

**Nancy Martins**

Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

April 25, 2023

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

The members of the Teddington Park Residents Association have a number of concerns with the Multiplex Study Final Report.

Jaye Robinson hosted a public meeting targeted for her Ward 15 Don Valley West constituents on March 6 entitled “Expanding Housing Options in Neighbourhoods: Multiplex Study Ward 15 Consultation”. The fact that the meeting was attended by 215 people demonstrates how important the issue of Multiplex housing is to the residents of DWA neighborhoods.

There was broad concern raised about the potential for damaging impact from multiplexes on our low-density neighborhoods if the policy changes are passed. The proposed policy will allow multiplex buildings to have a larger footprint and building form than a single-family dwelling on the same street. There were also several additional policy changes that staff included in their presentation that they stated that they wished to add – most of which added massing.

The take-away of the TPRA was that the Multiplex Policy was being presented as density-neutral to limit the objections of owners of single-family dwellings, but in fact, the objective of the policy is to effectively eliminate as many of the density limiting clauses as possible.

Fast forward to the Staff Report of the Multiplex Study submitted to Planning and Housing Committee on April 20. This revised proposal contains numerous new policies that eliminate most restrictions on size and form for multiplexes but retain the size and form restrictions for SF residences. So much so that, if approved as drafted, the policy will wreak havoc in our low-density neighborhoods through the introduction of higher density, box-like buildings in unlimited numbers with literally no restriction on location. The policy will apply to every street in every neighborhood regardless of the quantity and nature of the opposition. The result, in our view, will make it economically punitive for builders to construct a new single-family residence in a low-density neighbourhood, as they will inevitably opt for the more profitable multiplex.

Also of interest is the following statement in the summary section of the Staff Report “While most multiplex units are anticipated to be delivered as market rental housing, they will provide ground-related alternatives to add to the range of Toronto’s low-rise, mid-rise and tower housing types.”

What is apparent is that it is entirely unclear what drivers will determine what proportion of multiplexes to be built will be rental units and what portion will be individually owned units. At this point the market value of a new multiplex project vs a new single family dwelling building is unknown. Will there be an economic case for building single family dwellings in Toronto after the adoption of the Multiplex Policies? We suggest that a study of the impact on Toronto’s single family dwelling housing market be conducted before these policies are adopted.

It is the position of FoNTRA and the TPRA that the following major changes need to be made to the Multiplex bylaw:

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).

Additional changes that the TPRA supports include retaining a minimum room size and retaining restrictions on balcony size.

There has been no community consultation regarding some of these changes as they were not included in the earlier document.

The reasons our residents are opposing these density increasing policies are:

1. The proposed Multiplex policy is too generalized. There is no matching of policies to reflect the different densities and different abilities of neighborhoods to accommodate increased densities.
2. There are no additional parking space provision to match the number of new housing units to be built.
3. The visual form and massing of the proposed multiplex buildings will not respect the character of the residential buildings in most of the existing neighborhoods.
4. There is no additional public infrastructure proposed to match the additional population generated within the existing neighborhoods such as schools, hospitals, police services, and parks.
5. There are no additional commercial services proposed to match the additional population generated within the existing neighborhoods (restaurants, retail stores, pharmacies, veterinary services, hardware stores, et.)
6. Higher density means less space for mature trees and soft landscaping and therefore increased storm water runoff and increased localized flooding.

7. Homeowners have made their most significant investment based on a known set of rules for the neighborhoods in which they have chosen to purchase their homes. Their elected officials are now proposing to upend these rules with no mandate to make the proposed changes. The character of these neighborhoods will be permanently and irreversibly changed.

The TPRA applauds Planning and Development's objective of increasing the number of multiplexes within the city. However, we feel the set of policies proposed is too broadly applied and has not been sufficiently refined to protect the qualities of our low-density neighborhoods that have made Toronto's single family residential neighborhoods safe and well-functioning places to live.

Respectfully,

A handwritten signature in blue ink that reads "S. Stevens". The signature is fluid and cursive, with the first name being more prominent.

Scott Stevens  
President, Teddington Park Residents Association

CC:  
TPRA BOD  
Jaye Robinson  
Geoff Kettel, FoNTRA