



June 25, 2021

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

**RE: PH25.15 Expanding Housing Options in Neighbourhoods - Garden Suites - Proposals Report**

Dear Deputy Mayor Ana Bailao, Chair and Members, Planning and Housing Committee,

This is to provide our comments on the above noted report and its recommendations.

We note that the report is intended for public consultation not for decision on the proposals. While the types of proposals are generally OK, the details may need adjusting depending on the feedback, and also on the results of the laneway housing review. We are pleased that the report recognizes that neighbourhood character should be protected, and that consultation with the affected neighbourhoods is essential. While the learnings from the laneway housing experience will be useful, we continue to note the significant differences, particularly related to access, between laneway and garden suites.

Neighbourhood character

- Neighbourhoods have their own character – in this context, lot width and depth, building setbacks, vehicular access or not, house size and density, parking allowed on streets or not, trees etc. are all relevant considerations
- We agree that garden suites can be added in many areas without affecting their character; however the fine grained geographic neighbourhood analysis is key, as well as factors such as privacy, and maintenance of soft landscape.

Disincentives for creating more affordable housing

- Home occupations are being allowed – why? This is not helping with creating more and affordable housing opportunities.
- Increasingly, housing is being monetized. The report says condo-ization will be discouraged, but how? Recent reports about corporations entering the low density field suggest the need for financial regulation by other orders of government.

Lack of reporting on the laneway housing initiative

- We understand that the laneway housing review is now underway but having the information available earlier would have better informed the garden suites proposal.

While there are some examples in the report of lessons learned, such as regarding side yard setbacks, there are many other questions.

- How can the laneway housing review be fed into the current consultation process?
- How have applicants and neighbours accepted the by-law regulations?

#### Impacts of Committee of Adjustment and TLAB approvals

- It is proposed that garden suites will be introduced “as of right” but eligible for Committee of Adjustment application for minor variances, and TLAB appeals.
- CofA /TLAB approval can overrule what neighbours expect and where they oppose a variance. This is a problem where the CofA does not support residents concerns.
- What lessons are learned from decision-making for laneway housing?
  - How many involved Cof A applications? what were the CofA decisions,
  - How many involved TLAB appeals of CofA decisions? And were TLAB decisions in favour of the applicant, or neighbours, etc.?
- Committee members should have training in the amendments and understand that the neighbours will have special concerns as the introduction of garden suites will be disruptive to their homes.

We look forward to continuing dialogue regarding these matters.

Yours truly,

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**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.