

**PH22.4 - Housing Accelerator Fund: Expanding Permissions in Neighbourhoods for Low-Rise Sixplexes - Final Report,
Lenka Holubec, Protect NatureTO**

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Nancy Martins

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

VIA Email: phc@toronto.ca

Cc: councillor_perks@toronto.ca; councillor_nunziata@toronto.ca; Councillor_Myers@toronto.ca;
councillor_matlow@toronto.ca; Councillor_Crisanti@toronto.ca; councillor_bradford@toronto.ca;
mayor_chow@toronto.ca

Dear Chair and Committee Members,

Thank you for this opportunity to comment on **PH22.4 - Housing Accelerator Fund: Expanding Permissions in Neighbourhoods for Low-Rise Sixplexes - Final Report**

As many other members of public, I am concerned with the speed and haste with the proposal for Sixplexes across the City and the limited time available to understand and respond to the proposal.

City Planning has presented six reports reflecting three key directions

- Enabling more density in residential neighbourhoods:
- Enabling mid-rise buildings along transit corridors:
- Unlocking more housing on apartment sites by simplifying permissions

These reports are of great importance to the future of communities across the City of Toronto and of great interest to residents of those communities. But these six reports also include a total of 35 attachments representing hundreds of pages of policy and technical details. Resident associations and other stakeholders require time to review and discuss these reports

One week is simply inadequate.

The report suggests that the Sixplex study builds on the results of the pilot Sixplex developments that were approved with the Ward 23 Multiplex Study. There has been no report on the Ward 23 project and we are uncertain about its status eg whether construction has begun.

Essentially the proposed expansion is being driven by a funding opportunity from the federal government - not on the basis of analysis of data or place based consideration as to suitability or practicability.

This policy takes no account of neighbourhood character, prevailing heights and uses a “one size fits all” approach. It is also contrary to the Official Plan definition of Neighbourhoods which were always defined as a maximum of 4 storeys.

In practical terms the implications of 5 and 6 storey multiplexes have not been assessed and such as garbage stage and collection, parking, etc.

Without greater study and mitigation, the implications are unacceptable

Now when that the full scope of the proposal PH22.4 - Housing Accelerator Fund: Expanding Permissions in Neighbourhoods for Low-Rise Sixplexes - Final Report has been presented, the following are serious concerns:

- The status of the Ward 23 Pilot Project is unclear. The pilot was intended to provide guidance on built form for future development.
- The proposed building typology shares many attributes of a small apartment building. The typology also shares apartment issues as with accessibility, parking and garbage management.
- Sixplexes are not subject to provincial ADU regulations and a minimum lot width (e.g., 12 metres) should be specified.
- Sixplex side yard setbacks should be modified to reflect the size of the dwelling that will address accessibility issues for the six families that will live in the building.

Definitely, “one size fits all” does not apply here.

Our backyards are not just places important for the dwellers, but these little green spaces when joined together create Toronto’s “green sea” contributing significantly to the city’s overall biodiversity and sustainability as we are facing worsening climate breakdown and rapid decline of biodiversity.

“Biodiversity refers to the rich variety of life forms and the critical roles they play within varied ecosystems. Ecological health is related to healthy biodiversity. The greater the biodiversity of a defined geographic area, the greater the ecological health and resiliency of that area. Policies protecting and enhancing the natural heritage system are a key pillar of biodiversity conservation within Toronto. The biodiversity found in small green spaces, street trees, green roofs, community gardens, hydro corridors, cemeteries, and backyards also play an important role in our urban ecosystem.”

CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN. Chapter 3,3-45

Our Ask is:

1. That the expanded 5 and 6 storey multiplexes proposal be referred back to staff for further study
2. That the City change its approach and timelines for presentation, consultation, and review of planning reports to allow for meaningful public input.
3. The committee to pause and give time to consider the many impacts that as-of-right Sixplexes will bring to our stable neighbourhoods.

Sincerely,

Lenka Holubec, on behalf of [ProtectNatureTO](#)

Reference:

[Urban growth is leading to more intense droughts for most of the world’s cities – and Sydney is a case study for areas at risk](#)

Urban growth is leading to more intense droughts for most of the world’s cities – and Sydney is a case study for areas at risk.

The growth of cities worldwide is contributing to more intense drought conditions in many cities, including Sydney, a new Chinese study has found.

This is adding to urban heat and water stress. These important findings point to the need to improve how we design and build cities to make them more liveable and resilient.

The study has used a massive 40 years of weather station data collected from urban and rural areas around the globe. **Larger cities and those with less green cover are associated with even greater worsening of drought.**

The Greater Sydney region was one of six cities selected from around the world for additional, more detailed model simulations. These explore how urbanisation is making local drought conditions worse in Sydney and the other cities. On January 4 2020, the western Sydney suburb of Penrith was the hottest place on Earth that day. It reached a scorching 48.9°C degrees.

[Why Is Vancouver So Insanely Expensive?](#)

The city has built homes faster than any other in North America, but it's still the priciest place to live on the continent, By Patrick Condon, January 16, 2025

Politicians and pundits often blame Canada's housing crisis on a simple problem of supply and demand: housing prices are high because not enough new housing is being built for the people who want to live there. But something weird is happening in the city of Vancouver. Between 1970 and 2020, the city tripled the number of homes within its limits, primarily by adding density to already built-up areas, but the population only rose by around 70 per cent. No other major city in North America can claim a comparable feat: New York City increased its housing stock by only 30 per cent over the same period, and Los Angeles and San Francisco had similarly modest gains.

Yet despite this new density, Vancouver holds the dubious honour of having the highest home prices in North America. Houses in Vancouver cost an average of around \$1.3 million. This is the great paradox: the city that's added the most number of homes is now the least affordable, and the most vulnerable residents are no closer to securing the homes they need. Why? **Because the problem isn't just about how much housing we build. It's about the cost of the land beneath it.**

[Record flood of investors behind Canada's housing crisis](#)

Canada's distorted housing market calls for more than 'cranes on the skyline,' given that investors now own one in three homes. There are other ways.

Like most premiers and mayors, Carney is promising to **"build, baby, build"** to stimulate a record amount of housing construction. But Angus Reid Institute polling suggests the public is more than skeptical, perhaps in despair.

While voters understandably get lost in the complexities of solving a house-price catastrophe that sees average prices at a ridiculous [\\$1.2 million in Greater Vancouver](#) and \$1.1 million in Toronto, at least one veteran housing analyst is making a clear and devastating case that Canada's dilemma is being significantly fanned by a wave of investors.

John Pasalis, author of a new report titled [The Great Sell Off: How Our Homes Became Someone Else's Business](#), says politicians are abandoning people who want to live in their homes, and they're selling a generation of voters a "fantasy" that their worn ideas will lead to affordability, he writes.

"As long as politicians and housing economists insist that 'more supply' is the only solution — ignoring the financial dynamics driving demand from investors — we will continue to fall short.