



**MORE NEIGHBOURS
TORONTO**

Dear Members of the Planning and Housing Committee,

RE: PH22.3 - Expanding Housing Options in Neighbourhoods - Multiplex - Monitoring Program - Final Report

About More Neighbours Toronto

[More Neighbours Toronto](#) is a volunteer-only organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that has dominated Toronto's politics, created an affordability crisis, and cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

Position

The Multiplex Monitoring Study is an opportunity for the City of Toronto to evaluate the success of the changes made under the Expanded Housing Options in Neighbourhoods initiative.

The City permitted 726 net new multiplexes units in the 18 month period from May 2023 to November 2024. While this is an improvement over the rate before the Expanded Housing in Neighbourhoods Multiplex Study was approved, it is still well below the rate needed to produce 5,000-25,000 new units by 2031 as envisioned in the Housing Action Plan. There is clearly further room for improvement.

We applaud the efforts in this item, as well as in item PH22.4, to make multiplex construction easier. The proposed amendment, which clarifies that multiple units are allowed in both detached and semi-detached buildings, is a good step which will avoid cases like the recent rejection of the proposal at 1090 Kipling Avenue by the Etobicoke York Committee of Adjustment.

The clarification that multiplexes are permitted despite any restrictions in Chapter 900 Exceptions of Zoning By-law 569-2013 is welcomed. As thousands of buildings are subject to exemptions, this will open up many more potential sites for multiplexes. We also appreciate the clarification that multiplex-to-multiplex conversions are permitted.

We appreciate the proposed technical amendment to allow a fourplex and a garden or laneway suite to be reviewed at the same time without charging Development Charges and Parkland Levies across all units. This will help significantly reduce the cost of these types of developments. We note that the City saw an increase in multiplex applications even as many high-rise apartment projects have been cancelled due to challenging market conditions. The

development charge exemption likely played a role, similar to how the exemptions in the rental incentive program allowed “stuck” projects to move forward.

The report also highlights how parking reform has enabled multiplex construction. In areas with more transit, multiplexes can be built as-of-right, without applying for a parking variance. Yet, in other areas, multiplexes are being constructed with parking when residents have a need for it. This one framework allowed multiplexes that worked in every ward in Toronto, but with flexibility that allowed variation depending on the particular needs of an area.

There are, however, some interesting patterns in the numbers of multiplexes in different areas of the city. Despite having a harmonized by-law in name, zoning requirements like minimum lot size and setbacks follow the patterns of pre-amalgamation boundaries. The highest numbers of new multiplexes are in the old west end streetcar suburbs and the former City of York, where these standards are more permissive. This suggests that staff and Council were correct to remove the floor space index restriction when approving multiplexes, but that there would be advantages to more fully harmonizing other standards in the harmonized by-law as well.

However, we are concerned about the proposed limit on the number of bedrooms allowed in a multiplex unit. The reason provided to limit bedrooms is to address concerns about multiplex units becoming rooming houses without obtaining proper licenses. But rooming houses are permitted in all residential zones in all building types. It is not clear why multiplexes would be any more likely to become rooming houses without proper licenses than another building type.

We are worried that this revision’s goal is to prevent rooming houses in multiplexes altogether. Limiting the creation of rooming houses is not a stated policy in the Official Plan and is not part of any provincial planning policy. It is arguably contrary to the goals expressed in Chapter 1 of the Official Plan.

The number of bedrooms is not currently regulated by Toronto’s Zoning By-law for any other low-rise building type. While the mix of bedrooms in different units in apartment buildings is controlled, this is often done to achieve family sized units with more bedrooms. The proposed bedroom caps would limit the creation of units with 4 or more bedrooms. It is unclear why the City would want to prioritize family sized units in apartment buildings but limit them in multiplexes.

We urge the Planning and Housing Committee to remove the bedroom limits from the proposed Zoning By-law Amendment.

The future actions proposed by staff as part of the ongoing Multiplex Monitoring Study, especially those to reduce fees and charges, are promising. We hope to see additional changes to make it easier to permit more multiplexes.

Regards,

Damien Moule,
More Neighbours Toronto