

PH22.3 - Expanding Housing Options in Neighbourhoods - Multiplex - Monitoring Program Final Report, Lenka Holubec, ProtectNatureTO

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Toronto, ON M5H 2N2

Via email: councilmeeting@toronto.ca

RE: H22.3 - Expanding Housing Options in Neighbourhoods - Multiplex - Monitoring Program Final Report

Dear Mayor and Members of City Council,

On behalf of ProtectNatureTO, I am writing to express concerns regarding the Housing in Neighbourhoods package items especially PH22.3, PH22.4, 2025.PH22.5 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 key residents' concerns that are crucial for effective and sustainable implementation.

All of these proposals also fail to account for the environmental impacts of the expanding of housing options in respect to a potential biodiversity loss, a loss of trees and backyards biodiversity and the negative effects on the natural heritage (the ESA/ANSI/PSW) adjacent to development resulting from "as of right" proposals. There is a little consideration given to the fact that adding more density, height, retail, avenues and infill along one-size-fits all approach may not be in conformity with the Official Plan adopted environmental policies mandate.

OPA 262 approved by the Province in May 2016. The OPA is in full force and effect.

The Official Plan, Chapter 3.4 THE NATURAL ENVIRONMENT. 3-48

"Known areas exhibiting these environmentally significant characteristics are shown on Map 12A. Where these areas extend onto lands above the top of bank which have underlying zoning permissions, the lands may be used to calculate permissible density in the zoning bylaw. An impact study, as referred to in policy 12, will be required for any proposed development adjacent to these areas. Any proposed development will avoid these areas, minimize negative impacts and, when possible, restore and enhance the ecological functions attributed to these areas".

[Map 12A Environmentally Significant Areas](#)

[Map 12B Provincially Significant Wetlands and Areas of Natural and Scientific Interest](#)

This letter references to the items considered by Planning and Housing Committee - Meeting 22 on June 12: PH22.3 Expanding Housing Options in Neighbourhoods - Multiplex - Monitoring Program - Final Report; PH22.4 Housing Accelerator Fund: Expanding Permissions in Neighbourhoods for Low-Rise Sixplexes - Final Report; PH22.5 Housing Accelerator Fund: Apartment Infill Study - Residential Infill Report and PH22.8 Housing Action Plan: Avenues Policy Review - Phase Two Work Plan.

Recommendation:

- Avoid a one-size-fits-all approach and support intensification only where it's practical and appropriate.
- Where the policies, included in The Official Plan under Chapter 3.4 THE NATURAL ENVIRONMENT apply, "one-size-fits-all" approach is not in conformity with the adopted policies and de facto undermines its mandate and intent.
- Refer the item back to Planning staff for further study and consultation.

Sincerely,

Lenka Holubec, on behalf of [ProtectNatureTO](#)

Cc: Jason Thorne, Chief Planner and Executive Director City Planning

Romas Juknevičius, MCIP, RPP, Acting Manager, Strategic Initiatives, Policy and Analysis,
City Planning,

Kyle Fearon, Project Manager, Strategic Initiatives, Policy and Analysis, City Planning,

Kyle Pakeman, Senior Planner, Strategic Initiatives, Policy and Analysis, City Planning

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"Protecting Toronto's natural environment and urban forest should not be compromised by growth, insensitivity to the needs of the environment, or neglect. To this end, proposals for new development may need to be accompanied by a study assessing their impact on the natural environment." CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-44

"Biodiversity refers to the rich variety of life forms and the critical roles they play within varied ecosystems. Ecological health is related to healthy biodiversity. The greater the biodiversity of a defined geographic area, the greater the ecological health and resiliency of that area. Policies protecting and enhancing the natural heritage system are a key pillar of biodiversity conservation within Toronto. The biodiversity found in small green spaces, street trees, green roofs, community gardens, hydro corridors, cemeteries, and backyards also play an important role in our urban ecosystem." CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN. Chapter 3,3-45