

# GARDEN SUITES ZONING BY-LAW REVIEW AND MONITORING REPORT

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Prepared for City of Toronto **City Planning Division** by **Gladki Planning Associates Inc.**

gladki  
planning  
associates



# Why This Report?

## The Role of Garden Suites in Toronto's Housing Landscape

Toronto is growing and changing. Garden Suites are part of a broader shift toward enabling gentle, low-scale intensification within established neighbourhoods in the City. These small, detached dwellings are located in the rear yards of residential properties and offer an opportunity to introduce an expanded range of housing options including new rental and multi-generational housing within the city's existing neighbourhood fabric.

As a form of "accessory dwelling unit" (ADU), garden suites support a more diverse housing ecosystem. They provide flexible living arrangements for extended families, aging in place, or renters seeking lower-cost alternatives in low-rise neighbourhoods. Garden suites remain a part of a residential property including a principal residence. In a housing market that faces both affordability pressures and supply constraints, garden suites represent a key tangible component of the City's expansion of housing options and fits among other efforts to expand housing options in neighbourhoods as well as larger initiatives to expand larger housing forms along the City's thoroughfares and major centres.

## Why City Council Directed a Review

When Toronto City Council adopted the zoning and Official Plan amendments to permit garden suites city-wide in 2022, it did so with clear direction for follow-up. Council recognized that this new form of housing would require careful monitoring to ensure it worked as intended. Specifically, Council directed staff to:

- Monitor garden suite applications across the city;
- Track minor variance trends, tree impacts, and accessibility-related requests;
- Engage with residents, applicants, and industry stakeholders; and
- Recommend any changes to improve implementation, design outcomes, or clarity in the policy framework.

This report, prepared by Gladki Planning Associates, is a part of the City of Toronto's response to that direction and provides a review of

these considerations to the City. City of Toronto Staff will provide recommendations to City Council.

## What This Report Aims to Do

This monitoring report provides a city-wide overview of how the Garden Suites by-law has been functioning since its introduction. It identifies:

- Where garden suites are being proposed and built;
- Which zoning standards are frequently varied;
- What challenges applicants and reviewers are facing in the process; and
- How the policy could be clarified, adjusted, or better supported through amendments to the By-law, the review process or education and communication.

The report brings together data, mapping, staff insights, and feedback from consultations to offer a comprehensive picture of garden suite implementation. It provides recommendations to inform any future updates to the by-law or related City processes.

## Who is Reading This Report

- City Planning, Development Review and partner divisions, who continue to oversee policy development, review applications, and support implementation;
- City Councillors and decision-makers, who may consider updates to the Garden Suites framework or broader housing strategies;
- Residents, homeowners, and neighbourhood groups, who are engaging with garden suites as part of ongoing conversations about housing in their communities;
- Designers, architects, and builders, who work to bring garden suites to life on sites across the City and navigate the City's review processes;
- And future planning teams, who may return to this report as a reference point when assessing how the by-law evolved and what outcomes it delivered.



# Key Findings

This report evaluates the implementation and impact of the Garden Suites Zoning By-law (By-law 101-2022) and related Official Plan amendments adopted in 2022. As part of Council's direction at the time of adoption, staff were instructed to track the performance of the by-law, identify challenges and opportunities, and bring forward evidence-based recommendations to support effective delivery of garden suites across the city.

Garden suites are a key part of Toronto's broader strategy to enable low-scale, rental and multi-generational housing in neighbourhoods traditionally limited to single-detached homes. This review offers a timely check-in on how the by-law is functioning in practice—where it's succeeding, where adjustments are needed, and how implementation processes can be improved.

The scope of this report includes:

- A quantitative analysis of building permits, variances, and tree permits associated with garden suites;
- A review of Committee of Adjustment outcomes and zoning performance standards;
- Interviews and workshops with City staff from multiple divisions;
- Consultation with residents, industry professionals, and community stakeholders; and
- A review of best practices and comparable frameworks in other jurisdictions.

Together, these inputs offer a comprehensive, city-wide picture of how Toronto's garden suite policy is operating on the ground and how it can be strengthened to support gentle density while promoting livability, green space, and compatibility within the neighbourhood context.

## Building Permit Analysis

Since the adoption of the Garden Suites By-law in 2022, interest and uptake have steadily increased. Based on publicly available building permit data, as of April 2025, the City has received 748 building permit applications related to garden suites, with 62% resulting in approved or issued permits. This trend points to a growing awareness of the typology and a gradual normalization of garden suites within Toronto's housing landscape.

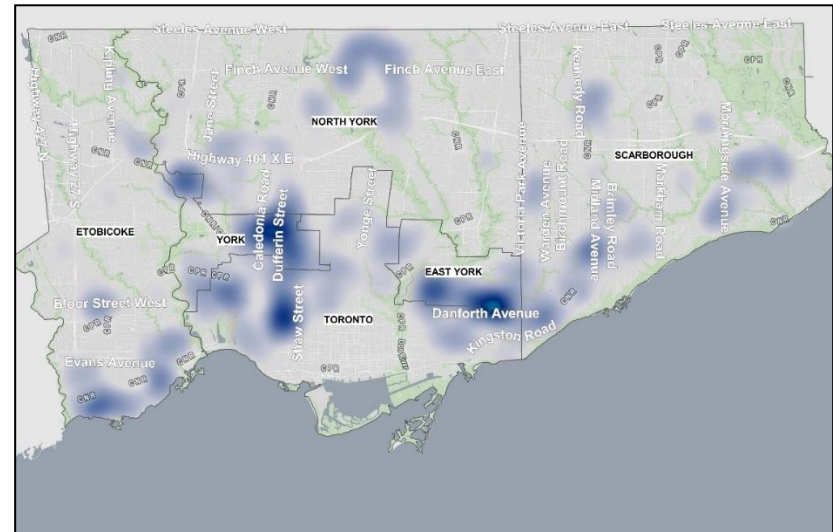


Figure 1 - Heatmap of building permit applications

Key insights include:

- **Steady Year-Over-Year Growth:** Annual permit applications have grown from 58 in 2022 to 337 in 2024, with an additional 128 already submitted in the first four months of 2025 alone.
- **High Rate of As-of-Right Applications:** Approximately 70% of applications proceed to Building Permit without an associated minor variance for the address.

- **Geographic Distribution:** Garden suite typology is applicable across the City with applications distributed city-wide, with particular concentrations in older neighbourhoods and in areas with larger or deeper lots.
- **Streamlined Review Times:** Average permit review timelines from date of first submission to permit issuance (including time for applicant response and revisions) have declined each year, from 216 days in 2022 to 96 days in 2024 reflecting increased familiarity with the by-law among both staff and applicants.
- **Integration with Other Projects:** Some applications were submitted in conjunction with broader redevelopment or renovation efforts for single detached residences or multiplex buildings, suggesting that garden suites are serving as a catalyst for reinvestment in low-rise housing stock.

## Committee of Adjustment Applications

While the majority of garden suites proceed through to building permit applications as-of-right, a significant proportion of applicants have sought relief through the Committee of Adjustment (CoA), revealing both flexibility in the system and opportunities for targeted improvement.

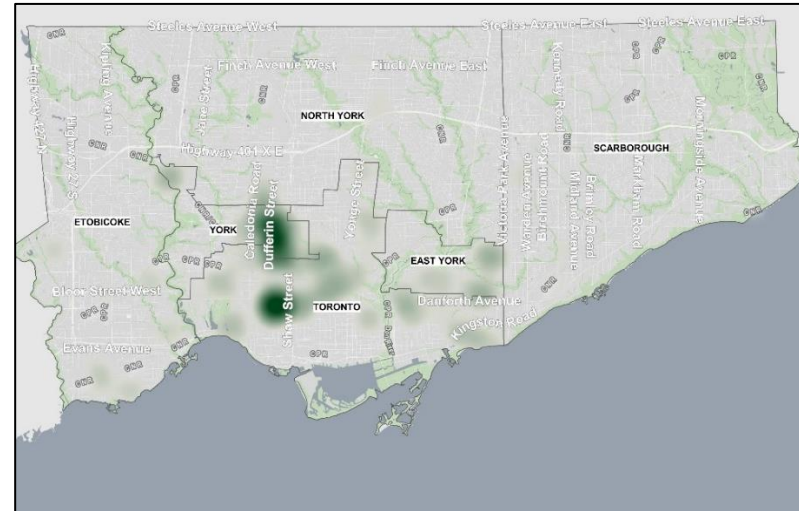


Figure 2 - Heatmap of applications for minor variance

### Between 2022 and August 2024:

- 233 minor variance applications were submitted for garden suites, associated with 232 unique addresses.
- These generated 714 total individual requested variances to By-law provisions.
- The overall approval rate for completed applications was 80%, indicating general support for garden suite proposals where modest relief was sought.

### Most Common Variances Included:

- **Angular Plane 150.7.60.30(2)** – 127 variances (74% approval rate): Frequently cited as a design constraint, especially for two-storey suites.
- **Side Yard Setback 150.7.60.20(5)** – 125 variances (73% approval rate): Sometimes related to the position of proposed windows/doors of the garden suite on narrow or irregular lots.
- **Rear Yard Setback 150.7.60.20(2)** – 74 variances (77% approval rate)
- **Soft Landscaping 150.7.50.10(1)(A)** – 69 variances (70% approval rate)
- **Height 150.7.60.40(1)** – 63 variances (76% approval rate)

Variances are typically modest in scale, and often converge around specific, recurring thresholds. The CoA is functioning effectively as a relief valve, enabling site-specific flexibility while maintaining policy intent. However, delays, uncertainty, and cost associated with the CoA process remain barriers for many applicants.

## Key Recommendations

### Zoning By-law Refinements

- **Increase Maximum Height:** Raise from 6.0m to 6.3m to accommodate standard ceiling heights and simplify design.
- **Review Side Yard Setback for Doors:** Explore flexibility to accommodate side door access without triggering increased setbacks, while maintaining privacy and safety objectives.
- **Revise Second Storey Massing Controls:** Replace angular plane with clear roof slope and window placement rules to preserve privacy.
- **Continue Review of Landscaping Definitions:** Encourage an expanded definition of soft landscaping to include

limited use of permeable walkways, improving accessibility and aligning with green infrastructure goals.

### Process Improvements

- **Integrated Application Tracking:** Provide applicants with a centralized dashboard and milestone prompts across divisions.
- **Application Streamlining by Complexity:** Establish clear pathways for as-of-right, moderate, and complex cases and improve coordination between City review divisions.
- **Pre-Screening and Guidance Tools:** Offer flowcharts, FAQs, and optional checklists to help applicants self-assess early.
- **Improved Interdepartmental Coordination:** Align interpretations, use shared timelines, and consider a case manager role for complex files.
- **Leverage Digital Tools:** Consider piloting zoning rapid compliance review tools available to designers and applicants (e.g., eCheck), expand pre-certified plans, and enhance online submissions.

### Alignment with O. Reg. 462/24

Update By-law provisions to reflect changes introduced by the regulation while preserving the original intent of design control, neighbourhood fit, and green infrastructure.

### Tree Protection & Urban Forestry

- **Screen for the presence of back yard and boundary trees and reinforce early engagement with Urban Forestry in the process to ensure applicants are aware of the review process, the possibility of enhanced investigation requirements and the timelines associated with this work.**
- **Promote low-impact design options to avoid injury/removal.**
- **Clarify timelines and conditions for tree permit review.**

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# 1 Introduction

## 1.1 What is a Garden Suite?

A Garden Suite is made up of two components:

### **Garden** + **Suite**

The intention behind Toronto's Garden Suite policy is to support housing growth while preserving the landscaped character and livability of residential neighbourhoods.

#### **Garden**

Garden suites are built in the backyards of existing residential properties. These spaces are a component of the City's urban forest, tree canopy, and provide soft landscaping and open space at the scale of an individual lot.

The Garden Suites by-law and review process include standards and requirements related to this character including:

- Minimum soft landscaping coverage;
- Tree protection and injury review;
- Building separations that allow for green space.

The garden component of the policy recognizes that suites are a part of a larger environmental function of the City and should maintain open space and the amenity function of backyards.

#### **Suite**

The second component is the suite itself – a small, self-contained dwelling unit that includes its own kitchen and bathroom facilities.

Garden suites function as accessory dwelling units (ADUs), dwellings that are secondary to the main house, but fully independent. They can provide:

- Rental housing options within established neighbourhoods;
- Flexible living arrangements for extended families or caregivers;
- Housing solutions for aging in place or downsizing close to home.

Garden suites are permitted on lots that do not abut a laneway, differentiating them from laneway suites and are accessed via walkways alongside the main dwelling. They are regulated under Specific Use Regulations, Section 150.7 of Zoning By-law 569-2013 and were introduced through Zoning By-law 101-2022 and Official Plan Amendment 554 in 2022.

## 1.2 Implementing Garden Suites in Toronto

The introduction of Garden Suites in Toronto builds on a broader alignment in housing policy to provide for more diverse, flexible, and context-sensitive housing forms within low-rise residential neighbourhoods. This policy aligns with Provincial direction and is implemented at the City level, allowing Toronto to develop a unique framework suited to the housing landscape and priorities of the City.

In February 2022, Toronto City Council adopted Official Plan Amendment 554 and Zoning By-law Amendment 101-2022, permitting garden suites on residential properties across the city. These amendments were part of the City's Expanding Housing Options in Neighbourhoods (EHON) initiative, a broader policy program gently increasing housing options and supply in areas traditionally limited to single-detached and semi-detached homes.

The policy was informed by provincial direction under the Planning Act and Ontario Regulation 299/19, which requires

municipalities to permit additional residential units (ARUs), and aligned with the City's objectives to improve access to rental housing, support aging in place, and multi-generational housing.

Garden Suites followed the introduction of Laneway Suites, which had been permitted city-wide since 2019 on lots that abut a public laneway. Garden Suites extend that logic to the many residential lots that do not abut a laneway, unlocking more opportunities for sensitive infill across the city and developing a unique typology and regulatory framework to do so.

Key milestones in the Garden Suites policy timeline include:

- **2019–2021:** City staff study the potential for additional low-rise housing types within Neighbourhoods.
- **2021:** Staff undertake public and stakeholder consultation on Garden Suites.
- **February 2022:** Council adopts the policy framework for Garden Suites (OPA 554 & By-law 101-2022).
- **2022–2024:** The City begins monitoring applications and implementation, leading to this review.

The policy was shaped by two core principles:

#### Garden

1. Maintain and where possible enhance the natural environment, urban forest tree canopy and soft landscaped character that is supported by the private yards within Neighbourhoods.

#### Suite

2. Promote the gradual expansion of housing options within Neighbourhoods by enabling livable, lower-scale detached accessory dwelling units throughout the city.

### 1.3 Study Purpose and Objectives

This assessment was undertaken to assess how Toronto's Garden Suites policy is functioning in practice and to identify opportunities for improvement. In accordance with City Council's direction, the purpose of this review is to evaluate whether the Official Plan and Zoning By-law amendments are effectively supporting the development of garden suites while meeting broader policy goals.

The objectives of the study are to:

- Monitor patterns in building permit and Committee of Adjustment applications;
- Assess the functionality of key zoning standards, including height, setbacks, and separation distances;
- Consider impacts on trees and tree permit applications;
- Identify challenges in the application and approvals process;
- Gather insights from residents, applicants, staff, and stakeholders; and
- Recommend any policy, regulatory, or process changes to improve implementation.

## 2 Housing Context

Garden suites are one of a number of distinct housing typologies enabled by the Planning Policy Framework in the City of Toronto aimed at implementing the City's broader housing strategy. Garden Suites are a form of gentle density that allows for a type of infill intensification to be enabled in all low-rise neighbourhoods across City of Toronto. It is unique as it applies to a wide range and variety of lot types and built neighbourhood characteristics.

While many in the City may be familiar with laneway suites which allow either the conversion of existing garages accessed via rear laneways to residential properties, garden suites are distinct as they are accessed through the lot frontage and do not have a rear access.

The Garden Suite By-law responds to Provincial policy direction, Province-wide enabling regulation and minimum permissive standards and legislative requirements under the Planning Act and represent the City of Toronto's balanced approach to implementing this form of Additional Residential Unit within existing neighbourhood areas across the City.

### 2.1 Toronto's Housing Strategy & the EHON Program

Toronto faces significant housing challenges, including affordability pressures, limited housing diversity across many areas of the City, and a growing population across the City as a whole while populations have maintained or declined in many low-rise areas. In response, the City has developed comprehensive strategies to address these issues.

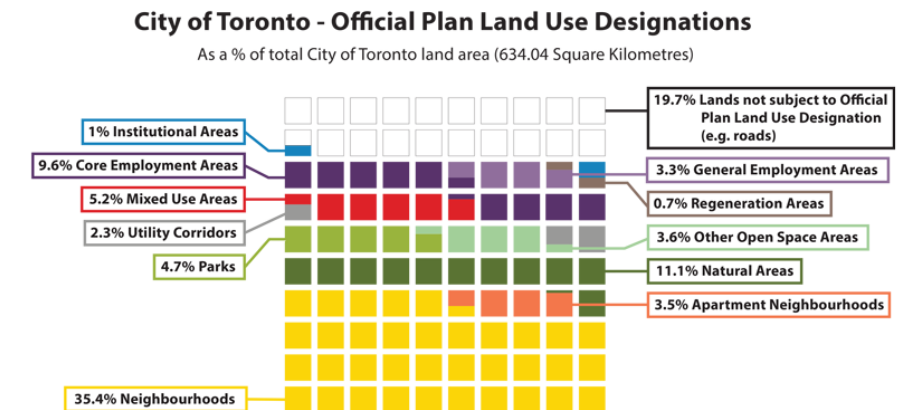
#### HousingTO 2020–2030 Action Plan

The HousingTO 2020–2030 Action Plan outlines the City's commitment to creating 40,000 new affordable rental homes, preserving existing housing stock, and improving housing

conditions across Toronto. The plan emphasizes the need for diverse housing options to meet the needs of residents at all income levels and life stages.

#### Expanding Housing Options in Neighbourhoods (EHON)

The Expanding Housing Options in Neighbourhoods (EHON) initiative is a key component of Toronto's housing strategy. EHON aims to facilitate more low-rise housing in residential neighbourhoods, addressing the "missing middle" by enabling housing types such as duplexes, triplexes, fourplexes, laneway suites, and garden suites. These housing forms provide alternatives to single-detached homes and high-rise apartments, promoting gentle density and housing diversity within established neighbourhoods.



Note: The graph excludes the 'Special Study Areas' land use designation which measures 0.1 square kilometres (0.02% of the City's land area)

Figure 3 City of Toronto, City Planning Division: Official Plan, February 2019

EHON supports the City's goals of creating inclusive, sustainable communities by:

- Increasing housing supply and diversity;
- Enhancing affordability;
- Promoting complete communities with access to amenities and services;

- Encouraging environmentally sustainable development.

By integrating garden suites into the housing landscape, EHON contributes to a more flexible and responsive housing system that meets the evolving needs of Toronto's residents.

## 2.2 Role of Garden Suites in Expanding Housing Options

Garden suites are one part of a broader set of policy tools the City of Toronto is using to respond to housing pressures across the city. While not a singular solution, they play a meaningful role in diversifying the housing stock and enabling more flexible living arrangements within low-rise neighbourhoods.



