

May 15th 2026

RE: MM41.8 - STRENGTHENING COMPLIANCE AND COORDINATION ACROSS MULTIPLEX DEVELOPMENT

TO: councilmeeting@toronto.ca, and Councillor_ChernosLin@toronto.ca

My concern pertains to the combination of a multiplex building AND a Garden or Laneway Suite developed on the same residential house lot, as in my opinion, the loss of outdoor amenity space does not represent good planning.

In my opinion, the Multiplex provision permitting fourplexes on residential properties should not apply where a Garden Suite or Laneway Suite is also involved. Garden Suites or Laneway Suites consume outdoor amenity space, otherwise required in low-density residential solutions.

Rear yards are an integral part of the outdoor living area associated with a main residential building. The required minimum permitted rear yard depth is generally the greater of either 7.5m or 25% of the depth of the lot. Houses were once limited to 14m in length, between the front and rear main walls. Much of the city's existing housing stock was built to that standard. Later on, the maximum permitted length for houses was revised to 17m. Meanwhile, the length for duplexes, triplexes and fourplexes remained limited to 14m, recognising the need for rear yard areas, commensurate with the intensified occupancy involved beyond a single-family house.

The adoption of the EHON initiative permits multiplexes to be 19m long. This represented an increase of 5.0m beyond the traditional house length of 14m, and represented an increase of 2.0m beyond today's house length of 17m. In both cases, the additional building length comes at the expense of outdoor living space. The impact of the reduction is amplified by the greater occupancy load of a multiplex than that of a house. In addition, there is greater diversity of interests and activities than in a single family.

Greater occupancy loads place greater demands on the outdoor living areas, while the amenity offering is to continue providing a soft-landscaped environment with a tree canopy, a children's play area, a social seating area, and practical facilities such as bicycle storage, a garbage corral, and a dog run.

A prominent difficulty arises when a Garden Suite or Laneway Suite is included in the development mix, which is that it substantially takes over the rear yard, changing the dynamics from what was formerly a shared semi-public space, plus a portion of the remaining open space, forms a curtilage around a Garden Suite or Laneway Suite, limiting that area's use by the tenants in common.

Some properties may be large enough to accommodate an appropriate outdoor living area along with a Garden Suite or Laneway Suite. However, consideration should be given to the fact that approximately 60% of Toronto's house lots are 25 feet wide or less, and a further 20% are 30 feet wide or less, which limits prospects. Again, Toronto's typical lot depths are generally modest, with the difficulties involved evident in the frequency of CofA Applications requesting a reduction in the minimum separating distance between the main building and a Garden Suite or Laneway Suite, which is an area where the last available outdoor living is to be found, and that is frequently encumbered with non-amenity features, such as exterior stair towers.

A fourplex plus a Garden Suite or Laneway Suite, totalling five units, falls within the definition of an apartment building, at which point amenity space becomes a formal consideration. Some argue that since the two buildings are not structurally attached, they do not constitute an apartment building; however, it should be noted that the definition of an apartment was codified prior to the existence of Garden Suites or Laneway Suites. Qualitatively, in my opinion, there are apartment-building issues to be addressed when a multiplex main building and a Garden Suite or Laneway Suite are contemplated on the same residential property.

Sincerely –



Terry Mills B.ARCH RPP MCI