

Planning and Housing Committee

November 25, 2021

RE: PHC 29.9: Expanding Housing Options in Neighbourhoods: Multiplex Study

The LBNA supports the need for further community and stakeholder consultation of this initiative.

An important question for the City Planning Multiplex team and which we would strongly recommend that this Committee ask this team to address during this next stage is:

 In RM zones, where the zoning already exists to enable additional housing units to be built in lowrise neighbourhoods and do not limit the building of multiplexes as-of-right – why are these not being applied for and being built?

Long Branch RM zones permit building multiplex dwellings now, however, Applicants almost exclusively apply to build single family dwellings. There is no tool in place that guarantees that by just expanding the ability to build multiplexes that any will be built.

The only applications we have seen in RM zones relating to Multiplexes since the LBNA was formed 4 years ago were to actually convert a multiplex to 2 single detached dwellings and another one to clear cut and pave over a well treed lot in the historic area of Long Branch, removing large healthy native and long-lived red oak trees to put in driveways, parking and detached parking garages.

We are pleased to see that one of the City's Strategic Priorities to improve quality of life for Torontonians is the tackle climate change and build resilience.

This leads to a second important question which is:

2. What protection will be put in place, before these policies are implemented, to ensure that healthy protected trees are preserved and that more protection is provided to the smaller trees that are the future of Toronto's Urban Forest?

Soft landscaping and the City's mature tree canopy will be inevitable casualties of this Expanding Housing Options in Neighbourhoods policy direction and, by destroying those with the addition of more asphalt to accommodate more housing, will further compromise already flood prone areas like Long Branch, served by old and outdated water infrastructure Before the City moves forward, they need to consider the implications of this direction through more than just a **single lens**.

Newly planted trees do not replace the lush tree canopy and benefits to a community of mature trees and without tree protection policies and strong regulations in place, our neighbourhoods will soon look like barren suburban environments.

Through partnership with the University of Toronto and funding from the Federal government, the LBNA has a detailed inventory of the trees in Long Branch (approx. 70% of the properties). In 2021, through partnership with the City Urban Forestry, our volunteers distributed over 1,220 free native trees for planting in the City on private properties.

However, none of these newly planted trees, or any of the other ones we have distributed in the four years prior, are protected under the current Municipal Code 813 or city policies. Only 19.7% of the trees in Long Branch are of protected size and almost every application to the COA is applying to remove or injure one or more healthy trees of protected size. Our tree canopy was at 26.5% in 2009 and is now down to only 15% according to the 2018 Toronto Tree Canopy analysis. It is going in the wrong direction when we are trying to grow our tree canopy to 40%.

In some neighbourhoods, water infrastructure is old and outdated. More asphalt leads to more flooding. Tackling climate change necessitates that policies are in place prior to policies that seek to intensify in neighbourhoods to avoid disastrous consequences down the road.

While the City pursues the introduction of missing middle housing, throughout the City, we ask that the existing policies, like OPA 320, that have been put in place to make way for new developments in our neighbourhoods so that they are done with sensitivity to neighbourhood character, not be diluted or replaced by policies and regulations that allow for developments that undermine that important priority – and what attracts people to the community to begin with.

OPA 320 was the result of years of consultation with neighbourhoods and the development industry to find a compromise that would protect neighbourhood character. Accommodating missing middle housing while retaining the general intent of Section 4.5.1 will be crucial.

Review of zoning standards needs to recognize that low density (e.g. 0.35 and 0.45 FSI which exists in much of Etobicoke) functioned as the lever to get developers to the table for discussion. Increasing FSI, removes that opportunity and puts neighbourhoods even more at the mercy of those with only opportunistic interests for profit, as their priority. Please recognize this when reviewing zoning standards.

Long Branch is fortunate to have Council Approved, Neighbourhood Character Guidelines in place and we want to be assured that there will be some framework to have them applied, even for "as of right permissions". We would welcome the opportunity for further discussions with Planning on this.

Finally, we would also like to see a monitoring system put in place to assess the impact of introducing all of these uses, into our neighbourhoods, all at the same time in order to fully understand the on-theground reality and consequences of such significant changes.

Long Branch was developed prior to the current Zoning By-laws and is not actually "missing middle" housing. There exists a range of housing types from triplexes, multiplexes, duplexes, semidetached, single detached, town houses and apartments.

Long Branch reflects more renter households than the City average and more than double the apartment buildings under 5 storeys. Expanding "missing middle housing" permissions to the RD zones in Long Branch, is an unnecessary step at this time, particularly in light of the amount of this housing type that we are currently providing and can continue to provide through the other residential zones within our neighbourhood.

The LBNA recognizes that intensification is necessary for the City of Toronto as the population grows larger. However, we hope that where this additional housing is being planned considers also providing additional infrastructure for neighbourhoods. All these new people will need schools, roads, improved transit, recreation facilities, etc. And also, more green infrastructure and trees.

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We welcome and look forward to the opportunity to participate in the upcoming consultations and discussion.

Sincerely,

Judy Gibson Vice Chair, Long Branch Neighbourhood Association Chair, Tree Canopy Preservation and Enhancement Committee

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Long Branch Urban Forest – DBH





Only 19.7% of the trees in Long Branch are of protected size (i.e. 30cm or greater DBH).

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## Long Branch Zoning



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