



SOUTH EGLINTON DAVISVILLE RESIDENTS' ASSOCIATION

May 9, 2023

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

email: phc@toronto.ca

Dear Deputy Mayor Jennifer McKelvie and Members of Council

RE: PH3.16 EXPANDING HOUSING OPTIONS IN NEIGHBOURHOODS: MULTIPLEX STUDY – FINAL REPORT

We are SEDRA, the South Eglinton Davisville Residents' Association, representing the Davisville Village and South Eglinton neighbourhoods in Toronto. Our area includes the Davisville and Soudan apartment neighbourhoods and the residential and Midtown cores between the intersections of Yonge/Eglinton, Yonge/Davisville, Eglinton/Mt Pleasant and Eglinton/Bayview.

SEDRA is an active member of the Federation of North Toronto Residents' Associations and we are in general support of FoNTRA's submission that addresses four key areas. The FoNTRA key recommendations are repeated below, and our comments are added.

The conventional wisdom of our provincial planners is that 'bigger is better' and 'one size fits all'. If we followed the same logic with everyday clothing, we would all be wearing XXL hats and XXL boots. Big is not better.

#1 - Units per Lot

Why permit 4 units per lot when the province only requires 3? To do so would permit the incursion of buildings that do not "fit", i.e., they are too tall for their setting. Increasing the height limit to 10m where the existing area height limit is less (many areas permit 8.5m or

9m), in to allow for 4 units is not appropriate. These lots can accommodate a maximum of 3 units in a form that relates to existing houses, while still increasing density.

- In the SEDRA catchment, we have many smaller lots that can barely accommodate a single-family detached dwelling.
- Fortunately, the existing bylaw regulations ensure a somewhat orderly consideration of the planning merits of each proposal.
- Allowing the development of as-of-right multiplex on the same small lot makes no planning sense.
- Refer to our attached report called 'Lots to Think About'

#2 - Floor Space Index

Eliminating the density limits where this regulation exists, for duplexes, triplexes and fourplexes, but still requiring houses and other building types in these areas to remain subject to FSI. The elimination of FSI will result in a box form, tempered only by the new third floor setback requirement. Further study is required before FSI before any decision is made.

- Outdoor amenity space and parkland area becoming increasingly scarce in the SEDRA catchment. The Floor Space Index is designed to ensure that the building is proportional to the lot and to provide adequate ground area to support the amenity needs of the building occupants.
- Amenity space is needed because you cannot kick a soccer ball or play hockey on a balcony.

#3 - Length of Building

Big buildings need big lots. Permitting 19m long buildings on lots as small as 36m deep and less than 10m wide which may preclude sufficient ground area which will not allow enough side yard setbacks for windows, trees, green space and garden suites.

- In the SEDRA catchment, our lot lengths vary between 27m (90 feet) to 46m (150 feet) and side yard setbacks are frequently legally non-conforming.
- The proposed 19m length would not be appropriate in every situation.
- Context is everything.

#4 - Narrow Side Yard Setbacks

We must avoid windowless rooms. Permitting side yard setbacks as small as .6m and .9 m where the building is 19m long will result in windowless centre rooms. Greater setbacks are needed.

- This is a no brainer. The market demand for dwelling windowless rooms is quite small. Advocates for the 19m buildings may claim otherwise, but all renters will prefer apartments over dark windowless floor space.

Recommendation

As we are now close to a mayoral election, and given that this initiative will adversely impact neighborhoods across the City, and that major issues are unresolved, we agree with the FoNTRA recommendation:

- That consideration of the Multiplex Study Final Report be deferred pending the Mayoral By-Election.

