



May 9, 2023

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

Dear Deputy Mayor Jennifer McKelvie and Members of Council

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

The Upper Avenue Community Association (UACA) is a residents association bounded by Wilson Avenue south to Lawrence, and Bathurst Street east to Avenue Road. We represent approximately 2700 homes in the area.

UACA supports the City's EHON program for intensifying neighbourhoods to accommodate our growing population with complete communities and adequate transit. Multiplexes are already permitted in older neighbourhoods and many of these provide affordable housing that fit well into their locations. Taking away development charges for multiplex will help encourage building of more multiplex developments.

UACA has concerns about some of the recommendations of the Planning Report as they may have unintended 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 direction as to what this means, i.e., a clear definition, how it is measured, and how it can actually be achieved.

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- 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 are needed to protect our trees and permeable soil. Lack of permeable soil leads to storm sewer overload and basement flooding.
- 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 recognized and respected. The combined impacts of depth, side-yard setbacks, and main wall height need to be looked at the neighbourhood level, not just the lot level.

- 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 to the neighbouring houses? The 19m long buildings should be limited to lots over 36m deep and wider than 10m. There is also concern about shadowing of adjacent lots at 19m building length.

- 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.

The City has undertaken extensive and varied public consultations – the most recent being in winter 2023. However, 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.

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 Mayoralty 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.

Regards,



F. Rochette,

Chair Upper Avenue Community Association

Cc: Councillor M. Colle, Ward 8