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Submitted via Email: [EHON@toronto.ca](mailto:EHON@toronto.ca)

Dear Philip,

On behalf of the almost 70,000 REALTOR® Members of the Toronto Regional Real Estate Board (TRREB), I am writing to provide input on the Multiplex Study proposed amendments to the Official Plan Amendment (OPA) and zoning by-law. Just as we submitted [feedback](#) to the working group last year, we remain supportive of the City of Toronto's (City) goal to increase market housing supply mix and choice in neighbourhoods through the various Expanding Housing Options in Neighbourhoods (EHON) initiatives.

TRREB believes that enabling gentle densification within the "Yellowbelt" will help to create an inclusive, equitable, productive and livable 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.

TRREB supports the thrust of the revised Official Plan Amendment (OPA) introduced in February of this year that:

- Permits duplexes, triplexes and fourplexes, subject to development criteria that focus on maintaining the lot patterns and low-rise built form of each geographic neighbourhood;
- Directs maximized soft landscaping to support tree growth and an overall green character;
- Encourages practices to offset environmental impacts;
- Allows for zoning by-law relief where necessary to accommodate sustainable design features;
- Amends explanatory text to delete references to “prevailing building types”; and
- Prevails over any existing Site and Area-Specific Policy (SASP) to the extent they would not permit multiplexes.

Following the introduction to the OPA Amendments, the City began to once again focus on the related zoning changes required. TRREB recognizes that the changes proposed include:

- Permitting multiplex building types in RD, RS and RT zones – this will allow multiplexes to be built in any neighbourhood across the city;
- Harmonizing building depth, side yard setbacks, and main wall height regulations for all building types, including:
  - Extending the multiplex building depth from 14 metres to 17 metres – this will align with the depth of detached and semi-detached dwellings and allow for larger, more livable units;
  - Applying the same side yard setbacks that exist for detached and semi-detached dwellings – since built form impacts are similar regardless of the number of units inside the building;
  - For areas that permit a height of less than 10 metres, multiplexes will be permitted 10 metres – this will optimize building up to three stories to create more livable units;
- Permitting up to two porches/decks/balconies per unit – this will allow for outdoor amenities for each unit in addition to meeting requirements for safe exits.

We recommend that the City extend the permitted multiplex building depth from the proposed 17 metres to 19 metres, depending on the overall lot depth of the site. This will enable larger and more livable units to be constructed.

We also recommend that the City extend the permitted maximum building height for multiplexes to more than 10 metres in areas with an existing permitted maximum height of less than 10 metres, if that is in line with the majority of existing zoning variance requests and if the lot size can accommodate it. This will also enable larger and more livable units.

We further recommend giving consideration to removing the 1.4 metre stepback requirement for flat roof multiplexes, while still permitting these types to achieve maximum permitted building height (i.e., still permit the additional main wall height that is allowed for detached homes). This will allow for more efficient units to be constructed.

## Ensure Multiplex Development Is Economically Feasible

TRREB recognizes 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 take another look at the draft zoning by-law to ensure fairness and flexibility. We continue to 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, for example, 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*** – recognizing the impact of real estate on the environment, we 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 which 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 in order 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.

- ***In 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.

### **Public Education Needed**

Last, as the City has conducted extensive public consultations, we recommend that 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.

### **Consider Report Timeline in Light of Mayoral By-Election**

The current timetable calls for the final staff report to be released at the April 27 Planning and Housing Committee and then be debated at the May Council meeting. With the mayoral by-election taking place on June 26, TRREB recommends that City staff wait until the election of the new mayor of Toronto before releasing the final report to ensure that the proposed amendments to the OPA and the zoning by-law align with the priorities of the new mayor.

We hope you will find TRREB's views helpful. To review our previous submission on the Multiplex Study from 2022, please click [here](#). 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,



Paul Baron  
President