

April 27, 2023

Dear Sir or Madam:

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

This letter responds to the City's request for input on the major changes proposed above.

We are writing as representatives of Wychwood Park through its trustees, the Wychwood Park Ratepayers' Association, and the Wychwood Park Heritage Advisory Committee. Our letter is also arising following an April 25th neighbourhood meeting that was open to all residents of the Park and was held to review and discuss the City's proposals and a draft version of this letter.

The Wychwood Park community acknowledges Toronto's housing needs and supports the wider permissions for multiplexes across Toronto, including the Wychwood Park Heritage Conservation District, Toronto's earliest Heritage Conservation District (HCD), established in 1985.

We do not see any inherent conflict between allowing multiplexes and conserving heritage.

Our community raises one major concern.

Concern with Removal of FSI Maximum for Multiplexes

We are concerned with the proposal that multiplex buildings would no longer be subject to a density maximum in the Zoning By-law. We believe the current maximum floor space index (FSI) of 0.35X plays a critical role to preserve heritage in Wychwood Park.

The park element of Wychwood Park arises from its landscape of several hills, mature tree canopies, valleys, wetlands, and a pond. The housing element of Wychwood Park arises from its creation over several decades more than a century ago as a neighbourhood in the Arts and Crafts style. The Park includes many large, irregularly shaped lots along a winding road. It also includes unusual conditions, as many lots across the Park front on two roads, there is a "house behind a house," and atypical setbacks.

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The heritage character of Wychwood Park is reflected not only in its HCD Plan (1986; amended 1996), but also more recently in the City's site-specific Official Plan Amendment (OPA) 488 for the Park.

We are pleased to see that the proposed multiplex Official Plan Amendment contains a policy to ensure that the development of multiplexes will conserve heritage properties and heritage conservation districts, as well as special landscape or built-form features of a neighbourhood: see proposed Site-Specific Policy 826, paragraph b)i.

The City has studied various design options leading to the proposed multiplex standards. These consider a typical pattern of rectangular lots (see *Multiplex Design Modelling - 06/17/2022*). Within this pattern, the City's existing and proposed zoning standards - e.g., height, setbacks and building depth and length - seem likely to reliably constrain the overall scale of multiplex buildings and ensure compatibility with neighbouring houses - even in the absence of a maximum FSI regulation.

In the context of Wychwood Park, with several large and many irregularly shaped lots, as well as unusual site conditions, zoning regulations such as setbacks, building length and depth alone will not act to effectively constrain building scale. In this circumstance, the proposed zoning regime will not sufficiently constrain new multiplex buildings or additions to existing buildings to ensure that they will be consistent in character with neighbouring houses.

Within the Park, the most important zoning constraint is the 0.35 FSI. The Park has always relied on this 0.35 FSI to control the scale of new buildings or additions.

We believe it is consistent with the City's proposed multiplex official plan policy to maintain the existing FSI constraint within Wychwood Park.

By contrast, removal of the FSI constraint from the proposed Zoning By-law amendment risks permitting new large multiplexes that will be out of scale and incompatible with neighbouring homes, and destroy or compromise natural landscape areas, topography, and trees canopy.

Should the general terms of the Multiplex Zoning By-law be approved as proposed, we request that the Council add a site-specific exemption to the Zoning By-law to provide that the current 0.35X maximum FSI continues to apply to the area subject to the Wychwood Park OPA 488.

Proposal re Parking

A related issue relates to parking. In the absence of zoning that limits the creation of surface parking spaces, new multiplexes or conversions will result in new clearing and hard surfaces that will harm the natural landscape, trees and topography. Our recommendation is that the City implement a zoning standard that would prohibit the creation of parking areas on the existing landscaped area of a lot.

Conclusions

Thank you for the opportunity to provide input on these important City proposals.

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We would be pleased to attend any future discussion by the City Council or staff to discuss our concerns.


Sincerely,



Victoria Cowling
Trustee



Susan Hoyle-Howieson
President Wychwood Park
Ratepayers Association



Susan Richardson
Co-Chair, Wychwood Park
Heritage Advisory Committee