

From: [Lenka Holubec](#)
To: [Planning and Housing](#)
Cc: [Councillor Perks](#); [Councillor Nunziata](#); [Councillor Myers](#); [Councillor Matlow](#); [Councillor Crisanti](#); [Councillor Bradford](#); [Mayor Chow](#)
Subject: [External Sender] PH22.5 - Housing Accelerator Fund: Apartment Infill Study - Residential Infill Report, Lenka Holubec, ProtectNatureTO
Date: June 12, 2025 3:39:30 PM

Nancy Martins

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VIA Email: phc@toronto.ca

To the City Clerk:

Please add my comments to the agenda for PH22.5 - Housing Accelerator Fund:
Apartment Infill Study - Residential Infill Report

I would like to kindly ask you that my submission is hyperlinked when posted on city website.

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

My comments:

Being many years resident of one rather well known "tower in park", located just across of High Park", I am very well aware of the issues related to this type of housing.

It is for one thing very dense, as this type of architecture when build in the 60th, was to accommodate the most density in the city. To compensate for this density, a portion of this property included a little green space for thousands of residents to enjoy.

Over the years, the rents at many of these locations shot up substantially, as the numbers of rentals stagnated, while the rent controls were removed. For example, in my complex the rent is now about 6th fold of what it was when I moved in as above guideline increases accumulated.

On the other hand, the same cannot be said about the quality of living as a growing density of the area, the high use of nearby subway stations, the lack of schools, the extremely high traffic on surrounding streets, etc. has kept diminishing any former benefits.

"The study recommends zoning amendments to enable additional housing on existing apartment sites by permitting townhouses on sites zoned Residential Apartment Commercial in city-wide Zoning By-law 569-2013, and by permitting the conversion of certain underutilized common spaces into residential dwelling units. It also recommends new permissions to enable overcladding associated with deep energy retrofits of existing apartment buildings, which will contribute to Toronto's housing supply through the preservation of existing and aging housing stock."

Streamlining of the Official Plan to permit "as of right" additional infill development, as proposed in this Study, to permit townhouses to be built under tenants windows on the little green space with few trees and *"the conversion of certain underutilized common spaces into residential dwelling units"* could be just the last straw for many residents.

This proposal to *"amend Zoning By-law 569-2013, as amended, substantially in accordance with the proposed Zoning By-law Amendment appended as Attachment 3 to this report"* ignores blatantly the impacts of removing via infill every little green space on the residents. Their little space to walk, meet and live outside of the "towers" accommodating multi-thousands residents. Tens of trees that tenants have admired for years and grew attached to will be gone too.

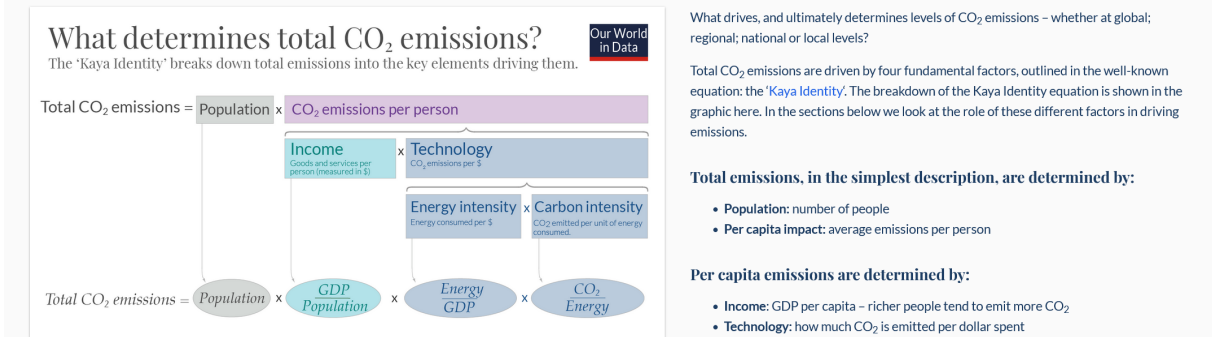
The infill of "towers in the park" is directly the opposite of what was intended when these were built. As they say, desperate times, desperate measures but we have to find some criterias to say to much is to much.

This proposal seems driven by federal funding opportunity rather than by sound data analysis.

As far as of the city *"achieving its climate and housing goals"* via cladding and more density, we have to keep in mind that any construction is extremely high source of GHG even compared to the use of cars. Buildings, of course, are a source of GHG and as such, more build environment, more buildings, more density produces more GHG.

Total emissions are determined by population numbers, per capita emissions, GDP per capita

Kaya Identity: what drives CO₂ emissions?



Is there any real measure analysis at the city planning level applied of how intensification, filling the city with more buildings, infrastructure and people squares with ecological footprint analysis? <https://www.footprintnetwork.org/our-work/ecological-footprint/>

How about heat islands, a loss of trees, mental stress, crime rate rising as a consequence of high density?

How about GHGs as a consequence of never ending construction, more buildings, less infiltration, more people=more GHG, more consumption, etc.?

ASK:

That the proposal be referred back to staff to engage the staff and residents in examination of the recreation and social role of the lands that would otherwise be removed.

This proposal seems driven by federal funding opportunity and a hasty growth aspirations over the relevant considerations, including the impacts on people, climate and environment and the sound data analysis.

Sincerely,

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

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