



Thompson Orchard Community Association

Dear Councillor,

We are writing to you on behalf of the Thompson Orchard Community Association (TOCA) because of serious concerns we have about the proposed EHON changes, which will be coming before Council for a vote in the near future. TOCA represents about 330 homes and 83 condominium units.

In June 2022, a background report was released by City Planning explaining the need for more housing. On the report's first page, the housing shortage was identified: "By 2051, if current trends continue, Toronto could have a deficit of over 42,000 ground-related units, such as single and semi-detached homes, townhouses, and multiplexes."

City Planning has identified EHON as the answer to this housing shortage, allowing up to four units in low-rise neighbourhoods across the GTA. However, City Planning did not give details as to whether this type of plan has been successful in other jurisdictions. There should be a detailed analysis of what has worked elsewhere, but City Planning has not provided it. What City Planning has done is admit – both in their June 2022 report and in public consultations - that their plans have big flaws. TOCA agrees that EHON has flaws and needs more work.

In their June 2022 background report and at public consultations, City Planning admitted the EHON plans are flawed in the following ways:

1. They are unlikely to be attractive to builders and developers because it will be hard to recover their costs. This is why City Planning is proposing to waive development fees. However, development fees are a small percentage of the overall cost of a project, so this is unlikely to make EHON significantly more attractive to builders.
2. They are unlikely to create affordable housing because of the cost of the underlying land and the cost of building new units. To recover these costs, rent or sale prices will be unaffordable for most people.
3. The changes proposed – allowing up to 4 units in all single-family dwellings – threaten the character of Toronto's neighbourhoods while being unnecessary. On page 8 of the June 2022 report City Planning admits that "adding one unit to just under 11% of the 405,360 semi-detached and row homes in Toronto could yield the required units." So why is City Planning allowing 4 units in 100% of single-family homes, profoundly changing the character of the neighbourhoods that make Toronto a beautiful city?

We can all agree that the City of Toronto needs more affordable and low-income housing, but for the reasons given above, the current EHON draft plan does not achieve this goal. Further, it is our understanding that similar changes in other cities did not achieve the increased affordable housing City Planning claims EHON will produce. Imitating changes that did not work



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elsewhere is bad planning. Before being asked to pass legislation as sweeping as the EHON changes, Council should be advised if these types of changes have been successful elsewhere, especially given the flaws noted above. City Planning should be required to explain why they think EHON will work. They haven't done so.

A final problem we would like to mention with respect to EHON is the complete lack of provision for infrastructure and parking for multiplexes. Our community association is based in the west end of Toronto. It will be already affected by the plan to reduce vehicular traffic to one lane in each direction in the next two years from Bloor Street from Runnymede Road to Resurrection Road. This will reduce parking and will cause flooding of parked cars to side streets off the main arteries. EHON will exacerbate this problem because there is no requirement to provide parking spaces for multiplexes.

City Planning should rethink its approach to creating affordable housing entirely since EHON appears unlikely to achieve that goal. However, if you are inclined to support a modified version of EHON, we strongly suggest that the maximum number of units to be permitted be reduced to 3. This will align with the current provincial requirement, be less intrusive to existing neighbourhoods and is still significantly in excess of the 1 new unit required in 11% of the current single-family homes.

Creating a robust and carefully thought-out final EHON plan is critically important. Thank you for your attention to our letter.

Sincerely,

Andrew Watson

Andrew Watson

Chair, TOCA Board

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