



June 21, 2025

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Attn: City Council

**EY22.4 – Expanding Housing Options in Neighbourhoods –  
for Low Rise- Sixplexes**

While we appreciate the opportunity to provide input, the volume and complexity of the materials released—combined with the extremely short turnaround time—make it nearly impossible for residents and community organizations to engage in a meaningful way. This approach creates a barrier to informed public participation and risks undermining the very goals of consultation and transparency.

We urge the City to reconsider its engagement processes. Releasing critical documents with more reasonable timelines, providing clear summaries, and staggering consultations would go a long way in supporting thoughtful, informed contributions from the public. These are not just procedural improvements—they are essential for building trust and ensuring policies reflect the values and needs of the communities they affect.

Residents are ready and willing to contribute, but they need a process that respects their time, capacity, and desire for genuine dialogue.

**22.4 Sixplexes**

This is not ready to be approved based on the lack of sufficient time and actual data from the sixplex pilot study for Ward 23 in Scarborough North and the lack of data on Multiplex Monitoring. To date, zero sixplexes have been built to inform findings. The pilot study remains theoretical and effectively removes regulations under the pretense that there are barriers, when in fact these regulations ensure more intense built forms remain compatible within neighbourhoods.

Long Branch is a complete community with EHON-endorsed zoning, a balanced rental/ownership mix (50/50), and has experienced 13% population growth according to the latest Census. Simply put, Long Branch is already experiencing rapid growth and intensification. Established in 1883, it already has density and a representation of diverse low rise housing types that many other neighbourhoods lack.

Our consistent position since EHON's inception is that Long Branch serves as an example to follow. However, the city-wide upzoning policies have made Long Branch a target for inappropriate consent applications. Robust data analysis based on actual built housing is available that found intensification on lots in Long Branch resulted in a 56% loss of tree canopy on redeveloped properties and a 24% loss of tree canopy on adjacent properties.

Policies introducing larger Multiplexes in Long Branch have had limited success at introducing new affordable housing units. The loosening of regulations for multiplexes seems to have only encouraged inappropriate land severance applications that amount to land speculation without the guarantee of density or affordable housing.

According to staff reports, two multiplexes and one duplex have been built as-of-right in Long Branch. These projects are still under construction, and residents are already experiencing significant issues such as extensive tree removal and injuries, and retaining wall collapses due to construction. These units are not yet occupied and the impacts have not been realized to deem these a success or not.

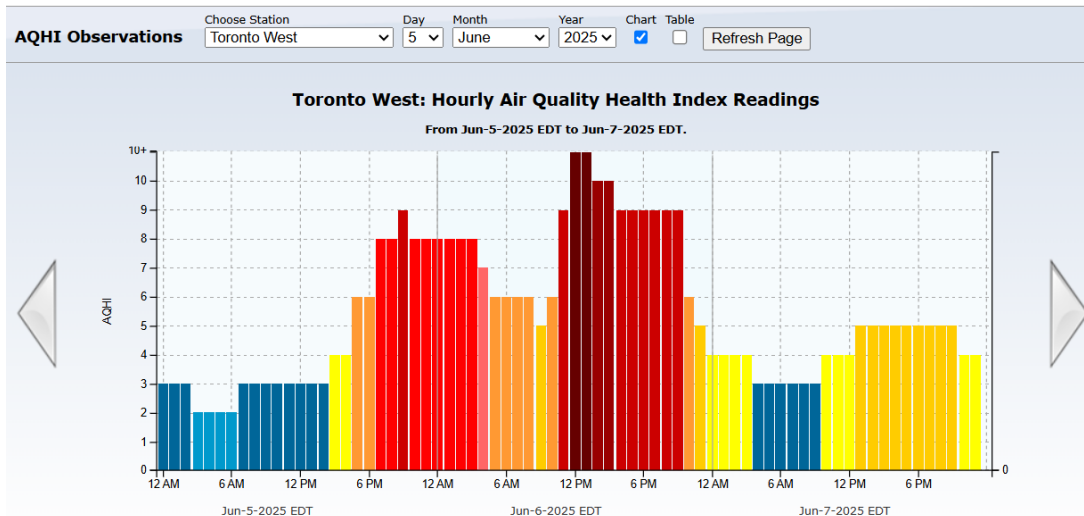
Tree preservation policies have not adapted to this new built form and are frequently overridden to allow multiplexes to become larger and denser.

Only 11.9% of trees in Toronto are of protected size (30cm DBH or greater). Multiplex monitoring has failed to gather data on the 88% of trees making up Toronto's Urban Forest that may be at risk of loss through Multiplex applications. This is a major concern given the policies that aim to prioritize climate action and the City's goal of increasing the Tree Canopy to 40%. There is no data showing that permitting sixplexes as-of-right city wide will support increasing the tree canopy yet there is data to show intensification results in substantial loss of tree canopy.