As self-contained dwellings located in the rear yards of residential lots, garden suites offer unique opportunities to increase the number of homes on a given property without altering the prevailing character of the neighbourhood. They support housing goals by:

- Providing new rental housing options in areas traditionally limited to single-detached homes;
- Enabling multi-generational living while maintaining privacy and independence;

- Offering older adults and homeowners the ability to age in place or downsize close to home;
- Supporting housing flexibility over time, adapting to changing family needs or income generation.

Garden suites are not the City's only response to housing challenges. Garden suites complement other City initiatives such as laneway suites, multiplex permissions, and affordable housing programs by delivering a discreet, ground-oriented housing type that expands choice in a way that is context-sensitive and scalable.

By making better use of existing neighbourhood infrastructure and enabling modest, site-specific infill, garden suites help advance a more resilient, inclusive, and flexible housing system for Toronto.

## 2.3 Balancing Housing Opportunities: Livability, Gentle Density & Tree Canopy Protection

The Garden Suites policy was developed to support housing growth in a way that reflects Toronto's Official Plan and neighbourhood context. The policy can be considered to include a balance of three planning goals: livability, gentle density, and environmental context.

### 2.3.1 Livability

Garden suites are intended to provide high-quality housing options that contribute to the overall livability of neighbourhoods—for both new residents and existing homeowners. Zoning standards were designed to ensure that these dwellings:

- Are subordinate in scale to the primary home;
- Maintain adequate separation and privacy between dwellings;

- Are sensitively sited to minimize shadowing and overlook;
- Can offer comfortable, self-contained living conditions on a modest footprint.

By regulating aspects such as setbacks, height, building massing, and access, the by-law supports the creation of functional and neighbourly housing that enhances and does not disrupt the livability of existing neighbourhood areas.

### 2.3.2 Gentle Density

The Garden Suites framework is a targeted response allowing modest intensification within neighbourhoods in a way that respond to the existing context and a range of permitted low-scale built form options. Garden suites enable one additional dwelling unit per lot on properties that do not abut laneways, broadening access to housing in parts of the city where growth has historically been limited.

As a form of “gentle density,” garden suites help distribute housing growth more evenly across the city, making better use of existing land and infrastructure. The suites also allow existing owners and families more options to accommodate an expanded variety of ways of living. This approach aligns with the City’s policy direction to increase housing choice and improve equity in access to residential neighbourhoods.

### 2.3.3 Tree Canopy Protection

A key component of the Garden Suites policy is to maintain and, where possible, enhance the urban forest and landscaped character of rear yards. Rear yards serve a vital ecological and stormwater management function and contribute to the city’s broader climate goals.

The garden suites program includes specific performance standards and requirements to protect green space, including:

- Minimum soft landscaping requirements;
- Limitations on lot coverage;
- Review and coordination with Urban Forestry for any proposed tree removals or injuries.

Through these protections, the policy aims to balance new housing with the ongoing stewardship of Toronto’s tree canopy and green infrastructure.

## 2.4 Relationship to Laneway Suites

While garden suites and laneway suites are both forms of accessory dwelling units (ADUs), they are not the same and are governed by separate policies and zoning regulations within the City of Toronto.

Laneway suites are only permitted on lots that abut a public laneway and are therefore limited in their geographic eligibility to parts of the city with laneway networks primarily in the Downtown and older inner suburbs. The presence of the laneway introduces a distinct rear lot condition that often allows for more predictable siting, access, and servicing.

In contrast, garden suites may be permitted on residential lots across the entire city, including areas without any laneways. As a result, garden suites must accommodate a much greater diversity of lot sizes, shapes, and conditions, including irregular or constrained lots, corner and through-lots, and lots with significant tree cover or grading challenges.

## Key Differences

Feature	Laneway Suites	Garden Suites
Lot Eligibility	Only permitted on lots abutting a public laneway	Permitted on lots without laneway access
Geographic Coverage	Limited to neighbourhoods with laneways and frequently in older neighbourhoods and inner suburbs	Applicability to neighbourhood areas City-wide
Access	Direct access is available from the laneway and the lot frontage	Access must be provided via side yard from the main street
Servicing	Servicing runs through the main lot	Servicing runs through the main lot
Rear Lot Conditions	Back directly onto a laneway and is most often separated from rear properties	Can back directly onto other residential properties

The implementation of garden suites draws on lessons from the City's earlier work on laneway suites, particularly with respect to performance standards, privacy and overlook considerations, and the integration of housing and green space.



# 3 Legislative, Policy & Regulatory Framework

## 3.1 Provincial Direction (Planning Act, PPS 2024, O. Reg. 462/24)

The introduction of Garden Suites in Toronto aligns with the direction provided by the Province of Ontario through legislation, regulations, and planning policy that encourage the development of additional residential units within existing neighbourhoods.

### 3.1.1 Planning Act

The Planning Act, as amended, requires municipalities to authorize additional residential units (ARUs) in both primary dwellings and accessory structures on urban residential lots. This mandate reflects the Province's objective to support housing supply, improve affordability, and promote a range of housing options.

### Ontario Regulation 299/19 (now reflected in O. Reg. 462/24)

Under Ontario Regulation 299/19 as amended by Ontario Regulation 462/24, municipalities are required to permit at least three residential units on a property, including within both a primary dwelling and an accessory building such as a garden suite. These regulations are designed to:

- Facilitate small-scale, ground-oriented intensification;
- Encourage housing forms that are compatible with existing residential areas;
- Reduce barriers to the development of ARUs across Ontario.

Toronto's Garden Suites framework satisfies and builds upon these requirements by enabling detached, self-contained

residential units in rear yards across the city, while adding tailored performance standards to address local conditions.

### 3.1.2 Provincial Policy Statement, 2024 (PPS 2024)

The Provincial Policy Statement, 2024, reinforces the importance of ARUs by requiring municipalities to provide a range and mix of housing options, including forms that promote intensification and optimize the use of existing land and infrastructure.

Relevant PPS policy directions include:

- Supporting the development of gentle density within settlement areas;
- Encouraging compact, transit-supportive development patterns;
- Removing unnecessary barriers to the provision of housing.

Toronto's Garden Suites policy directly responds to this provincial direction by providing a scalable, city-wide tool for introducing modest housing growth within established low-rise neighbourhoods.

## 3.2 City of Toronto Official Plan and Official Plan Amendment 554 and 670

The City of Toronto Official Plan is the City's primary land use planning document. It provides the vision and policy direction to guide growth, development, and environmental stewardship over the long term. The Plan integrates environmental, social, and economic objectives and aims to ensure that today's planning decisions do not compromise the needs of future generations.

Garden suites are permitted through amendments to the Official Plan that support housing diversity in *Neighbourhoods*. Neighbourhoods are intended to accommodate low-rise residential uses, including detached, semi-detached, and townhouses, alongside local services, parks, and schools.

Development in Neighbourhoods is guided by policies that require new housing to respect and reinforce the existing context (Chapter 4.1), provide a full range of housing forms and tenures (Section 3.2.1), and contribute to complete communities (Section 2.3.1).

The Garden Suites policy is also aligned with Natural Environment policies (Section 3.4) which emphasize the protection and enhancement of the urban forest to support tree growth and canopy coverage.

### Official Plan Amendment 554 and SASP 670

On February 2, 2022, Toronto City Council adopted Official Plan Amendment 554 (OPA 554) and Site and Area Specific Policy 670 (SASP 670), along with Zoning By-law Amendment 101-2022, to permit garden suites across most low-rise residential zones in the city.

OPA 554 expanded the range of residential housing forms permitted in Neighbourhoods to include garden suites, subject to zoning and performance standards. SASP 670 provided additional policy support where needed to reflect local conditions and ensure compatibility. These amendments were appealed to the Ontario Land Tribunal (OLT), which later dismissed the appeals, allowing the policy framework to come into full effect.

The policy direction established through OPA 554 and SASP 670 is rooted in the Official Plan's objective to provide a full range of housing options in form, tenure, and affordability while making efficient use of land and infrastructure. The introduction of garden suites reflects the City's commitment to creating complete communities.

## 3.3 Zoning By-law 569-2013

The use and development standards for garden suites are established under Section 150.7 of Zoning By-law 569-2013, which contains specific use regulations for Garden Suites as a permitted accessory use in most low-rise residential zones. This

section was introduced through Zoning By-law Amendment 101-2022, adopted by City Council alongside OPA 554.

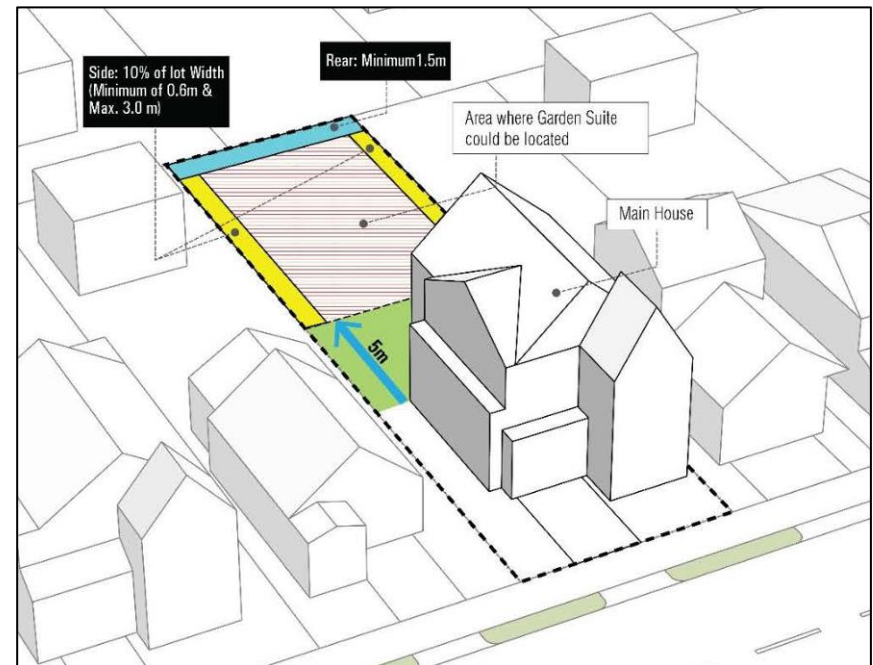


Figure 4 - Diagram of applicable garden suites standards

Section 150.7 sets out detailed performance standards to guide the size, placement, and design of garden suites in a way that is compatible with surrounding residential properties and sensitive to the environmental characteristics of the rear yard.

Key provisions include:

- **Height Limits:** Garden suites are subject to a maximum height of 4.0 or 6.0 metres depending on lot conditions, with additional controls through angular plane requirements.

- **Separation Distance:** Minimum distance of 5.0 metres and up to 7.5 metres between the garden suite and the main house.
- **Setbacks:** Required minimum setbacks from rear and side lot lines, often shaped by the lot's width and configuration.
- **Lot Coverage and Soft Landscaping:** Maximum rear yard coverage and minimum soft landscaping percentages to ensure that sufficient green space is preserved.
- **Access and Fire Services:** Garden suites must be accessible from the street via an unobstructed walkway and comply with Fire Services access requirements.

The intent of these standards is to enable the development of garden suites while:

- Ensuring compatibility with the surrounding context;
- Protecting the tree canopy and landscaped open space;
- Managing privacy and overlook impacts; and
- Addressing practical considerations related to safety, servicing, and access.

Section 150.7 represents a careful balancing of city-wide housing objectives with site-specific physical and environmental conditions in Toronto's neighbourhoods.

### 3.4 Tree Protection and the Toronto Municipal Code

The introduction of the Garden Suites policy in 2022 was accompanied by specific clarifications to the City of Toronto Municipal Code to strengthen tree protection measures in the context of rear-yard development. Recognizing that garden suites are often proposed in close proximity to mature trees and within landscaped open space, City Council adopted motions to ensure that tree protection remained a central consideration in the review and permitting process.

City Council directed the General Manager of Parks, Forestry and Recreation to:

Refuse, at their discretion, any permit to injure or destroy a tree protected under Municipal Code Chapters 608, 658, or 813 in relation to a building permit for a garden suite, and to advise applicants to meet with City Planning and Urban Forestry staff to explore design alternatives that could preserve the protected tree in question.

A supplementary staff report further clarified that:

*"Urban Forestry is not obligated to issue a tree injury or removal permit if such a garden suite is in conflict with by-law regulated trees... If the permit is denied by Urban Forestry, the property owner may appeal the decision to City Council."*

These provisions reinforce that the presence of by-law-protected trees can be a determinative constraint on whether a garden suite can be constructed on a given lot, and that design flexibility may be required to accommodate the City's broader environmental objectives.

In practice, this has made Urban Forestry review a critical step in the permitting process for garden suites and has reinforced the need for early coordination between applicants, designers, Development Review, and Forestry staff to balance housing delivery with the protection of Toronto's urban forest.

## 4 Methodology

The review examines the functioning of Zoning By-law 569-2013, Section 150.7 and the broader policy context and development review and approval system intended to facilitate and regulate the implementation of garden suites across Toronto.

The objective of the review is to assess how effectively the Garden Suites framework is supporting the City's housing, livability, and environmental goals, and to identify opportunities to improve the clarity, usability, and equity of the by-law and associated processes.

This review consisted of a review of quantitative data analysis, engagement and mapping. The goal of this approach is to build a comprehensive understanding of how the by-law is functioning in practice, what types of applications are being submitted, and where challenges are emerging across the City.

### Data Sources

The review draws on multiple data sets provided by the City of Toronto, including:

- **Building Permits:** All garden suite permit applications submitted since the adoption of the by-law, including status, location, and design characteristics. The City of Toronto maintains detailed tracking of EHON permit applications for internal monitoring and review. This analysis draws from publicly available building permit data accessed through the City of Toronto's Open Data Portal, from 2022 (with approval of the garden suites framework) to April 2025. This dataset was filtered to identify individual permit applications for garden suites, capturing relevant attributes such as location, application status, and design characteristics.
- **Committee of Adjustment (CoA) Applications:** Minor variance applications related to garden suites, with

analysis of variance type, frequency, approval outcomes, and geographic distribution. The City of Toronto maintains data on applications and individual variances for garden suites and other EHON typologies. This study included the review of Development Review data available to August 2024.

- **Tree Injury and Removal Permits:** Records of Urban Forestry permit applications associated with garden suites, used to assess the impact of rear-yard development on the tree canopy. This data was provided by Urban Forestry and was recent to August 2024.

These data sources were reviewed for completeness, categorized by relevant zoning and lot characteristics, and cross-referenced where applicable to identify applications that proceeded as-of-right.

### Qualitative Inputs

To supplement the technical review, GPA conducted a series of targeted qualitative engagements, including:

- **Interviews with City staff** from Planning, Urban Forestry, and Toronto Building across all four districts;
- **Stakeholder conversations** with designers, architects, applicants, and housing practitioners;
- **Public-facing input** gathered through surveys and participation in community meetings organized by the City.

These discussions were used to identify common patterns, clarify interpretation issues, and understand how applicants experience the process from submission to approval.

### 4.1 Consultation Strategy

An important component of the Garden Suites Zoning By-law Review was the integration of on-the-ground knowledge and lived

experience from those involved in the implementation and use of the policy. The consultation process was designed to ensure that the review reflected a range of perspectives from City staff and housing industry practitioners to residents and community organizations. Engagement with key parties ran from August 2024 to March 2025 with a Community Consultation Meeting occurring in March 2025.

### **Who We Spoke to and How**

Engagement was conducted with key groups involved in the review, approval, and application of garden suites, including:

- **City of Toronto Staff**, including representatives from Community Planning, Urban Forestry, and Toronto Building across all four City districts;
- **Industry stakeholders**, including architects, designers, and planning consultants with direct experience submitting garden suite applications;
- **Resident organizations**, including representatives of residents' associations from across the city;
- **Members of the public**, through a City-hosted Consultation Meeting (CCM) focused on garden suites.

These engagements were conducted through a combination of structured interviews, roundtable discussions, and a facilitated public consultation meeting, in collaboration with City Planning staff.

### **Summary of Consultation Activities**

The consultation process included:

- A series of interviews with staff members from multiple divisions;
- Several semi-structured conversations with applicants and industry professionals who have prepared and submitted garden suite applications since the by-law's adoption;

- Participation in a targeted stakeholder meeting with residents' associations, where feedback was collected on the impacts of garden suites in different neighbourhood contexts;
- A public Community Consultation Meeting (CCM), where members of the public were invited to share their experiences, ask questions, and provide feedback directly to the review team.

Insights gathered through this process were used to inform the identification of key implementation issues, test early observations, and shape the recommendations of this report. See the appendix to this report for a summary of consultation notes and findings.

## 5 Detailed Findings

There have been 748 building permit applications for new garden suites in the City of Toronto since the By-law was approved in 2022. A total of 461 building permits have been issued or approved as of April 2025.

Garden suites typologies may be constructed on a variety of lot types and sizes across the City of Toronto and as such variances are common. To August 2024 there have been 714 individual variances associated with 223 unique addresses. A total of 30% of all building permits between 2022 and August 2024 were associated with an application for Minor Variance to address a zoning deficiency at the Committee of Adjustment while 70% of building permit applications over this period were submitted without seeking a Minor Variance based on a review of publicly accessible permit data and application addresses.

There have been 70 applications to injure or remove trees related to proposals for new garden suites within the data provided to August 2024. Of these 27 were related to Committee of Adjustment applications and no healthy trees have been removed.

Generally, the By-law and review system is supportive of achieving the aims and objectives for the garden suites program in the City of Toronto.

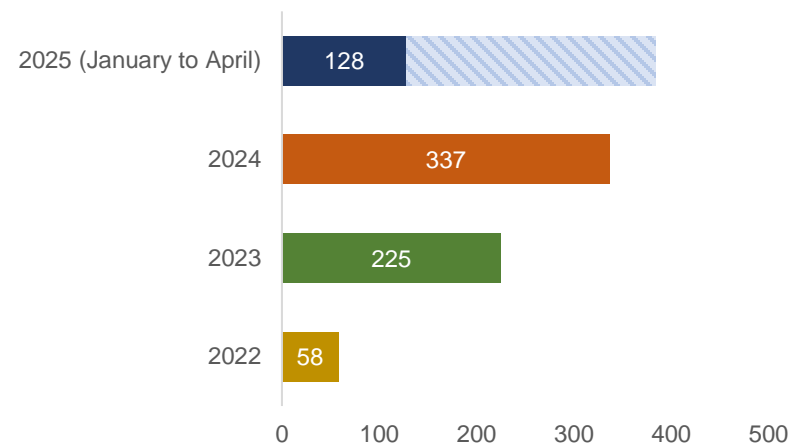
## 5.1 Building Permit Applications

Between 2022 and April 2025, a total of 748 building permit applications were submitted to the City of Toronto for the construction of garden suites.

Building Permits Issued, Approved/Completed	461
Under Review	177
Refused/Cancelled	110

Permit application volume has increased year-on-year since the program was first initiated in 2022 with the approval of the Garden Suites By-law and Official Plan amendments. This growth reflects increased awareness and uptake of the typology within the City of Toronto overtime.

To date, 62% of all permit applications have received the issuance of a permit allowing the start of construction including issued permits, construction awaiting inspection or completed or closed projects. Many applicants have therefore successfully navigated the City's zoning and building review process.

