



environmental
defence

June 9, 2026

Planning and Housing Committee
% Nancy Martins
10th floor, West Tower, City Hall
100 Queen Street West
Toronto ON M5H 2N2

PH31.18 - Requesting Reasonable Regulation of Length and Depth for Multiplexes in Residential Multiple Zones

Attention Planning and Housing Committee Members,

I am Counsel, Land Use & Development Program Manager and Ontario Environment Program Manager for Environmental Defence. I lead Environmental Defence's policy development and advocacy regarding land-use planning, smart growth, housing supply and the protection of farmland and habitat in Ontario.

It is our understanding, however, that this motion intended to address only the very narrow and specific circumstance of a multiplex (3, 4, 5, or 6-unit / 3-4 storey) apartment buildings being allowed significantly *greater* as of right depth than a mid-rise (5 or six storey) apartment building with *more* than six units on the same residential lot in the RM zone.

However because the current language of PH31.18 is somewhat vague, I am writing to urge Council and staff not to direct, draft or approve any bylaw which would result in :

- permissions for fourplex, fiveplex, sixplex or or triplex developments within any Residential Multiple (RM) Zone becoming any less permissive than the most permissive regime which would *currently* apply to such development in the Residential Detached (RD), Residential Semi-detached (RS), or Residential Townhouse (RT) zones.
- any reduction in permissions for fourplex, fiveplex, sixplex or or triplex within the Residential Detached (RD), Residential Semi-detached (RS), and Residential Townhouse (RT) zones.
- permissions for fiveplex and sixplex developments within the RM zone that are too restrictive to allow for the inclusion of at least five or six 3-bedroom family homes (as the case may be) as of right

As you will have heard from us before, it's absolutely vital, for anyone who cares about the environment, the housing shortage, or preventing economic segregation, that Toronto's homebuilders *actually* deliver more than 450,000 net new



family-sized homes inside our “neighbourhoods”. You know our evidence on how important as of right, zero-parking midrise permissions on **major** residential major streets to achieve this outcome - and we thank Councillors and the current mayor for the rapid improvements on that front. However we want to remind you that we, and the environmental and environmental concerns of our many Toronto supporters, were also a driving force behind the City’s adoption of as-of-right fourplex permissions on all *interior* residential lots.

It remains vital that the planning permissions for 4-plex on virtually all of the City’s interior residential lots:

- Are considerably more permissive than those would apply for a single detached home, garden suite, or townhome (with or without a secondary suite), providing permissions that are available *only* for multiplex or greater unit densities
- Provide as of right depths of at least 17m and at least 19m for deep and/or narrow lots
- Are free of any free-standing floor space index constraint
- Do not require any on-site parking
- And retain all of the other advantages granted under the multiplex bylaw.

While the potential of multiplex (just like the potential of mid-rise) is being held back by the Provincial Government’s refusal to adopt our recommended Building Code amendments (e.g., safe single egress), the progress that Toronto has been making is still valuable and should not be sacrificed.

Sincerely,

Philip Pothen
Counsel, Land Use & Development Program Manager
Ontario Environment Program Manager,
Environmental Defence