



To: Mayor Chow, City Clerk, Councillors

**SUBJECT: Concerns related to PH 22.2 (Neighbourhood Intensification), PH 22.3 (Multiplexes), PH 22.8 (Avenues).**

Dear Mayor Chow and City Council,

We are writing this letter to express our concerns regarding the Housing in Neighbourhoods package items especially PH22.3, PH22.4, and PH22.8 — that are set to be considered by City Council this week. While each proposal aims to expand housing options, they each assume that one-size-fits all and fail to adequately account for legitimate concerns by residents and ratepayer associations, which are crucial for effective and sustainable implementation. This letter of concern about creating more affordable/accessible/family-friendly housing.

If the Toronto Mayor and City Council do not meaningfully consider these concerns, Toronto's neighbourhoods will experience irreversible unwanted degradation and, although they will have higher densities, they will become more investor owned.

The Cliffcrest Scarborough Village SW Residents Association (CSVSWRA) urges the Mayor and Councillors to carefully review these items and consider amendments that respond to the concerns expressed. In the case of PH22.4, we ask that a Council decision be deferred to a future time when there is available data and information about the local impacts of multiplexes and what types of sites are suited and not suited. The CSVSWRA is also a signatory to an open letter and petition regarding "Proposed Amendments to Permit Sixplexes in All Toronto Neighbourhoods As of Right (item PH22.4)".

In summary:

- PH22.2: Theoretical forecasts of EHON units must not replace evidence-based assessments of appropriate sites for appropriate builds, and trees and greenspaces must be preserved by design.
- PH 22.3:
  - Sixplexes must be defined as apartments in order to retain building code requirements related to fire safety and internal storage of garbage bins.
  - Pre-approval checks are needed to evaluate impacts on basement flooding, privacy, shade, and location of garbage bins to abutting properties.
  - All multiplexes must provide one parking spot per unit to accommodate an aging population and accessibility needs.
  - Based on the evidence, we stand to lose or injure two trees per multiplex building...and the theoretic forecast is more than 17,000 multiplexes (based on ~87,000 units and average 5 units per multiplex) across the City – as above, tree and greenspaces must be preserved by design.



- PH 22.8:
  - Revise the pilot to include a broader mix of Avenues from across the city — in consultation with local Residents' Associations — to ensure the resulting framework is more diverse and representative before it is applied citywide.
  - Information must be provided to residents (by Ward and City-wide) much more in advance of final reports and decisions and in an understandable way so that residents are aware of and understand what is coming.
  - Begin consultations in the fall, once the strategy is finalized and residents and community groups are more available.
  - All EHON initiatives should be required to analyse how to not add undue burden to MLS and bylaw enforcement, who are already overburdened and cannot keep up.

In detail:

#### PH 22.2

The Neighbourhood Intensification Research Bulletin (Attachment 1) is a perfect example of the pie in the sky theoretical methodology that lacks grounding in the reality of Toronto's many streets and neighbourhoods. This study examines the theoretical potential for new housing units in Toronto's Neighbourhoods land use designation, as part of the Expanding Housing Options in Neighbourhoods (EHON) initiative. The output is scary. You will see what I mean as we apply the numbers to some of the findings to date. We understand that Toronto wants the province to deliver funding from the Housing Accelerator Fund, but this cannot come at the destruction of our communities and a livable Toronto. And these estimates cannot represent an assessment of the first phase of Expanding Housing Options in Neighbourhoods initiatives up to the end of 2024." At every consultation put on by EHON, the latest relating to the Garden Suites and Fourplex Monitoring Program, residents and ratepayer associations have been screaming about the unintended consequences and builds that go beyond proposals.

In the entire report there is not one mention of trees.

In the entire report, the greenspaces are only mentioned in the context of prevention of urban sprawl, but no conservation of greenspaces within the actual urban area that is considered one of the greenest cities in the world...for how long? And how can we adapt to and mitigate climate change with a diminishing canopy (shrubs aside)?

"On October 2, 2019, City Council declared a climate emergency for the purpose of "naming, framing and deepening our commitment to protecting our economy, our ecosystems and our community from climate change" (Item MM10.3)."

#### PH 22.3

The Multiplex monitoring report provides little to no evidence or data, mainly statements.

"Through the City's Multiplex Monitoring Program, staff evaluated the impact of multiplexes on the City's sewer system, including the impact on basement flooding. The findings indicate that while individual multiplexes contribute only minor increases in flow



to the sewer system, in areas where combined sewers are located, longer-term concentration of multiplex development has the potential to exacerbate existing constraints to adequate sewer capacity during wet weather flow. This may increase the risk of basement flooding in certain locations.”

Will an individual multiplex with minimal side yard setback and 45% less permeable surface have no impact on the basements of abutting neighbours? The proposal is lacking in any pre-approval checks and balances to assess the cumulative impacts of multiple of two or more of these builds in a concentrated area of a neighbourhood.

The report further talks about the problems associated with not internalizing the garbage bins. And yet, on June 12<sup>th</sup> PHC approved a new definition of apartments as 7 units or more, in order that fire safety and internalization of garbage requirements that come with the Ontario Building Code do not need to apply to sixplexes.

With respect to parking, the findings are concerning because a “hope hat” is being hung on a majority of multiplexes without parking being located by transit agencies from a small sample of the 222 multiplexes.