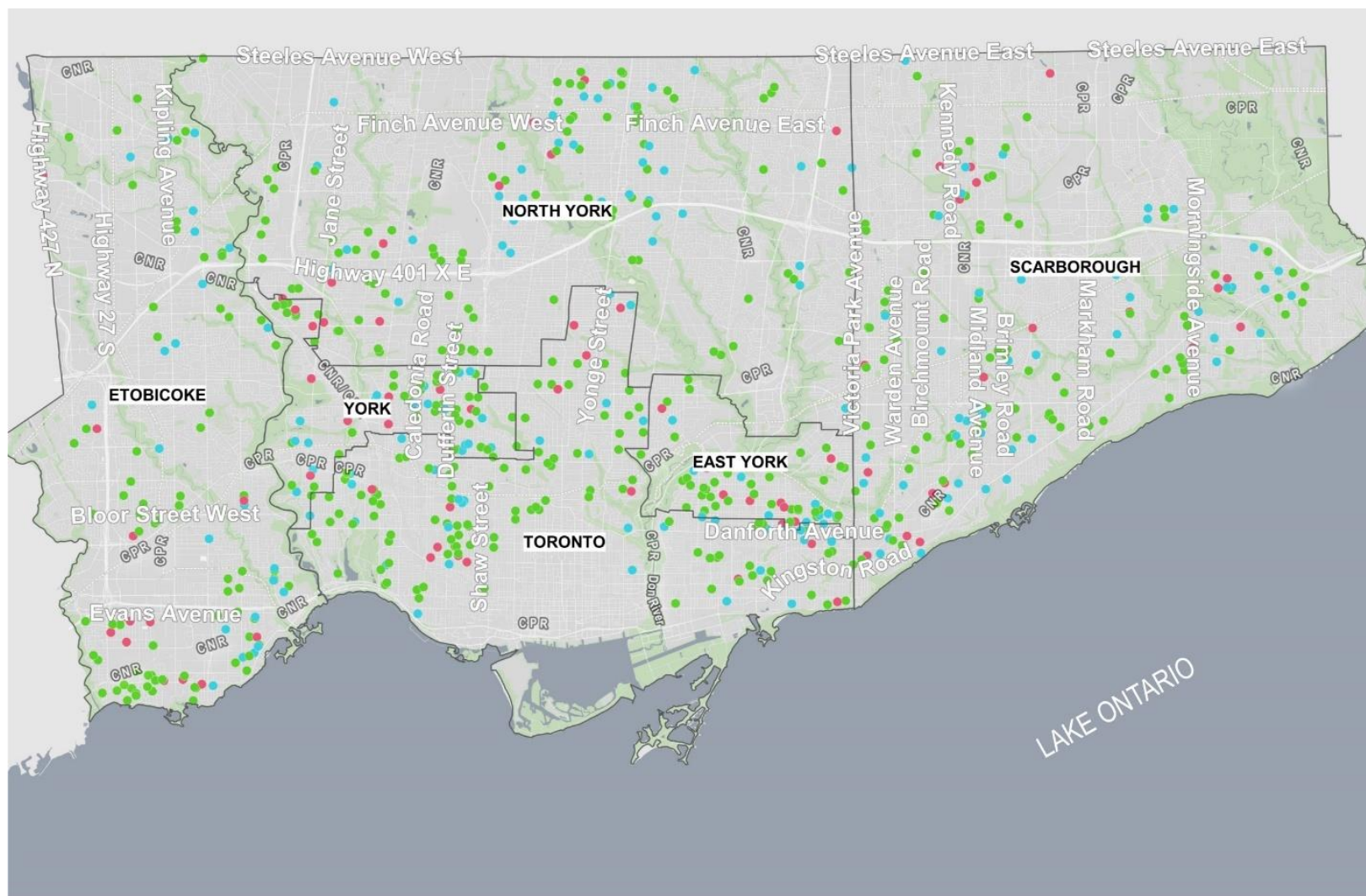


2022	58
2023	225
2024	337
2025 (January to April)	128

The following maps illustrate the spatial distribution of all garden suite applications received to date, categorized by permit status.

The distribution of applications is city-wide with notable concentrations in older neighbourhoods of the City within urbanized and inner suburban areas as well as across areas of larger lot sizes and depth. The following maps illustrate the location and status of all building permit applications for garden suites over the review period.



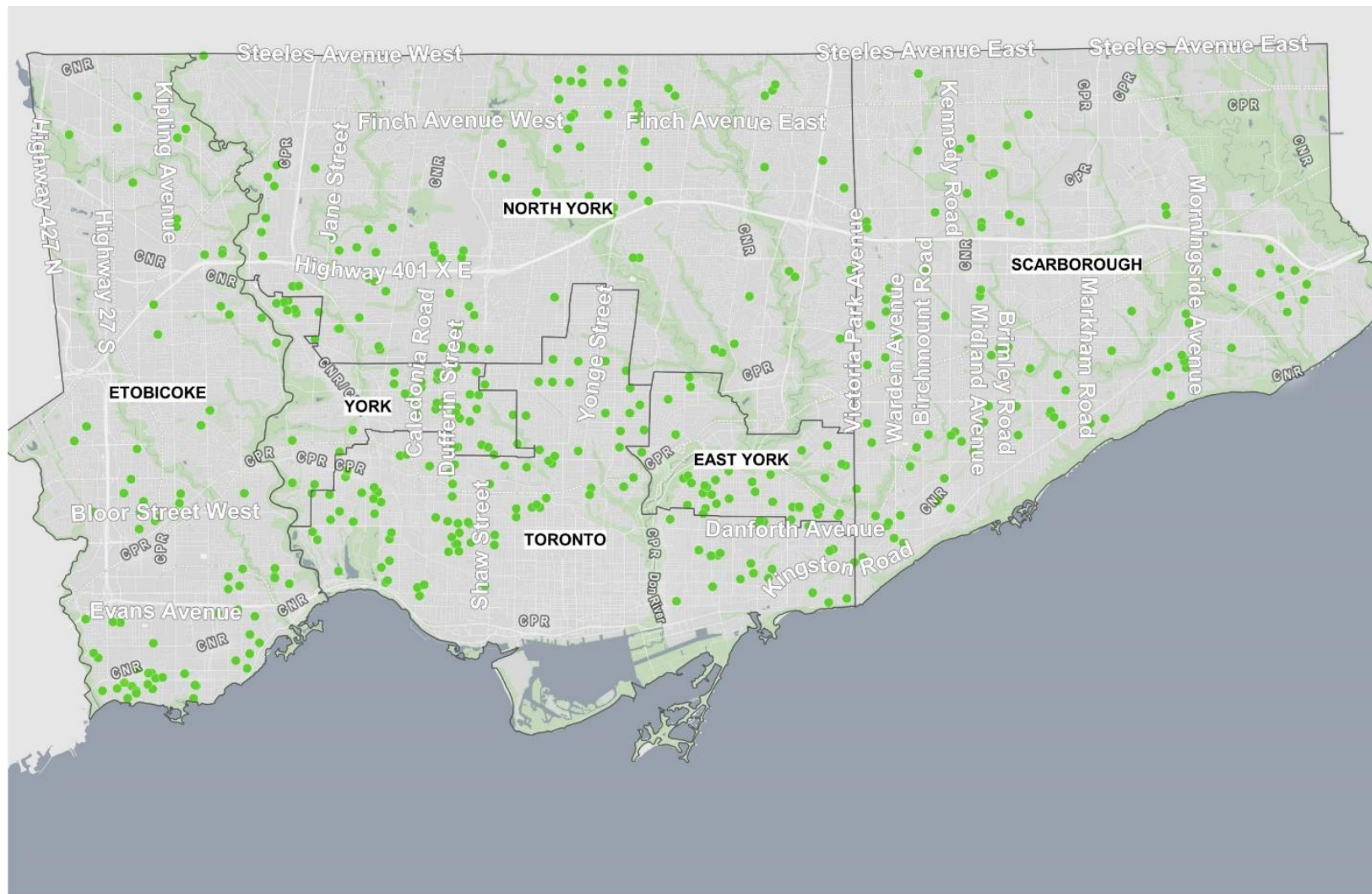


## Building Permit Applications

All Applications

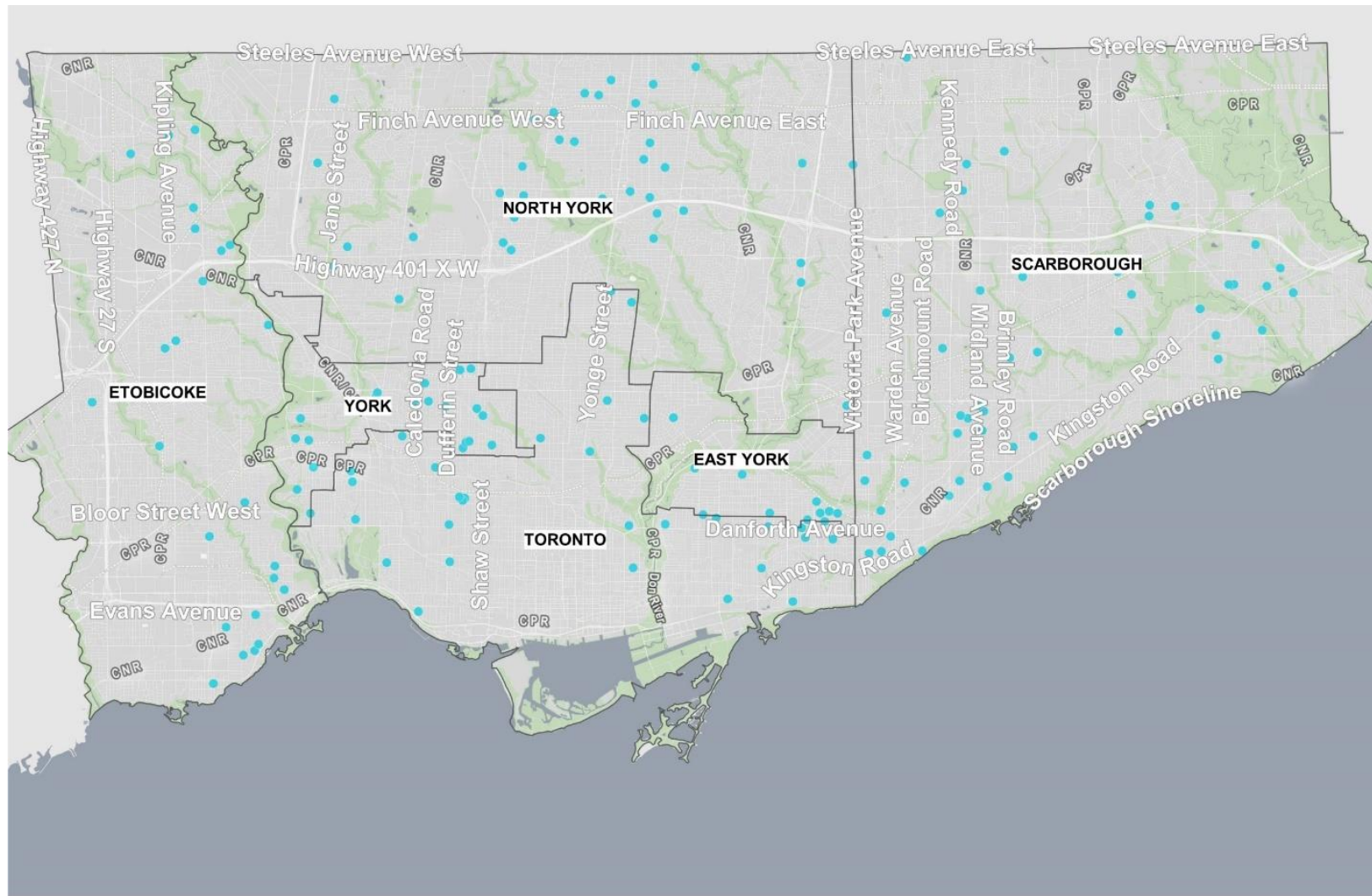
- Building Permit Issued, Approved/Completed
- Under Review
- Refused Cancelled





## Building Permit Applications Permit Issued

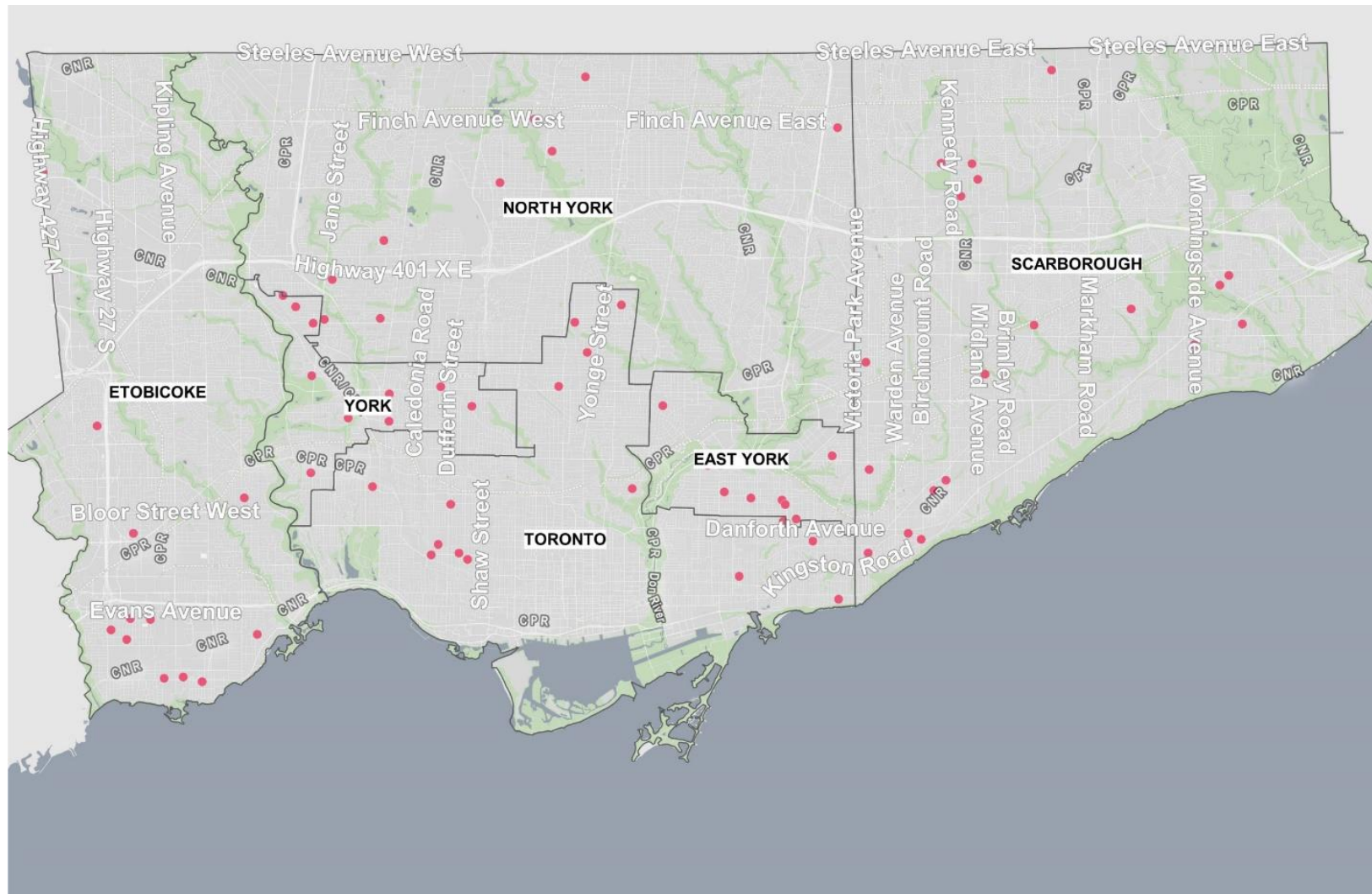




## Building Permit Applications Under Review







## Building Permit Applications Permit Refused

- Building Permit Issued, Approved/Completed
- Under Review
- Refused Cancelled

### 5.1.1 Estimated Construction Cost and Gross Floor Area

Based on publicly available building permit data for applications between 2022 and April 2025, the average estimated construction cost for garden suites in Toronto is approximately \$260,000, with a median cost of \$180,000. This distribution suggests that while many projects remain relatively modest in scale, a number of larger and more complex builds are skewing the average upward.

The average gross floor area (GFA) reported through permit applications is approximately 82 square metres, which exceeds the total floor area that can typically be accommodated within the lot coverage and zoning limits of Zoning By-law 569-2013. The median GFA of 68 square metres points to a broad range of unit sizes, with larger garden suites influencing the mean. It is important to note that some permit records include renovations or additions to the principal dwelling, or the construction of a new primary structure alongside a garden suite. These combined works may impact reported GFA and cost data.

While building permit data provides a general sense of scale and cost, it has limitations. Cost estimates provided through permit applications may not consistently reflect actual construction budgets and may be underreported for fee calculation purposes or subject to change during the course of the project.

In interviews with architects, builders, and consultants, industry experts noted that actual construction costs often exceed \$300,000–\$400,000 and can be significantly higher depending on site-specific servicing needs. Several noted that garden suites must meet the same life safety, fire separation, and building code requirements as principal residences, and that servicing connections (including underground trenching, sewer/water separation, and Toronto Hydro upgrades) can add substantial cost and complexity.

### 5.1.2 Permit Review Times and Project Duration

The timing of building permit approvals and project completion is an important indicator. Toronto Building provides review streams

for building permit applications and maintains a response standard for the review of complete permit applications. Here, within this report, permit review time is interpreted as consisting of the time from the date of application submission to the initial issuance of a permit and consists of both the City's review time and the applicant's response time and may include zoning review and applicant revisions to ensure zoning compliance. Project duration presented here includes the total time elapsed from application permit application to project completion/permit closure or cancellation.

A review of these times is conducted to understand the delivery of Garden Suites in Toronto and to understand familiarity with the typology broadly across the industry within the City and does not provide an assessment of internal service timelines in the City.

Across all applications, the average permit review time is approximately 116 days, while the average project duration is just over 300 days.

These figures reflect not only technical review periods, but can also include the time needed for applicant revisions and project-specific construction timelines.

*Table 1 - Year-over-Year Trends*

<b>Year</b>	<b>Average Review Time (days)</b>	<b>Average Project Duration (days)</b>
2022	216	445
2023	132	366
2024	96	163
2025*	52	21**

\*2025 values reflect only data from January to April and may increase as projects proceed.

\*\*Eleven permits filed since the start of 2025 were cancelled accounting for the brief average project duration in this year.

This year-over-year decline suggests that understanding of the Garden Suites typology has improved over time and reflects a decline in City staff review and applicant response timelines. This may be as a result of staff and applicants becoming more familiar with the garden suite review process, and that coordination has generally improved over time.

### 5.1.3 Other Notable Trends

A review of the submitted building permit applications reveals that a small but notable share of garden suites have been proposed on properties that include multi-unit low-rise building typologies, including duplexes, triplexes, and multiplex dwellings. These cases suggest that garden suites are not being pursued solely on traditional single-detached residential lots, but also serve as an expansion tool for gently intensifying low-rise multi-unit properties.

In some cases, garden suites are proposed in conjunction with broader site improvements or redevelopment projects, such as the construction of a new principal dwelling or the renovation of an existing home. This suggests that the garden suite typology may be operating as a catalyst for reinvestment in existing housing stock, particularly where owners seek to maximize the utility of larger or deeper lots.

