



April 4 2024

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

**RE: PH11.4 - Zoning for Residential Basements - Preliminary Report**

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

This is to advise that we are in full support of the staff report. In addition we are in support of the submission of Cristina Panneton, an engaged resident of Hoggs Hollow. We recognize that the issue is one that is not limited to Hoggs Hollow, rather is periodically experienced in neighbourhoods across the city, and is likely to grow in incidence.

Yours truly,

Geoff Kettel  
Co-Chair, FoNTRA

Cathie Macdonald  
Co-Chair, FoNTRA

Cc: Kyle Knoeck, Director and Secretary Treasurer, Zoning and Committee of Adjustment, City Planning Division,  
Caroline Samuel, Manager, Zoning Section, City Planning Division,  
Trevor Swann, Planner, Zoning Section, City Planning Division

**Attachment**  
**Submission of Cristina Panneton**

Dear Chair Councillor Gord Perks and Members of the Planning and Housing Committee:

Thank you for your Preliminary Report on Iceberg Basements. We appreciate Councillor Robinson bringing this matter forward to City Council and hence to Toronto Building and City Planning for a report. As a resident of Hogg's Hollow - the context of this topic is significant.

Hogg's Hollow abuts the banks of the Don River and is subject to a 1 hour evacuation in the event of a dam release on the Don River. It is also a City designated Natural Heritage System and subject to City/TRCA ravine regulations.

Recent application for iceberg basements are of major concern for Hogg's Hollow residents. In November 2020 and May 2023, the Committee of Adjustment approved new iceberg homes in Hogg's Hollow - both houses are located in a flood plain. Despite numerous objections from Urban Forestry, abutting neighbours, and City officials, a healthy 250 year old sugar maple was removed to accommodate building length variances granted by the Committee of Adjustments.

The North York Committee of Adjustment approves variances 97% of the time for predominantly oversized homes regardless of floodplain and other environmental obstacles. As a resident in a Ravine subject to the Ravine By-law, it is especially alarming that the Committee of Adjustment disregards adverse environmental impacts when approving the variances as they claim to only be concerned about the above ground variances. These builds contribute no economic benefit or assistance to mitigating the current Affordable Housing Crisis. On the contrary, the underground amenities merely add more value to elite, exclusive housing.

As the Zoning Review moves forward to the next phase, it is vital to include all stakeholders including:

1. All Toronto Emergency Responders and their Unions. This includes Toronto Police Services, Toronto Fire Services, Toronto Paramedic Services and Municipal Licensing Provincial By-law Officers. These sectors are typically first responders. With no zoning and safety standards in these builds, no first responders should be expected or subjected to unsafe working conditions. Toronto's spiralling and uncontrollable crime rate clearly exposes both citizens and first responders - shootings, stabbing, car thefts, etc. An iceberg basement with no lighting requirement is a perfect venue to ambush Toronto Police Services.
2. TRCA - While the TRCA commented on the tree canopy, they need to address why they currently permit these structures. We live in a Ravine. Within a radius of 500m of our home, there are at least 2 Iceberg homes erected under the guidance of the TRCA. One such home - an 8 car underground garage, was poorly constructed and pumps water from an underground stream to City catch basins 24/7. Another iceberg home can accommodate over 5 cars. These types of builds further illustrate the lack of connection to Affordable Housing.

3. Housing Standards - Unscrupulous owners/landlords would have the option of renting these builds. They could become fire traps and public health issues when used as rooming houses/living quarters for economically challenged persons.

4. Toronto Waste Water Management needs to address the extra stress on city drainage and stormwater management, especially in flood prone areas.

5. Residents of Toronto need to be able to raise their concerns about extra stress, draining, destabilizing foundations, basement leakage etc. of these builds on their property.

When developers retain qualified planners to seek zoning variances for Iceberg homes, planners, use their professional expertise to argue their client's proposal "represents good planning". Oversized structures shrink green space and biodiversity opportunities, increase stormwater loads, require tree removals, etc. - clearly contrary to Toronto's Ravine, Biodiversity and Pollinator Strategies. These consequences do not "represent good planning."

Clearly these planners contravene the AICP Code of Ethics and Professional Conduct which states:

*"Our primary obligation is to serve the public interest and we, therefore, owe our allegiance to a conscientiously attained concept of the public interest that is formulated through continuous and open debate. We shall achieve high standards of professional integrity, proficiency, and knowledge. To comply with our obligation to the public, we aspire to the following principles:*

*b) We shall have special concern for the long-range consequences of present actions.*

***We shall promote excellence of design and endeavor to conserve and preserve the integrity of heritage of the natural and built environment. "***

As a concerned citizen and grandparent, I worry about future adverse impacts these homes impose particularly during increasing extreme weather, climate change, species extinction, etc.

Clearly the City must follow London, England and work on eliminating these Iceberg builds,

Yours truly,  
Cristina Panneton

**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.