



ADAM LAYTON, MCIP, RPP
alayton@goldberggroup.ca
(416) 322-6364 EXT. 2101

June 11, 2025

City of Toronto Planning and Housing Committee
c/o Nancy Martins
100 Queen Street West
Toronto ON M5H 2N2

Dear Councillor Perks, and Members of Planning and Housing Committee,

**Re: Response to Proposed Zoning By-law Amendments
Expanding Housing Options in Neighbourhoods: Multiplex Monitoring
Report (Item 2025.PH22.3)
Housing Accelerator Fund: Expanding Permissions in Neighbourhoods for
Low Rise Sixplexes (Item 2025.PH22.4)**

Goldberg Group has been retained by several property owners as outlined in Appendix 'A' of this letter to review and comment on the proposed Zoning By-law Amendments related to items PH22.3 and PH22.4 of the City Planning Housing Committee meeting of June 12, 2025. Our Clients have an interest in pursuing the redevelopment of their lands with multiplex forms of housing and are generally supportive of any effort to simplify the policy framework related to same.

Notwithstanding this, we have identified several areas of concern which we outline below:

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

While we strongly support the intention to allow sixplex units across the City, and suggest this should be permitted on all lands, not just in 'detached' houseplex forms.

Further, we feel that increasing the height for sixplex buildings from 10 metres to 10.5 metres in certain circumstances remains too restrictive and does not account for variability in grading situations which may be experienced across the City, nor the desire of some proponents to provide greater floor-to-ceiling heights for improved living conditions.

It has been our experience that the Committee of Adjustment is hesitant to provide relief from newly adopted development standards, thus necessitating the establishing of a standard to incorporate sufficient 'tolerance' to account for a variety of situations. On this basis, we suggest that the maximum height of all multiplex buildings should be increased to 12.0 metres, absent the need to satisfy any additional criteria. We also suggest that the By-law include clarifying regulations which stipulate that there is no restriction with respect to the number of 'storeys' permitted for multiplex units. Lastly, we suggest that the height restrictions for 'main walls' be eliminated or increased. In their current form, this particular regulation adds unnecessary complexity to the built form, which has impacts in terms of construction costs and sustainability.

In our opinion, amendments to these regulations are appropriate and would provide additional flexibility to better accommodate a more varied design form across the City, and adapt to site or area specific context be it grading, lot size, or configuration. Most importantly, we feel this approach could potentially eliminate the need to seek Zoning relief, which can be costly, time consuming, and has no certainty of approval.

We are aware of several recent proposals which required relief from the height provisions of the Zoning By-law to either address grade conditions, provide greater height for basement units above grade, or to eliminate the need to step a unit and thus provide a fully accessible building, which were denied by the Committee and/or TLAB. As a result, the potential to realize the implementation of much needed housing units has been lost.

Expanding Housing Options in Neighbourhoods: Multiplex Monitoring Program

Draft Zoning By-law Amendment: Chapter 900 Exceptions

Similar to our prior comments related to the proposed increase in height, we feel the proposed interim approach to resolving the Chapter 900 Exceptions may be mis-interpreted in situations wherein relief is required from the COA. Accordingly, we could expect to see situations wherein the Committee determines that the 'General Intent of the Zoning By-law' is not maintained based on the approach taken.

We also suggest a regulation should be enacted outlining that Multiplexes are a permitted use despite any development proposal which resulted in a Chapter 900 Exception prior to implementation of the Multiplex OPA and ZBLA.

Draft Zoning By-law Amendment: Reverse Slope Driveways

The prohibition for reverse slope driveways takes a broad approach to a nuanced matter. We suggest that a framework to permit reverse slope driveways should be implemented to allow a proponent to advance such a request if desired.

We do not agree with the suggestion that the implementation of such driveways does not reinforce the physical character of a neighbourhood. There are numerous examples of neighbourhoods wherein the prevailing character has evolved to consist primarily of reverse slope driveways. In our opinion, the engineering and urban design impacts of a reverse slope driveway can be appropriately addressed, while still providing opportunity to accommodate vehicles without contributing to the need for additional height. We also suggest that the City should consider regulations to allow alternative parking systems, such as car elevators, without requiring application for Zoning relief.

Draft Zoning By-law Amendment: Outdoor Amenity Areas

We find issue with Staff's position with respect to the permission for rooftop terraces, particularly in light of the recommendations contained in the Urban Land Institute Technical Assistance Panel Report entitled 'Multiplex Housing Financial Feasibility Exercise' (April 19, 2022) (the "**ULI Report**"). This report was prepared at the invitation of the City Planning Department to consider the policy and economic viability to trigger the creation of more residential units during consideration of the Multiplex Study which preceded the implementing Official Plan Amendment and Zoning By-law. The ULI Report

recommended a number of interventions, many of which have already been adopted by the City, including increasing maximum height provisions as we have suggested above. In particular, the ULI Report references that the provision of rooftop amenity space would assist the design of multiplexes by maximizing internal space while also providing external livable area.