These patterns are consistent with observations raised during stakeholder consultations. Applicants and designers have noted that garden suites are increasingly being integrated into multi-unit housing strategies, particularly as a way to accommodate intergenerational family needs or to incrementally increase rental stock on already-diverse properties. This underscores the importance of ensuring the by-law remains responsive to a range of housing contexts, including multi-unit residential uses that extend beyond the detached house norm.

## 5.2 Committee of Adjustment Applications

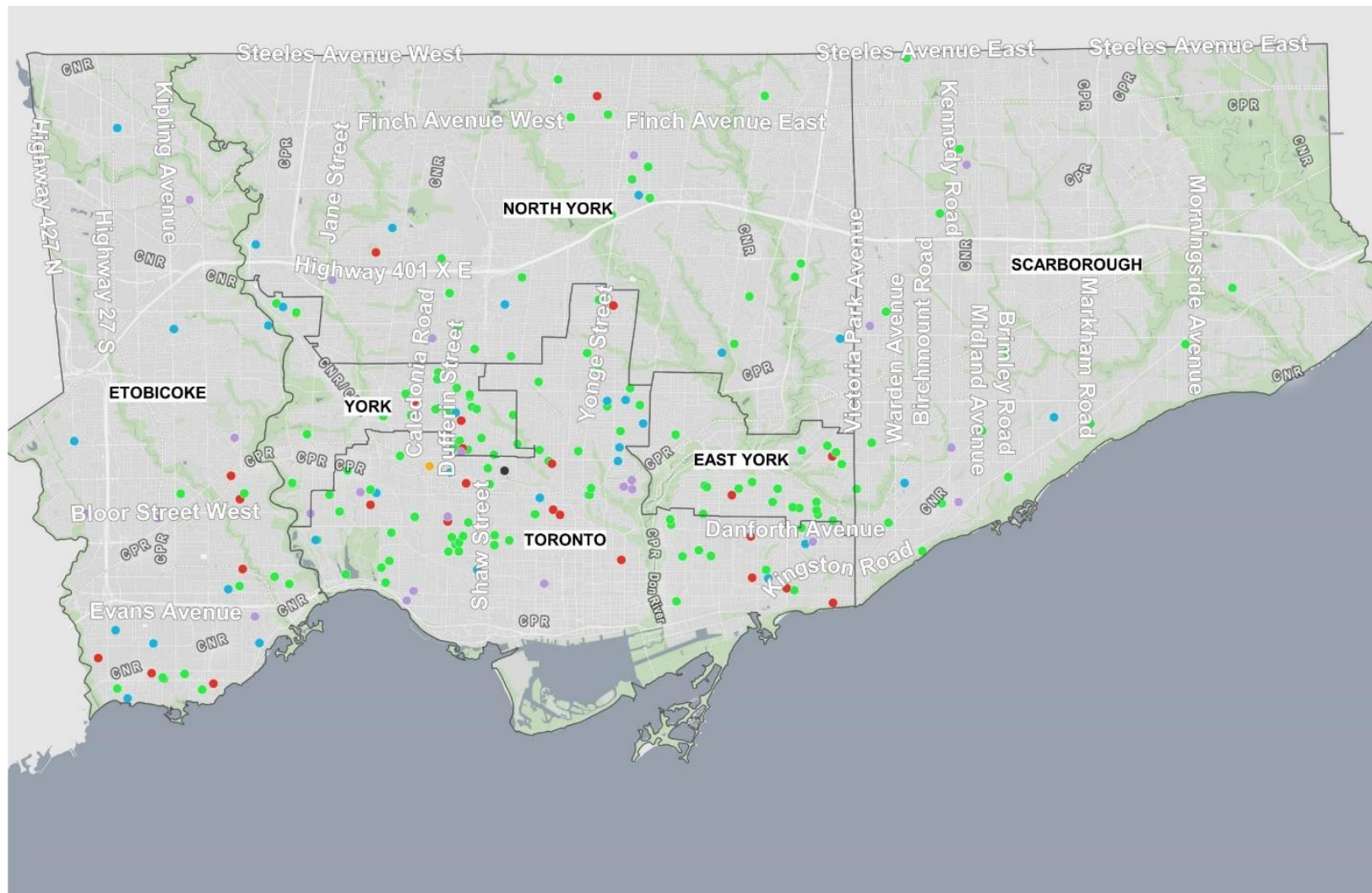
While a majority of garden suites have been approved as-of-right, a substantial share of applications across Toronto have required minor variances to proceed.

A review of Committee of Adjustment applications was conducted to understand how the By-law is performing and to identify which provisions of the By-law are most often varied. Further the analysis identified which variances are generally understood and supported by the Committee of Adjustment as well as other areas which may regularly generate friction through the application process.

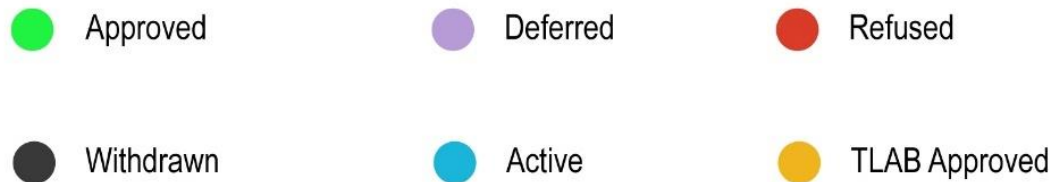
Since the Garden Suites By-law was adopted in 2022, a total of 233 minor variance applications have been submitted to the Committee of Adjustment, associated with 232 unique addresses. These applications have generated a total of 714 requests to vary By-law provisions. The number of requested variances indicates a degree of flexibility provided by the Committee of Adjustment with an overall approval rate of 80% of all completed minor variance applications.

Data constraints existed with the processing of committee of adjustment data associated Garden Suites. The data below include applications received between 2022 and August 2024.

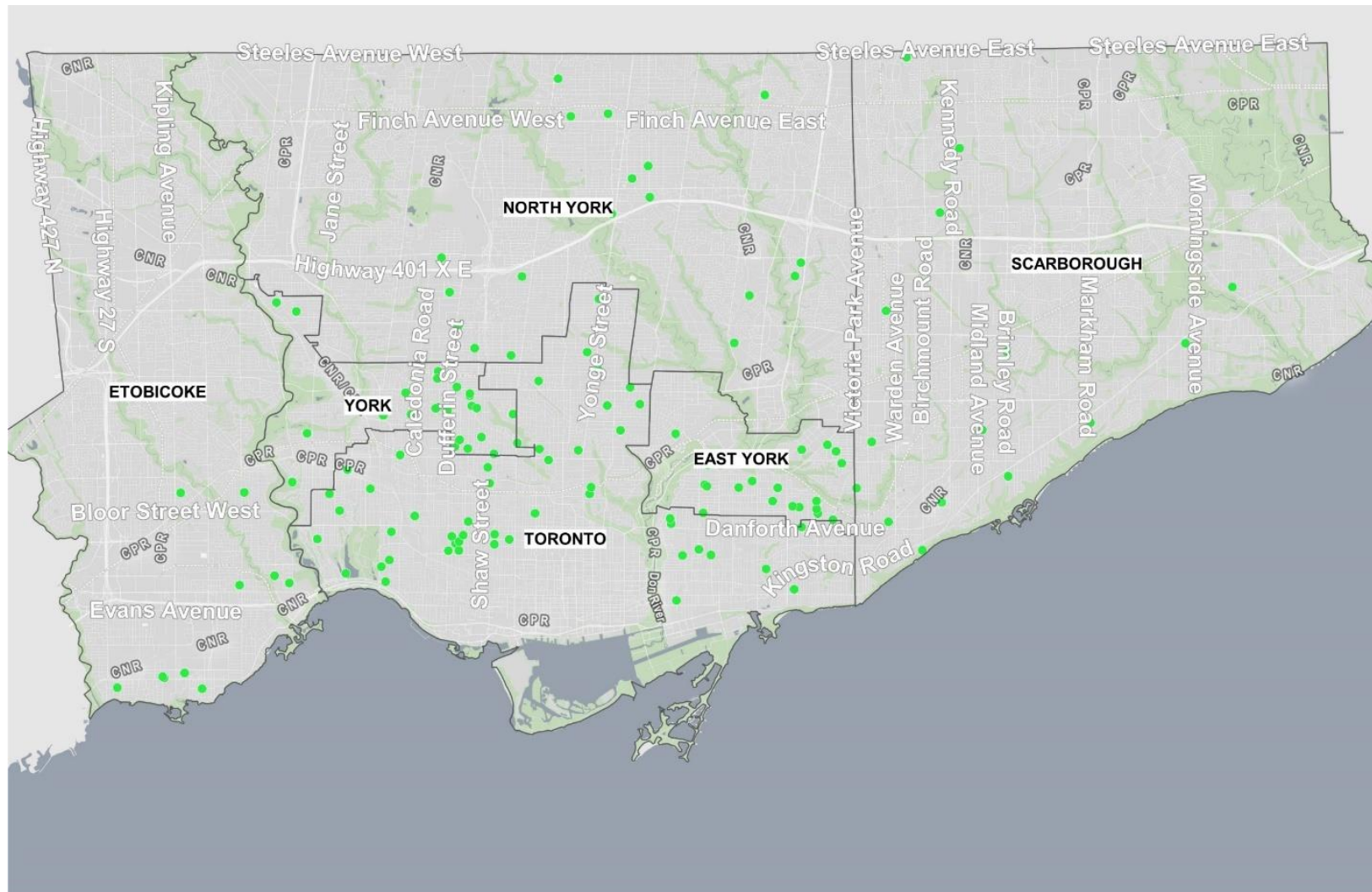
	Minor Variance Applications	Variances to Individual Provisions
Approved	131	442
Deferred	26	52
Refused	29	125
Withdrawn	1	6
Active	36	64
TLAB Approved	2	7
Unknown Status	8	18



