



Dear Planning & Housing Committee,

Re: PH22.3 - Expanding Housing Options in Neighbourhoods - Multiplex - Monitoring Program - Final Report & PH22.4 - Housing Accelerator Fund: Expanding Permissions in Neighbourhoods for Low-Rise Sixplexes - Final Report

The South Etobicoke Community Land Trust supports the City-wide legalization of five- and sixplexes in Toronto as well as technical changes to address conflicts with the existing multiplex by-law. These motions are a significant positive for community land trusts as they will reduce the amount of time and money spent for multiplex applications to resolve, enable builders to attain MLI Select funding from the Canadian Mortgage & Housing Corporation and allow us to offer a greater range of housing options for South Etobicoke residents with significantly lower land value uplift compared to site-specific upzonings while still allowing for financially stable portfolio expansion.



Pictured: A Toronto Special triplex located along Long Branch Avenue

Throughout South Etobicoke as well as many other parts of Toronto; multiplexes, including sixplexes, are a time-tested, tried and true built form that has become part of its neighbourhood fabric and provides affordable housing to its tenants, whether as rental or owned units. Multi-unit housing like this also provides intuitive ways for residents to age in place and host multi-generational housing. In a time where we are seeing increasing development pressures concentrated on apartment communities such as at 21 & 31 Park Boulevard and 220, 230 and 240 Lake Promenade; it is important that community members of all ages and all walks of life be able to stay where they are long term. Permitting sixplexes would aid in deconcentrating development pressures from apartment communities and redistributing them more equitably through low-rise neighbourhoods in order to protect against mass demovictions.

Our communities need all of the support that they can get. It is important to hold our governments accountable and make sure they enable counter-cyclical housing development as much as possible to fight the housing, climate, cost-of-living and unemployment crises. Allowing more gentle density, especially if buttressed by public investment in housing construction, would restore jobs in construction, urban planning, HVAC installation, plumbing, welding and many other adjacent industries facing private sector shortfalls in hiring.

Furthermore, [housing research](#) from the Lewis Center for Regional Policy Studies at UCLA shows broad upzonings cause the least intense land value increases compared to site or block upzoning scenarios. For our desired outcomes of mitigating displacement and above-guideline rent increases for renters, this is a much preferable outcome to restricting multiplexes to site-specific upzonings or doing nothing at all, which both cause land values to increase in a negative way for community members and displace them rather than keep them together. Our study area consists of several historic streetcar suburbs that already have rapid transit as well as more recently developed areas with decent bus access. In that vein, we believe we should be able to build more housing that fits into existing neighbourhoods and allows more people to take transit, bike or walk rather than drive and be closer to where their community bonds, recreation and work are.

Moving onto policy minutiae, the increase in permitted building height for multiplexes to 10.5 metres is a positive for obtaining greater ceiling heights in basement units. However, many Etobians experienced the voluminous rainfall and subsequent flooding last year on July 16th; we are well aware many areas in our study area are lakeside communities prone to flooding or sit atop historic and buried creeks, rivers and other waterways. This presents an obvious concern if we were to build multiplexes with basement-level units. Additionally, it is important we be able to build or design multiplexes where either the first floor is fully accessible or the entire building is. As such, we encourage the City to increase the maximum height of multiplexes to 12-13 metres, allowing 4 full storeys at or above ground so that residents can all live above the water table and can meaningfully access their communities.

We urge City Planning to delete the proposed bedroom maxima for multiplexes entirely. Vitally, we believe that putting forward a bedroom maximum would negatively impact our mission, as community members have raised to us that 4-bedroom housing is in short supply in our community and inaccessible at current prices for families. Enacting bedroom maxima will also perpetuate stigma against rooming houses and their residents, harkening back to before 2024, when rooming houses were not legal City-wide and diminishing the hard-won policy victory in 2023.CC2.1. Bedroom caps would also contradict the principles set out in Chapter 1.4 of the Official Plan, surrounding reconciliation, equity, access and inclusion. Discrimination against rooming house residents; who have often comprised groups like students, newcomers and people historically discharged from Queen Street Mental Health Centre and Lakeshore Psychiatric Hospital, is still unfortunately common in Toronto and Canada. We urge Toronto not to impose a bedroom maximum on multiplexes when no other housing type has one.

We would also like to echo Pamela Blais' call to exempt detached houseplexes up to six units from development charges and to remove the proposed requirement for semi-detached houseplexes to obtain lot severances. As well, the City should request the Minister of Municipal Affairs and Housing enact the changes necessary to the Ontario Building Code to remove barriers to constructing four-storey residential dwellings, notably around single stair egress and enabling permissions to use EN 81/ISO 8100 standard elevators common in Europe, South America and much of Asia. This way, we can minimize further impediments to constructing sixplexes and other multiplexes in Toronto and help produce meaningful affordable housing for the people that need it most.

Sincerely,
Thaddeus W. Sherlock
Board of Directors, South Etobicoke Community Land Trust