

Expanding Housing Options in Neighbourhoods: Multiplex Study – Final Report

Submission to Toronto City Council

April 27, 2023

Toronto City Council
City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of City of Council,

Re: PH3.16 - Expanding Housing Options in Neighbourhoods: Multiplex Study - Final Report

On behalf of the Canadian Centre for Housing Rights, I am writing to voice our support for proposed Official Plan and Bylaw amendments to enable more multiplex housing development across Toronto, as articulated in *Expanding Housing Options in Neighbourhoods: Multiplex Study – Final Report*. For over 35 years, we have worked tirelessly at the intersection of human rights and housing, providing free services to renters facing evictions and human rights violations to remain housed, providing education and training about housing rights across Canada, and advancing rights-based approaches to housing through research, policy development, and law reform.

While we support the overall proposed amendments, we also recommend:

- Increasing building height permissions to up to 13 metres in all areas to ensure the conditions are in place for four-unit buildings to be constructed.
 - o Consider providing financial incentives to help overcome potential barriers stemming from Ontario Building Code requirements and make four-unit projects more viable.
- Creating incentives to ensure as many multiplexes as possible are affordable rentals

The Need for More Density

Creating the conditions to facilitate more multiplex housing development is overdue in the City. The proposed changes address a long-standing practice of exclusionary zoning where the majority of “Neighbourhood” lands have traditionally been zoned for single units. This has restricted the supply of much-needed housing for a population that has been growing rapidly, and with a more diverse set of housing needs. Indeed, multiplexes help diversify a housing stock that is otherwise dominated by condominiums and single-family homes. An earlier [Land Needs Assessment](#) also projected a shortfall in ground-related housing options in a scenario where actions such as those currently under consideration were not taken. The potential for intergenerational housing options through the proposed amendments is also a testament to the initiative’s responsiveness to Toronto’s diverse demographics. In addition, the proposed amendments can help stabilize and increase populations in neighbourhoods that have been experiencing a demographic decline. This, in turn, would ensure the infrastructure in such areas are optimally utilized.

Given the chronic affordable housing crisis in Toronto, such actions are therefore urgent. At the same time, we commend the City for taking a consultative and evidence-based approach to formulating proposals that are workable and balanced. Taken together, it is encouraging to see that an overwhelming majority of participants appear to be supportive of multiplexes. Such engagements also gave our organization opportunities to support the proposal and offer recommendations to refine the proposed measures.

Strengths of the Proposal

In general, the City of Toronto appears to be proposing a fairly balanced set of refinements to the Official Plan and Zoning bylaws related to permitting multiplex housing construction. For example, it makes sense to remove non-policy text from the Official Plan that favours “prevailing building types” such as detached homes – this increases the likelihood of more multiplexes being constructed wherever they are now permitted. Amendments to form-based zoning, such as removing Floor Space Index (FSI) requirements are also important changes that can help create more conducive conditions for multiplex developments. At the same time, measures to retain versions of policies such as those that respect aspects of heritage conservation are equally important. Such provisions may help contribute to a sense of place and community for both new and longstanding residents. It must be noted, however, that as demographics change, design preferences may likely evolve and future opportunities for engagement should be made available to gauge whether standards remain culturally adequate, a significant element of a rights-based approach to housing.

Improvements to the Proposal

In some instances, there is still room for improvement and creativity. For example, limitations remain for permissions related to building height. For example, areas that earlier had height permissions below 10 metres would now be increased to 10 metres. However, this change would enable construction of no more than 3 storey buildings. The rationale for not allowing further increases to accommodate four units appears to stem from requirements in the Ontario Building Code (OBC) that would render many of the projects unviable; that is, buildings with four units require an elevator to be installed.

This is not a convincing argument. Some builders may, in fact, be able to find financially viable solutions that absorb costs related to OBC requirements especially if they have sufficient capital backing bigger projects. An increase in height permissions to up to 13 metres would leave room for developers to innovate and create the possibility of some four-unit buildings to emerge in these areas. Making such an accommodation would also be in line with related built-form amendments that create more flexible conditions to facilitate the development of the maximum number of multiplex units. In addition, the City can explore ways to financially support and incentivize the development of larger multiplexes and overcome costs related to OBC requirements.

It is also worth reiterating a concern that we have raised in past submissions: that the promise of this initiative is at risk because of the uncertainty over how affordable the multiplexes will be, and the proportion of rental options that will emerge from these changes. While the report acknowledges the limitations of zoning in regulating tenure, the City must dig deeper into its policy toolkit to ensure that as many of these new developments actually meet the needs of a population that is increasingly spending larger shares of their income on housing. For example,

development charge exemptions currently being proposed for additional units could be calibrated specifically for developments that are affordable. Alternatively, financial incentives, with support from higher orders of government, could be considered to promote more affordable rental multiplexes.

Increasing access to housing that is affordable for Toronto's residents is an essential component of advancing a rights-based approach to housing. This model offers an integrated way of ensuring housing policy is adapting to the constantly evolving needs of Toronto's diverse population.

We look forward to providing more of our housing expertise and welcome further discussions with the City to ensure its housing initiatives are effective and rights-based.

Sincerely,

A handwritten signature in black ink, consisting of the letters 'A' and 'B' followed by a stylized flourish.

Ayushman Banerjee
Senior Policy Advisor
Canadian Centre for Housing Rights (CCHR)