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April 25, 2023

TO: PHC@toronto.ca

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

We agree that Toronto needs more multiplexes, particularly in neighbourhoods where populations are declining, and infrastructure exists. But the proposed current by-laws in front of you are flawed and need to be sent back to staff to be revised before going to City Council.

Major changes that need to be made to the Multiplex bylaw include:

1. Building Depth should not be more than 17m.
2. Floor Space Index (FSI) must be retained (to regulate the mass and size of the building on the lot).
3. Meet provincial government requirements of 3 units (NOT exceed it with 4 units as City Planning is recommending).
4. Not increasing the permitted height limit to 10m (many neighbourhoods permitted height limit is 8.5m or 9m currently).

The benefits of making these four changes are:

- Preservation of the environment and neighbourhood trees. FSI and Building Depth are one of the few tools that protect mature trees. They ensure sufficient soft landscaping (permeable surfaces) and space for trees to be retained and thrive. Removing FSI and increasing building depth to 19m will be devastating to our tree canopy and will destroy healthy trees on many redeveloped lots in many neighbourhoods. With intensification in neighbourhoods, we will get more people. More people need MORE trees. Planting trees elsewhere in the city instead of retaining trees where people live is not the right approach for a liveable, equitable, and sustainable environment for all.
- Going from 1 housing unit on a lot (the majority situation in single detached neighbourhoods) to 3 units will meet the provincial requirements and allow gentle density which is the goal for becoming the welcoming city of diversity and fight the housing crisis. It will be more affordable to build and encourage existing residents to renovate into multiplexes. Permitting 4 units will just provide more investment

opportunities for developers and, the few who can afford them will not generate more affordable rental housing.

- Keeping building depth at 17m and keeping FSI will ensure that new multiplexes fit in with most neighbourhoods and with existing multiplexes in neighbourhoods that already permit them. Removing FSI and increasing building depth and building height beyond what is currently permitted for multiplexes will encourage developers and investors to tear homes down and replace them with newer, larger and much more expensive units prematurely. It will also threaten the built-form character of the neighbourhood.

We have no confidence with how the current Municipal Code Chapter 813 is written. We are not confident the General Manager of Parks, Forestry and Recreation will be successful refusing tree permits and refusing the construction of Multiplexes given the large, form-based approach to Multiplexes with no consideration for whether the lot or neighbouring lots have mature, large trees. Forestry staff have advised that this has not been proven and, we see healthy trees routinely destroyed if they are within or near an as-of-right building footprint.

We are in the midst of a mayoral election race. We request that you send these by-laws back to staff to revise and come back after the election with better by-laws that encourage affordable housing, retain neighbourhood character and save our trees, all of which contribute to a livable and healthy city.

Your sincerely,

A handwritten signature in blue ink, appearing to read "Rita Bilerman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rita Bilerman
Chair, Annex Residents' Association

Copy to: Councillor Dianne Saxe
Federation of North Toronto Residents' Associations