Yours sincerely,



Al Kivi
SERRA – Chair, Residential Infill Committee
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c.c. Gregg Lintern, Chief Planner and Executive Director, City Planning Division
Anthony Perruzza, Councillor, Ward 7 – Humber River-Black Creek
Josh Matlow, Councillor, Ward 12 – Toronto-St. Paul's
Brad Bradford, Councillor, Ward 19 – Beaches-East York
Other Councillors



SOUTH EGLINTON DAVISVILLE
RESIDENTS' ASSOCIATION

Lots to Think About

Submission to City's Multiplex Proposal

**Multiplexes:
One Size Does
Not Fit All**

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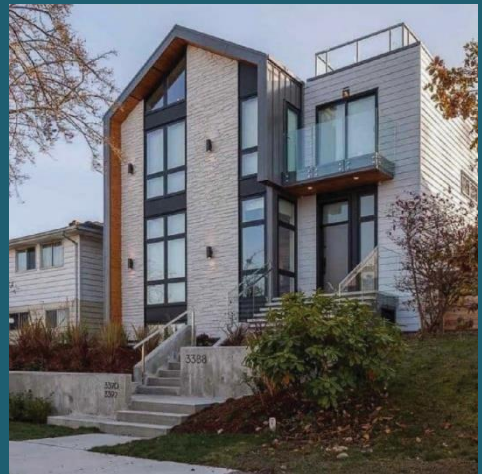
April 24, 2023

Context is Everything ...

- The City's premise is that the province's Bill 23 must be followed precisely ... to allow 3 dwelling units on every city residential lot.
- The downtown and midtown wards have many small lots that can scarcely support one dwelling unit.
- It does not follow that every city residential lot should be eligible for multiplex dwellings.
- So, bylaws must be developed to allow for sensible development where good planning outcomes can be assured
- Good Sense leads to Good Planning

Study Considerations – From City Study

- **Official Plan** – what policies need to change to support low-rise built form intent?
- **Zoning** – how can regulations be adjusted and/or simplified to permit multiplex units?
- **Sustainability** – how can we maintain adequate tree protection and soft landscaping?
- **Parking** – what standards are appropriate for multiplexes in different contexts?
- **Process** – where can it be streamlined to reduce time and cost?



Study Considerations – Our Small Lots Study

- **Official Plan** – does the province’s policy direction make sense in every instance?
- **Zoning** – what zoning regulations are necessary to drive good planning outcomes?
- **Sustainability** – require a minimum lot size
- **Parking** – require a minimum lot size
- **Process** – require a minimum lot size



Multiplex Developments on small lots

- Our study is quite simple ... we will show a picture of a small single family dwelling on a small lot and imagine three family units on the same lot
- We have selected seven small properties for the study
- Information on the seven properties is readily available ... as each of the properties has been described in online articles
- Note that all of the properties are located in the old City of Toronto
- Our focus will on the lot frontage and length of each property.

Note: We have observed many planning issues arise when large buildings are built on small lots

A short primer on Lot Frontage Bylaws

- Many lots in the old City of Toronto have frontages of 25 feet (about 7.5m)
- Some planning areas have specific frontages designated as f5.0, f6.0, f7.5, f9.0 and larger
- Bylaw 10.5.30.20.(2) applies to areas where frontages of not designated and requires:
 - Minimum front lot line of at least 3.5m (with some conditions)
- Bylaw 10.5.30.21.(3)(A) requires a Vacant Lot to have:
 - Minimum lot frontage of at least 6.0m

Note: Required minimum lot frontages in other Ontario cities typically range between 6.0m to 9.0m

126 Day Avenue – Older Dwelling



- **Where: Davenport**
- **Lot size: 7.4 x 113 feet**
- **Building size: 400 square feet**
- **Building width: 2.25m (7.4 ft)**
- **Setbacks: None**
- **Bedrooms: 1**
- **Bathrooms: 1**

• **Comments:** This property is quite famous and was featured on the Ellen DeGeneres show. There was much laughter about the size and listed selling price.

- **Prospect of Multiplex Renovation:** Slim to none
- Note that lot frontage is less than the 3.5m minimum

1024A Shaw Street – Older Dwelling



- **Where: Ossington/Dupont**
 - **Lot size: 6.5 x 70 feet**
- **Building size: 400 square feet**
- **Building width: 1.98m (6.5 ft)**
 - **Setbacks: None**
 - **Bedrooms: 1**
 - **Bathrooms: 1**

• **Comments:** This property appears to have been built in a previous driveway.