## Committee of Adjustment All Applications

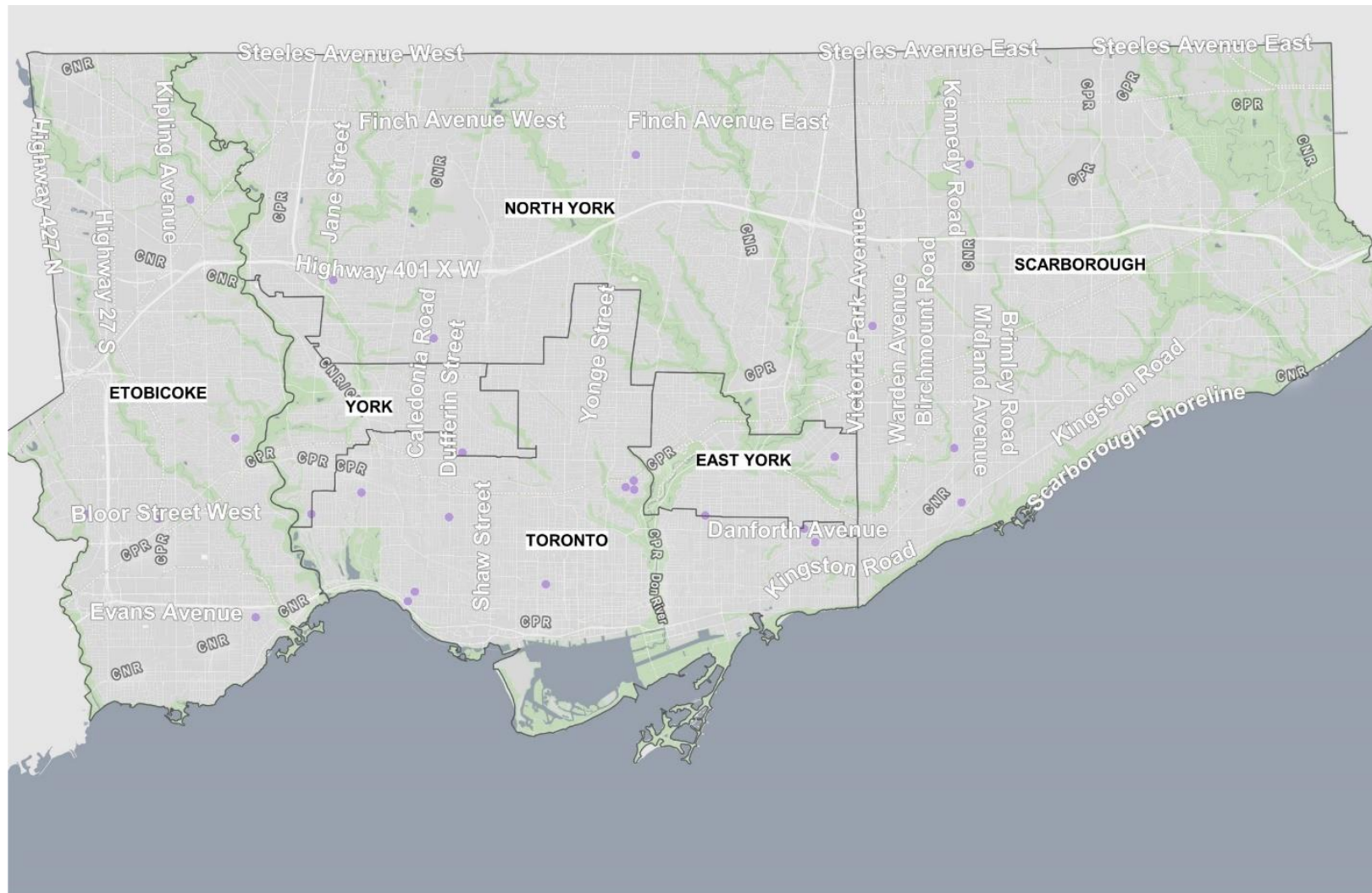






## Committee of Adjustment Approved

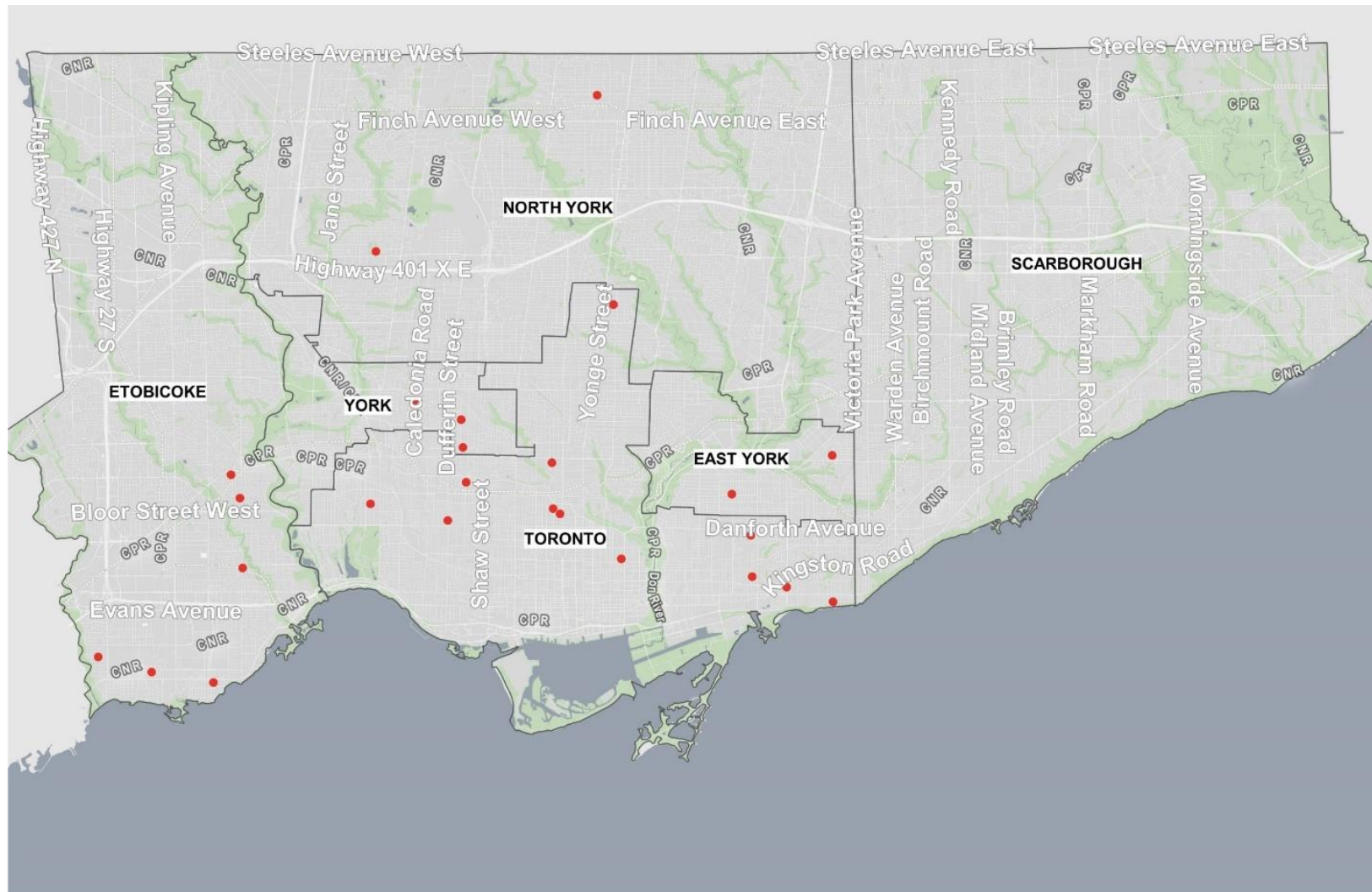




## Committee of Adjustment Deferred

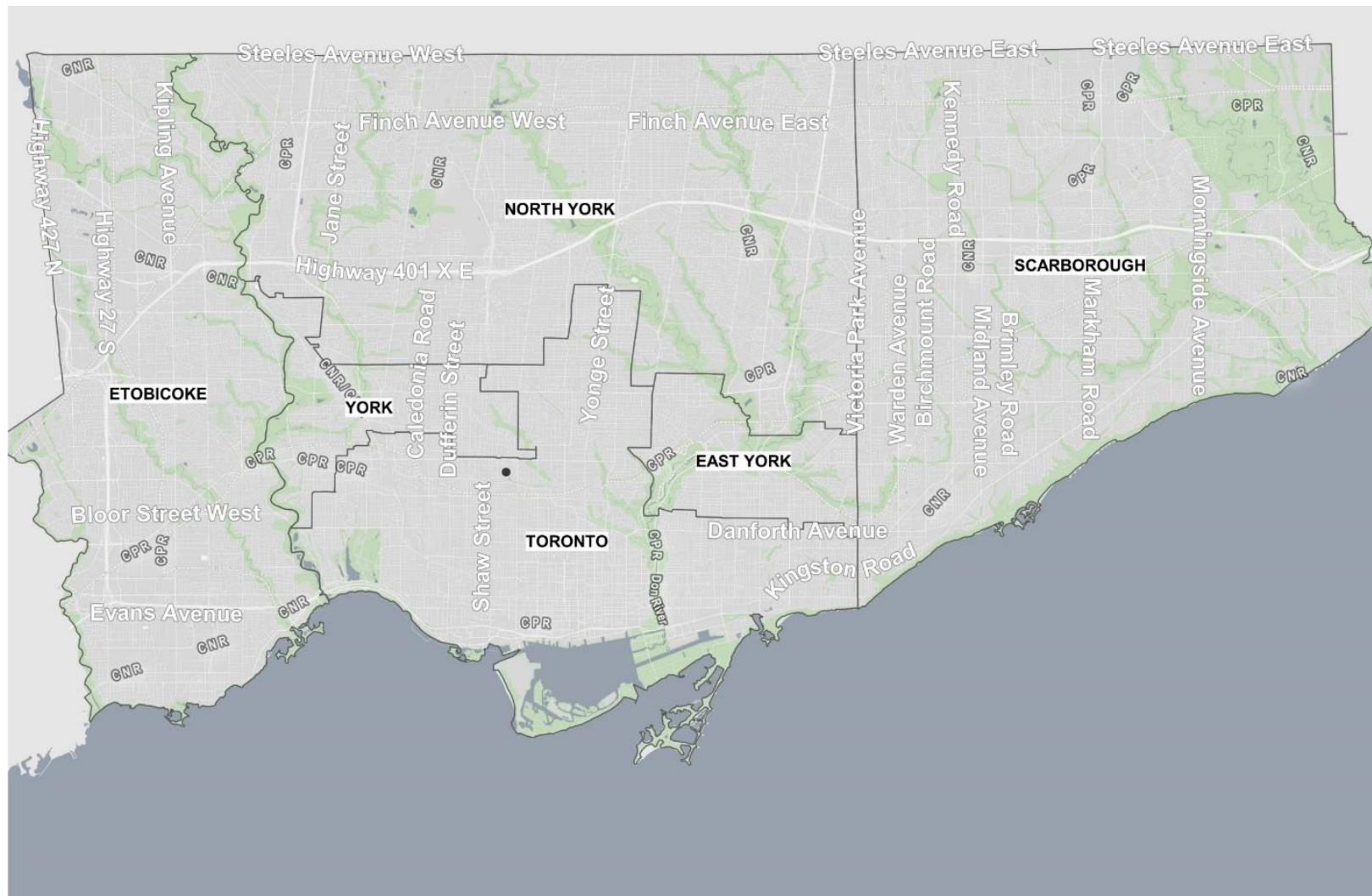






## Committee of Adjustment Application Refused

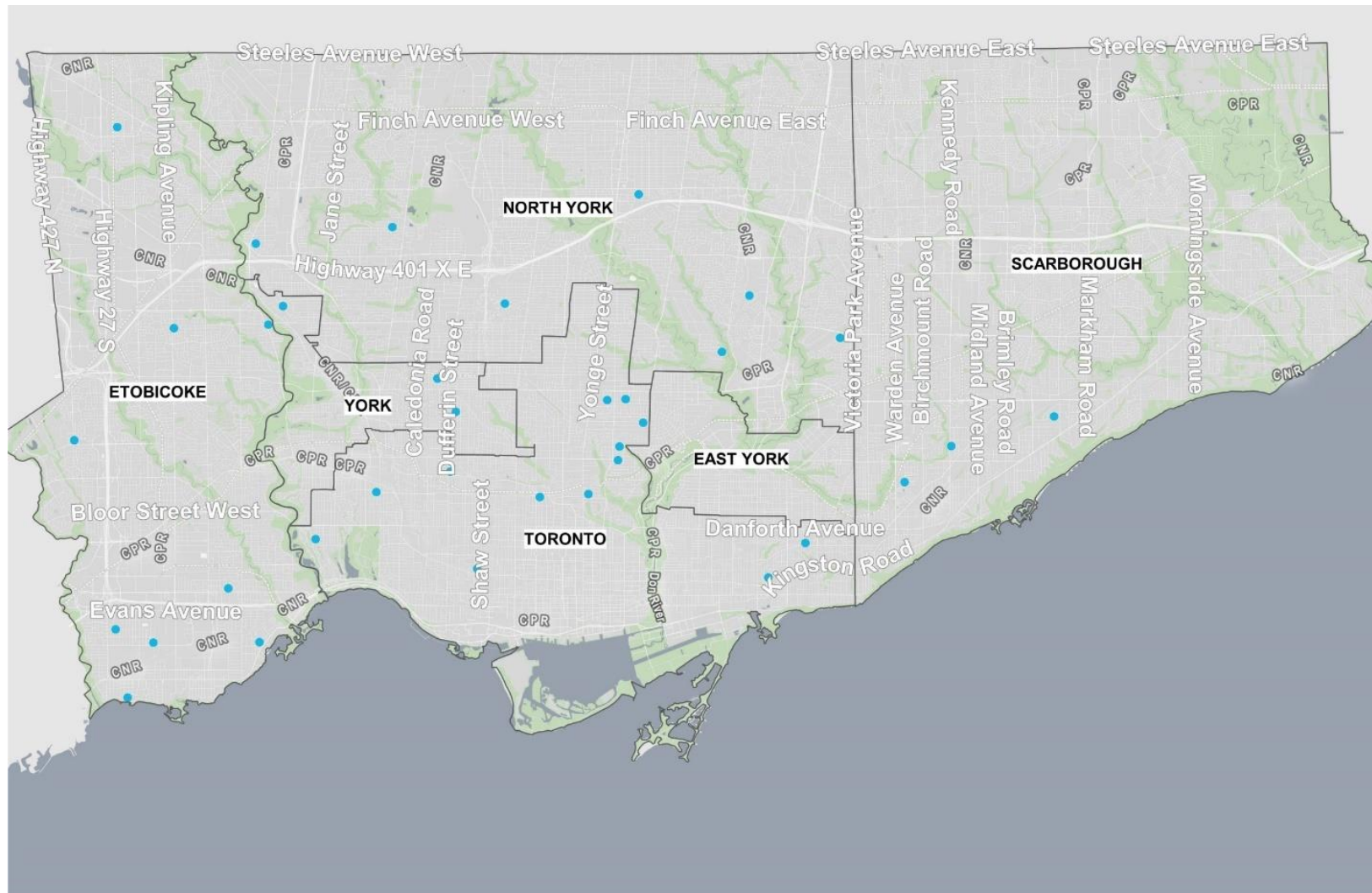




## Committee of Adjustment Application Withdrawn

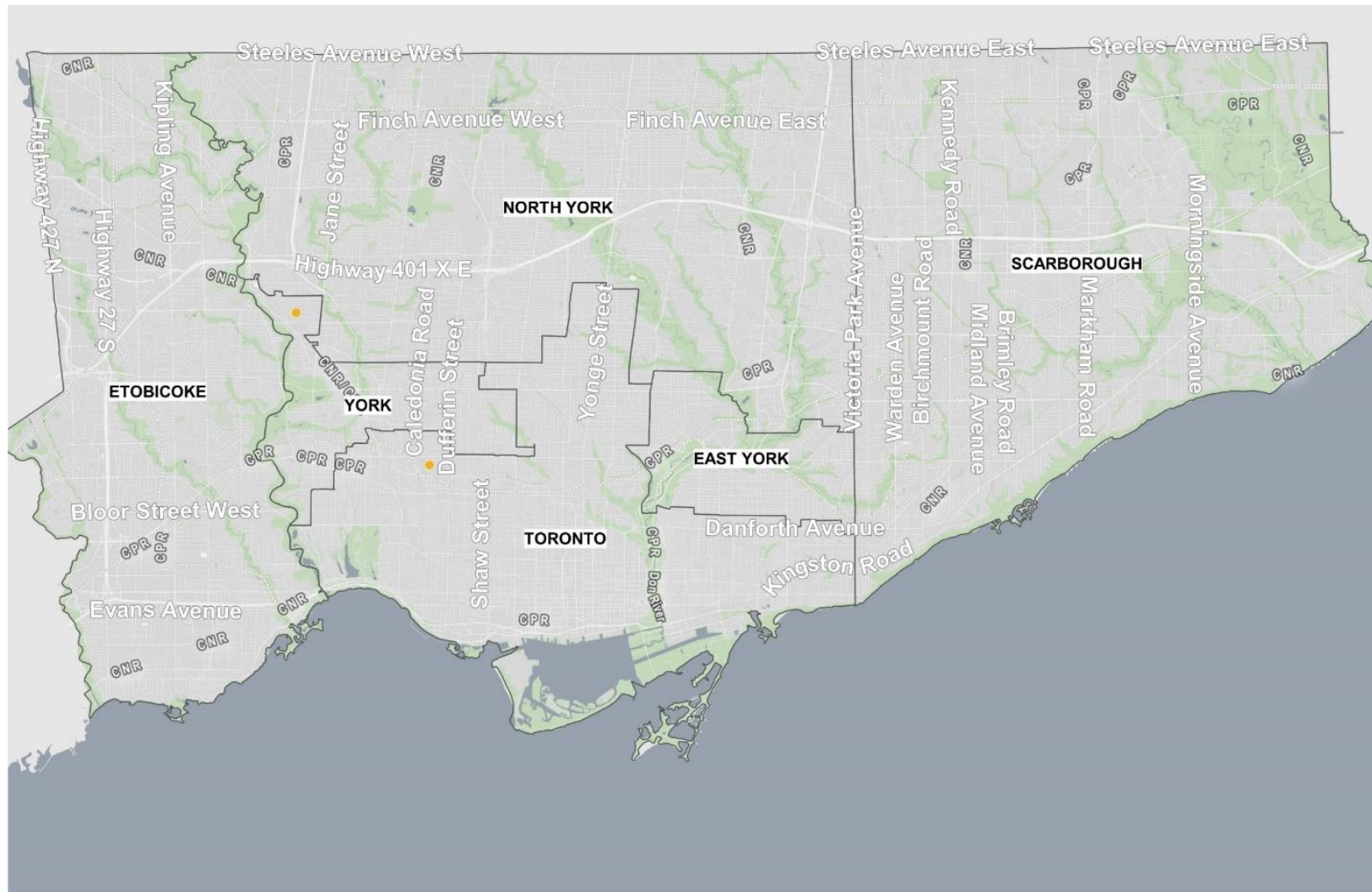






## Committee of Adjustment Under Review/Hearing Scheduled





## Committee of Adjustment Approved on Appeal



Our review of Committee of Adjustment application identified five of the most common minor variance applications sought before the committee of adjustment.

By-law Provision	Description	Count	Approved
150.7.60.30(2)	Angular Plane	127	74%
150.7.60.20(5)	Side Yard Setback	125	73%
150.7.60.20(2)	Rear Yard Setback	74	77%
150.7.50.10(1)(A)	Rear Yard Soft Landscaping	69	70%
150.7.60.40(1)	Height	63	76%

These approval rates suggest that the Committee of Adjustment is generally supportive of common garden suite variances.

### 5.2.1 Angular Plane

**150.7.60.30(2):** The portion of a garden suite that is located above 4.0 metres in height must fit within a 45-degree angular plane projected from a point 1.5 metres above grade at the side, rear, and front lot lines. Relief from this provision is one of the most frequently sought variances. A total of 127 variances related to angular plane were submitted between 2022 and August 2024. Of these, 94 were approved, resulting in an approval rate of 74% among completed applications including approved, refused and withdrawn applications.

### 5.2.2 Side Yard Setback

**150.7.60.20(5):** Because this provision ties to the lot frontage, the permitted standard varies widely across applications. Zoning provisions also require an enhanced lot setback where openings such as windows or doors are proposed in the side main wall. This variability is reflected in the range of requested variances.

Variances noted here are requested to By-law provision 150.7.60.20(5) (A) and (B).

Between 2022 and August 2024, a total of 125 applications sought relief from this provision. Of these, 111 applications are complete (approved, refused or withdrawn). A total of 81 applications were approved, for an approval rate of 73% among completed variances to August 2024. Across these varied standards, the average permitted side yard setback is calculated at 1.35 metres from a minimum of approximately 0.5 m. Frequently, the permitted standard requiring a variance appears to relate to 150.7.60.20(5)(A) of the By-law related to the presence of openings along the side main wall of a proposed garden suite.

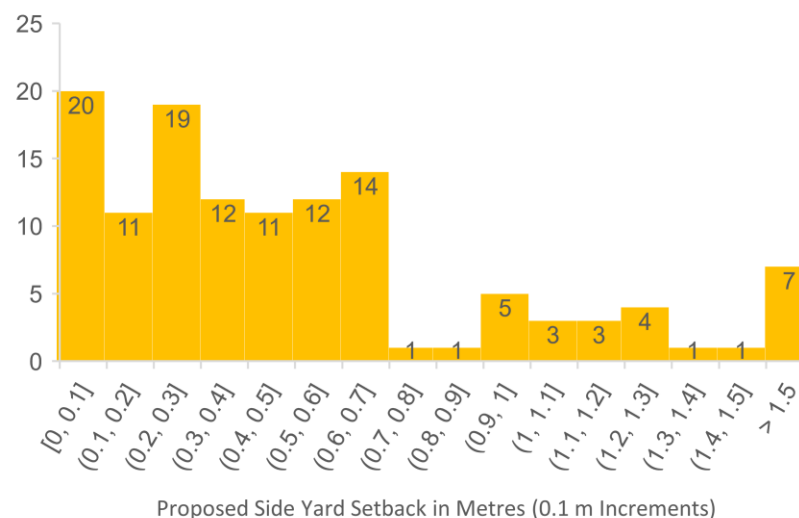


Figure 5 – Histogram of Proposed Side Yard Setbacks

The data indicates that applicants are frequently seeking relief to bring proposed side yard setbacks below 0.6 metres. The average proposed side yard setback was 0.54 metres across all applications and 0.56 metres across approved applications.

Approved applications typically received a 60% reduction from By-law requirements.

Relief from the side yard setback standard is one of the most frequently sought and commonly approved variances for garden suites and these variances reflect a range of conditions. Given the variability in lot types and sizes across Toronto, the Committee of Adjustment process will be important to continue to determine acceptable standards on irregular lots and unique contexts. The findings however suggest that the current threshold may be overly restrictive for smaller or narrower lots and may particularly limit the potential consideration of window and door openings along the side wall.

### 5.2.3 Rear Yard Setback

**150.7.60.20(2):** The required minimum rear yard setback for a garden suite is 1.5 metres or on deep lots exceeding 45 metres in depth, the required rear yard setback is equal to the greater of 1.5 metres or half the height of the proposed garden suite.

Between 2022 and August 2024, a total of 74 minor variance applications were submitted to reduce the required rear yard setback.

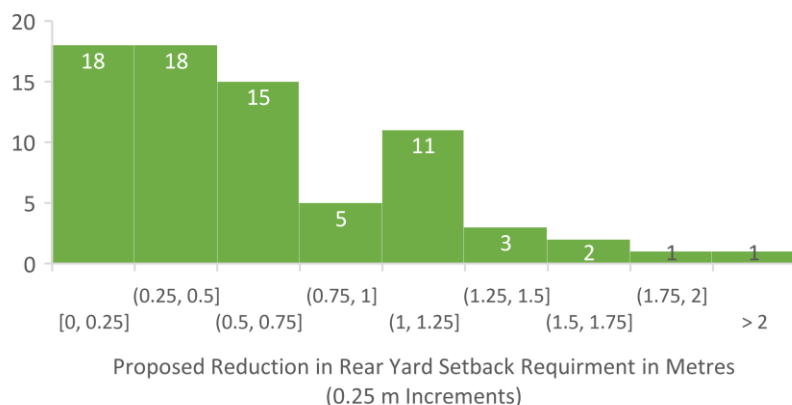


Figure 6 - Histogram of Approved Reductions in Rear Yard Setback Requirements

Of these 66 applications are complete and 51 applications were approved reflecting a 78% approval rate among completed applications over the review period. The average required setback was 2.01 metres across all applications. The average proposed setback was 0.70 metres, with proposals ranging from 0.0 to 1.5 metres. The average approved reduction was 0.63 metres. The histogram below shows the distribution in approved reductions in rear yard setbacks.

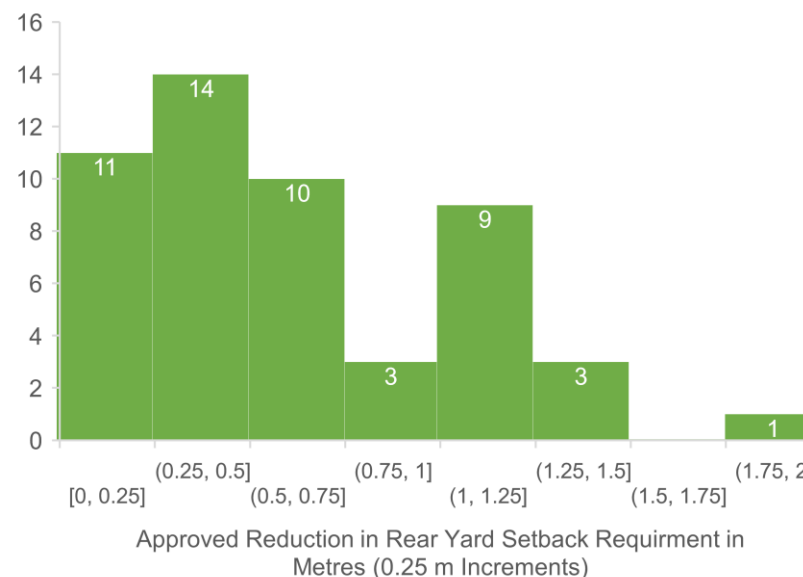


Figure 7 - Histogram of Approved Reductions in Rear Yard Setback Requirements

Variances to this provision may be sought on irregular lots or lots with limited depth. The Committee of Adjustment may also consider reductions on a site specific basis where no significant overlook impacts are anticipated or where the garden suite massing may be well integrated into the lot. Applications proposing setbacks of 0.0 metres were more likely to be refused. This trend suggests that while the rear yard setback standard is



broadly achievable, a moderate degree of flexibility may be contemplated.

#### 5.2.4 Rear Yard Soft Landscaping

**150.7.50.10(1)(A):** A minimum of 50% of the rear yard area must be maintained as soft landscaping (on lots with a frontage exceeding 6 metres), measured as the portion of the yard behind the principal dwelling and not occupied by the garden suite or hard surfaces.

Between 2022 and August 2024, a total of 69 minor variance applications were submitted to reduce the required percentage of soft landscaping in the rear yard. Of these 64 variances are completed and 45 applications were approved, resulting in an approval rate of 70% for completed applications. The average proposed landscaping provided was 33%. The average among refused applications was 26% and 37% among approved applications.

In most approved cases, soft landscaping of 30% or more was maintained. These results suggest that while the 50% standard remains a viable benchmark, a minimum threshold in the 30%–40% range is often accepted at the Committee of Adjustment.

#### 5.2.5 Height

**150.7.60.40(1):** This provision introduces a tiered approach to height, based on the spatial relationship between the garden suite and the principal dwelling. While it allows up to 6.0 metres in many contexts, the permitted height is reduced to 4.0 metres when suites are sited closer to the main house. As a result of a pilot in the Beaches neighbourhood (bounded by Coxwell Avenue, Coxwell Boulevard and Massey Creek to the west, the Don River and Sunrise Avenue to the north, Victoria Park Avenue and Nursewood Park to the east, and Lake Ontario to the south), the maximum height of a garden suite is 6.3 metres in this location.

Between 2022 and August 2024, 63 applications sought variances to exceed the maximum permitted height. A total of 55 variances have been completed (refused, approved or withdrawn). Of these 42 applications were approved, yielding an approval rate of 76% of completed minor variance applications. The average proposed height was 6 metres.

