



June 25, 2021

Planning and Housing Committee
City of Toronto

Subject: Comments on Garden Suite Draft Proposal – June 28th PHC

We have received a copy of the draft proposal for Garden Suites (Additional Dwelling Units) to be presented to the Planning and Housing Committee on June 28th. We offer preliminary comments on the proposal recognizing that additional details and changes will be forthcoming. We are encouraged that consultation will continue to take place over the coming months and we look forward to open discussion prior to finalization of the by-laws.

We appreciated the opportunity to take part in the City-wide survey which focused primarily on the potential “use” of Garden Suites. We also attended the public consultation meetings. There are many aspects to consider implementing a program such as this. The impact on existing residents will be significant particularly with the planned “as of right” legislation.

Our plan is to do a detailed review of the draft proposal and consult with our 3000 household residents in the coming month. In preparation for the PHC meeting on June 28 we felt it was important to submit a preliminary list of comments based on the current draft proposal which also includes resident feedback from our recent survey. It would seem that the current Laneway Suite Zoning By-Laws are the basis of the Garden Suite proposal, with additional relaxed requirements. Having had some experience with laneway suites, we have experienced first-hand areas of concern for existing residents. Although the proposal lists the concerns from the public from the City survey and consultations, it was difficult to see where many of these concerns were reflected in the proposal. We realize that this may be addressed in future updates to the proposal.

The following is a list of our key areas of concern, including background information for the basis of our comments.

1. **HEIGHT** – the draft proposal indicates a maximum height of 6M based on distance to the primary house. We reviewed 8 municipalities across Canada where Garden Suites have been implemented. **NONE** of the cities allowed a height of 6M for Garden Suites with all of them having a height allowance of less than 4.6 M. It was difficult to understand the rationale for the City’s decision on height given that the proposal indicated that research was done on Cities where Garden Suites had been implemented. The implications to adjacent properties are significant with a height allowance of 6M. We realize that data must have driven the height decision and are hopeful that we gain further insight in the coming months. We ask the City to consider a maximum height of 4.6M in line with other municipalities.
2. **BASEMENTS** – it was surprising to see that “basements” were proposed. It is noteworthy that the City of Barrie – which implemented Additional Dwelling Units (garden suites) in 2019 – is now in the process of making amendments to their original zoning and will be eliminating basements. Our understanding of the contributing factor to this change is that garden suites were being made into two units – basement and ground unit. No doubt this would be an area of concern in Toronto as well. We believe very serious consideration should be made to not allow basements.
3. **SOFT SCAPING** – It was very disappointing to see a reduction in soft scaping from the current Laneway Suite by-laws. We live in a very flood prone area and sufficient soft scaping, permeable ground surface, and soil storage volume are all very important. This, combined with deep basements, soft scaping reduction, and the unknown number of garden suites expected, clearly exacerbate the flooding issue. As well, Toronto Water has advised that a new value of \$68,000 per benefitting property has been imposed so future sewer upgrades are not expected any time soon. Reducing soft scaping is also contrary to the City survey results.
4. **LOT SIZE** – We applaud your study on various lot types and sizes in the City. It would be beneficial for the public to see the results of the study once it is completed. Again, it is noteworthy to see that the City of Barrie in their upcoming Garden suite amendment, will now require a minimum lot size of 400 M Sq. This has also allowed the City of Barrie to determine the potential number of lots where garden suites may be built. An approach such as this in Toronto would seem to

make sense and we appreciate that the lot study currently underway may result in the same conclusion. This would allow the City to quantify the impact of the program.

5. **UTILITY SERVICING** – the proposal indicates that servicing “may” occur from the main house. We interpreted this to mean that another option may be to run separate services. The street/site implications of this are significant in all areas of the city where some services run above ground. There are also significant implications regarding the possibility of lot severances. It is our understanding that Garden Suites cannot be severed and were of the belief that servicing must occur from the main house and be safely extended to the suite, preferably below ground.
6. **PARKING** – zero parking requirement is proposed. Although admirable as a goal, many areas of the city are not well serviced by transit at this point in time. We see parking as a requirement with the thought that we may be able to transition to no parking at some point in the future. I enclose for reference, a picture of what is occurring in many areas of the city today. We are a long way from all riding bicycles. We feel that parking should be a requirement for implementation.



As mentioned, there are many factors that need to be considered in this implementation. The following items seem to be absent from the draft proposal but are important to highlight:

1. **Enforceability** – There is no mention in the proposal how the by-laws will be enforced and see no City budget financial impact mentioned in the proposal.
2. **Affordability of owner-occupied residences:** We have a serious concern that the income stream from garden suites will be “priced in” to the sale of the residential unit in such a way that it will possibly make more rental units available (although not necessarily at a lower cost being in a residential neighbourhood) but this benefit will be offset by making the cost of buying a

property much more expensive. The proposal does not seem to address this issue and we feel it is a very serious one in the City today.

3. Tax considerations: The increased valuation mentioned above will disproportionately increase the value of properties with Garden Suites which will push up the valuation of all nearby properties and their tax assessment. How will this issue be addressed?

We appreciate the opportunity to provide feedback early in the process. This is a very important initiative and requires a great deal of consideration for all aspects of the program and for all residents of Toronto. We look forward to having further dialogue and are hopeful the City will share the data for the lot study as well as the Consultant Laneway Suite program.

Regards,



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