



April 26, 2023

Planning and Housing Committee
City of Toronto
PHC@toronto.ca

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

The Upper Avenue Community Association agrees that Toronto needs more multiplexes, particularly in Neighbourhoods where populations are declining, and infrastructure exists. The proposed current by-laws in front of you are flawed and need to be sent back to staff to be revised before going to City Council.

Major changes that 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 the requirements 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).

The benefits of making these four changes are:

- Preservation of the environment and neighbourhood trees. FSI and Building Depth are one of the few tools that protect mature trees. They ensure sufficient soft landscaping and space for trees to be retained and thrive. Removing FSI and increasing building depth to 19m will be devastating to our tree canopy and will destroy healthy trees on many redeveloped lots in most single-detached neighbourhoods. With intensification in neighbourhoods, we will get more people.

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More people need more trees. Planting trees elsewhere in the city instead of retaining trees where people live is not the right approach for a liveable, equitable, sustainable environment for all.

- Going from 1 housing unit on a lot (the majority situation in single detached neighbourhoods) to 3 units will meet the provincial requirements and allow gentle density which is the goal for becoming the welcoming city of diversity and fight the housing crisis. It will be more affordable to build and encourage existing residents to renovate into multiplexes. Permitting 4 units will just provide more investment opportunities for developers and the few who can afford them and will not generate more affordable rental housing.
- Keeping building depth at 17m and keeping FSI will ensure that new multiplexes fit in with single detached neighbourhoods and with existing multiplexes in neighbourhoods that already permit them. Removing FSI and increasing building depth and building height beyond what is currently permitted for multiplexes will encourage developers and investors to tear homes down and replace them with newer, larger and much more expensive units prematurely. It will also threaten the built-form character of the neighbourhood.

We have no confidence how the current Municipal Code Chapter 813 is written, and that the General Manager of Parks, Forestry and Recreation will be successful refusing tree permits and refusing the construction of Multiplexes given the large, form-based approach to Multiplexes with no consideration whether the lot or neighbouring lots have mature, large trees. Forestry staff have advised that this has not been proven and we see healthy trees routinely destroyed if they are within or near an as-of-right building footprint.

We are in the midst of a mayoral election race. I request that you send these by-laws back to staff to revise and come back after the election with better by-laws that encourage affordable housing, retain neighbourhood character and save our trees, all of which contribute to a livable and healthy city.

Sincerely,



France Rochette,
Chair UACA

cc: Councillor Mike Colle, Ward 8 Toronto