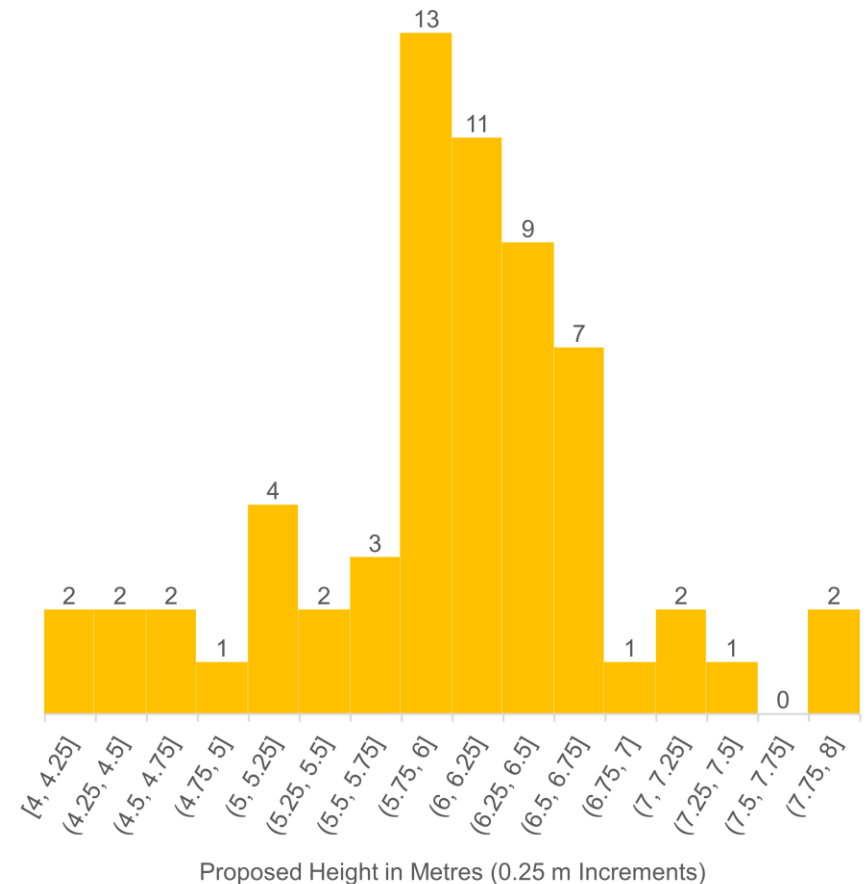


Figure 8 - Histogram Showing Distribution in Proposed Garden Suite Heights

These outcomes suggest that the framework for height is broadly effective. In many circumstances, heights converging on 6 metres accommodate most garden suite proposals. The modest increase in height may be recommended to capture the majority of proposed garden suite designs.

### 5.2.6 Emerging Themes

Across these provisions, several shared themes emerge:

- **Modest but meaningful relief is often supported.** In many cases, applicants seek small reductions or increases (e.g., 0.3–1.0m of setback or height).
- **Variance approvals provide the opportunity to address lot constraints** and lot variability across the City on an individual basis.
- **Consistency in approvals reveals opportunities for refinement.** In several categories particularly angular plane, **side yard setbacks, rear yard soft landscaping and height**, variance approval rates exceed 70%, and most proposals converge around specific thresholds. These patterns may suggest that adjustments to baseline standards could reduce the need for discretionary review.
- **Extreme deviations are less likely to be supported.** Applications proposing zero setbacks or minimal soft landscaping were more likely to be refused, reaffirming the importance of the Committee of Adjustment in balancing flexibility with impacts to neighbours and the public realm.

The data also highlights the critical role of the Committee of Adjustment in enabling site-specific housing solutions. The variance process has functioned as a relief valve within the broader regulatory framework, allowing context-sensitive adjustments where performance standards are difficult to meet but project goals remain consistent with the City's housing, design, and environmental objectives. The Committee of Adjustment must be able to continue to provide that function efficiently. Recurring patterns in variance approvals and

performance thresholds provide a strong foundation for considering targeted refinements to the by-law allowing for a reduction in the most commonly approved variances and potentially supporting increased consideration and update of Garden Suite typologies across the City of Toronto.

### 5.3 Tree Protection

Given Toronto's extensive urban tree canopy, garden suite applications frequently intersect with tree protection requirements, particularly in established neighbourhoods with mature trees located near rear lot lines. While the City's policies aim to protect tree health and longevity, the permitting process for tree injury or removal can introduce significant complexity and delay if not proactively addressed.

Between 2022 and August 2024 (the period for which accurate and detailed summary data are available), 70 applications were submitted for tree permits associated with garden suite construction.

*Table 2 – Summary of Wards with Frequent Tree Permit Applications*

Ward	Total Count	Permit Issued	Under Review
Don Valley West (15)	10	20%	80%
Etobicoke-Lakeshore (03)	9	33%	67%
Beaches-East York (19)	8	25%	75%
Parkdale-High Park (04)	6	17%	83%
Toronto-Danforth (14)	5	60%	40%



Of the permits issued over this period:

- 14 garden suites resulted in the injury of 18 trees
- 9 garden suites resulted in the removal of 11 trees
- Notably, no healthy trees were removed during the period to August 2024 in alignment with Council direction

## 5.4 Stakeholder Perspectives

Through focused discussions with City staff, industry professionals, and residents, this review gathered a wide range of perspectives on the performance of the Garden Suites Zoning By-law. While experiences and views vary, several strong themes emerged across planning districts, professional backgrounds, and areas of expertise.

### 1. Angular Plane Standards

**Broad Agreement:** The 45-degree angular plane, particularly from side lot lines, is seen as the most frequent and impactful regulatory constraint. Stakeholders agree it limits design flexibility, adds cost, and is a primary trigger for variance applications.

Many support retaining a modified form of angular plane, such as limiting it to the front (house-facing) plane or applying it only on narrower lots.

Others argue it should be replaced with rear and side yard setbacks that achieve the same intent in simpler terms.

In view of recent regulatory changes, angular planes are no longer required however this does not allow for the extension of the massing of an ancillary building into the second story. It was noted through consultation that Toronto is unique in Ontario for providing permissions for a second storey for ancillary buildings located in the rear yard. Some respondents noted that some design control was desirable while maintaining that flexibility should continue to be provided.

**Divergent Views:** Some staff and designers see angular planes as essential to maintaining neighbourly relationships and limiting the rear yard mass, particularly on tighter lots.

### Edge Cases:

Applicants and designers noted that angular plane requirements between the principal dwelling is often redundant as the property owner retains a relationship with the ancillary garden suite as the structure remains on the same property and continues to be accessed via the lot frontage.

In some cases, concerns were raised about angular plane overhangs being miscalculated or inconsistently interpreted in permit drawings.

Some stakeholders proposed standardizing the number of required planes (e.g., reducing from four to two) and tying application to lot width.

### 2. Lot Conditions and Application Consistency

**Broad Agreement:** The diversity of lot types across the city makes the garden suite typology challenging on some lots. Staff and applicants alike emphasized that irregular and constrained lots trigger more variances and are more likely to produce delays.

Stakeholders supported clearer guidance and pre-screening tools to help applicants assess feasibility based on lot type.

**Edge Case:** Several stakeholders noted that minor variances, even when garden suites are as-of-right in principle, are often required simply due to lot geometry or conflicting interpretations of terms like "main wall" or "basement."

### 3. Tree Protection and Urban Forestry

**Broad Agreement:** Urban Forestry plays a critical role in protecting the City's tree canopy, but there is shared concern that the process can result in delays.

Many applicants state that they are familiar with the tree permit process. Staff note that early coordination could reduce delays, but Urban Forestry reviews are often initiated after designs are already developed and where a conflict is identified late in the process.

Tree canopy protection is a critical consideration for many members of the public at large. We heard comments seeking the prioritization of the protection of the tree canopy across the City. Within Community Consultation meetings conducted, members of the public and residents' associations expressed concerns regarding the loss of trees associated with Committee of Adjustment applications. Notably, this concern was not related to Garden Suites project in particular. Members of the public also expressed some concern regarding enforcement of the City's tree By-law with some concern for tree removals associated with construction projects in neighbourhoods.

#### **Notable Suggestions:**

Use of helical piles or other lightweight foundations to reduce root zone impacts. Clarifying how below-grade foundations relate to Tree Protection Zones.

#### **4. Permit Process and Variance Timelines**

**Broad Agreement:** The building permit and Committee of Adjustment process is time-consuming, especially for applicants unfamiliar with municipal planning processes.

There is a strong call for streamlining and better integration between Planning, Building, and Urban Forestry.

Applicants and designers report the perception that even as-of-right garden suites still face months-long delays due to unclear zoning interpretations, file circulation, and re-review cycles associated with zoning reviews.

#### **Divergent Views:**

Some believe improvements could be made within the current structure, while others suggest a dedicated garden/laneway suite unit or a delegated "rubber stamp" approval stream for as-of-right applications.

#### **Edge Cases:**

Some applicants suggested that the process be modernized through the use of an online submission and commenting portal like ePlan, or the use of an AI-assisted pre-screening process.

Some applicants and designers suggested concern that Committee of Adjustment outcomes are increasingly swayed by neighbour opposition, reducing predictability.

#### **5. Financial Feasibility and Intended Use**

**Broad Agreement:** Garden suites are most commonly used for multi-generational housing, such as housing adult children, aging parents, or extended family. Rental use is secondary and often not financially viable on its own.

Many projects are driven by family needs, not speculation, and require upfront investment with long return horizons. Some staff and members of the public however note an increased perception in proposed multi-unit projects in neighbourhoods in Scarborough with some potential interest in multi-unit garden suites.

Financing remains a significant barrier, especially given appraisal uncertainty and lack of comparables in the resale market.

#### **Notable Perspectives:**

Some industry voices noted that garden suites, despite no land cost for existing owners, are still expensive to build and rarely generate "cash flow" unless integrated into larger multiplex projects.

Designers and applicants noted that the typology is important for non-profit providers seeking to provide gentle intensification across their existing housing portfolio.

Federal financing programs or grant incentives were seen as a potential game-changer but not yet widely accessible.

## 6. Soft Landscaping and Environmental Performance

**Broad Agreement:** The definition and interpretation of soft landscaping is seen as inconsistent and occasionally too rigid.

There is interest in allowing permeable materials and surfaces that support stormwater management but are not traditional green space.

Some stakeholders noted that variances for soft landscaping are relatively rare, suggesting the current standard may be achievable on most lots.

### Edge Cases:

Confusion about how green roof space or pavers are counted.

Some designs incorporate underground drainage solutions like soak-away pits, but these are not consistently evaluated.

## 7. Opportunities for Innovation

Across conversations, stakeholders suggested multiple opportunities to modernize and simplify garden suite implementation:

- Introduce standardized massing envelopes to reduce reliance on variances;
- Expand use of pre-approved designs, with flexibility for lot variability and potentially leveraging the CMHC housing catalogue;
- Improve coordination with Toronto Building and Urban Forestry;

- Consider allowing two-unit garden suites or stacked designs in specific contexts;
- Allow mechanical equipment (e.g. heat pumps) as encroachments above permitted height, provided they support electrification and carbon reduction goals.

## 8. Emerging Themes and Practical Considerations

Stakeholders flagged concerns regarding the unintended financial consequences of existing development charge policies. Specifically, when a fifth residential unit is added to a property, it may trigger development charges for all five units, including those previously exempt. This was described as a deterrent to the “4+1” model (a fourplex augmented by a garden suite). Participants noted that this policy could undermine the intent of recent policy changes to facilitate gentle intensification by discouraging homeowners or non-profit providers from adding a fifth unit where they might otherwise do so.

Industry participants also raised issues related to the conversion of existing garages or ancillary buildings into garden suites. In many cases, these structures require variances to comply with height, angular plane, or separation distance requirements, even when no changes to the built form are proposed. Stakeholders questioned the rationale for this, especially in cases where structures are otherwise safe and serviceable. Several suggested that the Zoning By-law should more clearly allow the use of existing buildings as-of-right where feasible.

### 5.4.1 Common Themes, Misconceptions, and Points of Consensus

The Garden Suites Zoning By-law Review engaged a wide range of perspectives from across the development, design, and approvals ecosystem, including planners, urban forestry staff, Toronto Building officials, architects, designers, and resident-facing staff. While experiences varied across geographies and

roles, several strong themes, misconceptions, and points of alignment emerged throughout the engagement process.

### Common Themes

- **Design constraints are cumulative:** While no single performance standard is universally prohibitive, the combined effect of angular planes, separation distances, setbacks, and soft landscaping requirements (especially on constrained or irregular lots) can render many proposals infeasible without variances.
- **Process complexity is a barrier:** Even experienced applicants report that the multi-division review process is difficult to navigate, particularly due to inconsistent interpretations and lack of integration between zoning, forestry, and building code requirements.
- **Garden suites are primarily used for family:** Most built or proposed garden suites are intended for intergenerational living or personal use. Financial viability is not the primary driver, though cost remains a major constraint.
- **Trees are central – but complicated:** Tree protection is essential to the policy's environmental goals, but the timing, transparency, and rigidity of Urban Forestry's role is a consistent source of tension. Applicants often don't account for tree constraints early enough in design.

### Common Misconceptions

- **"As-of-right" means fast and simple:** Many applicants assume that "as-of-right" zoning translates into a straightforward permitting process. In reality, site conditions, tree protection requirements, and building code compliance frequently require design adjustments or trigger variances.

- **Urban Forestry will permit removals if needed:** Some applicants and members of the public at-large assume that removal of a by-law-protected tree can be justified if it facilitates infill housing. In fact, Council direction empowers Urban Forestry to refuse such permits, particularly for healthy or mature trees.
- **Laneway and garden suites are interchangeable:** While similar in form, the two are governed by distinct by-laws, lot conditions, and servicing requirements. Garden suites face greater variability due to their broader applicability across lot types. Garden suites on through-lots are not laneway suites and are intended to maintain their relationship to the lot frontage. There is a desire however among industry stakeholders and their clients for some greater alignment between these By-law standards as they both reflect similar typologies.
- **Garden suites are primarily an investment strategy:** While they may add property value, many applicants note that construction costs, financing challenges, and unclear resale or rental value make garden suites a long-term investment, not a guaranteed as a reliable income-generating asset. Many note that Garden Suites serve many purposes in supporting various types of living and flexible living arrangements including supporting multi-generational families or allowing for access to an accessible unit.

### Points of Consensus

- **Angular plane standards are the most common barrier:** Angular planes, especially from side lot lines are the most frequently cited reason for perceived constraints in design options, motivation for variances, and applicant frustration. As these regulations are impacted by recent provincial changes there is broad understanding of the removal of these controls. During community consultation,

members of the public noted a desire for the mass of a garden suite to be addressed.

- **Clarity and consistency are more important than leniency:** Stakeholders don't necessarily want fewer rules, they want clearer ones. There is strong support for improving definitions (e.g., "main wall," "separation distance"), standardizing drawings, and reducing interpretive ambiguity.
- **Most applicants benefit from working with professionals:** Applications are more successful when homeowners work with experienced designers, planners, and arborists who understand the system and can proactively address its requirements.
- **A policy reset is not needed—but refinements are:** The general policy direction is supported by most stakeholders. What's needed is improved coordination, communication, and fine-tuning of specific zoning standards to reduce friction and support more successful, context-sensitive projects.

## 5.5 Community Consultation Meetings

As part of the Garden Suites Monitoring Program, the City of Toronto hosted two community consultation meetings in March 2025 to inform the public of the monitoring review, share preliminary findings, and gather feedback on emerging trends and implementation issues. These sessions provided an opportunity for City staff and the consulting team to hear directly from residents.

### Residents' Associations and Grassroots Organizations Meeting (March 19, 2025)

The first meeting was targeted to residents' associations and grassroots organizations across the City. Not all participants had direct experience with Garden Suites in their neighbourhood.

Key themes from this session included:

- **Concern about the frequency of minor variance approvals:** Several attendees expressed concern about widespread approvals at the Committee of Adjustment. Attendees noted that this perception applies to Committee of Adjustment applications in general and is not limited to those for Garden Suites.
- **Privacy, overlook, and noise:** Participants raised concerns about how new garden suites might affect adjacent properties, particularly regarding privacy and noise for longstanding homeowners.
- **Need for stronger enforcement:** Residents flagged challenges in monitoring compliance with tree protection by-laws in general, especially cases where trees were removed without permits. There was the perception of limited enforcement capacity and minimal penalties.
- **Transparency and neighbourhood-specific impacts:** Some attendees emphasized the need for clearer data on neighbourhood-level applications, approvals, and the cumulative impact of garden suites in mature areas with infrastructure constraints. Some noted concerns about cumulative storm water or water pressure impacts.
- **Recognition of value but calls for restraint:** While many participants acknowledged the role of garden suites in providing additional housing, they cautioned that changes to zoning standards must not impact wider neighbourhood context or decrease tree cover.

### City-Wide Community Consultation Meeting (March 25, 2025)

The second session was open to all residents of Toronto and attracted a wide range of participants from across the City. This meeting generated a large volume of questions through the Q&A function, reflecting broad interest and varied perspectives.



Common themes and feedback included:

- **Clarifications on zoning and definitions:** Residents sought clarification on the distinction between garden and laneway suites, setback requirements, and the implications of recent changes under O. Reg. 462/24.
- **Concerns regarding infrastructure and servicing:** Participants questioned whether older neighbourhoods had the capacity to support additional units given aging water, sewage, and stormwater systems.
- **Tree protection and enforcement:** Multiple residents shared concerns of trees being removed (legally or otherwise). There were strong calls to increase penalties for illegal removals and improve monitoring.
- **Use and scale of garden suites:** Some participants expressed concern about the size and scale of some garden suites being proposed, particularly when used as luxury rentals. Others advocated for more flexibility in size for larger families.
- **Interest in design guidance and pre-approved plans:** A number of participants welcomed the idea of standard designs or pre-approved plans to help homeowners better navigate the process while ensuring consistency with City objectives.
- Participants valued the opportunity to engage and offered constructive feedback on improving process transparency, addressing unintended consequences, and better communicating the intent and implementation of the Garden Suites framework.
- City staff responded to questions with technical clarification and acknowledged areas where improvements or clarifications may be considered in future policy updates.

## Summary of Perspectives

Across both meetings, a few clear patterns emerged:

- There is general support for the principle of enabling more housing options within neighbourhoods through garden suites, especially for multigenerational families.
- Trust in the process depends on enforcement, clarity, and fairness. Concerns about tree removals, neighbour impacts, and inconsistent approvals risk undermining confidence in the program.

## 5.6 Impact of Ontario Regulation 462/24

Ontario Regulation 462/24, which came into effect in November 2024, represents a significant shift in the regulatory environment for Additional Residential Units (ARUs), including garden suites. The regulation overrides several municipal zoning standards for properties proposing up to three residential units, including one located in an ancillary structure (such as a garden suite). These changes are intended to streamline infill development and eliminate the need for variances in many cases.

These provisions apply to new and existing applications (building permits and variances) for ARUs, provided the total number of units on the lot is three or fewer. City of Toronto Staff have been reviewing Ontario Regulation 462/24 and will provide recommendations regarding how the provisions of the Ontario Regulation will be reflected within the existing City-wide Zoning By-law 569-2013 regulations. Staff will continue this review and provide recommendations in consideration of all permitted ARUs across the City's zoning By-law.

