

Toronto City Hall 100 Queen Street West Toronto, ON M5H 2N2

May 9, 2023

RE: PH3.16 Expanding Housing Options in Neighbourhoods: Multiplex Study - Final Report

Dear Members of City Council

What started with the goal of addressing the City's affordability crisis has now evolved into the by-laws in front of you that we are asking you to refuse as they are, defer and send back to staff to change. As they are they will:

- Destabilize neighbourhoods through allowing buildings 4.5 6 times the maximum density permitted now to be built in single detached neighbourhoods. This is more than the density zoned for along our Avenue! How is that remotely good planning?
- Result in the destruction of mature trees which will negatively impact the livability of our communities and the quality of life and health of our residents and at a time when we are facing a climate crisis and the City has the goal to grow the tree canopy to 40%.
- Create favourable conditions for the eviction of tenants who live now in our existing, older, more affordable multiplexes as these get torn down to make way for these much larger, more expensive MONSTERplexes.

Objective of EHON has changed...Ask why?



1. Planning Staff Report to Planning and Housing Committee Nov 24, 2020 2. Planning Staff Report to Planning and Housing Committee Feb 1, 2022

Long Branch is a success story as a complete community. Our population is growing at a rate of over 13%. 37% of Long Branch housing is multiplexes and small apartments today; over 50% of our residents rent and approximately half of our neighbourhood has RM zones that already permit multiplex housing. We are not against new multiplexes in neighbourhoods, particularly in those that currently don't have them, and see that this as a possibility to add density into Toronto's neighbourhoods if done well. However, we absolutely do not support the changes made by staff at the last minute to the Multiplex by-laws and OP Amendments. The reasons this by-law is not ready to be approved are as follows:

• Complete elimination of Floor Space Index (FSI) by-law standards for a multiplex. FSI is essential for multiplexes to fit appropriately in single detached neighbourhoods.

- Excessive size that the staff report acknowledges will not create affordable housing, but worse, will result in the creation of unaffordable multiplexes and the removal of trees as a result of the excess height and length. Permitted to be 19m long, where single detached homes are a maximum of 17m long and most, in our neighbourhood are not that long.
- Over intensification with four units in a multiplex resulting in 5 unit potential on any lot.
- Lack of community consultation with impacted residents both home owners and renters in existing multiplexes

Lack of Consultation with impacted residents

With less than 48 hours notice, the LBNA held a meeting last Thursday at Legion 101. We notified people of the meeting via a couple of emails and limited social media using plain language on the impacts of the Multiplex Housing Policy. The room was packed. We ran out of chairs. It was standing room only.

- We explained the impacts of the proposed Multiplex by-laws that were made public just 7 days prior and that were not communicated broadly by City Staff or in plain language.
- We looked over 200 residents in the eye and asked if they supported it. None did.

City staff have done none of this.

- The two City consultations were online. People from anywhere could join and make comments –
 whether or not they lived in Toronto, the GTA or this country for that matter. The first consultation
 was delayed due to technical problems and the residents we knew who were able to persevere
 and eventually join the meeting (many were not able to) were not able to get their questions
 asked or answered.
- The survey done by the Planning Department was available only online and required an in-depth knowledge of the Official Plan and existing residential area bylaws to participate effectively. It took 90 minutes to complete if you opposed, 5 minutes if you agreed with no qualifier on why. Again, no questions were asked to confirm whether participants lived in Toronto, the GTA or even the country.
- The LBNA met with staff and were assured by the project leads that FSI and the 17m building length would be retained. With the only FSI exemption being the common entrances and hallways needed for a multiplex. One week before the Planning and Housing Committee voted on this, FSI and length were removed leaving us to scramble to try to inform impacted residents.
- During the Planning and Housing meeting, the Chair permitted online deputations from people from the US and New Zealand and limited residents to 3 minutes. That is outrageous. Again technical problems resulted in people who registered to speak being kicked out of the meeting.

Permissions that create unaffordable Monsterplexes and affect livability and trees

The proposed by-laws will create **MONSTERplexes that will make favourable conditions for DEMOviction.** As an older neighbourhood our existing Multiplexes fit well into the neighbourhood, are solid, low and have green space around them with mature trees. And more affordable than what will be created if this by-law is approved. The proposed Monsterplexes without FSI regulation and extended length will remove mature trees on the lot and adjacent lots, with a simple building application.

For buildings with under 5 units, in the case of a demoviction, owners are not required to provide any alternative housing for tenants or first right of return. We have researched this topic with lawyers and organizers who specialize in DEMOviction and know from first hand experience how developers take down perfectly livable, more affordable housing and replace it with much more expensive housing when encouraged to do so – which these by-laws will certainly do.

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Long Branch Neighbourhood Association: P.O. Box 48525 Long Branch, Etobicoke, ON M8W 4Y6

Elimination of FSI and increase from 17m to 19m in building length

A recent study by a Masters student at the University of Toronto on the impact of intensification in our neighbourhood found that at 2x the FSI on a lot (as typically seen when there is a lot severance), more than half the tree canopy is lost and a quarter of the tree canopy is lost on adjacent properties. The form based approach proposed for multiplexes will result in FSI that are 4-6x what is permitted now and will not protect existing trees or increase Long Branch's Tree Canopy from 15% to 40%. (2018 Tree Canopy Study)

Where is the corresponding city staff report that quantifies the impact on Toronto's Tree Canopy as a result of this proposed intensification in Neighbourhoods?

Forestry will be powerless to prevent this tree destruction. If the applicant does not acknowledge that a tree will be injured, which we have had happen in multiple situations, then Forestry will not even be involved. The building permit stage being proposed is far too late.

The population of Toronto is growing and we need more housing – particularly affordable housing. But more people also need more trees, including the ones we already have.

EHON was started to create affordable housing in neighbourhoods. What is before you will not create affordable housing but MONSTERplexes that will be unaffordable for most people, destroy trees, displace tenants and destabilize communities.

We respectfully request that you support a deferral on this item and send these by-laws back to staff to come back with by-laws for multiplexes that don't create MONSTERplexes.

Sincerely,

Christine Mercado Chair, Long Branch Neighbourhood Association

Judy Gibson Chair, Tree Canopy Preservation and Enhancement Committee, LBNA

Impact of Residential Intensification on Urban Forest in the Long Branch Neighbourhood, Toronto Canopy loss on redeveloped properties



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