

April 26, 2023

BY E-MAIL ONLY phc@toronto.ca

John D. Elvidge
City of Toronto Clerk
Second Floor, West Tower
100 Queen Street West Toronto ON, M5G 2N2

Re: City-Initiated Amendments to the Official Plan and Zoning By-law 569-2013 to permit the Development of Duplexes, Triplexes and Fourplexes on lands designated Neighbourhoods and subject to the Residential Zone category (Application Number 20 175353 STE 10 TM)

Toronto and Region Conservation Authority (TRCA) is in receipt of the Notice of Public Meeting for the above-noted Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) to be held by the Planning and Housing Committee on April 27, 2023. We understand that, if approved, the OPA and ZBA would permit the development of multiplexes (duplexes, triplexes and fourplexes) on lands designated as Neighbourhoods and subject to the Residential zone category.

- The OPA would apply a Site and Area-Specific Policy to all lands designated as Neighbourhoods on Maps 13-23 to enable permissions and define development criteria for the conversion or construction of multiplexes within low-rise neighbourhoods. The ZBA would permit multiplexes on lands zoned Residential Detached (RD), Residential Semi-Detached (RS), and Residential Townhouse (RT). In addition, zoning standards and regulations applicable to multiplexes in the Residential (R), and Residential Multiple (RM) zones would be harmonized to align with the standards and regulations of detached and semi-detached dwelling types.

Comments

TRCA supports the intent of the proposed OPA and ZBA to permit increased housing options, however, in accordance with the Provincial Policy Statement, 2020 (PPS), and TRCA's, The Living City Policies, TRCA would not support intensification within hazardous lands associated with valley and stream corridors and the Lake Ontario shoreline. In addition, TRCA's section 28 regulation under the *Conservation Authorities Act* is applicable law under the *Building Code Act*, and TRCA would not be able to support a permit for residential intensification within lands subject to flooding and erosion.

The amendments should ensure that intensification through new, expanded or converted multiplex housing is prohibited within natural hazards (i.e., flooding, erosion and/or unstable slopes) and in areas rendered inaccessible to people and vehicles during times of flooding and/or erosion hazards, unless it has been demonstrated that the site has safe access appropriate for the nature of the development and the natural hazard.

The proposed amendments may benefit from the following:

- OPA – Through the OPA, Policy No. 826 in Chapter 7 could include an additional “SIDEBAR” specifying that intensification through multiplex development or conversion is not permitted within Hazard Lands, in accordance with provincial policy and the City's Official Plan (i.e., 3.4 – The Natural Environment).

- ZBA – The ZBA could be amended to reference the “General” clauses in Article 5.10.40.1 of the City’s Zoning By-law related to location restrictions for buildings below a shoreline hazard limit of stable top of bank, or otherwise require general compliance with the entirety of the bylaw.

We trust these comments are clear and are of assistance. Should you have any further questions or comments, please contact the undersigned at 437 880-2327 or by e-mail at jthompson@trca.on.ca.

Sincerely,



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Cc :

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