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Submitted via Email: philip.parker@toronto.ca

Dear Philip,

On behalf of the 68,000 REALTOR® Members of the Toronto Regional Real Estate Board (TRREB), I am writing to provide input on the Multiplex Study consultations. We appreciated the opportunity to further discuss this important issue when you met with TRREB's Housing Affordability Sub-Committee.

We support the City of Toronto's goal to increase market housing supply mix and choice in neighbourhoods via the various Expanding Housing Options in Neighbourhoods (EHON) initiatives. We believe that enabling gentle densification within the Yellowbelt will help to create an inclusive, equitable, productive and liveable city that is sustainable over the coming years. Multiplexes are an important element in achieving this objective.

Additionally, due to it being a relatively more dense form of housing in comparison to existing neighbourhood choices, this typology directly supports *market* housing affordability. This has been identified as a provincial objective, and is also supported by TRREB.

Ensure Broad and Flexible Parameters to Encourage Supply

We are encouraged by the approach that the City has taken to date with this particular stream of the EHON initiative. Review of other North American jurisdictions that have already enabled multiplexes, review of City of Toronto minor variance applications from the past decade, and case studies of various diverse Toronto neighbourhoods should all help to create a more robust as-of-right framework. The City's intention to adopt a simplified approach and an approval process which can be applied city wide while respecting distinctive neighbourhood differences should also help in this regard.

In the interest of facilitating multiplex development, we favour an approach which sets the as of right parameters at a broad enough level to accommodate and capture the most commonly anticipated minor variance requests at the outset.

We recommend that the City take a progressive and flexible approach to *neighbourhood character* considerations when setting as-of-right parameters for multiplexes throughout the city, particularly in the more suburban parts of the city. This typology doesn't currently exist in many neighbourhoods and there is a risk that a strict interpretation of current Official Plan terminology (e.g., OPA 320) may effectively prevent meaningful adoption in these locales. Doing so would be suboptimal as these neighbourhoods could benefit the most from this form of gentle intensification and are well suited to it, due to declining populations, current lower density, wider and deeper lots than other areas of the city, existing access to good quality higher order transit and also lower land values. We suggest that any existing Official Plan wording which de facto prevents approval of multiplex typology be removed or amended.

Simplify Process and Remove Red Tape

We welcome the City's comprehensive review of its approval processes, development charges, parkland dedication and other fees. TRREB suggests that, as part of this review process, the City consider doing the following:

- Adjust incentives and approval processes to encourage development of additional units within multiplexes and also larger units (e.g., 2 and 3 bedroom units) within multiplexes, without necessarily mandating either.
- Prioritize and fast track approval of EHON related typology including multiplexes, similar to how affordable housing projects are being fast tracked under the Housing Now Initiative. While EHON housing types may not necessarily meet the City's definition of affordable housing, such housing often constitutes the most affordable form of low-rise market housing within a specific area, and therefore should receive priority consideration similar to affordable housing. In particular, we believe that larger family size units, higher density projects and more affordable projects should be fast tracked.
- Study financial pro-forma for multiplex projects to better understand the specific economic difficulties these projects and associated developers face in order to identify opportunities to remove or mitigate any challenges that are not fundamentally required.
- Ask for assistance from higher levels of government where they can alleviate impediments to development. As examples:

- Missing middle project developers may be smaller organizations that face specific financing challenges. CMHC could be asked to provide assistance in the form of financing insurance specifically tailored for missing middle projects.
- Multiplex ownership options could be facilitated via some form of condo/co-op mechanism. This may require changes to provincial condominium legislation and could be requested.
- Ontario and Canadian National Building Code changes could facilitate construction of new multiplexes and also conversion of existing single-family homes to multiplexes. e.g. the ability to install a separate covered external staircase to the side of an existing single family home may more easily allow for conversion. Similarly, changes to the Code/s may permit higher density four storey multiplexes to be built more affordably than is possible now (e.g., Part 3 vs. Part 9 classification).
- Recently announced Federal and Provincial Housing Accelerator Funds could be used to implement process improvements and shore up staffing needs.
- Ideally, we recommend that all EHON initiatives be exempted from development charges, to encourage uptake and keep costs low so as to allow for these units to remain relatively affordable.

