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Comments on EHON – Multiplex Study

To EHON@toronto.ca

RE: OP revisions to permit Multiplex Housing in all Zones.

We have read the proposed Multiplexing OP amendments. Below are our comments. Of particular concern are:

1. There is insufficient protection or preservation of existing tree canopy and plantable space for increasing the tree canopy.
2. There is no language to ensure the overly loose permissions actually create multiplex housing – which to date has only encouraged land speculation and construction of large and expensive single detached housing in the areas where multiplex zoning permissions exist. In Long Branch when development happens in RM Zones variances are requested for severances and to build large single family homes but not for multiplexes which are already permitted.
3. The stated goal for EHON is to direct density to areas that need density because of declining populations and underutilized infrastructure. But instead of focusing on specific areas of the city where development and growth is needed, this policy has no focus. Instead it includes neighbourhoods where RM zoning and existing growth plans are in place and working, such as Long Branch.
4. This does not require the provision of family size units in multiplexes and, as written, will not discourage the continued creation of micro-housing.
5. There is no defined planned physical character of each geographic neighbourhood. No consultations have taken place. What is the process where that will be defined for each geographic neighbourhood? How can a planned physical character be respected and reinforced if it is not defined?

Preservation of Tree Canopy and Plantable Space

Reference MULTIPLEX STUDY – DRAFT OFFICIAL PLAN AMENDMENT Released for Consultation – May 2022

Chapter 7 Policy 1b, i

b) Development of Multiplexes

- i. **will respect and reinforce the existing and planned physical character of each geographic neighbourhood, including in particular:**
 - a) **patterns of streets, blocks and lanes, parks and public building sites;**
 - b) **prevailing size and configuration of lots;**

- c) prevailing setbacks of buildings from the street or streets;
- d) prevailing patterns of rear and side yard setbacks and landscaped open space;
- e) continuation of special landscape or built-form features that contribute to the unique physical character of the geographic neighbourhood; and
- f) conservation of heritage buildings, structures and landscapes.

The new Chapter 7 Policy should include most of the language of 4.1.5 policy c and be as follows

Prevailing heights, massing, density, scale and density of nearby residential properties; additional density may be considered with the inclusion of a multiplex.

Rationale

There is no reference to prevailing heights, massing, scale, density and dwelling type of nearby residential properties which is contained in 4.1.5c of the Official Plan. The EHON study has not included the entire policy instead of simply reference to the “prevailing building type”.

Heights in Long Branch are limited to 9.5 m and 7.2m in the RD neighbourhoods where **additional** multiplex zoning is proposed. This height limit is generally adhered to and supports the existing character of the neighbourhood. We have existing non-conforming multiplexes that also adhere to this height limitation and fit seamlessly into the neighbourhood. They are compact, affordable and support the existing tree canopy, below grade and above.

There needs to be a reference to prevailing density. The prevailing density in Long Branch is .35 fsi. Where .35 is prevailing, a smaller duplex would be more appropriate. Such a consideration would permit a variety of unit sizes that would accommodate a variety of new residents. It is important to note that blocks with houses that are .35 have more plantable space and existing tree canopy.

Without this critical wording, to continue to encourage, **prevailing, height, massing, scale and density** maintaining **BOTH existing and planned character**, including the tree canopy, will be impossible and the goal of **new affordable units** will not be achieved.



Figure 1-1 Ash - Triplex that fits seamlessly with it's neighbours in an RD zone – no height variance



Figure 2- 1A Ash corner lot with access off a minor street.

Chapter 7 Policy 1b, vi -

Despite section 4.1.5, multiplexes are permitted in Neighbourhoods, subject to the following policies:

vi. should not result in the injury or removal of a healthy tree protected under Municipal Code Chapters 608, 658, and 813 on the subject property and adjacent properties;

The policy should be amended to:

vi. will not result in the injury or removal of a healthy tree protected under Municipal Code Chapters 608, 658, and 813 on the subject property and adjacent properties especially for the purposes of hardscape or accessory buildings.

Rationale

This policy does not protect trees sufficiently. In policy, the Manager of Urban Forestry has the authority to refuse any application that removes a private protected tree, but in practice does not. This policy does not take into account other outbuildings on the property such as garages, driveways and parking pads on the property that will also increase hardscape on a property and remove significant and protected size trees.

The policy needs to be amended to protect trees over parking; especially where public transit is present.

The OPA uses the word “should” which is weak language if tree protection is the goal. “Will” or “must” are much stronger words that would ensure much stronger tree protection.

The City of Toronto Strategic Forest Management Plan has established a target to grow the tree canopy in the City to 40%. This target is not achievable without the preservation of large canopy trees while ensuring space for planting new trees.

Tree canopy 2018 Study Findings show a need for much more urgent action and wording in the OP to ever achieve the 40% tree canopy goal and ensure a liveable environment for current and future residents of the city

- a. Although the tree canopy in Toronto increased, on average, by 1.8% (26.6% to 28.4%) over the ten years from 2008 to 2018, the increase peaked at 29.1% in 2014 and has leveled off or declined to now 28.4% in 2018.
- b. The distribution of tree cover is uneven with 60.9% difference in the amount of tree cover in the most treed vs the least treed neighbourhoods in Toronto.

