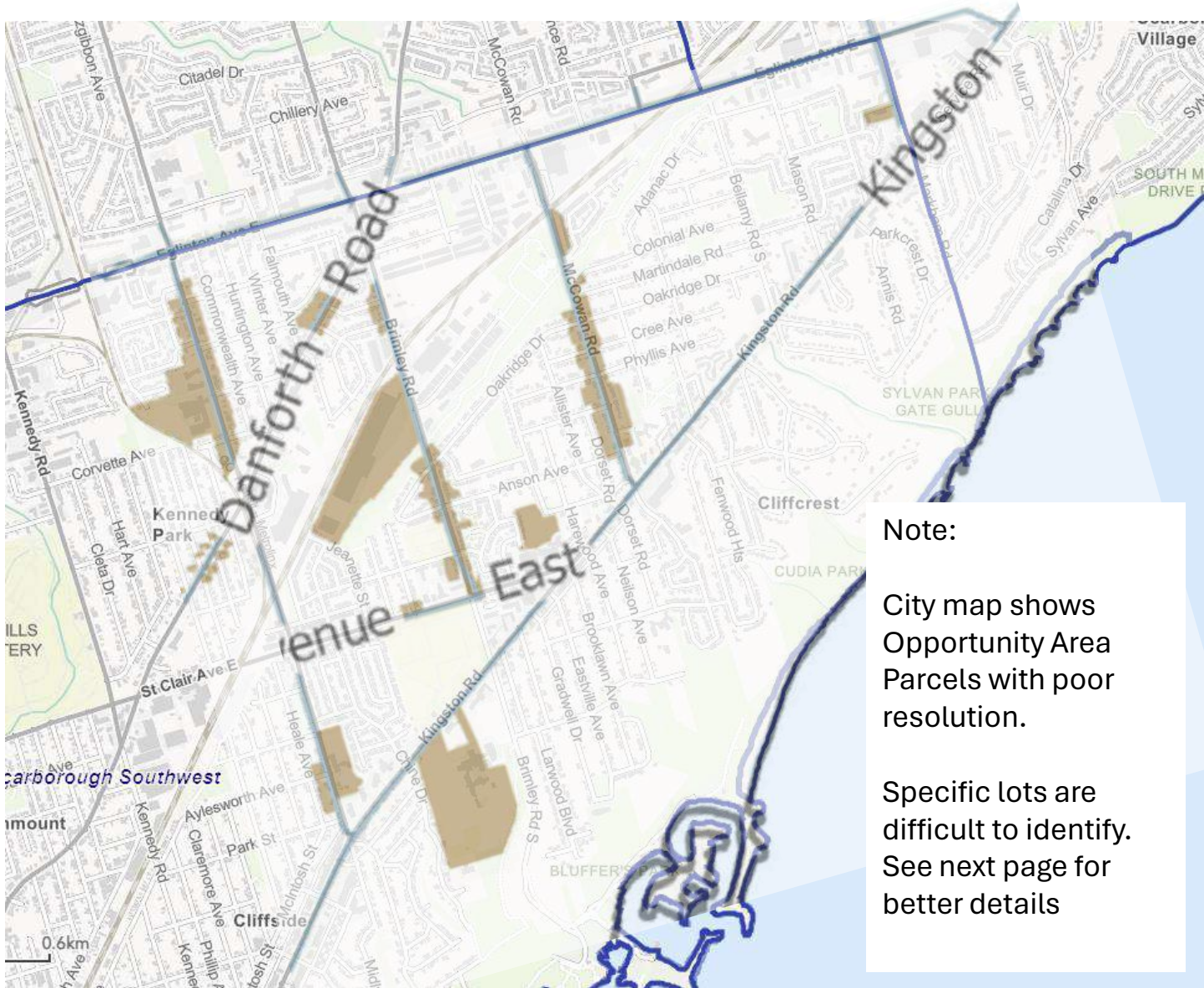


# City Map of Cliffcrest

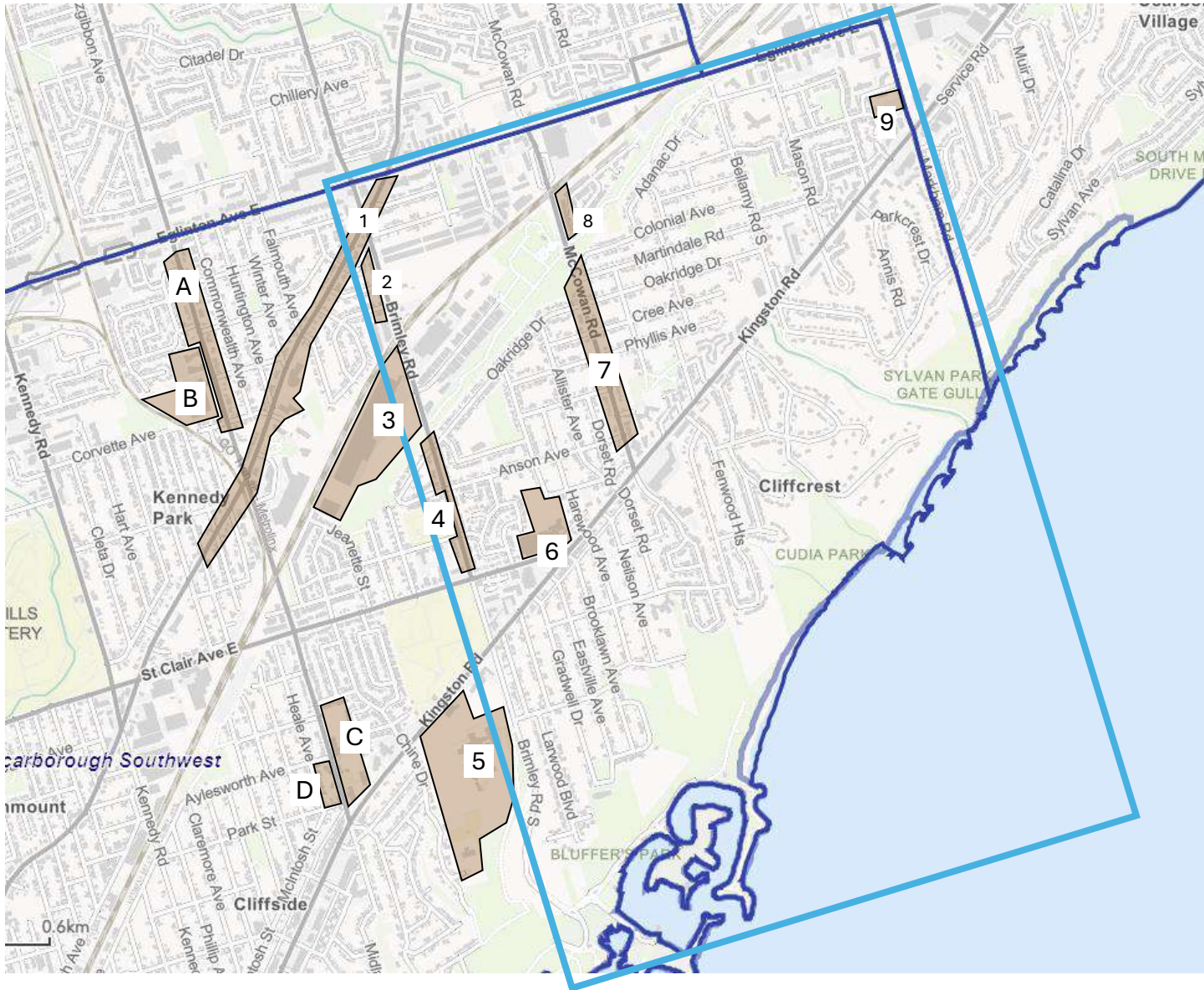




# City Map with Opportunity Area Parcels



# City Map with Opportunity Area (Redrawn)





# Analysis: Problems with City Proposal

- Parcel Group #1
  - Properties hidden behind “Danforth Road” map label
- Parcel Group #2
  - Small segment – west side of the street
- Parcel Group #3
  - Large lot is zoned ‘Employment Industrial’
- Parcel Group #4
  - Small segment – both sides of the street
- Parcel Group #5
  - Large lot is zoned ‘Institutional’

# Analysis: Problems with City Proposal

- Parcel Group #6
  - Large lot – Zoned under Cliffcrest Community Bylaw 9396
  - Not included the current proposal
- Parcel Groups #7
  - Small segment – both sides of the street
- Parcel Group #8
  - Small segment – existing townhouse complex (RT Zone)



# Analysis: Problems with City Proposal

- Parcel Group #A
  - Small segment – both sides of the street
- Parcel Group #B
  - Two large lots not zoned for Neighbourhoods
- Parcel Group #C
  - Large lot – Zoned under Cliffcrest Community Bylaw 9396
- Parcel Group #D
  - Small segment – west side of the street
  - Not that RS Zone area on Midland Ave has been excluded.

# Recommendation – Need to vet the City Map

- Parcel Maps provided by City are inadequate for analysis:
  - Detailed analysis can reveal various problems
- Existing Zoning conditions not properly represented:
  - Parcels should not include ‘Institutional’ and ‘Employment Industrial’ and Community Bylaw 9396 areas.
  - Parcels with RS zoning should be included
- **Recommendation:**
  - Published City maps are opportunity areas are not reliable for planning purposes
  - A more reliable method to identify eligible properties needs to be made available.