Encourage Scalable Solutions for High Uptake

We recognize that if implemented, as of right permissions could help to unlock much needed missing middle supply. Nevertheless, uptake is likely to be incremental and economic considerations may prevent development of multiplexes. With this in mind, we respectfully recommend that the City be as flexible as possible when it comes to interpreting any as-of-right parameters it may set, and err on the side of generosity when it comes to allowing future minor variance applications to be approved. We also advocate for the following, which should make multiplex development more *economically feasible*:

- ***Amenity space*** – we suggest not requiring amenity space within multiplexes. Rather, we advise the City to encourage multiplex residents to use existing available community space within neighbourhoods.

- ***Automobile parking*** – we suggest not requiring minimum parking spaces for multiplexes. Parking is certainly a necessity for many residents, and creative parking solutions should be devised as part of the City’s broader review of parking requirements. Additionally, if parking is offered as part of the development, we recommend that the City be accommodating of a variety of possible solutions – e.g., parking at the rear of the property, allowing front parking pads, rear carports etc.
- ***Bicycle parking*** – in the interests of encouraging more environmentally friendly means of transportation, we suggest supporting (but not requiring) covered bicycle parking in multiplexes.
- ***Soft landscaping*** – we recognize the impact of real estate on the environment, and therefore are in favour of utilizing green construction processes where possible. We are also aware of the acute lack of housing diversity within neighbourhoods, and the need for more low rise gentle density choice within the housing spectrum for residents at reasonable cost. We therefore advocate for a flexible and contextual approach which doesn’t inadvertently become too pedantic and unnecessarily restrict supply or raise costs (and consequently prices) to an extent that prevents diversity and equity within neighbourhoods. We urge the City to offer a variety of alternative soft landscaping solutions and allow developers to select what works for their particular project design.
- ***Entrances*** – we suggest permitting (but not requiring) side and rear entrances in addition to front entrances. This will enable design flexibility.
- ***Unit configuration mix*** – we don’t advocate for a required mix of unit configurations (e.g., 1 bedroom, 2 bedroom etc.) within a particular project, but suggest that the City give consideration to fast tracking projects which offer a mix of unit sizes and configurations, to encourage diversity.
- ***Development guides*** – we are pleased to see that the City is investing in resources, frameworks and a best practices guide to assist applicants with the application process. The City should consider creating a live concierge program or a one-stop interactive web portal with all necessary information (including fire safety standards, building codes, contact information for all relevant city departments, etc.). This is something which we have recommended for other EHON initiatives. We also suggest that terminology be simplified where possible, to assist a lay person to understand requirements.

- ***Combination with secondary suite and garden suite*** – we are in favour of allowing a multiplex, secondary suite and garden suite as of right on the same plot of land, depending on lot size and neighbourhood context. Doing so may encourage uptake as such a project may see some cost benefits (due to one permit approval process, etc.) and increased return on investment.
- ***Standardized designs*** – recognizing that homeowners face additional costs for architectural designs, we recommend that the City, as part of the development guide, provide standardized designs to simplify the process and ensure that multiplexes follow the Building Code requirements.

Conversion of existing single-family homes into multiplexes – In an era characterized by escalating construction costs, shortages of labour and rising interest rates, it is advantageous to encourage conversion of existing single-family homes into multiplexes. Conversions have environmental benefits and are more likely to win favour with existing neighbourhood residents, since existing structures are being modified rather than being razed.

Once in force, we also recommend the City undertake a public education campaign to put a spotlight on this and the other EHON initiatives, highlighting the benefits of these initiatives to homeowners, neighbourhoods and the City overall. In this regard, TRREB will be pleased to work with the City to educate all our REALTOR® Members on the Multiplexes and all other EHON initiatives so in turn, Realtors® will be able to educate their clients and residents of the City to take advantage of these opportunities.

We hope you will find TRREB's views helpful. Encouraging the creation of multiplexes across the City will be a significant step forward enabling gentle densification within existing neighbourhoods that will help create a more inclusive, equitable, sustainable and liveable city.

Sincerely,



Kevin Crigger
President