- c. The average tree condition has declined, with just 69% of trees in excellent or good condition compared to 81.6% in 2008. This emphasizes the need to prioritize the preservation and retention of healthy trees.
- d. Throughout the City, there was an overall increase of 1.3% in impervious land cover (hard surfaces) between 2008 and 2018 representing an area of 892 hectares. The most area converted to impervious surfaces was in the Single Family Residential areas of the city (349 hectares)
- e. 54.4% of the 11.5 million trees in Toronto are on Private Property. The total structural value of the Urban Forest in Toronto is estimated to be \$7.04 billion making the structural value of trees on private property \$3.83 billion.
- f. Only 11.8% of the trees in Toronto are 30cm DBH or greater – the size protected under the Toronto Tree Protection By-law.
- g. The total leaf area of Toronto’s urban forest decreased by 11% from 2008 to 2018 which translates to a loss of benefits provided by the urban forest
- h. Annual air pollution removal went from 1,905 tonnes in 2008 -2009 to just 972 tonnes in 2018 (-49% annual decrease)
- i. Gross annual carbon sequestration decreased from 46,7000 tonnes in 2008 – 2009 to 35,170 tonnes in 2018 (-25% annual decrease)
- j. Five of Toronto’s eight watersheds do not support the minimum desired level of 30% tree cover that contributes to somewhat healthy aquatic ecosystems. A sixth, the Don watershed, has lost tree cover since 2008 and risks falling below the 30th tree cover threshold.
- k. The greatest amount of possible planting area for new trees is currently found on Single Family Residential lands (5,292 hectares)

The City’s Multiplex Study did not evaluate the impact of the increased as of right permissions for Multiplexes on existing trees and the City’s Tree Canopy.

The City’s Multiplex Study did not evaluate the impact of increased as of right permissions for Multiplexes on removal of plantable space for new trees in neighbourhoods

The OP needs to incorporate wording to require sufficient growing space and soil volume for large growing shade trees in the rear yards and between Multiplexes other housing such as single detached and semi detached and other multiplexes.

Urban Forestry Procedures are very clear that they will not impact the property owner’s ability to build according to the as-of-right zoning. The OP and Zoning By-law are very clear that Multiplexes would be as-of-right. Urban Forestry will not refuse a permit to injure or remove a private tree, regardless of size, if the build is as-of-right.

As it is currently written, the OPA will not support and enhance our tree canopy and allow the destruction of some of our oldest and leafiest urban forests in Toronto.

Permissions are no guarantee that multiplexing will be generated

Long Branch is zoned 50% RM. Despite the permissions to permit multiplex homes, only single detached homes have been built. How will permitting multiplexes in the other 50% get you there when they are not being built in the first place?

In 5 years, one triplex property has been torn down, the property severed and two expensive single detached homes built. One RM property has been given large variances and the property was immediately sold for \$800,000 more.

Long Branch Builders have a terrible record of not generating multiplex housing where it is permitted. Where are the assurances in this policy that land speculation or the desire to build large homes with no density will be prevented?

Inequitable application where the existing Official Plan is working and generating growth through SASPs, Avenues and existing RM zoning.

