



**MORE NEIGHBOURS  
TORONTO**

Dear Members of the Planning and Housing Committee,

**RE: PH10.4 - Expanding Housing Options in Neighbourhoods - Garden Suites  
Monitoring Program - Update**

***About More Neighbours Toronto***

[More Neighbours Toronto](#) is a volunteer-only organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that has dominated Toronto's politics, created an affordability crisis, and cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

***Position***

More Neighbours Toronto is disappointed with the slow uptake of garden suites and the resulting delay in the monitoring report. We would also like to note a misleading statement in this report: on page 8, it says "The intent of this provision is to limit shadow and privacy impacts onto neighbouring properties."

In fact, the garden suites bylaw requires angular planes not only toward neighbouring properties, but toward the primary dwelling (which would be owned by the owner of the garden suite due to the discouragement of lot severances). **More Neighbours Toronto feels that this requirement can safely be removed without waiting for the monitoring report since it will not impact neighbours or the community.** It isn't clear what purpose this requirement serves beyond adding barriers for property owners who prefer to construct a larger dwelling unit and perhaps want more shade. Relief from the angular plane requirement was the most common variance requested at the Committee of Adjustment, making up 28.8% of requests. No breakdown is provided between requests for angular planes toward the primary dwelling versus those toward neighbouring properties, but it seems like that removing this requirement from the by-law would make more garden suites feasible as-of-right.

We are pleased to see that trees and garden suites are working in harmony: no unhealthy trees have been removed. We note that a great deal of consultation time was spent discussing trees and, while that may have contributed to this success, hopefully future planning consultations can include as much time considering how to make structures like garden suites viable, increasing access to trees and furthering the City's tree equity goals.

In the future, we hope that the City will also consider allowing more than 1 unit in a garden or laneway suite when building code requirements can be met. City Planning already has several initiatives looking at the removal of unit maximums in low-rise buildings and moving

toward more form-based zoning. The inclusion of laneway and garden suites in this work seems like a logical next step.

Legalizing garden suites was a positive move and it appears that there is significant interest from the public. Far more applications were submitted than have been granted, with a significant number still under review. We are pleased to see the ongoing work streamlining the building permit process and developing public education materials, which should help to address this. However, we also hope that some of the initial requirements, like angular planes - which seem driven almost by habit rather than neighbourhood impact - are made more flexible so that we can truly expand housing options in neighbourhoods.

Regards,  
Colleen Bailey,  
More Neighbours Toronto