- **Prospect of Multiplex Renovation:** Slim to none
- Note that lot frontage is less than the 3.5m minimum

229 Winnett Avenue – Older Dwelling



- **Where: Cedarvale**
- **Lot size: 8 x 70 feet**
- **Building size: 600 square feet**
- **Building width: 2.2m (7.2 ft)**
- **Setbacks: about 1 foot/side**
 - **Bedrooms: 2**
 - **Bathrooms: 3**

• **Comments:** This property appears to be built recently and appears structural sound.

- **Prospect of Multiplex Renovation:** Slim to none
- Note that lot frontage is less than the 3.5m minimum

30 Hanson Street – Older Dwelling



- **Where: Monarch Park**
- **Lot size: 14 x 20 feet**
- **Building size: 215 square feet**
- **Building width: 4.0m (13 ft)**
- **Setbacks: about 1 foot/side**
 - **Bedrooms: 1**
 - **Bathrooms: 0**

• **Comments:** This property is a renovated garage that has been turned into a dwelling. The original property was severed to create a very small lot.

• **Prospect of Multiplex Renovation:** Slim to none

383 Shuter Street – Newer Dwelling



- **Where: Regent Park**
- **Lot size: 8 x 70 feet**
- **Building size: 1,300 square feet**
- **Building width: 2.4m (8 ft)**
- **Setbacks: None**
- **Bedrooms: 2**
- **Bathrooms: 3**

• **Comments:** This property was built as a detached dwelling and was constructed recently.

- **Prospect of Multiplex Renovation:** Possible
- Creating a second dwelling unit would require another entrance, perhaps in the rear

138 St Clarens Ave – Newer Dwelling



- **Where: College and Lansdowne**
 - **Lot size: 12.5 x 90 feet**
- **Building size: 1,200 square feet**
- **Building width: 3.4m (11 ft)**
- **Setback: About 1 foot/side**
 - **Bedrooms: 3**
 - **Bathrooms: 3.5**

• **Comments:** This dwelling was constructed of cargo containers that were installed on a very narrow lot.

- **Prospect of Multiplex Renovation:** Possible
- Creating a second dwelling unit would require another entrance, perhaps in the rear

154 Hamilton St – Newer Dwelling



- **Where: Dundas and Broadview**
 - **Lot size: 15 x 86 feet**
- **Building size: 1,300 square feet**
- **Building width: 4.1m (13.5 ft)**
- **Setbacks: About 1 foot/side**
 - **Bedrooms: 3**
 - **Bathrooms: 3**

• **Comments:** This building was constructed at the rear of the property. The building is currently a single detached dwelling.

• **Prospect of Multiplex Renovation:** Possible

• Significant design changes would be required to create an additional family unit.

Summary Observations

- **Older Dwellings**

- The four older dwelling are located on very narrow lots
- Renovations of these dwellings to create additional units does not seem practical

- **Newer Dwellings**

- The three modern dwellings are also on narrow lots
- These dwellings have a modern design and feature 2 or 3 bedrooms
- Renovations are technically possible but would require significant design efforts

- **Key Problems**

- The dwellings are most likely legal non-compliant structures partly because of lot frontages and setback requirements
- The lots are generally shorter than 100 feet
- Front yards are small with little or no landscaping. Small trees (bushes) are visible on several properties.
- Aerial views show that there is no backyard amenity space
- There is simply not enough lot size to support three family units.

The Path Forward

- Minimum lot frontages and lot lengths should be established for three family units on each lot.

1. Define a minimum lot frontage

- The bylaws should require a minimum lot frontage of 5.0m where there is laneway access
- The bylaws should require a minimum lot frontage of 6.0m where there is no laneway access
- **Rationale:** The minimum lot frontage of 3.5m is barely adequate for detached dwellings and must be increased for multiplexes.

2. Define a minimum lot length

- The bylaws should require a minimum lot depth of 30.0m (about 100 feet)
- **Rationale:** Lot depths of less than 30.0m provide little or no outdoor amenity space.

Note that the above rules should apply for both renovations and new builds. Grandfathering rules for detached dwelling built-form should not be extended for multiplexes.

Recommendations for Multiplex Bylaws

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