

2025.06.09

Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2

RE: PH22.3 – Multiplex Monitoring Report and Zoning By-law Amendments

Dear Members of the Planning and Housing Committee,

I am writing to express my support for the recommendations set out in the Multiplex Monitoring Report. The proposed amendments to Zoning By-law 569-2013 and Municipal Code Chapter 415 reflect a thoughtful and measured approach to addressing technical and implementation challenges identified since the adoption of multiplex permissions in 2023.

These refinements help clarify permissions, resolve barriers, and ensure that the City's multiplex framework remains functional and viable across a diverse range of sites and housing types. I commend City Planning for its careful monitoring and cross-divisional coordination and offer several constructive suggestions that could further strengthen the framework and align it with other Expanding Housing Options in Neighbourhoods (EHON) Initiative priorities.

Support Clear Permissions for Semi-Detached Multiplexes

The introduction of a new "semi-detached houseplex" definition and its addition as a permitted building type in low-rise residential zones addresses a key implementation gap in the City's multiplex framework. The proposed by-law amendments clearly establish that up to four units per building are permitted in semi-detached form and apply equally to new construction and conversions. This clarification is welcome and should help ensure greater consistency across projects and neighbourhoods.

To support effective implementation, it will be important that City staff consistently interpret these permissions as applying to newly constructed semi-detached multiplexes, including where both halves are built concurrently on a single lot or as part of a coordinated development. Where necessary, supplementary guidance or public education materials could help applicants and reviewers avoid delays or minor variances stemming from outdated assumptions about the permitted building types or applicable standards.

Reconcile Chapter 900 Overlays with City-Wide Permissions

While the interim measures proposed are helpful, Chapter 900 overlays continue to constrain as-of-right permissions for multiplexes on many lots across the city. I encourage the City to undertake a comprehensive review of Chapter 900 provisions and remove or update those that are inconsistent with city-wide permissions to support implementation and reduce the need for minor variances.

Consider Definitional Clarity in Lieu of a Bedroom Cap

I understand the intent behind the proposed limit on bedrooms per building—to differentiate multiplexes from multi-tenant dwellings—but it may be more appropriate to rely on definitional clarity. The City already distinguishes multi-tenant dwellings based on the presence of shared kitchen and bathroom facilities. Strengthening and consistently applying these definitions could achieve the same objective without imposing arbitrary bedroom limits that may constrain larger or family-sized units.

Additionally, such caps may unintentionally disadvantage larger or multigenerational households that require more bedrooms per unit, even where building form, servicing, and impacts remain consistent with low-rise standards. These constraints could have equity implications and may not be proportionate to the planning objective.

It is also worth questioning whether the City's authority under Section 34 of the Planning Act clearly extends to regulating the number of bedrooms within a dwelling. While the Act permits municipalities to regulate use, density, and built form, internal room configurations may fall outside the proper scope of zoning unless demonstrably tied to land use impacts. A form-based, function-oriented approach may offer a more defensible and outcome-focused alternative.

Avoid Blanket Restrictions on Reverse Slope Driveways

While the prohibition on reverse slope driveways is consistent with flood mitigation goals, I encourage the City to explore a more flexible, performance-based approach. In particular, reverse slope driveways could be permitted on lots located outside high-risk sewer catchments or where site-specific flood protection measures are provided. A narrowly applied prohibition could inadvertently reduce feasibility on constrained lots, particularly where on-street parking is limited.

A more nuanced approach—allowing reverse slope driveways subject to demonstrated flood mitigation in low-risk areas—could preserve flexibility while protecting infrastructure and minimizing flood risk.

Harmonize Height Permissions with the Sixplex Framework

As the Sixplex Study moves toward permitting up to six units per lot, it recommends a building height limit of 10.5 metres. In contrast, the current multiplex permissions maintain a 10.0 metre height cap for up to four units. I recommend that the City evaluate whether this 0.5 metre discrepancy remains necessary.

The current 10.0 metre cap often results in compromised third-storey unit layouts, with constrained ceiling heights, awkward dormers, or oversized stair bulkheads. Increasing the height permission for multiplexes to 10.5 metres would improve design flexibility, facilitate livable and energy-efficient upper-level units, and align the built form standard across similar housing types.

Importantly, a modest height increase also improves the functionality of below-grade units. Allowing for slightly more height can support the inclusion of well-proportioned basement units with better ceiling heights, natural light access, and grading transitions—enhancing livability while supporting the City's broader housing goals.

Address Implementation Barriers Across Zoning and Building Code Frameworks

Finally, I encourage the City to consider a range of implementation challenges that affect the viability of multiplex construction and may warrant further refinement, both within and beyond the zoning framework.

From a zoning perspective, certain provisions remain unnecessarily restrictive. For example, side yard setback standards often require applicants to retain existing building walls to qualify for reduced setbacks, even in cases where compliance with the Ontario Building Code can be achieved through other fire protection measures such as fire shutters, closures, or non-combustible cladding. These solutions are already commonly used in low-rise infill projects and are addressed through Ontario Building Code review. Zoning should not inadvertently preclude these approaches by linking reduced setbacks to form-based conditions that privilege existing buildings over new construction.

Similarly, rear yard soft landscaping requirements can be difficult to satisfy when combined with the functional needs of secondary egress, barrier-free access, and the integration of garden or laneway suites. These requirements may unintentionally limit development on constrained or shallow lots, even where alternative design responses provide usable open space and meet the intended goals of stormwater management and urban forestry. The City should remain open to refining these standards over time to ensure they enable, rather than restrict, the successful implementation of multiplex housing.

Several constraints embedded in the Ontario Building Code continue to impact feasibility. These include current limitations on wood-frame construction, and the requirement for a second means of egress in small-scale multiplexes, which can result in highly constrained layouts and excess hardscape. While these matters fall outside the scope of the current zoning amendment, they are critical to realizing the full potential of multiplex permissions and warrant ongoing dialogue with Toronto Building and provincial counterparts.

Conclusion

The Multiplex Monitoring Report and proposed zoning amendments represent a continued commitment to enabling low-rise intensification in a context-sensitive, climate-responsive, and implementable way. I support the recommendations and encourage City Council to adopt them, while considering the above enhancements to improve alignment with EHON priorities and the City's broader housing goals.

Thank you for your leadership in advancing this important work.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Scorgie'.

Blair Scorgie

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