

May 10, 2023

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Sylwia Przewdziecki

Dear Deputy Mayor Jennifer McKelvie and Members of Council

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

FoNTRA supports the City's EHON program for intensifying neighbourhoods to accommodate our growing population in complete communities with adequate transit. Multiplexes are already permitted in older neighbourhoods and many of these provide affordable housing that fit well into their locations. But none have been built for decades. Instead, mainly larger and more expensive single family homes are built. Taking away development charges will help encourage more. Substantially increasing density on Major Roads is the major way to increase housing options.

FoNTRA has concerns about the recommendations of this report for new and significant changes to the proposals to date that can have unnecessarily negative impacts.

The proposed Official Plan statements are weak and unmeasurable

- The proposed Official Plan policy “to maintain the low-rise character of each geographic area” needs more directions as to what this means, how is this measured, how is it actually can be achieved?
- Proposed statements call for the protection of the tree canopy, a critical City objective. But current implementation tools are ineffective. Substantive and strong policies and programs to protect our trees and add much more are required.

The proposed Zoning Regulations will fail to protect, indeed will damage many neighbourhoods

The stated City Planning objective is to “harmonize building depth, side yard setbacks, and main wall height regulations for all building types”. The original concept was to allow multiplexes generally within the same built form as detached houses in an area. While there is certainly recognition of different types of neighbourhoods, some proposals for harmonizing appear excessive. In our large City, the variety of neighbourhoods should be recognised and respected. The combined impacts of depth,

side yard setbacks and main wall height need to be looked at the neighbourhood, not just the lot level.

- In areas where the height limit is only 8.5m or 9m to 10m. why increase the height limit 10m? This limit will accommodate three units in the main building plus laneway/garden suite there are four units. The Province only requires 3 units per lot.
- Why eliminate the density (floor space index) limits, where they currently apply, for duplexes, triplexes and fourplexes, but still require houses and other building types in these areas to remain subject to FSI? Elimination of FSI will result in a box form, tempered only by the new third floor setback requirement. No reason is given for this recommendation. But the report notes that there is to be a further report on the FSI question. Why not consider the question of eliminating FSI for multiplexes as part of that coordinated review with public consultation?
- Why permit 19m long buildings (houses are permitted only up to 17m) on lots as small as 36m deep and less than 10m wide? Will there be sufficient side yard setbacks for windows, trees, green space and garden suites? What will be the impact on shorter houses? The 19m long buildings should be limited to lots over 36m deep and wider than 10m.
- Why permit side yard setbacks as small as .6m and .9m where the building is 19m long? This will result in windowless centre rooms. Greater setbacks are needed in these cases.

Consultation process failed to adequately explain the combined impacts of different proposals on different lots and neighbourhoods

City staff report on the number of people supporting the proposal, but consultation is not an opinion poll. There must be an effort to determine the impacts of many different changes on a property and a neighbourhood. Voting on a single proposal in isolation, such as whether a proposal to extend depth to 19m is acceptable, is meaningless. Illustrations provided at the consultations demonstrate what can happen on an isolated lot -- but not on a neighbourhood scale or different types of neighbourhood. Examples of tree protection and loss were not included.

The final report includes major changes that were not subject of the consultations.

The City has undertaken extensive and varied public consultations – the most recent being in winter 2023. But the proposals in the Final Report differ significantly from the directions that were then proposed, and the Final Report provides little information on

the evidence supporting the last minute changes that were made. While we had the draft OP and Zoning Bylaw in advance, we needed to read the Final Report to try to understand the rationale for the recommendations, but still information was missing.

The Monitoring plan is too little, too late

We strongly support the need for monitoring – analyzing and reporting on the applications and resulting developments, impacts of the range of issues raised, including impacts on the tree canopy issue, parking and affordability - and ensuring needed changes are made. The monitoring plan must include opportunities and ongoing consultations with residents.

The Mayoral race is underway. The leadership of the new Mayor can help ensure that the important Multiplex initiative can be better adapted to neighbourhoods across the City.

We therefore strongly recommend:

- **that consideration of the Multiplex Study Final Report be deferred pending the Mayoral By-Election**

Respectfully submitted,

Sharon Johnson, Co-Chair, Environment Committee, BVA
for
Bayview Village Association