The Final Report for the Multiplex Monitoring Program did not gather data or assess the impact of greater building footprint or other design features such as as-of-right driveways and parking spaces that could reduce permeable surface areas.

The Multiplex Monitoring Final Report states that the reduction of permeable area can lead to less rain infiltration and therefore greater runoff which could increase loading on the storm system. Particularly for areas of the city that have a combined sewer system. The Report goes on to state that in these areas where combined sewers are located, longer-term concentration of multiplex development has the potential to exacerbate existing constraints to adequate sewer capacity during wet weather flow. This may increase the risk of basement flooding – something that is already a recurring problem for most of Long Branch.

Toronto's air quality ranked second worst in the world on Friday, June 6, 2025 – reaching an air quality index of 173. At this level seniors, pregnant women, infants, young children and people who work outdoors, as well as people with an existing illness or chronic health condition are more likely to be impacted.



Wildfire smoke is a complex mixture of particulate matter and gases. Particles less than 2.5 microns in size (PM<sub>2.5</sub>) are of greatest health concern as they can penetrate deep into the lungs and are associated with a number of health effects. Severe symptoms include dizziness, chest pains, difficulty breathing, wheezing, heart palpitations. It can also exacerbate existing respiratory and cardiovascular diseases such as asthma, chronic obstructive pulmonary disease, congestive heart failure, etc.

90% of the total particle mass of wildfire smoke can be PM<sub>2.5</sub>.

Below are the data measured in Toronto less than a week ago. There is no “safe” level of PM<sub>2.5</sub>, as any exposure can have health impact, but it is generally considered safe at or below 12 µg/m<sup>3</sup>. Short term exposure of 35 µg/m<sup>3</sup> is considered unhealthy. Toronto, particularly Toronto West, far exceeded those levels.

#### Air Pollutant 1-Hour Concentrations For June 6, 2025, 12:00 pm EDT

Station	O <sub>3</sub> (ppb)	PM <sub>2.5</sub> (µg/m <sup>3</sup> )	NO <sub>2</sub> (ppb)	SO <sub>2</sub> (ppb)	CO (ppm)
Toronto Downtown	35	81	12.4		
Toronto East	39	89	2.7		
Toronto North	43	96	3.5	0.5	
Toronto West	46	106	5.5	0.1	0.66

Ref: Ontario Ministry of the Environment, Conservation and Parks [airqualityontario.com/aqhi](https://airqualityontario.com/aqhi)

Trees remove pollution from the air by direct absorption through their leaves as well by capturing particulate matter on and in plant tissue. This benefit is linked to leaf area and function.

Trees remove ozone (O<sub>3</sub>); nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), small Particulate Matter PM<sub>2.5</sub> and sulphur dioxide (SO<sub>2</sub>). In 2008, Toronto's trees were estimated to remove approx. 1,906 tonnes of pollution per year. As of 2018, this has declined to approx. 972 tonnes of pollution per year.

According to the 2018 Toronto Canopy Study, Toronto's Total Leaf Area of its urban forest has actually decreased. From a total Leaf area of 101,500 ha in 2008-2009 to 90,516 ha in 2018. This is an 11% loss in Total Leaf Area. Recently planted/young trees contribute much less to the total leaf area of the urban forest which is why it is so important to retain healthy, mature large trees.

There is no data supporting that these built form policies are successful or moving in the right direction to justify further bylaw amendments City wide.

### **Sixplex policy encourages inappropriate Lot Severances without a guarantee of Density**

Since EHON's approval, we have seen an increase in multiplex applications used as a strategy to sever lots and avoid variances such as Floor Space Index (FSI) and building length. Examples include:

6 Birchlea - To obtain consent to sever the lot into two residential lots and construct two multiplexes. Refused

77 Thirty Seventh Street - To obtain consent to sever the lot into two undersized residential lots.

Part 1 and Part 2 - To construct new triplex on each new lot with an attached garage and a new front porch. Refused

121 Twenty Seventh Street - To obtain consent to sever the lot into two undersized residential lots. Part 1 and 2 to construct 4 unit multiplexes. Deferred

None of these applications were approved at the Etobicoke York COA as the severances creating new undersized and deficient lots in combination with the variances did not meet the 4 tests. If any of these were approved – it does not preclude the building of two single detached homes where no density is guaranteed.

