



April 24, 2023

Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Councillor Bradford and Members of the Planning and Housing Committee:

The Cliffcrest Scarborough Village SW Residents Association (CSVSWRA) is an incorporated not-for-profit organization working to preserve the unique nature of our neighbourhoods in Ward 20 and a portion of Ward 24. Like most residents of Toronto, CSVSWRA is extremely concerned about the lack of affordable housing. However, in our neighbourhoods, houses that were relatively affordable are being demolished and replaced by overbuilt dwellings that require multiple “minor” variances. In many cases, this leads to the eviction of tenants. We believe that permitting multiplexes, particularly fourplexes, throughout our established low-rise neighbourhoods is likely to remove more affordable houses and result in more demovictions.

Our concerns include:

- Building depth of 17 m. must be maintained as must FSI to ensure gentle intensification. The elimination of these sound planning concepts will lead to the destruction of healthy mature trees. It does not appear that City Planning has considered the environmental impacts of demolishing existing smaller houses and replacing them with multiplexes without FSI restrictions. According to a University of Toronto Engineering study, larger houses have a significantly higher carbon footprint due mostly to concrete basements. (<https://news.engineering.utoronto.ca/large-carbon-footprint-of-new-house-construction-mostly-due-to-concrete-basements/>)
- Every additional unit adds value to land. If someone buys a property for \$ 1 million, it will cost about \$ 350 /sq. ft to build a new dwelling. The cost to build a fourplex of 4,800 sq ft (four units at 1,200 sq ft) is an additional \$ 1,680,000. How many households can finance a project like this? As well, a household will need to pay for accommodation while the new build is constructed. The Multiplex concept is a win for developers and land speculators. What evidence does City Planning have that permitting multiplexes everywhere will create affordable housing? Where are the safeguards to prevent rent gouging and to ensure that units in multiplexes will be affordable?
- Our Scarborough communities are woefully lacking in the amenities and services required to accommodate more density and there is seemingly no one looking at the entire picture. For

example, Scarborough Village has been identified as a Neighbourhood Improvement Area and at least 14 applications for mid-rise (11 storey) condominiums along a four-kilometer stretch have been submitted to City Planning for our immediate neighbourhood. These applications are evaluated on a case-by-case basis. CSVSWRA believes that City Planning needs to be looking at the impacts of development on a **cumulative** basis before more density is permitted, including multiplexes.

- There is inadequate protection for mature trees provided by the current tree protection bylaw. At present, Urban Forestry rubber stamps the destruction of mature trees to accommodate overbuilt houses. The Garden Suite bylaw did not protect mature trees; we lack confidence that the proposed changes to allow multiplexes everywhere will protect mature trees. Mature trees serve many purposes, not the least of which is absorption of stormwater and reduction in erosion, of key importance to Scarborough Southwest, our bluffs and our already limited stormwater drainage system. This is also not acceptable when our planet is facing a climate crisis, and more intense rain events and heat waves;
- In February, the TTC announced cuts to service throughout the city, including in Cliffcrest and Scarborough Village. At the Multiplex consultation, one of the planners enthusiastically promoted the existence of TTC stops in every city neighbourhood. There might be TTC stops but service is declining. Clearly, one City division is not aware of what other City divisions are doing;
- In 2010 Toronto Public Health began to develop the Toronto Food Strategy. The goal was to move from an outdated concept of “market forces determine location of food stores” to “neighbourhoods are developed with food access, affordability and resilience in mind” (<https://www.toronto.ca/legdocs/mmis/2018/hl/bgrd/backgroundfile-118079.pdf>, p.5) The majority of residents in our neighbourhoods cannot walk to buy food, unless you count the dollar store and large chain drug store located in Cliffcrest Plaza, a site slated for a future condominium development. A vehicle is required. Residents in our communities can walk to buy a used car but we cannot walk to buy an apple. At public consultations, residents are quick to point this out. However, planning staff are still promoting the outdated market force theory. This is yet another example of City divisions operating in silos.
- Our only Community Centre is not walkable for the majority of residents in our RA’s catchment area;
- Unlike arterial roads in other parts of the city, our arterial roads do not have cafes, retail stores that provide necessities or a vibrant street life for pedestrians;
- In our communities, builders violate City bylaws with impunity, especially the removal of mature trees without permits and at times when Forestry inspectors are not at work;
- CSVSWRA requested a public consultation for Ward 20 several times and this request was ignored. In fact, none of the wards in Scarborough had a ward specific consultation, yet City Planning did hold a consultation with More Neighbours Toronto, despite developer links to this organization.

CSVSWRA believes that the City of Toronto needs to address long-standing issues before making wide-ranging changes to the Official Plan and Zoning By-laws. We recommend:

- Implementing adequate by-law enforcement, including enforcement on week-ends, before opening up the city to profit-motivated developers;
- Looking at sprawling commercial spaces and one storey retail, such as LCBO's, along arterial roads that could be converted to missing middle housing before making incursions into established and resilient residential areas, many of which have a healthy canopy of mature trees;
- Engaging in evaluations of communities in partnership with residents to determine what amenities are needed before increasing density and exacerbating long standing issues;
- Maintaining neighbourhoods that afford present and future residents proper light, setbacks, privacy and trees.
- Genuine democratic discourse that addresses the concerns, listed above, of those who live in our communities has not occurred during the EHON process to date. Instead, City Planning is pushing through changes that lack planning and appear to have been largely influenced by an unverified poll that may have been unduly influenced by a development advocacy group.

Yours sincerely,

Janet May and Alan Burt,
Co-Chairs, Planning and Sustainable Development Committee