



December 7, 2020

10th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
Attention: Nancy Martins

#### **PH19.4 Expanding Housing Options in Neighbourhoods - Garden Suites Review**

Dear Chair Ana Bailão, and Members of Planning and Housing Committee,

This is to advise that while we are in support of expanding housing options in neighbourhoods, we have serious concerns with the introduction of the “Garden Suites” concept. The report lists multiple issues to be considered, and the consultation must be very comprehensive. The long list of matters to be studied must be considered carefully.

The proposal assumes implicitly that "garden suites" can be treated as the same as “laneway suites”. But no -- laneway suites have legal access to a ROW whereas “garden suites” do not have this. There are therefore serious safety issues. To successfully insert a house behind a house, which is not normally permitted, and to attempt this in “as of right” regulations would be much more challenging, and likely impossible.

- Laneway houses are on public rights of way, well separated from the houses on the side of the lane. Garden suites do not necessarily have access to a ROW. How will garden suites be accessed by emergency services?
- As a practical matter, how will GFA/FSI/lot coverage ratios be dealt with? How will trees be protected, what is the impact on soft landscaping ratios?
- Further, this initiative proposes that “garden suites” be introduced “as of right,” giving no opportunity for neighbours and other stakeholders who will be affected to comment. Garden suites must fit into the neighbourhood. Good planning practice must ensure that regulations are developed for different neighbourhoods with different lot and development patterns. In some neighbourhoods they may not be permitted at all.

An alternative may be to develop guidelines for permitting garden suites to be used at the Committee of Adjustment, or to have pilot projects in different types of areas. Alternatives such as these need to be considered.

We are also unclear how these units will address the affordable housing issue? We look forward to learning from the Laneway Housing Review about the affordability of those units, where they are being created, and the profile of those buying these units?

Again it is critical that neighbourhoods should be deeply involved in consultations on what can happen in their areas. All of this means that the proposed time frame is impractical and not feasible.

We recommend:

- That Planning and Housing Committee NOT endorse the contents of the Garden Suites report as a basis for public consultation, and defer the report pending further consideration, and the results of the report back on the Laneway Suites Review.

Respectfully submitted,

Yours truly,

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Cc: Gregg Lintern, Chief Planner and Executive Director, City Planning Division  
Kerri Voumvakis, Director, Strategic Initiatives, City Planning Division  
Brooke Marshall, Senior Planner, Strategic Initiatives, City Planning Division

**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.