

April 26, 2023

Planning and Housing Committee
City of Toronto
100 Queen St. W., 13th Floor
Toronto, Ontario M5H 2N2

RE: Expanding Housing Options in Neighbourhoods – Multiplexes – PH3.16

I am a Land Use Planner who has worked for more than a dozen of my twenty-five year career as a planner on small-scale development projects, with a particular interest and focus on low-rise multiplexes in Toronto. I have been engaged with the EHON initiative from the start, and am very glad to see this next phase of it arrive at Planning and Housing Committee. I support the comments submitted by Environmental Defence and Habitat for Humanity GTA.

The proposed changes through the proposed multiplex Official Plan Amendment and Zoning By-law Amendment will have a demonstrably positive effect on the provision of new, neighbourhood scale multiplexes throughout the City. While I personally would have liked to see even bolder steps taken in this program, I am extremely satisfied that the proposed changes will result in more housing in more neighbourhoods that in no way disrupt the low-rise character of the respective areas.

The proposed changes, in particular changes to the permitted height, depth, and Floor Space Index (FSI) are exactly what are needed for this initiative to be a success. These performance standards will result in the construction of many family sized multiplexes, of various sizes and configurations. I have worked on many such projects in Toronto's R-Zone designated areas, and can speak from experience that units within these parameters are achievable

I am particularly impressed that Planning Staff has proposed, stemming from considerable public support for the idea, removing (FSI) requirements for multiplexes. This will ensure that projects which otherwise meet the yard setbacks, landscaping, height, depth, etc. requirements of the Zoning By-law are not unduly put at risk through the need for a variance at the Committee of Adjustment. FSI is, in a word, a stupid way to regulate building massing when the Zoning By-law contains dozens of other regulations restricting the form of the building.

By way of example, I offer the following example. The house on the left triggered one single variance for FSI, and it otherwise fully complied with the Zoning By-law. The house on the right, on the other hand, fully complied with all provisions of the Zoning By-law (including FSI) and was constructed with building permits. The only difference between the two is that the third floor on the left had a bedroom and the third floor on the right was solely an attic.



Required FSI variance (refused by Committee of Adjustment and the Toronto Local Appeal Body)



Required no variances whatsoever and received a building permit

As should be obvious,



The house shown above only has one unit in it, and fully complies with the Zoning By-law. What the proposed changes will allow is for homes like it to have four units in it, city wide. This will allow for an expansion in creativity on how people in all communities can respond to the need for housing, either for themselves and their multigenerational family, or for others. It will enable a new generation of small scale developers to emerge, something that has been missing from the city since the planning regime signaled that they weren't welcome anymore. The EHON multiplex initiative is a much needed corrective of this.

Despite the fears of some (well, one) councillor, this will not result in triplexes "popping up overnight," however great that would actually be. This is a generational change, that will result in the gradual evolution of neighbourhoods in accordance with the needs of homeowners and projects by small scale developers. I support Councillor Myers's requests on expanding this program to up to six units, enabling access to CMHC financing options.



Conclusion

The proposed changes will result in much less work for consultants like me, because if you don't need variances you don't need me to help you get them approved. I'm absolutely fine with this. When there is an option to create more housing for more people in more neighbourhoods that have erected invisible fences around them, put me out of business. I'll do something else.

I fully support the EHON multiplex initiative and the staff recommendations before Planning and Housing Committee and Council as a first step to allowing for more multiplexes across Toronto.

Kindest regards,
GALBRAITH & ASSOCIATES, INC.

Sean Galbraith, MCIP, RPP
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