Standard Removed/Modified	Description
Angular Planes	ARUs may now penetrate any angular plane that would otherwise be enforced by municipal by-laws.
Minimum Separation Distance	A default separation of 4.0 metres between residential structures is established; however, a more permissive by-law may prevail.
Lot Coverage	Up to 45% lot coverage is permitted. Municipal by-laws can allow more.
Minimum Lot Size	Removed entirely—any parcel that allows residential use may include ARUs.
Floor Space Index (FSI)	No limit on FSI for parcels containing ARUs.
Parking Requirements	Clarified flexibility: municipalities may set minimums, but no default requirement is imposed.
Occupancy Restrictions	No owner-occupancy or family-related restrictions; ARUs can be occupied by anyone.

## 5.7 Jurisdictional Scan

### 5.7.1 Program Overviews

#### 5.7.1.1 *Ottawa – Coach Houses*

Ottawa permits coach houses on lots with detached, semi-detached, duplex, or townhouse dwellings, provided the principal dwelling is a permitted building type. Coach houses must be located in the rear yard for lots under 0.4 hectares and adjacent to a traveled lane if abutting a laneway. For the urban area, the coach house must have servicing from the primary homes municipal water and sewer connection. Under the new O.Reg. changes, where permitted, lots served by municipal water and wastewater may benefit in having up to two additional dwellings. This could be a combination totaling two apartments within the dwelling units that are subsidiary to the principal dwelling or an apartment in combination with a coach house on the same lot.

In urban areas, coach houses must not exceed about 40% of the footprint of the principal dwelling or 40% of the rear yard area. Notably, they are limited to one storey and may not exceed the height of the principal dwelling. Servicing must be connected to the principal dwelling's water and sewer systems.

The city provides a comprehensive guide to assist homeowners through the planning, design, and application processes, including considerations for building placement, lot eligibility, and tree protection. The City of Ottawa also provides an online webpage through providing guidance to homeowners and applicants that may be accessed through the “Do I Need a Building Permit?” information portal including helpful screening information, links to building permit and committee of adjustment fees, a review of the City’s process and a recommendation to connect with the 311 Service to discuss requirements and a link to upload applications through the new Building, Planning and Land Development online application available through *My Service Ottawa*.

#### 5.7.1.2 *Edmonton – Backyard Housing*

Edmonton's updated zoning bylaw, passed by Council on October 23, 2024 and effective January 1, 2024, introduces "Backyard Housing" as a term encompassing garden suites, garage suites, and other accessory dwellings. These units are permitted in various residential zones and are no longer considered as an accessory structure meaning that they can be built on vacant lots or as additions to existing homes.

Backyard housing must be self-contained, including a kitchen, bathroom, sleeping, and living area. The maximum site coverage for garages and backyard housing is 20% of the total 45% allowed for all structures on a lot. This form of housing may be arranged in different forms including single detached, semi-detached and row housing and the By-law may permit one or more Backyard House per lot. This form of housing may also be attached to other buildings or an existing backyard house.

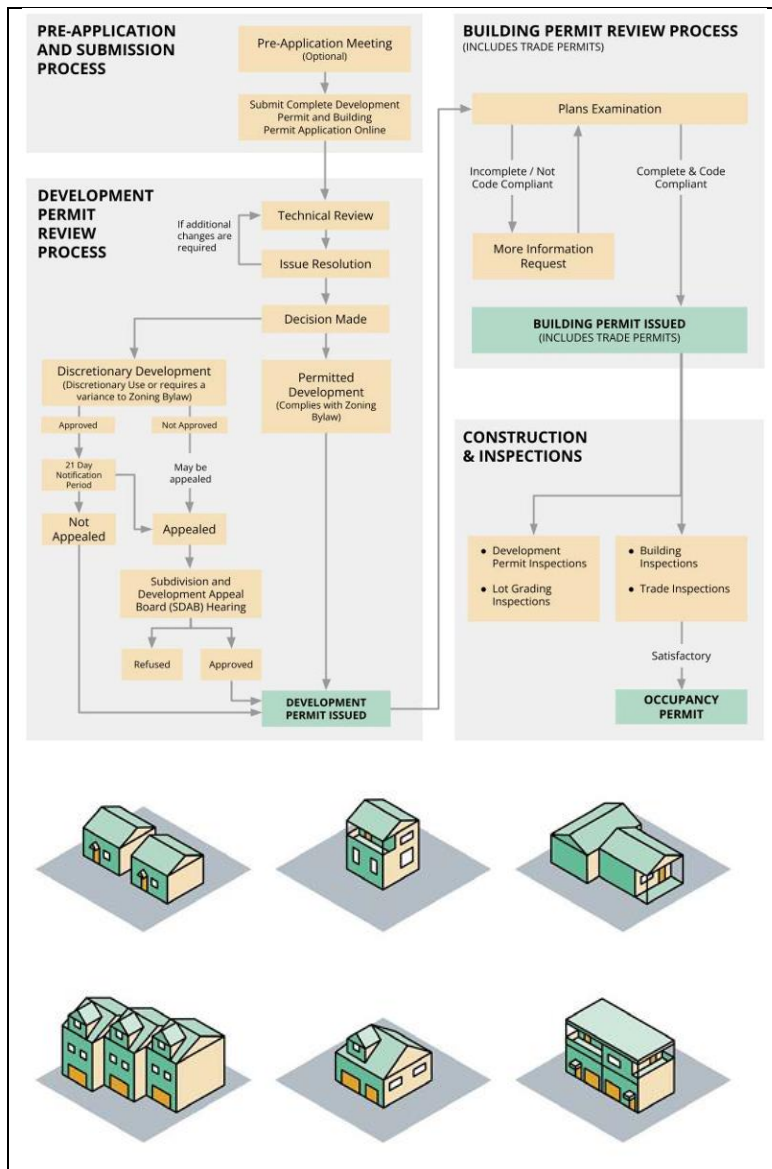


Figure 9 – City of Edmonton Development Permit to Building Permit Review Process

The City of Edmonton maintains a development permit system. The construction of the typology requires several types of permits, including a Development Permit and a Building Permit.

Edmonton offers a detailed "Garden Suite How-To Guide" to assist homeowners in navigating the planning, design, and permitting processes.

#### 5.7.1.3 Vancouver – Laneway Houses

Vancouver allows laneway houses on most single-family lots, provided there is rear lane access. These units are intended for rental or family use and cannot be sold separately.

Laneway houses are limited to a maximum floor area of 0.25 times the lot area, not exceeding 186 m<sup>2</sup>. They must be at least 4.9 meters from the principal dwelling and adhere to specific height and setback requirements.

The city provides resources, including a "Laneway Housing How-to Guide," to assist homeowners in understanding the design and permitting processes. The City of Vancouver has begun using a tool called eCheck through a pilot program to allow designers and applicants to check the compliance of drawings and regulations.

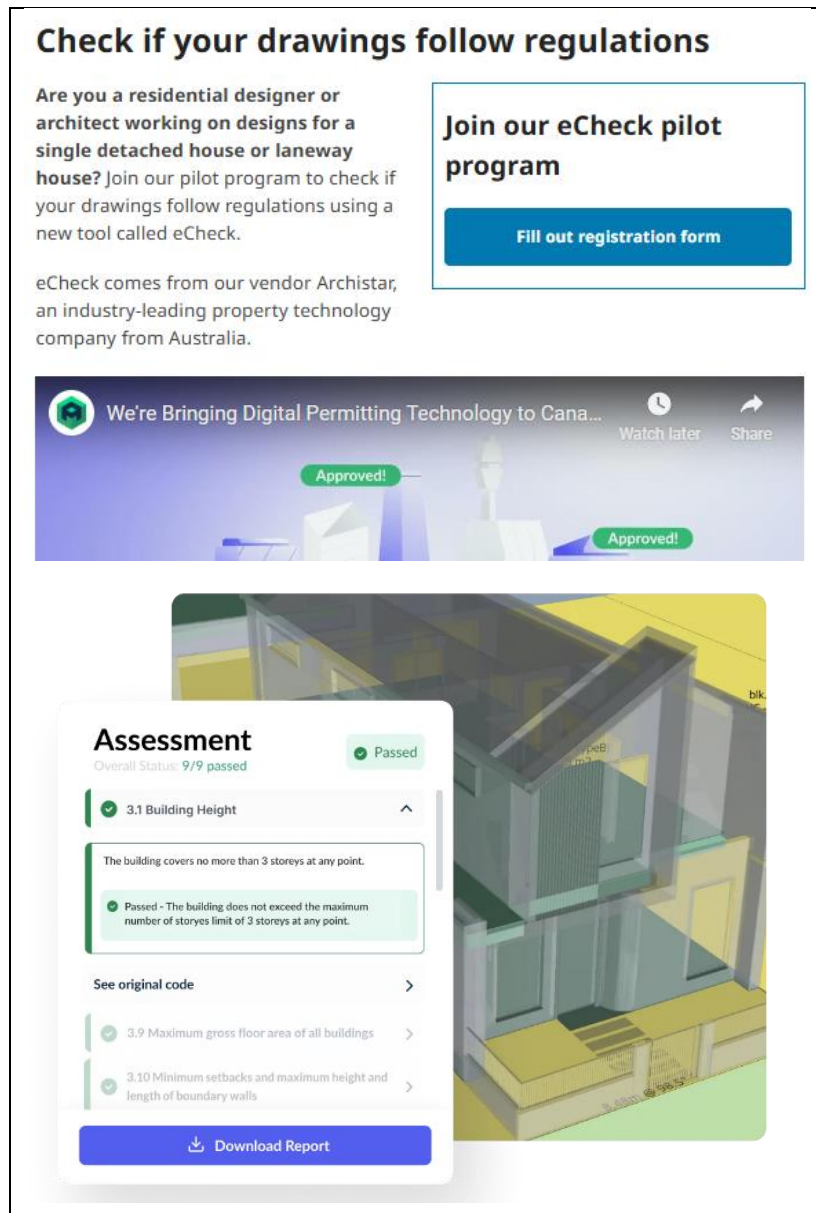


Figure 10 - City of Vancouver eCheck Pilot Software

#### 5.7.1.4 Los Angeles – Accessory Dwelling Units (ADUs)

Los Angeles has implemented a Standard Plan Program to streamline the permitting process for ADUs. Pre-approved plans, developed by licensed architects and engineers, are reviewed for compliance with building codes, allowing for expedited permit issuance.

ADUs must comply with zoning and building codes, with specific requirements varying based on the selected standard plan and site conditions. The Los Angeles Department of Building and Safety provides access to approved standard plans and resources to guide applicants through the ADU development process.

#### 5.7.1.5 Calgary, Alberta – Backyard Suites

Calgary permits backyard suites in specific residential districts. The city has implemented land use by-law amendments to facilitate the development of these units. Calgary introduced a discretionary use process for backyard suites, allowing for case-by-case evaluations. The city provides detailed guidelines and checklists to assist applicants in navigating the approval process via an online webpage and several guides including fee and timeline guides. Backyard suites in Calgary always require planning approval through a development permit and a building permit is required to review and approved construction. Many municipalities in western Canada have implemented development permitting systems. These processes can streamline approvals and lead to increased certainty around required variances but often require the completion of a development permit in order to support any development, even where a design aligns with By-law requirements or would otherwise be considered “as-of-right”.

Variances to the By-law are addressed through the development permit process, where planners assess the impact on the surrounding community and have the authority to make decisions accordingly.

#### 5.7.1.6 Victoria, British Columbia – Garden Suites

Garden Suites are permitted on all properties with only one single-family detached home, and which are appropriately zoned.



Most single-family zones permit garden suites, except for small lot zones. Properties that already have secondary suites, or an existing duplex, are not eligible. The city has established a clear policy framework to support the development of these units. In addition, some Neighbourhood Plans in Victoria contain specific policies about garden suites.

The siting of a Garden Suite in the City of Victoria requires that proposed structures respect mature trees both on site and on adjacent properties. This means locating the Garden Suite so as to minimize impact on a tree's root system. The City may require an arborist's report to support an application.

Victoria offers a streamlined approval process for garden suites that meet pre-established design guidelines, reducing the need for public hearings as rezoning applications had been required prior to 2017 to implement the typology. The city also provides a comprehensive policy guidebook for homeowners.

Applications that deviate from the guidelines require a development permit with variance, which involves a more detailed review and public notification.

## 5.7.2 Process Modernization and Application Streamlining

Pre-Approved Plans & Standardized Designs	AI-Driven Compliance Tools
<b>St. Catharines, Ontario</b> Offers a range of pre-approved detached ADU designs compliant with the Ontario Building Code, including detailed plans for various needs. The City notes that the code-compliant designs are intended to reduce cost and timelines and streamline approvals but note that they do	<b>Vancouver, British Columbia</b> Launched a pilot program using eCheck to enable designers and architects to verify if their drawings comply with regulations, aiming to streamline the permitting process.

Pre-Approved Plans & Standardized Designs	AI-Driven Compliance Tools
not guarantee compliance with the City's zoning by-law.	
<b>Collingwood, Ontario</b> Provides a gallery of pre-approved detached Additional Residential Unit (ARU) designs to expedite the permitting process. The Town of Collingwood cautions that the designs do not necessarily comply with in situ zoning requirements.	<b>Austin, Texas</b> After the completion of an initial pilot program, the City of Austin has implemented an eCheck system, allowing applicants to submit designs for AI-based compliance assessments against zoning ordinances, reducing permit review times.
<b>Ontario, California</b> The City does not provide pre-approved plan for download however, homeowners can utilize pre-approved ADU plans prepared by private vendors, facilitating a more efficient building process. The City of Toronto has implemented a similar process through pre-certified plans.	<b>Burlington, Ontario</b> In late 2024, the City has proposed procurement of the eCheck Automated Compliance solution to enhance zoning review processes and integrate development planning with building permit workflows with a clear sequencing of necessary clearances.
<b>La Cañada Flintridge, California</b> Partnered with architecture firms to offer pre-approved ADU designs, expediting plan check review times.	<b>Burnaby, British Columbia</b> The City of Burnaby has launched a pilot program to use new eCheck digital tools to speed up residential building permit processing. It is important to note Burnaby's staff are still required to review submitted documents to resolve

Pre-Approved Plans & Standardized Designs	AI-Driven Compliance Tools
	complex issues and ensure compliance with the BC Building Code.
<b>Canada Mortgage and Housing Corporation (CMHC), Canada</b> CMHC has released the Housing Design Catalogue, providing designs, floor plans and rendering for housing options within neighbourhoods across Canada. Released nationally, designs are specific to each region to align with building codes, climate zones and planning rules.	

## 5.8 Summary of Findings

The Garden Suites By-law has enabled meaningful infill housing activity across Toronto, with hundreds of projects initiated since the framework was adopted in 2022.

### Overall Effectiveness of the By-law

- The By-law has supported the development of 748 garden suite applications as of April 2025, with 62% resulting in issued or approved permits.
- Most applications proceed as-of-right, without variances, and permit activity has increased each year since adoption.
- The Committee of Adjustment has provided a consistent, avenue for flexibility approving 80% of completed minor variance applications.

- The By-law is enabling low-rise, context-sensitive intensification within neighbourhoods, with designs tailored to the wide range of lot conditions across the city.

### Where the By-law is Working Well

- Height permissions of up to 6.0 metres, and 6.3 metres in designated areas, are accommodating most two-storey designs without significant need for relief. Height variances are common and further support of designs up to 6.3 metres in height will support further flexibility in design approaches.
- Rear yard setback standards are broadly achievable, and variances are often modest and contextually supported.
- Urban Forestry enforcement of tree protection has largely functioned as intended; within the data available for this review to August 2024, no healthy trees have been removed in connection with permitted garden suites. Many applications have also proceeded without the requirement to injure or remove trees.
- The By-law is flexible enough to support integration into multi-unit and multi-generational living arrangements, particularly on larger or reinvested lots.

### Key Challenges in Implementation

- **Angular plane standards** are a frequent trigger for variances and a significant constraint on two-storey massing.
- **Side yard setbacks**, especially when tied to wall openings are a significant constraint.
- **Rear yard soft landscaping requirements**, while justifiable from a policy standpoint, are frequently varied and difficult to achieve on constrained lots.
- Application timelines remain long with many potential sources for delays across reviewing bodies and divisions.

## 6 Recommendations

Based on a comprehensive review of zoning performance, minor variance and building permit application data, and findings from interdivisional interviews, key informant discussions with City staff, applicants, and designers, as well as public consultation, we propose the following zoning and process recommendations.

These recommendations are designed to enhance the delivery of garden suites in Toronto, while maintaining an appropriate balance for neighbourhood areas. They are structured to improve clarity, reduce the need for common variances, streamline interdepartmental coordination, and support a more integrated and accessible review process. Ultimately, they aim to improve applicant experience and increase uptake of the garden suite typology across the city.

### 6.1 Proposed Zoning By-law Amendments

#### 6.1.1 Maximum Permitted Height of an Ancillary Building Containing a Garden Suite

Increase the permitted maximum height of a garden suite from 6.0 metres to 6.3 metres.

##### **Current Regulation:**

- 150.7.60.40(1)(A) & (B) Maximum height:
  - 4.0m if within 5m of the main house
  - 6.0m if at least 7.5m from the main house

**Proposed change:** Increase maximum height to 6.3m as-of-right (subject to minimum separation distance/stepback conditions). A total of 66% of height variances would be eliminated by increasing the limit to 6.3m. This variance, applicable to both 150.7.60.40(1)(A) & (B) aligns with the average height approved at committee over the review period. Some consideration of minimum separation distance/stepback should be considered resulting from the reduction in required building separation distances introduced by O.Reg. 462/24. The increase also accommodates common roof designs and 8ft interior ceilings.

#### 6.1.2 Side Yard Setbacks

Consider introducing greater flexibility for side yard setbacks. Any amendment must carefully balance control of the Garden Suite mass across varied lot types with opportunities to provide for design options and flexibility. The City may consider accommodating door access along the side wall of a garden suite.

##### **Current Regulation:**

- 150.7.60.20(5)(A): if the side lot line does not abut a street, and there are openings such as doors or windows in the side main wall of the ancillary building, the greater of 1.5 metres and the amount that is 10 percent of the lot frontage, to a maximum of 3.0 metres

##### **Consideration for Refinement:**

Staff should explore opportunities to refine side yard setback requirements in a manner that continues to balance privacy and fire safety considerations while enabling more practical and flexible design outcomes (particularly on narrow lots).

One potential refinement could include permitting door openings without triggering the increased setback. This type of change would recognize that solid doors do not create the same privacy concerns as windows or glazed openings, and it would facilitate more functional access arrangements. In turn, this could reduce the volume of Minor Variance applications related to side yard setbacks and improve clarity for applicants and reviewers.

This amendment would permit a greater number of practical access configurations for Garden Suites, particularly on narrow lots where relief is needed and it would align with permissions for side door access for principle buildings. This amendment would also reduce the frequency of side yard variance applications and clarify interpretation.

We recognize that there are challenges to clearly implementing this through zoning as zoning is not able to clearly differentiate

permissions for solid (non-glazed) doors vs. glazed doors and windows on side walls.

### 6.1.3 Second Storey Massing

The City of Toronto is unique among Ontario municipalities in permitting two-storey massing for garden suites without lot size or other restrictions. This reflects the City's diverse lot fabric and built form patterns, which often support more substantial rear yard structures. Historically, the angular plane provision served as the primary massing control for the second storey.