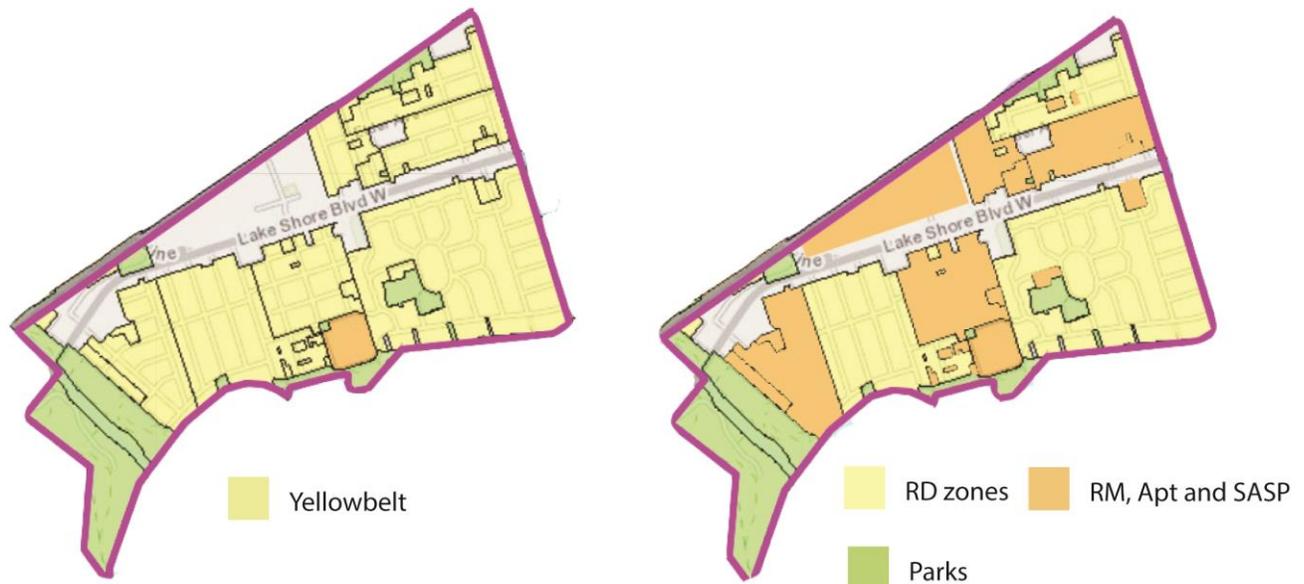


Figure 3 -The yellow belt in Long Branch already has zoning and SASPs that permits density and encourages Growth.

Long Branch is zoned more than 50% RM and has permissions on the Avenue to build to 6 storeys supported by an aggressive SASP. We have more rental than home ownership and our population has increased 11.3% (2021 Census) without the addition of towers. It is a desirable neighbourhood **that has no need for this policy amendment.**

Older neighbourhoods such as Long Branch, Mimico, Alderwood and New Toronto are already substantially zoned for multiplexing and other forms of missing middle housing. Our schools are full with no commitment to more by other levels of government, there is a tiny library, and no community centre. Planning tools available to staff should be utilized to direct growth to areas that are largely zoned RD, have underutilized schools and community centres and are abutting higher order transit!

It is important to note that none of the Lakeshore West neighbourhoods were part of the case study for Multiplex.

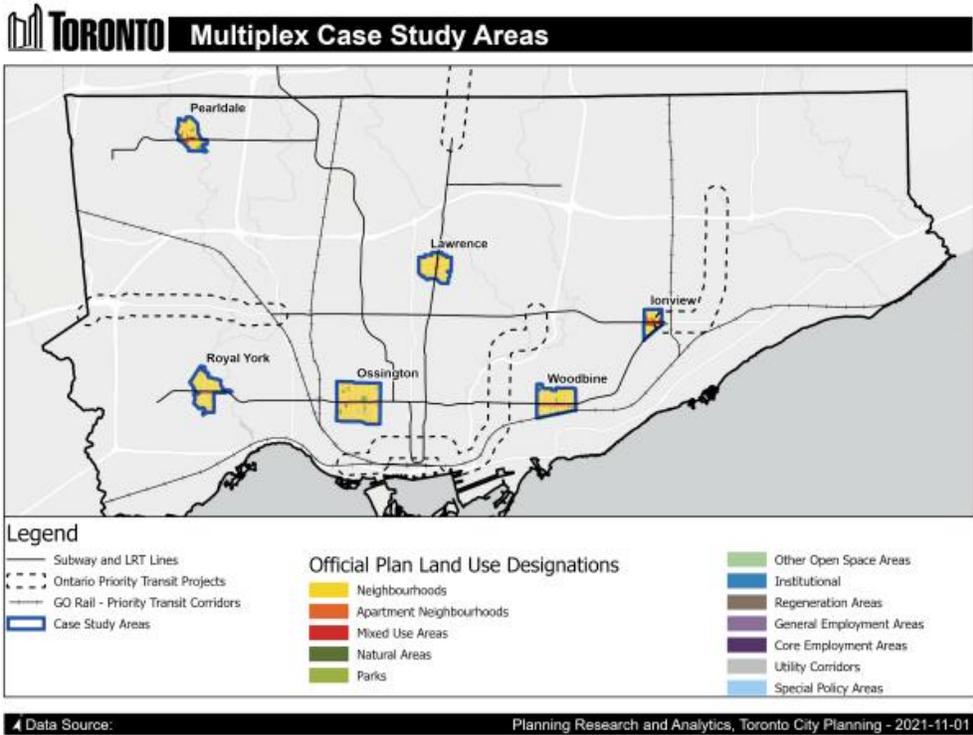


Figure 4 – Expanding Housing Options in Neighbourhoods: Multiplex Study - Interim Report page 33 - Long Branch, Alderwood, New Toronto and Mimico were not considered for a case study. As an older neighbourhood with diverse housing, they should be assessed if multiplexing is needed at all.

If the desire is to have more units for families then there should be a requirement that at least one unit in a multiplex has 2-3 bedrooms.

We have always maintained that Long Branch is a neighbourhood model that shows that such as neighbourhood with different housing uses and zoning put together can create a diverse neighbourhood available to many Toronto residents. We would encourage a more focused study in neighbourhoods where density is needed and how the Long Branch model can be replicated there.

We hope you will include our comments for further consideration when updating this policy.

Sincerely,

Christine Mercado
 Chair,
 Long Branch Neighbourhood Association

Cc

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