



Executive Committee on March 21 2023

EX3.1 - Housing Action Plan 2022-2026- Priorities and Work Plan

March 20, 2023

Re: Comments Report for Action: Housing Action Plan 2022-2026- Priorities and Work Plan

Thank you for the opportunity to comment on this work plan. Our Association believes that there is not enough evidence to warrant the adding of Transition Zones in Neighbourhoods and Mixed Use Areas considering the permissions of Bill 23 and the lack of corresponding policy framework to increase plantable space and mature tree canopy protection in these areas in tandem with adding density.

Proposal of Transition Zones along Avenues and Mixed Use Areas – More People need More Trees

Having transition zones between the Neighbourhood and Mixed Use Areas is premature considering Bill 23 already permits 3 units per lot.

In 2009 Long Branch had 26.5 % tree canopy and in 2018 it decreased to 15%. That is a 43.4% decrease in tree canopy in 9 years based on Toronto's 2018 Tree Canopy Study. Even when one takes into account the standard deviation associated with these numbers it is undeniable that our neighbourhood is losing Tree Canopy.

The canopy reduction in Long Branch is evidence of what happens when Developers are permitted to remove plantable space to maximize interior volumes and profits for their developments. As Toronto permits density, better protection is needed to preserve existing tree canopy and plantable space.

The strategy of letting market forces dictate development promotes that the most sought-after locations will be developed and Neighbourhood Improvement Areas (NIAs) will be ignored. The LBNA supports good planning in neighbourhoods. As such, City Staff should be seeking out opportunities to direct density and growth in areas of the city where the population is declining; schools are at risk of being closed and in locations where there are no mature trees that will be lost for the developments.

As-of-right zoning permissions in transition zones eliminates tree protection and environmental considerations and considers only the generous built form requirements. It is unclear how this strategy ensures tree canopy and green space will be preserved for new residents in these proposed Transition Zones.

“...the Official Plan should: seek to eliminate disparities experienced by Torontonians; challenge orthodoxies and systemic impacts of land use planning; achieve complete communities and all its requisite components; prioritize climate change action and sustainability towards net zero by 2040...”

The City is expecting private, for profit, development to achieve the City's goal. Growing the tree canopy to 40% can only be achieved by protecting and preserving mature trees on private property, including within proposed Transitions Zones.

In many established neighbourhoods, like Long Branch, planned intensification on the Avenues is just getting started in accordance with the Official Plan using SASP and directing density along the Avenue where it is needed. As a result, Long Branch has grown by over 13% from 2016 – 2021 vs Toronto's much more modest growth of 2.3%. Further strategies to promote intensification in neighbourhoods, such as Long Branch, with no clear plans to increase greenspace and grow the tree canopy are premature.

Housing Targets are being met: Profile TO: The Development Pipeline – Toronto can do it Right by Planning

According to the Profile TO: the Development Pipeline 2022, Toronto is already exceeding the Bill 23 Housing Pledge 2021 - 2031 targets for 285,000 units which addresses housing stock, not affordability. (Ref: <https://secure.toronto.ca/council/agenda-item.do?item=2023.PH2.7>)

“Summary

Between January 1, 2017 and June 30, 2022... there were 203,793 residential units approved but not yet built, and an additional 409,896 units in projects still under review....In total, there are 613,689 residential units ...in projects that are either under review or active, indicating a continuation of strong development activity in Toronto in the coming years. If all of these residential units were realized over time, they would increase the total number of dwellings in the city by over one half.”

Aligning Objectives for Complete Communities: Preserving the things that attracted people to live there

We disagree that removing protection for heritage properties and mature trees will create a complete community.

Heritage structures and mature trees add to the walkability and livability to neighbourhoods and are part of the community to help make it complete. Creating as-of-right permissions that permit the destruction of these important elements are not aligned with the community and will preserve nothing but individual profit for a developer. If a developer approaches a project with preservation in mind, as of right permissions are not needed. If the City is sincere about protecting the environment and preserving space for trees to grow they must remove as-of-right language everywhere.

The LBNA strongly agrees that a key objective for Complete Communities is to achieve the 40% Tree Canopy goal. Some communities will be able to achieve more, but all communities should strive for 40% to address the inequities in Tree Canopy that already exist in different parts of the city.

It is unconscionable that The Housing Action Plan 2022 - 2026 Priorities and Work page 15 of 31 acknowledges that these plans may result in an increase in the issuance of tree permits and loss of tree canopy. Promises of vague, unspecified plans down the road to expand the City's tree canopy are not sufficient when we are in a climate emergency and cities all over the world, including Toronto, are faced with heat islands, poor air quality and increased noise - all issues that the increased tree canopy and green infrastructure are critical to help address. More people in the city need more tree canopy.

To grow the tree canopy in Toronto our trees need more protection, not less. The 2018 Tree Canopy study found that the total leaf area of Toronto's urban forest **decreased by 11%** from 2008 to 2018 which translates to a loss of benefits provided by the urban forest.

The total structural value of the Urban Forest in Toronto is estimated to be \$7.04 Billion. With 54.4% of the 11.5 million trees in Toronto on Private Property, the structural value of these trees are at least \$3.83 Billion. Although the tree canopy increased, on average by 1.8% over the 10 years from 2008 to 2018, the increase peaked in 2014 and had leveled off or declined in 2018.

City Council Goals and Motions: Full Steam Ahead is not promoting Environmentally Sound Development Strategies

On Dec 15, 2021 City Council reaffirmed the goal of 40% Tree Canopy by 2050. We strongly object to City Council accepting immediate loss of tree canopy and green space proposed in this report with no concrete strategies to add tree canopy and green space in the immediately impacted communities.

There have been multiple Motions and promises of presentations by the city on the strategies for how expansion of the City's Tree Canopy will be achieved with aggressive objectives for infill market-based housing. Deadlines for these reports have come and gone. Examples:

1. A report was adopted by City Council February 15, 2022 (PH31.6 - Expanding Housing Options in Neighbourhoods - Update Report) - The Tree/House Working Group was convened in January 2022 and was to meet throughout 2022 in preparations of recommendations for City Council in 2023 or earlier to support both the City's tree canopy and opportunities for new urban infill housing. The group is to develop and execute a community consultation plan. They were to report back in the first quarter of 2023. Today there is no report and the members of this working group is not public.
2. A Motion adopted by the Infrastructure and Environment Committee on May 25, 2022 (IE30.18 - Report on Pervious Planting Spaces on Private Property) that the General Manager, Parks Forestry, in consultation with the Executive Director, Municipal Licensing and Standards, the Chief Building Official and Executive Director, Toronto Building, and the Chief Planner and Executive Director, City Planning to report back to a future meeting of Infrastructure and Environment Committee regarding potential strategies to protect and enhance the City's tree canopy and growing space, while also supporting infill housing growth in the City's Neighbourhoods, and that the report is returned before City Council provides further guidance on Expanding Housing Options in Neighbourhoods.

How will the city achieve a 40% tree canopy when it has made no progress in 10 years and has presented no plan for adding green space in neighbourhoods where greenspace and trees are being removed?

Requests

1. We ask that these reports and potential strategies for growing the tree canopy be brought forward for public discussion and consultation prior to moving forward with any more zoning changes.
2. Affirm that Provincial housing targets can be met without the destruction of mature trees, removal of FSI and protection of heritage structures.
3. Delay any changes to regulations in transition zones and further as-of-right language without showing plans for corresponding tree protection and increase of soft landscaping and green space in these same zones.

Sincerely



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