



April 24, 2023

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins

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

Dear Chair Brad Bradford and Members of the Planning and Housing Committee,

FoNTRA represents over 30 Residents' Associations in the area bounded by Bloor, Bathurst, Sheppard and the DVP. This area includes a great variety of different neighbourhoods – including the older City and newer suburbs.

FoNTRA supports intensification. It sees it as necessary for the city. On the other hand, it wants to be sure that, as the city intensifies, it does it well. It is crucial that Toronto remain green, and, given climate change, that it become greener. And it is important to build an attractive city. The new multiplexes should fit in well with their neighbourhoods. Some neighbourhoods already have duplexes, triplexes, and four-plexes, and often they harmonize with their surroundings. We can look to them for models for building well.

Consultation direction not fairly reflected in the Final Report

The City has undertaken extensive and varied public consultations – the most recent being in winter 2023. But the proposals in the Final Report seem to differ from the directions being proposed in the final consultations. Specifically, the elimination of FSI and the depth extension to 19m. were mentioned as possible “stretch” directions but did not appear to be proposed for implementation as part of the current initiative. And the unexpected changes, like the depth extension to 19m, are not trivial, and will impact tree cover and reduce green space.

Consultation failed to adequately explain the impacts on neighbourhoods

Toronto is the City of Neighbourhoods – but they are not all the same – various lot plans, lot sizes and shapes, building forms and shapes. Illustrations provided at the consultations demonstrate what can happen on an isolated lot -- but not on a neighbourhood scale or different types of neighbourhood. Voting on a single proposal in isolation, such as whether a proposal to extend depth to 19m. is acceptable or not

is meaningless without context. Lot width and depth, impacts on adjacent buildings, as well as setback and positions of trees can affect impacts.

As residents we expect transparency from the City in its policy consultations – unfortunately the Consultations and the Final Report do not meet this standard.

The following are detailed comments on the OP changes and zoning regulations:

Official Plan statements

- Important statements relate to the need to protect the tree canopy. But current implementation tools are not proving acceptable. Further reporting is required on substantive and strong policies and programs to protect our trees and add much more.
- The proposed Official Plan amendment included that “maintains the low-rise character of each geographic area”. More must be done to meet this objective.

Proposed zoning regulations

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. Now there are many proposed new regulations that fail to respect that principle. In fact many of the proposals reflect existing zoning categories for different areas. But some raise questions about how they will affect the different neighbourhoods. So, why the need to harmonize these regulations?

Here are the proposed City changes that will damage neighbourhoods.

- 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”, ie they are too tall for their setting. Increasing the height limit to 10 m. where the existing area height limit is less (many areas permit 8.5m or 9m.), in order 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.
- Eliminating the density (floor space index) limits where they currently apply, for duplexes, triplexes and fourplexes, but still requiring houses and other building types in these areas to remain subject to FSI. No reason is given for this. The use of FSI provides flexibility within the built form regulation box. Not to fill it. Elimination of FSI will result in a box form, tempered only by the new third floor setback requirement. Further study is required for these areas before FSI before any decision is made re eliminating FSI.
- Big buildings need big lots. Permitting 19 m. long buildings (houses are permitted only up to 17m.) on lots as small as 36m deep and less than 10m wide which may preclude sufficient // which will not allow enough sideyard setbacks for windows, trees, green space and garden suites.

19m long buildings should be limited to lots over 36m deep and wider than 10m.

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

Monitoring

We strongly support **the need for** monitoring, reporting issues and opportunities and ongoing consultations with residents.

As we are now close to a mayoral election, and given that this initiative affects residents across the City, and that major issues are unresolved, we recommend:

- **That the Multiplex Study Final Report be deferred pending the Mayoral election**

Yours truly,

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The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.