



June 11, 2025

Planning and Housing Committee

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

Attention: Planning and Housing Committee, Council of the City of Toronto

**RE: Multiplex Monitoring Report
 PH22.3
 Housing Accelerator Fund: Expanding Permissions in Neighbourhoods for Low-Rise
 Sixplexes
 PH22.4**

We are writing in response to proposed changes to the City of Toronto's existing permissions for multiplexes, as well as proposed amendments to the City of Toronto's Official Plan and Zoning By-law which will allow five- and sixplexes in *Neighbourhoods* and *Residential* zones citywide.

Please consider this communication regarding the City's Multiplex Monitoring Report and its report on Expanding Permissions in Neighbourhoods for Low-rise Sixplexes, as there is overlap in our commentary.

The Biglieri Group is a land-use planning consulting firm of Urban Planners, Urban Designers, and Heritage Professionals. We work with landowners, builders and developers who are active in supporting the expansion of housing supply across Toronto. Many of our clients are engaged in developing garden and laneway suites, multiplexes, and multi-family apartment buildings on Major Streets.

Based on our experience supporting clients through multiplex development, we offer the following suggestions for Planning and Housing Committee to consider as you plan for the future of this built form.

1. Allow for expanded building length and depth when elevators are included

One of the City's goals for multiplex development is to provide opportunities for seniors to age in place. In many cases, providing elevators within a multiplex building footprint without sacrificing a bedroom is challenging due to spatial constraints. The City should consider a modest extension to the permitted maximum building length and depth when proposed multiplexes include an elevator for accessibility. This will unlock greater possibility to include elevators that enable accessible units for seniors and other community members.

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2. Exempt multiplexes from Chapter 900 Exceptions related to Floor Space Index

The City's in-force zoning standards for multiplexes do not impose Floor Space Index (FSI) limitations on the multiplex built form, however, legacy Chapter 900 Exceptions related to FSI render many multiplex developments impossible on properties otherwise well suited to accommodate modest intensification. The City's objective of Expanding Housing Options in Neighbourhoods is therefore weakened on many properties where these exceptions apply. Multiplexes should not be subject to Chapter 900 Exceptions related to FSI, as it prevents appropriate growth in areas where it can be accommodated.

3. Do not impose limitations on the number of bedrooms permitted

The Multiplex monitoring report states that recently approved multiplexes are on average, 106 square metres (1160 square feet) in size, and that 65% contain units with two, three or more bedrooms. Properties subject to multiplex permissions vary in size, however, there is generally a logical limit to unit size (and number of bedrooms) due to lot constraints. This is especially true in older areas of the City with tighter lots where much of the City's multiplex activity is ongoing (Old Toronto and York). Restricting the number of bedrooms is arbitrary and will not improve development outcomes. Determining the number of bedrooms that can reasonably be accommodated in a multiplex should be a design decision rather than a zoning limitation.

4. Allow for new semi-detached multiplexes, including five- and sixplexes

TBG is pleased that the City is proposing to expand multiplex permissions to newly constructed semi-detached duplex, triplex and fourplexes. It is TBG's opinion that five- and sixplexes should also be permitted in the semi-detached format as-of-right. This will lead to better building efficiency on smaller sites, and unlock more properties for more housing. The rationale for preventing semi-detached five- and sixplexes is unclear. These multiplexes are proposed to be guided by essentially the same form-based zoning provisions as multiplexes with fewer units. As such, their scale will be the same as a fourplex, resulting in an equivalent impact on neighbourhood character and streetscape.

5. Allow increased building heights and storeys

The City should consider permitting multiplexes in buildings up to four storeys. We believe this would enable improved layouts, more family-sized units, and more flexibility depending on site characteristics. While we acknowledge existing Ontario Building Code realities when four storeys are introduced, determining the developability of a multiplex on a particular site should be a design exercise.

6. Development Charge exemptions

TBG is pleased that the City is providing clarity on Development Charge exemptions for lots containing a fourplex and a garden suite. This will help to better enable these typologies, and will remove a substantial barrier that has been faced by our clients thus far. We fear that landowners, developers and builders will choose not to develop five- and sixplexes (with or without garden suites) due to Development Charge constraints. We suggest that, if the City wishes to levy Development Charges on five- and sixplexes, they only be charged on the fifth, sixth and seventh

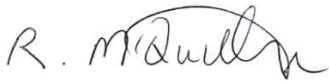
(if a garden suite is included) unit. This would make Development Charges less prohibitive and better support the ability for five- and sixplexes to be executed.

Conclusion

TBG commends the City on their work to expand permissions to enable more housing in existing neighbourhoods. We are pleased to support clients in the development of multiplexes and look forward to the City's adjustments to permissions for the future of this typology.

Best regards,

The Biglieri Group Ltd.

A handwritten signature in black ink, appearing to read "R. McQuillan". The signature is fluid and cursive, with a large loop at the end.

Robert McQuillan, MPI, BCom
Planner