

June 11, 2025

Planning and Housing Committee
City Clerk
Attention: Nancy Martins, Planning and Housing Committee
Toronto City Hall
100 Queen St. West
2nd Floor
Toronto, On M5H 2N2

Dear Members of Planning and Housing Committee:

**RE: PH22.4 Housing Accelerator Fund: Expanding Permissions in
Neighbourhoods for Low-Rise Sixplexes - Final Report
Proposed Amendments the Official Plans and By-law 569-2013 to Permit five and
sixplex Housing**

Our firm represents ABC Residents Association, which has represented the interests of residents, including condominium and apartment residents, in the Yorkville area since 1957. The boundaries of ABC run east from the intersection of Avenue Road and Bloor to Yonge Street, north up Yonge Street to the CPR track, and west to Avenue Road, then south to Bloor.

We are writing to the Planning and Housing Committee to express ABC's concerns with respect to the process that the City has followed regarding the proposed official plan and bylaw amendments to By-law 569-2013 for the purpose of permitting five-unit and six-unit low-rise multiplexes across all residential neighbourhoods in the City. ABC also has concerns regarding the failure of City staff to adequately study and prepare for the adverse impacts that will arise if steps are not taken before this expansion is permitted in *Neighbourhoods*.

The process that has led to staff's recommendation to amend the official plan and Zoning By-law 569-2013 has been rushed and will result in significant changes to Toronto's *Neighbourhoods* if staff's recommendations are accepted by Committee and Council. Further, staff have identified adverse impacts that will occur, but have not addressed how those negative impacts will be addressed *before this expanding approvals for five and sixplexes in all Neighbourhoods across the City*.

It is critical to note that our client, ABC, is not opposed to the creation of additional housing units in the City. ABC is not opposed to intensification and redevelopment. ABC is supportive of good planning. Good planning requires much more than just an increase in

the number of dwelling units in the City. Good planning requires a detailed examination and consideration of the myriad of factors that must be considered when determining how redevelopment and intensification will be achieved.

For example, Toronto's Official Plan contemplates most of the population growth to occur in *Mixed Use Areas* and *Regeneration Areas*. Therefore, the City's resources and assets necessary to support population growth have been directed towards those areas.

Conversely, the City's *Neighbourhoods* are planned to be physically stable areas made up of residential uses in lower scale buildings. The Official Plan specifically states that, "The stability of our Neighbourhoods' physical character is one of the keys to Toronto's success." The physical character of Toronto's Neighbourhood has developed as it has because the designation allows for detached, semi-detached, duplexes, triplexes and townhouses.

Permitting up to 6 separate dwellings in one structure within a *Neighbourhood* is not something that is contemplated in the City's Official Plan. This change will result in significant changes to the use and character of properties within *Neighbourhoods* throughout the City.

Admittedly, change is often not welcomed, but change is not necessarily bad in and of itself. However, change, especially when it is a fundamental change as is now recommended by staff, must be taken with great care. This is especially so when the objective of change is allegedly not to change the character of *Neighbourhoods* but, according to staff, "to be sensitive to their contexts."

ABC has little confidence that the proposed fundamental change to the City's comprehensive zoning by-law will allow for change that is sensitive to the context of the City's *Neighbourhoods*. ABC takes this position because the voluminous report prepared by staff does not provide a clear analysis of the actual impacts that will arise when multiplexes are permitted as of right in all *Neighbourhoods*. In fact, staff's recommendation report acknowledges that issues will arise. However, staff's response is to advise the Committee that the impacts will either be the subject to further study or be addressed when they arise. The staff report notes that Solid Waste Management, Tree Protection and Growing Spaces, Community Services and Facilities, Hydro Services, and Infrastructure Servicing will all be impacted by permitting Multiplexes.

Staff's response to concerns about "Infrastructure and Servicing" is indicative of staff's response, or lack of response, to all of the negative impacts from Multiplexes. At page 21 of PH 22,3 - Multiplex Monitoring Program - Final Report states as follows:

The Multiplex Monitoring Program found that although individual multiplexes contribute only incremental flow to the sewer system, some locations may contribute to capacity constraints during wet weather flow.

which would make the existing constraints to adequate sewer capacity worse. The current trends of multiplex data show some clustering in Ward 9, Ward 4, and Ward 5. Continued clustering trends, particularly of projects with more than three units per building, may, in the longer term, measurably exacerbate negative impacts experienced.

Staff goes on to say that modifications are generally required to the sewer system through capital infrastructure upgrades. However, staff does not indicate that there is any plan in place to ensure that upgrades are undertaken in any particular area or that any upgrades have been planned to respond to this new intensive land use.

The problems related to Solid Waste Management, Tree Protection, Community Services and Hydro Services are treated the same way by staff; Approve Multiplexes everywhere in the Neighbourhoods and we will respond to the impacts as they arise. That is not good planning. Permitting new housing forms should never override the need to prepare for the impacts of new housing forms.

Additionally, the PH22.4 Housing Accelerator Fund: Expanding Permissions in Neighbourhoods for Low-Rise Sixplexes - Final Report states that the Sixplex study builds on the results of the pilot Sixplex developments that were approved with the Ward 23 Multiplex Study. However there has been no report on the Ward 23 project and there is uncertainty about whether construction of any five or sixplexes has begun.

Essentially, this proposed expansion of land uses is being driven by a funding opportunity from the federal government - not on the basis of analysis of data or place-based consideration as to suitability or practicability.

The change takes no account of *Neighbourhood* character, prevailing heights and uses a "one size fits all" approach rezoning all *Neighbourhood* properties. It is also contrary to the Official Plan definition of *Neighbourhoods* which were always defined as a maximum of 4 storeys.

There are ample opportunities to construct new housing on lands within the City of Toronto. The 1000's of already approved units yet to be constructed and the City's Avenues and *Apartment Neighbourhoods* also provide opportunities to construct additional housing. Therefore, an increase in the City's housing supply and intensification within the City can continue to occur if staff is directed to study and report back on how the adverse impacts of Multiplexes will be mitigated *before* five and sixplexes are permitted to develop within Neighbourhoods.

Staff should be required to submit a further report to this Committee which addresses all reasonably foreseeable adverse impacts of Multiplexes upon the City's resources and assets prior to expanding permissions to ensure

unacceptable adverse impacts upon the City's resources and assets are addressed.

As to the content of staff's report, members of the public should not be expected to go through the zoning by-law amendment with a fine toothed comb to try to understand the changes that are proposed to *Neighbourhoods* on a city-wide basis, the details of which were not explained at public consultations. Rather, the public was presented with 6 interrelated planning reports and their 35 attachments representing hundreds of pages of policy and technical details and given 6 days to digest and understand the implications on their properties. The public must be given a clear understanding of what the zoning by-law amendment will and will not permit. **The City should seek additional input from the public with respect to the new staff report once the new information is provided.** Such an approach will ensure that members of the public have an opportunity to make their views known to their respective Councilors regarding this fundamental change to development rights within the City's *Neighbourhoods*.

On behalf of my client, I recommend that members of the Planning and Housing Committee refer this item back to staff to report on the results of any five or sixplexes constructed in the Ward 23 pilot and to clearly outline responses to the questions raised in this letter.

Thank you for considering the views of ABC Residents Association.

Yours truly,

**RITCHIE KETCHESON
HART & BIGGART LLP**



R. Andrew Biggart
c. ABC Residents Association