



April 26,2023

Planning and Housing Committee (phc@toronto.ca)

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

Dear Committee Members:

As the ABC Residents Association, we are writing to the Committee with our comments for the proposed zoning by-law amendments for Multiplex Housing. Our neighbourhood has always allowed Multiplex units in R zonings so we are uniquely positioned to understand their inclusion in the fabric of the neighbourhood. With this in mind, we participated fully in the City led consultations curious as to any proposed changes.

During the consultation process we were repeatedly assured that the intent in our neighbourhood was to allow Multiplex housing the same built form envelope as other permitted residential built forms in the R designated neighbourhoods. We understood that the purpose of the by law changes was to even the playing field and let Multiplex housing have the same zoning rules as detached and semi's. We agreed with this rationale.

We were surprised and concerned to find that the consultation directions were not reflected in the Final Report. The final report recommends that the depth of Multiplex dwellings be extended from the current 14m to 19m as opposed to 17m which would match detached and semi detached dwellings depths. We oppose extending building depths to 19 metres as it will have too many adverse effects. The current bylaws in our neighbourhood with heights ranging from 10 to 12 metres allow ample envelope for Multiplexes to be built.

Our second concern relates to the removal of FSI limits under item **1.0 Density**. The FSI limit will not apply to a duplex, triplex or fourplex (Sec 43 C). This will cause some issues of overbuilding on lots where setback regulations may not adequately limit density and its impacts. We suggest that an upper limit on density be included in this revision. Based on some previous examples we have seen reasonable infill developments at an FSI of 1.30 in some contexts. That limit should be tested by the City to verify that a reasonable outcome is possible.

We expect there will be many cases of pushing the density up by varying the physical envelope limits of height and setback. In this case the argument will be used that density is not limited so height and setback variances should be approved as they comply with the intent of the unlimited density .

The increase in building depth to 19 metres and the elimination of FSI are not trivial, and will impact privacy and will reduce green space and tree cover. As residents we expect transparency from the City in its policy consultations – unfortunately the consultations and the Final Report do not meet this standard. We suggest that the city defer this matter in order to address these serious issues and avoid potential future adjudication.

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ABCRA Co-Chair

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