



January 31, 2022

12th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Marilyn Toft

PH30.2 Expanding Housing Options in Neighbourhoods – Garden Suites – Final Report

Dear Mayor John Tory, and Members of City Council,

FoNTRA supports the careful intensification of neighbourhoods and has been involved in the development of the new policies and regulations for Garden Suites to help ensure that the character of neighbourhoods is protected, and that the impacts on neighbours are acceptable.

We have continued to raise concerns most recently at Planning and Housing Committee including the following¹:

- The proposed Garden Suites Amendments should not apply at this time to lots where multiplex building types are permitted. And appropriate regulations should be developed for garden suites on lots with multiplexes in the multiplex study now underway;
- Separation distance of the primary building from the ancillary dwelling and where measurements are taken;
- The need for additional regulations for the conversion of existing ancillary buildings to protect light, view, and privacy of buildings on the lot and neighbours;
- Communications, monitoring of implementation, and needed supporting processes and information systems.

While some RA members support the approach used to introduce garden suites permissions across the City, others continue to be concerned about such matters as the use of “as of right” approvals which disallows any prior notice to neighbours of such development, and the departure from regular zoning practice, in terms of no longer measuring density (FSI or GFA) and lot coverage.

¹ (January 11, 2022) Letter from Geoff Kettel and Cathie Macdonald, Co-Chairs, Federation of North Toronto Residents' Associations (PH.New)
(<http://www.toronto.ca/legdocs/mmis/2022/ph/comm/communicationfile-143246.pdf>)

The initiative is being considered from a physical planning perspective, without regard to its implications in the current “real world” of real estate. Teranet Market Insights Q4 report states that investors represent the largest home buying group in Toronto and Ontario, surpassing first-time home buyers. Evidence from the introduction of garden suites in Barrie show that Garden Suites without control on land speculation will risk changing neighbourhoods from resident owner occupied to investor-owned.² Will the new permission for Garden Suites, add fuel to an already over heated investor driven housing market? And if so should this be stopped?

Monitoring of EHON programs now focuses on increasing housing opportunities and ensuring that happens in an appropriate form. Monitoring programs should be expanded to include other issues such as real estate impacts, with changes made as needed to the programs.

We recommend that:

- City Council defer the Garden Suites OPA and Zoning Bylaw Amendments for further consideration of resident’s concerns and ask for a report on the real estate implications of the Garden Suites Initiative

Respectfully submitted,

Geoff Kettel
Co-Chair

C.C. Chris Murray, City Manager
Gregg Lintern, Chief Planner and Executive Director, City Planning
David Driedger, Senior Planner, Community Planning
Allison Reid, Program Manager, Urban Design

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

² Garden Suites – Understanding the Impact (Video Recording of Long Branch Neighbourhood Assn Discussion)

https://www.youtube.com/watch?v=pKYX_5m3To