

June 10, 2025

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

Re: PH.22.3 Expanding Housing Options in Neighbourhoods – Multiplex Monitoring Program – Final Report
and
PH22.4 Housing Accelerator Fund, Expanding Permissions in Neighbourhoods for Low-Rise Sixplexes – Final Report

Dear members of the Planning and Housing Committee

Given the inter-related nature of the above-cited items, please consider the following comments with respect to both.

I am writing to convey my strong support for the proposed multiplex zoning amendments, including the expansion of permissions for sixplexes city-wide. Making it easier to build multiplexes across the city is an important and potentially significant means of increasing housing supply and options, particularly low-rise buildings with larger units, within existing neighbourhoods.

However, the reports raise some issues that must be addressed in order to facilitate multiplex construction and see more such units actually built:

- 1. DC and park levy exemptions available to four-unit *houseplexes* and *semi-detached houseplexes* (up to 10 units total) should be made available to five and sixplexes at the same time that the zoning amendments are brought forward.**

The *Expanding Permissions in Neighbourhoods for Low-Rise Sixplexes* staff report notes that financial feasibility of multiplexes is difficult. Recent changes to **development charges** were intended to help address this issue, providing exemptions for multiplexes up to four units. In addition, changes proposed in the *Multiplex Monitoring* staff report also clarify deferral/exemption on development charges for a garden or laneway suite.

In addition, the proposed zoning definition implies that both sides of a semi-detached houseplex would be exempt from DCs, potentially up to four units per side for a total of eight units.

In all, if on a given property an owner chooses to construct two semi-detached houseplexes with two garden suites, a total of ten units would be DC-exempt.

On the other hand, if a property owner wishes to construct a five- or six-unit houseplex, no DC exemptions would be available.

A houseplex with six 2-bedroom units (if not rental) would be charged some \$484,140 in DCs. A semi-detached houseplex also with a total of six units (or up to eight units) would be DC- exempt.

This creates an inconsistent situation in which semi-detached multiplexes up to ten units are incentivized while five and six unit houseplexes are not, perversely undermining the proposed zoning permissions aimed at encouraging the latter.

The same argument applies to **parks levies**. Exemptions are currently available for up to five units on one parcel of land (a fourplex plus a garden or laneway suite), or up to a total of ten units for a semi-detached houseplex (including two laneway or garden suites), but would not be available for a five- or sixplex.

I understand that DC exemptions to complement permissions for five and sixplexes are to be considered in a future comprehensive review of development charges. However, if the objective is to facilitate the construction of multiplexes, then a comprehensive package of measures is needed. And in the interests of fairness and policy consistency, exemptions that apply to four-unit houseplexes and semi-detached houseplexes should be made available to five and sixplexes at the same time that the zoning amendments are brought forward.

2. The proposed zoning definition of “semi-detached houseplex” should not require that it be located on two separate lots.

A stated objective of the proposals is to implement a “form-based approach” to regulating multiplexes, based on “the external features of the building”. This includes the sensible idea that the permitted built form of multiplexes should be the same as that that applies to single-detached houses.

Yet the proposed definition for *semi-detached houseplex* includes a provision that it be “erected on two lots.... with each half situated on its own lot”. This provision is not included in the zoning by-law definition of *semi-detached house*.

The requirement that each half of a *semi-detached houseplex* be located on its own lot:

- is an unnecessary stipulation
- undermines the intent of the form-based approach
- places an additional restriction on multiplexes that does not apply to single-detached houses.

Furthermore, the requirement could impose an additional requirement for severance where it may not be needed or desired. Consider an owner of a 50 foot wide lot. For various reasons (e.g. unit types, construction costs, financial incentives (see above)), he may wish to build a *semi-detached houseplex* form (i.e. two side-by-side multiplexes with a common party wall), but retain ownership of the entire building (e.g. as a rental building or family-owned). Under the proposed definition, the property owner would be required to obtain a severance, a costly additional approvals step.

An appropriate definition would relate to building form only, as is the stated objective of a form-based approach.

3. The proposed limits on bedrooms in houseplex buildings should be eliminated.

Given that providing family-sized apartment units is an important policy objective that remains difficult to achieve, introducing limits on the number of bedrooms in houseplexes is counter-productive at best. If the concern is that multiplexes could become defacto rooming houses, then this issue would be better resolved through refined zoning definitions of the two residential types.

4. Develop a City guideline for acceptable alternative solutions to allow for a single stair in Part 9 OBC houseplexes.

A three-storey, up-to-six-unit houseplex requires a second exit stair if there is a shared primary stair to access units. This Ontario Building Code requirement is particularly detrimental to houseplexes, which tend to be of necessity small in scale and footprint.

This is especially true for five- and sixplexes.

In order to circumvent second stair requirements, fourplexes are often built with four sets of private stairs and entrances. This is a very inefficient solution, which reduces building efficiency, eats up living space and compromises unit layouts. A private stair solution is unworkable for a five or sixplex.

Alternatively, where fourplexes have one unit per floor and a shared primary access, shared external fire escapes are often used. This solution works if there is one unit per floor. But when there is more than one unit per floor, which would by definition be the case with five and sixplexes, multiple external fire escapes could be required in order to serve every unit. This becomes impractical, especially on the typically small sites.

Single-stair sixplexes can offer better unit layouts, better building efficiency and therefore improved financial viability. In addition, single-stair five and six-unit multiplexes can often support an elevator, making units accessible to young families with strollers and elderly couples alike.

Single stair proposals are required to undertake an alternative solutions process, which adds an additional step to the approvals process and added approvals time and cost.

I understand the City has commissioned a report which is offered as guidance for single-stair buildings.¹ However, many of the proposed alternative solutions contained in this report are not appropriate for three storey, Part 9 OBC buildings, but rather geared more to larger multi-unit buildings. For Part 9 buildings, many of the proposed solutions are onerous and risk undermining or simply negating the benefits of a single stair.

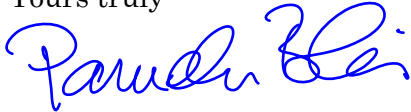
¹ <https://www.toronto.ca/services-payments/building-construction/apply-for-a-building-permit/building-permit-application-guides/guides-for-other-buildings/single-exit-stairs/>

A City guidance document that provides a clear and reasonable set of alternative solutions specific to Part 9 buildings that the City will accept would go a long way toward supporting livable, accessible, high quality units in three storey multiplex buildings.

While changes to the OBC are ultimately required, in the meantime such as guideline would be extremely helpful in encouraging houseplex construction. If the goal is to see many more houseplexes actually built across the city an integrated approach is needed.

Thank you for the opportunity to submit these comments.

Yours truly



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