

12 June 2025

PH22.3 - EXPANDING HOUSING OPTIONS IN NEIGHBOURHOODS - MULTIPLEX - MONITORING PROGRAM

## **OBJECTION TO BEDROOM LIMITS**

Dear Planning and Housing Committee and City Council Members,

We are disappointed in the attempt to limit the number of bedrooms in multiplexes. This new requirement will be counterproductive to controlling rooming house concerns, increase subversion in design and construction, and reduce family-friendly housing opportunities.

### **COUNTERPRODUCTIVE TO CONTROLLING ROOMING HOUSE CONCERNS**

The monitoring program detected only a small number of project that may have been attempts to create rooming houses. In those cases, the designs had over 7 bedrooms per unit.

Multi-Tenant Houses (MTH) should be controlled through licensing requirements, other sections of the zoning bylaw, and proper enforcement.

Attempts to limit bedrooms will be harmful to good actors, who substantially outnumber bad actors in this case. There is no statistical indication that this is actually a problem, and the analysis is solely focused on a small problem without considering the harm it will cause to projects that have opportunities for larger family-sized units.

If the Committee and Council insist on limiting the number of bedrooms, it would only be appropriate to limit the bedroom count to 5 bedrooms per unit or higher, although we recommend removing this requirement entirely and properly controlling MTHs through licensing and the rooming house bylaws.

### **INCREASE SUBVERSION IN DESIGN AND CONSTRUCTION**

In the case of projects that provide 5-bedroom units for families, although they would technically require minor variances under the new bylaws, we would simply change the designs to relabel bedrooms and make provisions for enclosing illegal bedrooms in the future.

The cost and time required for Committee of Adjustment in situations like this is punitive, and we will be very happy to begin lying to staff about our projects to avoid it.

Instead of controlling bad actors who will continue to lie and subvert, you will be creating new bad actors who will begin lying and subverting.

Bedroom limits will fail to effect MTH concerns, and will create new concerns.

### **REDUCE FAMILY-FRIENDLY HOUSING OPPORTUNITIES**

In addition to small, affordable rental units, the missing middle also includes large rental units and ownership opportunities. There is a growing class of middle-income earners who will suffer without expanded options for large 4-to-6-bedroom rental and purchasing opportunities.

Down payments are becoming increasingly more challenging to afford, and a growing number of Toronto families are seeking rental opportunities for mature families. These do not exist in highrise and midrise housing. The multiplex bylaws created a responsible, efficient pathway to creating this type of housing, and

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there are many architects and builders executing these projects. These good actors far outnumber the supposed bad actors these changes attempt to control.

There is also a growing trend to condominiumize multiplex units for purchase. This is creating new ownership opportunities for new-construction, large units that benefit families who cannot afford detached homes. No matter how much we may wish our society was moving more quickly towards a European, rental-based model, a substantial portion of Canadian's wealth is associated with their home ownership.

## **CONCLUSION**

Multi-tenant housing is not actually a problem. The evidence of its presence is miniscule. If Committee and Council actually cared about it, they would enforce it through licensing. These measures to limit bedrooms will not solve MTH concerns.

Bad actors in this space will continue to attempt to break the rules. These changes will be ineffective at preventing that. All this will do is harm families, and turn good actors into bad actors.

Thanks to the EHON initiatives we can act openly and in good faith. The zoning bylaws are finally working to enable family-friendly housing and rental opportunities in our neighbourhoods. This where we need housing most – near parks and schools.