

November 24, 2021

10th floor, West Tower, City Hall 100 Queen Street West Toronto, ON M5H 2N2 Attention: Nancy Martins

RE: PH29.9 Expanding Housing Options in Neighbourhoods: Multiplex Study - Interim Report

Dear Chair Ana Bailao and Members, Planning and Housing Committee,

This is to express our support for the recommendation of the above noted report that the ideas for consultation presented will form the basis of virtual consultation through the fourth quarter of 2021 and the first quarter of 2022. Staff will consult with future and current residents of low-rise neighbourhoods and other stakeholders, as well as continue a technical review with other City Divisions.

The overall EHON strategy is to permit increased density in the Neighbourhoods. We support this strategy in principle based on the idea of encouraging development across the city rather than allowing over-development in certain parts of the city, such as the Yonge-Eglinton Centre. However, it is critical that the strategy be create complete communities, not just residential growth. This initiative should not be about adding multiplexes but doing it in the context of building complete communities based on good transit access as well as community services, employment, cultural opportunities and shopping, etc. The study areas chosen should take these principles as a comprehensive framework. The best opportunities for this type of intensification are in the low density suburbs.

The report proposes a major change of direction for the lands designated Neighbourhoods in the Official Plan, which constitute about 35% of the land area of the City. This large area includes considerable geographical variation in the amount of physical and population change currently¹. The report states that 70% of the area covered by the Neighbourhoods designation only permits single family detached and semi-detached units. That is in stark contrast to the bulk of the Neighbourhoods designated area with the R-zoning that already permits a large variety of housing forms. Within neighbourhoods there can be different opportunities for different types of multiplexes, and areas where they may not be suitable. For example the 2020 EHON report noted that the low density main streets like Islington Avenue could have greater options.

¹ The report mentions this, but surprisingly does not link to data - which is in fact available in the Neighbourhood Change and Intensification Bulletin which is PH29.8 on the same agenda.

In addition there are numerous other challenges, such as how to maintain the residential character, retain (or rather increase) the tree canopy, and not create parking problems in Toronto's urban neighbourhoods.

In summary, while supportive in principle, we urge the City to be cautious in moving too far, too fast without proper consideration of the implications arising. A change of this magnitude needs to be approached carefully, ideally involving development of Secondary Plans on an area by area basis, rather than allowing *carte blanche* change across all Neighbourhoods. Also, it may be wise to change the name of the initiative. It is not about "Multiplexes" per se but about a transformation of the City's low density suburbs into complete communities.

We look forward to the opportunity for direct public consultation.

Yours truly,

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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 170,000 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.