Further, we disagree with the suggestion that the recreational opportunities afforded by a balcony is comparable to that on a rooftop terrace. In our opinion, the shared amenity of a common rooftop patio may be superior to exclusive use balconies by helping create a stronger and more resilient sense of community amongst residents, and in particular can establish areas for children's play which may be considered more secure than at grade areas.

We also suggest that an outright prohibition on rooftop amenity areas creates a scenario wherein narrow or irregularly shaped or graded lots that are not able to provide usable rear or side yards must instead obtain relief from the Committee, which may be hard to obtain.

In our experience, past discussions with City Building Staff have highlighted that there is no functional difference to building massing between a rooftop access used for maintenance purposes, and one used for amenity purposes. Thus, in most cases there is no built form impacts resulting from permitting a rooftop amenity space. Further, the ability to provide a rooftop amenity space could potentially eliminate the need to provide balconies or platforms on the front or rear elevations of building, thus removing visual obstructions to the streetscape, simplifying construction (and thereby costs), and potentially improving energy efficiency through the elimination of exterior portions of a floorplate which radiate heat to the exterior in the winter.

Technical Amendment to Development Charges By-law (Attachment 2)

While we are supportive of the resolution pertaining to the construction of a garden or laneway suite in conjunction with a multiplex building, we suggest that this amendment should be revised to consider the recommendations of Staff pertaining to Item PH22.4, being to permit sixplexes citywide.

In recognition of the considerable effort expended by City Staff in advancing the permission of same, we suggest that the text of the technical amendment to **Section 415-6.A(2)** should instead read:

*"Where not already exempt pursuant to subsections 2(3) and 2(3.1) of the Development Charges Act as in Subsection A(1) above, development charges shall not be imposed with respect to the **second, third, fourth, fifth, or sixth** residential dwelling unit constructed on a single residential parcel of land or within a single residential building, whether constructed as part of or ancillary to the primary residential dwelling on such parcel of land, provided that such exemption applies only to a development of no more than **six** units on such single parcel of land. If a Garden Suite or Laneway Suite is proposed as a **seventh** unit on such parcel of land, provided that the said ancillary dwelling unit is the subject of a Development Charge Deferral Agreement for Ancillary Dwelling Units with the City through the Laneway and Garden Suite Development Charges Deferral Program, it shall not be included in calculating the total number of units for the purpose of the **six** unit exemption." **[emphasis added]***

Barring acceptance of a waiver of development charges for sixplex units, we feel it should be clarified that charges shall only be levied against those units in excess of four plus a garden/laneway suite, rather than for all units (i.e. the 'delta' of the charge).

We also suggest that consideration for exemption from parkland levies should be implemented to fully incentivize the creation of multiplex housing.

Conclusions

On the basis of the above concerns, we suggest that it is necessary to defer consideration of these items to allow further revisions to be incorporated into the implementing instruments.

We request to be notified of any future actions, reporting, or decisions related to this matter. If you have any questions or require additional information, please do not hesitate to contact the undersigned at ext. 2101.

Yours truly,

GOLDBERG GROUP



Adam Layton, MCIP, RPP
Associate Principal

cc. Jason Thorne
Kyle Knoeck
Carola Perez-Book
Caroline Samuel
Brooke Marshall
Kasia Kmiec
Daniel Kolominsky

Appendix 1
Property Ownership

Address	Registered Owner	Legal Description
40 Snowdon Avenue	Mohammad Reza Lotfi	PCL 80-1 SEC M370; LT 80 PL M370 TORONTO; TORONTO , CITY OF TORONTO
80 Berkinshaw Crescent	Behesteh Gharahdash	LT 288 PL 4332 NORTH YORK; S/T NY154468; TORONTO (N YORK) , CITY OF TORONTO
19 Tallwood Drive	Behesteh Gharahdash	LT 486 PL 4759 NORTH YORK; S/T NY175229, NY197539, NY200194; TORONTO (N YORK) , CITY OF TORONTO
10 Ternhill Crescent	Amin Alibeik	LT 199 PL 4545 NORTH YORK ; S/T NY174935 EXCEPT THE BELL EASEMENT THEREIN; TORONTO (N YORK) , CITY OF TORONTO
41 Norwood Road	1001184247 Ontario Inc.	PT LT 14 BLK 5 PL 635 EAST TORONTO AS IN EX81826; S/T & T/W EX81826; CITY OF TORONTO