



July 4, 2022

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

RE: PH 35.3 - Expanding Housing Options in Neighbourhoods - Multiplexes

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

We are writing on behalf of the Federation of North Toronto Residents Associations to support the staff recommendation for further study of multiplexes. The neighbourhoods of our members include both those with multiplexes, and those where multiplexes are not permitted.

Multiplexes — duplexes, triplexes and quadraplexes — have been permitted in many parts of the pre-amalgamation City of Toronto without degradation of residential neighbourhoods. We see no reason why multiplexes should be discouraged in other parts of the amalgamated City.

While we support the principle of permitting multiplexes in all R-zoned neighbourhoods, eliminating the multiplicity of R zones limiting building types, we believe it makes no sense to pass an OPA without the necessary changes to the zoning by-law, allowing detail as to how multiplex permissions will be implemented.

We agree with the strategy proposed by the City Planning Division: to proceed first with an OPA and to implement zoning changes that permit multiple units in existing or proposed house-form buildings in R neighbourhoods, without changing existing rules governing heights and setbacks, and then, separately, for those same neighbourhoods, to study where and how multiplexes can be integrated into suburban neighbourhoods. While, in inner-city neighbourhoods, three- or four-storey buildings can co-exist comfortably with the two- or three-storey houses, for other neighbourhoods, we need further consultation to establish locally appropriate regulations.

Turning to the proposed OPA, we are concerned about the proposed elimination of height from the factors listed in section i ('Development of multiplexes'). We understand the issues raised by staff and thus support protecting existing height limits. But it is essential that the Official Plan regulate height in a manner consistent with the prevailing building typologies in any neighbourhood. Different provisions will be needed for different types of neighbourhood. They should be implemented through the zoning by-law, buttressed by OP language that defends zoning limits. We fear the effects of removing height on Committee of Adjustment decisions regarding single-family monster homes.

We also stress the esthetic and ecological value of street trees and green space in embellishing and cooling communities, reducing run-off, hosting wildlife, and palliating the impact of larger buildings in residential neighbourhoods. We urge the City to plant and protect street trees in neighbourhoods subject to intensification both before and after it takes place. Intensive greening should be integral to the EHON initiative.

Finally, we note the current economics of the housing market, and the concerns raised by the ULI study cited in the staff report. Apparently, if subject to current parking requirements and development charges (including parkland contributions), few multiplexes will be built. As for development charges, we strongly believe that 'growth should pay for the services required by growth' and thus we will be interested in the forthcoming report on proposed changes in development charges.

We urge the Committee to support the staff's recommendations and proposed outreach program. The staff work on neighbourhood typologies and alternative building forms helps make the implications of the proposals clear, and we urge staff to provide more examples as they reach out for further comment.

Yours truly,

Geoff Kettel
Co-Chair FoNTRA

Cathie Macdonald
Co-Chair FoNTRA

c.c. Gregg Lintern, Chief Planner and Executive Director, City Planning Division
Melanie Melnyk, Project Manager, Strategic Initiatives, Policy & Analysis, City Planning Division
Philip Parker, Senior Planner, Strategic Initiatives, Policy & Analysis, City Planning Division
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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.