

November 16, 2022

BY EMAIL ERO (PlanningConsultation@ontario.ca) & BY REGULAR MAIL

Chair and Members of Committee
Standing Committee on Heritage, Infrastructure and Cultural Policy
Queen's Park, Whitney Block, Room 1405
99 Wellesley Street W.
Toronto, Ontario
M7A 1A2

Sirs/Mesdames:

RE: ERO number 019-6163 - Proposed *Planning Act* and *City of Toronto Act* Changes

(Schedules 9 and 1 of Bill 23 - the proposed *More Homes Built Faster Act, 2022*)

Thank you for the opportunity to provide comments regarding *Bill 23* through the Environmental Registry Office ('ERO'). *Bill 23* will promote opportunities to increase the quantity and quality of much needed housing in the GTA, and represents an 'intensification first' approach to community and city-building.

An 'intensification first' approach is especially urgent and needed in the Yonge-Eglinton-Davisville (Toronto) area, where for example, a significant clustering of new high- and mid-rise apartment towers – apartment dwellings continue to evolve. While surrounding mature low-rise residential neighbourhoods are valued, *Bill 23* provides an opportunity, by comparison, to provide for the lack of new ground related housing, as it proposes to allow 'as of right' 3 residential units per lot. The resulting increased range and choice of ground-related housing integrated with mature residential neighbourhoods represents appropriate urban planning.

In support the goals and objectives of *Bill 23*, it is recommended that *Bill 23* similarly also incent another housing/lot typology at the edges of mature residential neighbourhoods.

While mid-rise height (6-8-10+ storey buildings) are generally approved along Yonge St./Mount Pleasant Road, in Mixed Use Corridors, for example, the adjacent lots (ie., those 2 or 3 lots in from the main street) are well positioned to accommodate 'Courtyard or Terrace Townhouse' project designs, to better utilize the entire lot, with age-friendly designs and transitional housing/lot densities.

POUND & STEWART ASSOCIATES LIMITED

205 BELSIZE DRIVE, SUITE 101, TORONTO, ONTARIO, CANADA M4S 1M3 • 416 482 9797
305 RENFREW DRIVE, SUITE 101, MARKHAM, ONTARIO, CANADA L3R 9S7 • 905 305 9797
WWW.CITYPLAN.COM • INFO@CITYPLAN.COM



Existing long-time residents of these communities, who may desire to remain in ground-related units, but with less physical responsibility of managing and maintaining their properties within this community, would benefit from this design which would typically allow for more than three (3) townhouse units per lot (depending on lot depth), when arranged perpendicular to the local street.

Additionally, the 'Courtyard or Terrace Townhouse' housing/lot typology provides opportunity for young families to relocate within the community by upgrading from their high-rise apartment towers, to obtain more living space, with better housing affordability than single detached dwellings. All of these benefits would be an adjunct to the advantages of desirable and walkable communities.

Technically, the 'Courtyard or Terrace Townhouse' housing/lot typology provides ground-related residential 'missing middle' densities 'feathered in', and fronting onto local roads, 2 or 3 lots inward from the lots that face main streets. This permission would contribute to a more livable communities, being in conformity with provincial housing objectives to better optimize the use of the existing urban land supply, encouraging a broader range of housing at the right location, (at the outer edges of) mature neighbourhoods. This density will also optimize the use of public investment in infrastructure.

In summary, *Bill 23* can be made better by unlocking the untapped reserve of existing residential lots located at the outer edges of mature low-density neighbourhoods, where complemented by nearby main street localized amenities. Current planning design restrictions and processes work against these forms of 'infill' opportunities. *Bill 23* should remove rigid adherence to existing built form and associated development standards in this context, which currently reinforces the original suburban character and densities of mature city neighbourhoods throughout.

Bill 23 ought to incent housing intensification or infill opportunities at the outer edges of mature low-density neighbourhoods to 'design it better', with an 'intensification first' approach to community and city-building. I would be pleased to discuss any matters contained in this submission at your convenience.

Yours truly,
Pound & Stewart Associates Limited



Philip Stewart, MCIP, RPP

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cc. The Hon. S. Clark, Minister of Municipal Affairs and Housing (via email Steve.Clark@pc.ola.org)
cc. Mr. I. Thorning, Committee Clerk (via email schicp@ola.org)

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