



February 26, 2024

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins, Committee Administrator

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

Dear Chair, Councillor Gord Perks, and Members of Planning and Housing Committee,

This report summarizes the planned monitoring program and presents preliminary findings following the analysis of approved building permits, and minor variance applications for variances to the zoning bylaw for garden suites.

We note that building permit application numbers indicate a slower uptake in garden suite applications than laneway suites, with only 97 permits issued at the time of this report. As such, the report recommends that the monitoring period be extended to ensure enough data is available in order to recommend any necessary policy and zoning changes necessary to facilitate the construction of garden suites.

The report states that “Assessing the degree of change demonstrates the extent of variation between a proposal and the zoning by-law requirement. This analysis will inform whether the existing zoning requirements are too restrictive and whether minor adjustments to the zoning requirements are necessary to increase the number of as-of-right applications”. We submit that this statement is supposition i.e. believing something to be true without any proof. It does not show if it is too restrictive – it just shows that there are more applications with respect to certain variances than others – no surprise!!!

Let’s not forget that the performance measures were developed and approved by City Council in order to protect the interests of the City, the public, and stakeholders from the self interest of the applicant.

An example is the staff preliminary analysis of the 126 minor variance applications which found that 28.8 percent of the variances requested were to vary the angular plane requirements. The intent of this provision is to limit shadow and privacy impacts onto the primary residence and neighbouring properties. These variances indicate that a significant number of proposed garden suites have not met this requirement. So the variance should be removed? That is supposition – frequency of the variance is information, but does not argue, in the absence of evidence, for the performance measure to be done away with.

Finally, we note that the consultants to be hired will be responsible for preparation of a consultation strategy. We would simply remind you that the consultation of “a broad range of stakeholders” needs to specifically involve neighbours, as well as applicants.

Yours truly,

Geoff Kettel
Co-Chair, FoNTRA

Cathie Macdonald
Co-Chair, FoNTRA

Cc: Kerri Voumvakis, Interim Chief Planner and Executive Director, City Planning Division
Kyle Knoeck, Director, Zoning and Secretary-Treasurer, Committee of Adjustment, City Planning Division
Kelly Jones, Senior Planner, Community Planning, City Planning Division
Victoria Fusz, Senior Planner, Community Planning, 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 250,000 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.