

11th June 2025

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

To: Members of the Planning and Housing Committee

Re: PH 22.4 Housing Accelerator Fund: Expanding Permissions in Neighbourhoods for Low-Rise Sixplexes

Dear Members of the Planning and Housing Committee,

As someone deeply involved in the Missing Middle housing space, I want to thank the City for its continued leadership in advancing policies that address our growing housing crisis. The proposed amendments to facilitate multiplex construction are a critical step in the right direction. However, to ensure this initiative has the intended impact, I respectfully submit the following **recommendations and enhancements** for your consideration.

1. Support for Sixplexes

Sixplexes strike the perfect balance between density and neighbourhood compatibility. Cities like Montreal, Paris, London have successfully integrated this typology, enabling greater affordability, walkability, and land efficiency—without compromising character. Toronto should take a bold step and permit sixplexes city-wide, as part of this evolving framework.

2. Side Yard Setbacks: Flexibility for Infill Projects

I strongly recommend amending the side yard setback requirement to allow:

- Either zero lot line or at the very least the use of the **existing building's side setback** (if applicable) on one side for **infill** properties, and
- A min **900mm setback** for only one side (for fire access to allow flexibility on garden suite / laneway access in the future.)

As someone who regularly services multiplex projects in Toronto, the majority **of our multiplex projects have required variances to reduce side yard setbacks.**

On standard 25-foot-wide lots—common throughout Toronto, the current zoning setbacks are unduly restrictive for the internal apartment footprint. They limit the ability to provide reasonable side-by-side bedrooms, which in turn reduces unit livability and discourages density. Maintaining unnecessary setbacks on infill lots not only limits design potential but also burdens both developers and the Committee of Adjustment with redundant variance requests.

3. Rethinking Bedroom Limits: Tie to Lot Size, Not Arbitrary Caps

The proposed cap on bedrooms per building may be well-intentioned, but in practice, it restricts the creation of **larger, family-sized units**—which are in extremely short supply.

I urge the City to reconsider this approach and instead:

- **Tie the number of bedrooms to the lot size or building area for units over 3 bedrooms,**
- Consider ratios of **communal space to bedroom area** as a metric to prevent rooming house conditions, and
- Allow flexibility for 4+ bedroom units where sites can comfortably accommodate them.

Blanket caps on bedrooms run contrary to the goal of enabling housing choice. If a lot can reasonably support larger units, we should be encouraging their construction—not limiting it arbitrarily.

4. Waive Development Charges on the First Six Units

Development Charges (DCs) are a significant barrier to the economic viability of small-scale infill projects. Applying full DCs when a project exceeds four units creates a clear **disincentive** to deliver more housing.

To support sixplex adoption and incentivize Missing Middle development, I recommend waiving DCs on **at least the first six units** of any qualifying development. This change would:

- Encourage more builders and homeowners to consider sixplexes,
- Keep costs lower for end-users, and
- Align DC policy with the City's own housing goals.

Closing Thoughts

We applaud the City's progress on this file. But for multiplex zoning to become a **meaningful tool** in the fight against housing scarcity, we must ensure the regulations support—not hinder—good infill housing. I appreciate your time and thoughtful consideration of these points and would welcome any opportunity to discuss them further.

Sincerely,



Noam Hazan

Founder, Noam Hazan Design Studio

noam@noamhazan.com | [Instagram.com/noamhazanstudio](https://www.instagram.com/noamhazanstudio)

o 437 780 8204 | d 647 994 6284