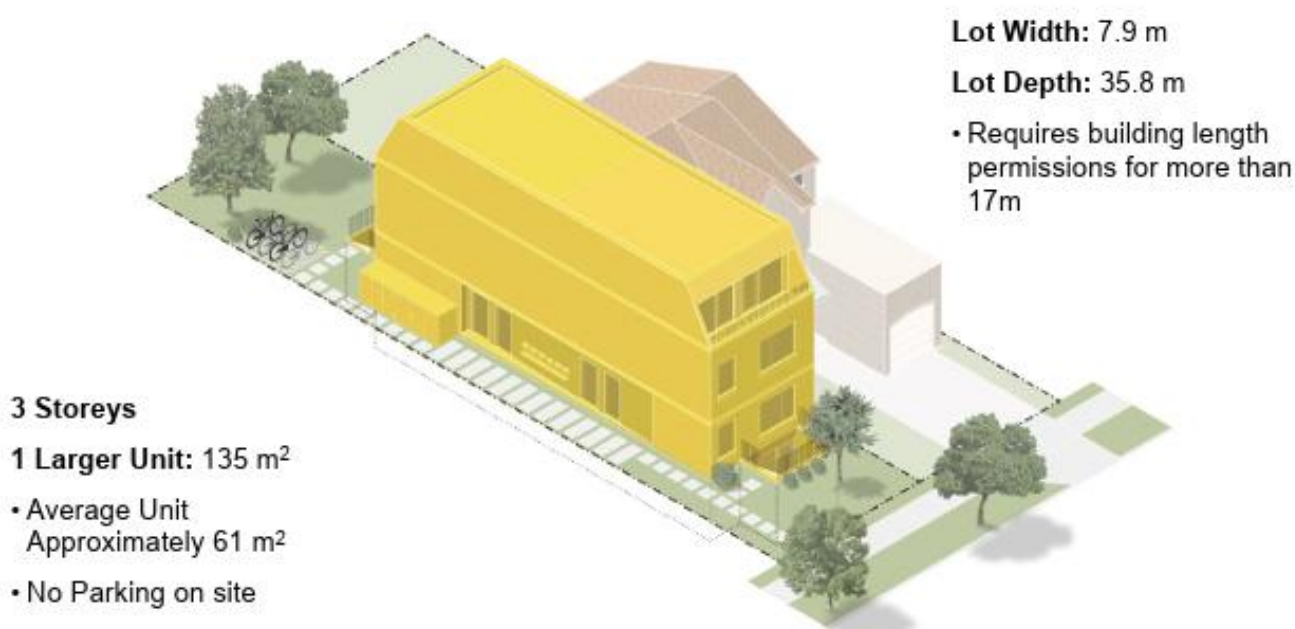
While Long Branch already has Multiplexes and small apartment buildings in the RM zones – They are not on 7.62m lots and in Long Branch creation of new lots with a lot frontage less than 9m does not meet the intent and purpose of the bylaw. (page 21 - Long Branch Character Guidelines)

One of the aims of the Multiplex study was to stabilize declining neighbourhood populations – this is not a problem that Long Branch is experiencing since our population continues to grow. We have always objected to City wide applications of policies – especially density, which should be directed to

neighbourhoods with declining population; school and daycare capacity; appropriate emergency and medical services; libraries; community centres and higher order transit. (Not regional rail).

This infill recommendation seems to be a requirement to fulfil commitments made by the City under the \$471.1 million agreement with the Government of Canada through the Accelerator Fund. Nowhere in the commitment does it say that this policy needs to go City wide with no data points collected. As this policy in its present form encourages deficient lot creation with no promise of density – this should go back to staff for further evaluation and recommendations on which neighbourhoods would be a good fit for this kind of density and have the infrastructure to support this level of intensification.

## Sixplex Design Testing on Low-Rise Detached Box on a Narrow Lot



### Insufficient Parking

The Long Branch GO Station is at the end of the commuter line, and the proposed density does not reflect local commuting patterns. Many residents do not travel to Union or Exhibition stations but instead commute westward, north to Midtown, or to other parts of the GTA, where public transport service is less frequent. In Etobicoke, car ownership remains essential for managing daily life efficiently, especially given limited east–west and northbound transport options.

Taller than midrise buildings along Lake Shore near the GO Station have not shown excess parking capacity. Commuter parking regularly overflows onto nearby narrow residential streets, increasing congestion and strain on local infrastructure. A more realistic parking allocation is needed to reflect actual community needs and avoid negative impacts on the neighbourhood.

As it currently stands, Sixplex policies as proposed do open a door to abuse of policy that we are already experiencing in Long Branch. Exempting Sixplexes from Chapter 4 policies do nothing to ensure that new development respect and reinforce existing physical character in Neighbourhoods.

Despite staff recommendations, we hope this Council will side with the taxpayers and refer this change in policy back to staff for further study and direct growth in neighbourhoods that need the density and diversity in housing.

Sincerely,



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Long Branch Neighbourhood Association  
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Cc

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