“Staff mapped the parking data across the city and included an 800-metre radius to subway stations, GO stations, and light rail transit “LRT” stations (Attachment 16). The mapping exercise demonstrated the relationship between the multiplexes with no parking spaces (71 total sites) and existing or planned public transit infrastructure. Some sites with no parking spaces fall outside the 800-metre radius and are not located near a streetcar or rapid bus network. However, the majority of sites are located within 800 metres of these transit stations and others are often close to streetcar lines.”

This direction completely ignores the aging demographics of the city and accessibility requirements.

Furthermore, what about noise, shadow, overlook/privacy? Where is the data and study on those impacts? Were any neighbours/residents interviewed? There is not one mention of this in the study.

Finally, the trees.

“Urban Forestry staff continue to monitor the impacts to tree canopies resulting from multiplex development approvals. As of April 4, 2025, Urban Forestry’s findings demonstrate that 52 of 222 sites (23%) included a submission of construction-related tree permit applications requesting tree injury and/or removal”.

What this report does not say is that the balance of the 222 sites have not yet been evaluated. So, let’s extrapolate. Out of the 52, 41 sites (or 80%) saw 47 tree removals and 49 damaged...so if we use the same rate for the 222:

80% x 222 x per 41 sites 47 trees removed and 49 damaged =  
TOTAL ~ 204 trees removed & 212 damaged.



The theoretical Neighbourhood Intensification Bulletin projects 87,134 Multiplex units (so assuming 5 units per build, we forecast more than 17,000 multiplex builds across the City. At the observed rate of tree destruction, this rate would result in ~15,600 removed trees and 16,300 damaged trees. The Growing Space for Trees, Infill Development and Iceberg Homes initiative MUST introduce protections (not just guidelines) for trees, but the initiative is still incomplete!

PH 22.8

OPA 778 introduced 283 kilometres of new Avenues (see Attachment 1)—which represents a 165% increase—and removed the need for Avenues Studies and Avenue Segment Reviews.

This initiative is huge and the HAP team continues to not inform or engage with the ratepayers in any meaningful way.

Firstly, information notices are provided to RAs/public with little advance notice, this PHC meeting is a prime example. A meaningful consultation would mean that we'd already have information / materials for a planned consultation with ratepayer associations this June/July. As it is, nothing has been provided so that we are unable to socialize the technical information with our members and residents to ascertain support or concerns. Secondly, phasing is useless when the City doesn't collect or analyze how the builds turn out and how they affect abutting sites or neighbourhoods. There's no time built in between phases to consider and report on the findings and how things may need to be adjusted before moving to the next ward or phase. In fact, there is no evidence that any EHON initiatives been adjusted to respond to the many concerns of residents (who are ratepayers) noted in the reports.

The elephant in the room. We want to bring your attention to MNT0 petition ([New/Mode | Make your voice impossible to ignore](#)) and the use of such tactics by the development lobby to push further deregulation for the benefit of investors and speculators. The voices of residents and volunteers organizations representing Toronto residents have regularly been pushed aside by these tactics. Our Mayor, City Council, and especially members of the Planning and Housing Committee need to recognize this imbalance.

As a counter point to the deregulation lobby, resident associations continue to show up at Toronto consultations to bring forward concerns about multiplexes and other EHON initiatives where the aim is to reduce regulation and requirements and remove democratic processes (i.e., replacing with as-of-right). This letter of concern is not about standing in the way of more affordable/accessible/family-friendly housing, but rather about evidence-based decision making and the purpose of regulation.

The Coalition of Etobicoke Residents Associations (CERA) recently issued a survey across the City. The results are telling and a counter to the investor/development lobby. CERA presented these results to PHC on June 12<sup>th</sup>. and it was pointed out in the meeting that in 6 days CERA was able to get double the response rate from residents compared to EHON over months.



Here are a few highlights.

1. Residents/ratepayers feel strongly that:
  - Multiplexes should not be permitted on residential lots, and the City should wait to expand as-of-right sixplex housing developments until studies on the challenges and benefits of fourplex are completed;
  - The city should wait to expand as-of-right sixplex housing developments until studies on the challenges and benefits from the sixplex pilot are completed in 2028;
  - Sixplex developments should be restricted to specific types of lots.
  - All sixplex developments should require the approval of Committee of Adjustment (they should not be as-of-right and would allow community consultation);
  - The City of Toronto has not adequately informed residents about proposed sixplex developments;
  - One size does not fit all neighbourhoods in our city.
2. The survey shows that residents are open to sixplexes being permitted in mixed-use neighbourhoods and on major/minor arterial roads that have public transit.
3. Residents feel strong that as of right sixplexes without parameters (e.g., parking requirements) will NOT address housing needs.
4. Residents feel strongly that multiplexes must align with the character of the existing neighborhood in which it is located in terms of built form, setbacks, heights, landscaping, lot coverage, etc.

Lastly, these ill-conceived proposals, if passed without further thought and refinements, will put a greater burden on MLS and regulation/bylaw enforcement. The head of Toronto's bylaw enforcement division will be stepping down this October because the job is "chewing him up and spitting him out". And these draft multiplex proposals are designed to add to that churn.

We are concerned Torontonians and community groups who want to see our City grow in ways that meet the needs of its residents and not at the hands of developers who build and leave. We want to make Toronto's neighbourhoods affordable and livable and free of illegal rooming houses and unscrupulous investors.

Thank you for your consideration,

Cliffcrest Scarborough Village SW Residents Association