However, this approach has proven challenging in practice. Variances to angular plane requirements have been frequently sought and commonly approved, suggesting that the provision may not reflect functional design needs or actual site conditions. With the removal of angular plane requirements under O. Reg. 462/24, there is an opportunity to implement a clearer, performance-based alternative that preserves neighbourhood fit while enabling functional, livable two-storey designs.

Alternative massing strategies, such as prescribed roof slopes and controlled window placement, can offer a simpler, more predictable means of regulating second-storey form. These can address privacy and overlook concerns without requiring complex interpretation or frequent minor variance applications.

**Proposed Change:** Provide performance standards focused on roof slope and window placement to provide predictable limits on massing while preserving privacy and maintain compatibility with surrounding residential forms. Permit pitched roofs with a slope consistent with base zoning. Require stepbacks of second-storey volumes beyond a set height or setback, particularly on narrow lots. In addition, optionally, limit second-storey massing within a defined vertical plane (e.g., starting at 4.0 m from grade).

### 6.1.4 Review Definitions of Landscaping and Soft Landscaping

Continue the review of the definitions of landscaping and soft landscaping in line with the City of Toronto's Growing Space report and ongoing study. We encourage staff to continue this

review and implement an expanded definition that allow for portions of permeable pedestrian walkways to be considered within soft landscaping requirements.

Soft landscaping is an important requirement in the Garden Suites By-law, aimed at preserving permeability, reducing stormwater runoff, and maintaining rear yard character – it is the 'garden' in garden suite.

Building on Council direction and the findings of the *Growing Space* report, staff should continue to explore revisions to soft landscape definitions that support permeable pedestrian walkways, enable accessible and practical rear yard access and align Garden Suites with the Laneway Suites By-law.

Additionally, the By-law could clarify acceptable materials to promote consistency with green infrastructure and tree protection goals.

## 6.2 Process Improvement Recommendations

The successful implementation of the Garden Suites By-law depends not only on zoning performance, but also on a coordinated, accessible, and transparent review process. Based on our review of applicant experiences, interdivisional interviews, and jurisdictional best practices, we propose the following process improvement recommendations:

### 6.2.1 Enhancing Application Tracking and Oversight

- **Integrated Tracking Systems:** Develop a centralized system to provide continuous oversight as applications move between divisions (Planning, Urban Forestry, Toronto Building).
- **Applicant Dashboards:** Offer real-time application status tracking, with prompts for next steps (e.g., reminder to submit building permit materials after CofA approval or to contact Urban Forestry at an appropriate stage).
- **Clear Milestone Communication:** Automate updates when an application reaches a new phase to ensure applicants are notified promptly and can respond accordingly.

### 6.2.2 Categorizing Applications by Complexity and Streamlining Review

- **As-of-Right Reviews:** Clearly define and streamline processing for as-of-right garden suites with no required variances or tree permit conflicts.
- **Moderate Complexity Pathway:** Establish a review path for applications requiring one additional process (e.g., a minor variance or tree permit) with integrated review milestones.
- **High Complexity Pathway:** Implement enhanced project management for applications involving multiple divisions or reviews to ensure interdepartmental coordination and reduce delay.

### 6.2.3 Public Education and Support Tools

- **Review Flowcharts and User Guides:** Publish simplified flowcharts outlining the steps in the garden suite application process, with time estimates and division responsibilities on the landowner, their consultants and city divisional staff.
- **Educational Web Content:** Expand online resources with examples of successful applications, common mistakes, and guidance for coordinating permit submissions.
- **Pre-Screening Options:** City staff currently provide valuable and timely feedback on inquiries from the public to those interested or curious about Garden Suites. This input is provided by Planning, Development Review and Toronto building staff. This is a vital function in ensuring members of the public have accurate information guiding their decision making. To reach more members of the public, offer (and promote) optional screening tools, including self-assessment checklists for applicants or digitally assisted review software.

### 6.2.4 Improved Interdepartmental Coordination

- **Standardized Review Protocols:** Align interpretation of key by-law terms and review criteria and develop a shared understanding of review processes between Planning, Urban Forestry, and Building staff.
- **Dedicated File Managers or Coordinators:** Explore the feasibility of a case manager role for complex garden suite applications (involving multiple divisions) to facilitate communication across divisions and provide timely prompts back to the applicant to ensure they are aware of the steps they are required to take to continue to advance through the process on complex projects.
- **Shared Review Timelines:** Establish joint internal timelines and mutual notification systems to flag when one division's review is complete, advisory notes can be sent to the applicant about their next steps and when the work of the next division can begin.

### 6.2.5 Leveraging Digital and Automated Tools

- **Evaluate AI-Based Zoning Screening Tools:** Consider the potential to pilot or adopt tools like "eCheck" used in Vancouver or proposed in Burlington to allow applicants to verify compliance before submission.
- **Consider the potential for publicly available Pre-Certified or Pre-Reviewed Designs:** Develop a library of standard, pre-approved garden suite designs with zoning compliance confirmed, reducing delays for eligible lots. Consider leveraging the CMHC Housing Design Catalogue to build this library.
- **Online Submission and Comment Portals:** Expand or integrate digital systems for uploading applications, tracking responses, and consolidating comments from multiple divisions.

These process recommendations are intended to work in tandem with proposed zoning changes, ensuring not only that the



regulations are workable, but that applicants can successfully navigate the system to deliver timely and high-quality outcomes. These changes are intended to support more effective implementation of Toronto's Garden Suites framework and foster a more transparent, coordinated process.

# Appendix - Consultation Summary

## Urban Forestry

July 29, 2024

- Parks and forestry started monitoring EHON monitoring for 6 months. This includes the tree protection strategic project which includes monitoring laneway and garden suites. Urban forestry reviews the applications and take notes. The EHON monitoring program for urban forestry looks at when permit application is received. Data is logged by: 1.) Address 1.) EHON type 2.) result status, 3.) appeal status, 4.) not specifically canopy (canopy is only logged for issued building permits), but they are not tracking length of time.

### Application Submission Experience

- **Low Application Volume:** The relatively low number of garden suite applications involving tree permits limits the ability to form a complete picture of trends and challenges.
- **Late Engagement:** Urban Forestry is often brought into the process too late, making it harder to build relationships with applicants and often resulting in additional time and costs for permit revisions. Applicants are unfamiliar with the role of Urban Forestry within their review and have not incorporated an understanding of the tree permit process within a broader view of the cost or timeline of their projects.
- **Common Requirements:** Applicants are frequently advised to conduct exploratory excavation or consider alternative construction methods (e.g., helical piles) to reduce tree impacts. These are common options but they require projects to undertake additional design with different impacts on budget.
- **Understanding of Process:** Many applicants undervalue the role of trees in the planning process and are unprepared for forestry-related requirements.
- **Comparison with Laneway Suites:** The process is generally similar, though Urban Forestry receives stronger direction to refuse tree removals for garden suites given the importance of green space and urban canopy across the City.
- **Applicant Representation:** Most applicants are represented by consultants who are generally familiar with the process, though Urban Forestry does not track this systematically.

### Processing and Timelines

- **Timeline Standards:** Standard first review timeline is 15 business days, though this varies with revisions.
- **Seasonal Delays:** Spring and summer are peak review periods; frozen ground in winter delays exploratory excavation, which typically takes one day.
- **Key Barriers:** Delays are often due to:
  - Seasonal constraints,
  - Slow applicant response times,
  - Internal staffing shortages.
- **Financial Barriers:** Potential concerns with fees, but assistant planners would have better insight.
- **Applications “Under Review”:** There is concern about the high number of tree permit applications listed as “under review” at the time of the interview. The informant noted that this may indicate process delays or unresolved issues.

# **Development Review – Assistant Planners (Committee of Adjustment)**

September 23, 2024

## **General Observations**

- Approval rates vary by ward, with higher interest and lower approvals noted in Etobicoke and limited activity in University-Rosedale and Ward 10.
- Differences between laneway and garden suite activity may be attributed to lot constraints in older parts of the city.
- Tracking of approval conditions is inconsistent, and many tree-related conditions are general in nature.
- The impact of Urban Forestry requirements is often understated until detailed review occurs.

## **Submission Experience by District**

### **Scarborough:**

- Applicants are generally informed, with architects often representing homeowners and ensuring smoother applications.
- Most applications originate from Wards 20 and 21; designs range from garage conversions to new builds.
- Zoning notices are common, and applicants typically accommodate modifications with little resistance.

### **Toronto East York:**

- In Ward 11, applicants are usually aware of requirements but often confused about through-lot conditions or whether an application qualifies as a laneway or garden suite.
- In Ward 12, consultants typically represent homeowners, though issues arise during resubmissions when notices lack clarity. Confusion persists around interactions between Toronto Buildings and the Committee of Adjustment (CofA).
- Through-lot and curb cut applications present unique challenges, sometimes requiring multiple revisions and reclassification from laneway to garden suite.

### **North York:**

- Most applicants are knowledgeable and typically apply with a zoning notice rather than a waiver, which improves processing.
- Lot sizes affect form: larger lots (Wards 16 & 17) favor new builds, while smaller lots (Ward 8) tend toward garage conversions. Ward 18 sees a mix.

### **Etobicoke:**

- Most applicants are represented by architects; City staff often recommend professional assistance.
- Zoning review delays are common due to staffing shortages and incomplete application submissions.
- Urban Forestry requirements are a key constraint; several applications had to be revised or paused due to tree protection concerns.

### **Minor Variance Processing**

- Zoning delays, especially in Etobicoke can occur as a result of applications with incomplete materials provided by applicants. Applicants are typically represented and well-advised. Application technicians are able to advise of missing information. Delays in information for zoning reviews can result in multiple iterations of submissions prior to being scheduled for a hearing.
- There is a need for clearer communication between applicants and Urban Forestry, with suggestions for establishing designated points of contact.
- In high-volume wards, issues like tree impacts are sometimes identified too late. Introducing pre-circulation of application materials (as done with consents) could flag issues earlier and streamline hearings.

### **Key Regulatory Issues**

#### **Angular Plane Requirements:**

- Compliance is often difficult, particularly in constrained downtown lots. Applicants commonly seek to maximize space, triggering variances.
- Suggestions include revising the standard 45° angular plane to 60°, provided side-lot privacy is maintained.
- Elevation drawings often lack clarity regarding angular plane penetration. Including angular plane lines and penetration extents in drawings would improve transparency and aid both zoning and CofA review.
- Garden suites face more angular plane requirements (up to four planes) compared to laneways (typically one), adding complexity.

#### **Separation Distance Requirements:**

- Variances related to separation distances for below-grade walls and egress routes are common, with conflicting interpretations between Planning (more flexible) and Toronto Buildings (stricter).
- Examples show variances being both approved and refused depending on lot conditions and available space for emergency access.

#### **Bicycle Parking:**

- There is some debate over the necessity of requiring two designated bicycle parking spaces, with questions about whether this justifies variances.

#### **Emergency Access and Addressing:**

- Emphasis placed on ensuring garden suites have clear addressability and meet emergency access standards, including directional signage.

# Industry, Designers and Architects #1

October 18, 2024

## 1. Participant Backgrounds

Attendees included planners, architects, residential designers, and researchers with expertise in garden suites, laneway housing. Participants were familiar with zoning and the Committee of Adjustment (CofA) process. Some participants were familiar with modular/prefab construction, and attendees had experience in design implementation across Toronto and other jurisdictions.

## 2. Planning & Zoning Challenges

### Inconsistent Regulations:

- Differences between laneway and garden suite by-laws create confusion, particularly around setbacks, fire access, and overall permissions.
- Discrepancies between zoning by-laws and Building Code intentions were noted, especially regarding setbacks and angular planes.

### Angular Plane Restrictions:

- Widely seen as a major barrier to feasibility - especially the 45-degree side yard angular plane.
- Suggestions included reducing or removing the angular plane requirement, or applying it only toward the main house.
- Angular planes increase costs and reduce flexibility for two-storey or prefab designs.
- Participants suggested using greater rear yard setbacks instead of angular planes to manage neighbourhood impact.

### Separation Distances:

- Separation requirements, particularly for below-grade walls and egress, are inconsistently interpreted and sometimes overly restrictive.
- Variances are commonly sought, and support from planning staff may be overruled by CoA decisions.

### Soft Landscaping Requirements:

- Current definitions limit design flexibility and are overly focused on green landscaping.
- Calls were made to allow a broader range of permeable surfaces (e.g., pavers, gravel) to meet environmental goals without compromising usability.
- Designers noted that actual implementation of soft landscaping requirements often diverges from approved plans.

## 3. Cost, Feasibility, and Financing

### Cost Barriers:

- Garden suites are often cost-prohibitive due to design limitations, development charges, and construction constraints.



- Education development charges and parkland fees add to costs, and inconsistent application of rules creates financial uncertainty.

#### **Financing Issues:**

- Lack of comparable properties hinders mortgage underwriting.
- Homeowners often only break even on investment, deterring uptake.
- Grant programs (e.g., \$80K rebate in St. Catharines through HAF) were cited as effective tools to encourage ADU development.

#### **Construction Constraints:**

- Access, servicing, and mature tree protection zones pose major logistical challenges.
- Foundations and construction methods (e.g., helical piles) must adapt to constrained lots and tree impacts.
- Prefabricated units face particular zoning hurdles due to height and angular plane requirements.

### **4. Use Cases and Social Function**

#### **Family-Oriented Housing:**

- Garden suites are often built for family members (e.g., adult children, aging parents) rather than rental income.
- Flexibility in zoning and design could help meet growing multigenerational housing needs.

#### **Neighbourhood Fit and Scale:**

- Concerns raised about over-intensification on small residential lots.
- Preference for larger-scale intensification to be directed to major streets and nodes rather than interior neighbourhoods.

#### **Neighbour Perception:**

- Community opposition and privacy concerns continue to pose obstacles, especially in tight lot configurations or high-density backyard projects.

### **5. Opportunities and Best Practices**

#### **Pre-Approved Designs:**

- Mixed opinions: While they may streamline approvals, they often fail in practice due to lot-specific constraints (e.g., tree impacts, access).
- Success depends on zoning de-risking and performance standard flexibility.

#### **Modular & Prefab Units:**

- Seen as a potential solution to lower costs and standardize construction, but are currently limited by zoning and angular plane restrictions.

#### **Soft Landscaping Innovation:**

- Permeable materials (e.g., gravel, pavers) and rooftop green spaces could help meet landscaping goals on constrained lots.

#### **Alternative ADU Typologies:**

- International examples include "junior ADUs" without kitchens, micro-condos, or conversions of existing building envelopes (e.g., garages, amenity spaces in multi-residential zones).

## **6. Policy Reform and Provincial Proposals**

### **Regulatory Alignment:**

- Greater consistency is needed between City Planning, Toronto Building, and the Committee of Adjustment.
- Performance-based standards should replace rigid regulations where appropriate.

### **Proposed Reforms:**

- Eliminate angular plane requirements.
- Reduce or simplify setbacks.
- Eliminate development charges for small-scale infill.
- Allow more flexible landscaping definitions and materials.
- Invest in transit to support reduced parking requirements.

### **Administrative Improvements:**

- Faster processing times and clearer approval pathways are essential to improving feasibility.
- Including code consultants earlier in the process was recommended to address conflicts between planning and building interpretations.

# Industry, Designers and Architects #2

October 25, 2024

## 1. Use Cases, Demand, and Feasibility

- **Multi-Generational Housing Dominates:** Most participants reported that the majority of garden suite clients build for family use (e.g., adult children, parents), not for rental income. This was especially true in suburban areas like Etobicoke and Scarborough.
- **Rental and Investment Use:** In denser parts of Toronto, clients are more focused on return on investment, but high construction and financing costs make this challenging. Many rely on refinancing the primary dwelling due to a lack of conventional financing options.
- **Challenges in Appraisal and Resale:** The lack of comparable properties makes financing and resale pricing difficult. Some clients abandon projects due to high costs or unclear value outcomes.

## 2. Regulatory Barriers and Zoning Interpretation

- **Angular Plane Restrictions:** Widely criticized as a key barrier to two-storey garden suites. Many argued for eliminating the requirement entirely or limiting it to side yards. Others supported maintaining a single side-lot angular plane as a compromise to protect neighbours.
- **Inconsistent Interpretations:** Applicants face conflicting guidance between zoning examiners, City Planning staff, and the Committee of Adjustment (CoA). This adds delays and creates uncertainty for both as-of-right and minor variance applications.
- **Urban Forestry Constraints:** Multiple participants raised concerns about rigid tree protection rules, which have led to project cancellations. While tree protection is acknowledged as important, clearer ratios or more flexible approaches were recommended.
- **Separation Between Departments:** There were calls for improved coordination or even a dedicated process or department for handling garden and laneway suites due to current inefficiencies and lack of clarity across divisions.

## 3. Financial and Administrative Barriers

- **Development Charges and Parkland Levies:** These costs were identified as a major deterrent, particularly when they are triggered across all units (e.g., a multiplex with a garden suite). Participants called for alignment between charges applied to multiplexes and secondary units.
- **Processing Delays:** Delays at Toronto Buildings and inconsistent ZAP interpretations were repeatedly cited. Issues with review timelines, unclear redlining, and extended CoA hearings further delay project delivery.
- **Permitting Innovation Needed:** The current submission process (often email-based) was seen as outdated. Participants advocated for automation, centralized digital submissions (e.g., ePLAN), and even AI-assisted review processes to streamline approvals.

## 4. Design, Construction, and Sustainability

- **Height and Massing:** Participants advocated for increasing the permitted height to 6.3 or 6.5 metres to accommodate 8-foot ceilings and mechanical systems, particularly on sloped or constrained sites.
- **Mechanical Equipment and Heat Pumps:** Height limits should not include utility equipment such as heat pumps. Allowing roof encroachments for mechanical systems was recommended.
- **Electrification and Decarbonization:** Garden suites present an opportunity to advance net-zero goals. Participants encouraged the City to prohibit fossil fuel hookups and incentivize electric heat pumps and emissions standards.
- **Soft Landscaping Definitions:** Existing rules were seen as too rigid. Recommendations included allowing permeable pavers and recognizing non-vegetative surfaces that support stormwater infiltration.
- **Prefabricated Housing Limitations:** While prefab units are seen as a potential solution, they often prove more expensive and inflexible due to lot-specific regulations and design constraints.

## 5. Innovation and Best Practices

- **As-of-Right Envelope:** Several participants advocated for clear, pre-approved volumetric envelopes to reduce discretionary review and streamline approvals.
- **Two-Unit Garden Suites:** Support was expressed for allowing two units within a single garden suite building, mirroring permissions for laneway suites in other municipalities.
- **Public Perception and Opposition:** Despite some resistance, participants reported that most neighbours accept or appreciate garden suites after construction. However, CoA decisions are increasingly deferential to public objections.
- **Provincial Direction (O. Reg 299/19):** Most participants supported the province's proposed changes and encouraged the City to move ahead with by-law reviews, regardless of pending provincial amendments.

## 6. Key Recommendations from Industry Participants

- Remove or significantly revise angular plane requirements.
- Clarify and streamline zoning interpretations, particularly around basement inclusion, height limits, and building footprint.
- Introduce clear, as-of-right design envelopes.
- Reform development charge and parkland levy structures to avoid penalizing modest infill projects.
- Improve permitting through digital submissions, automation, and coordinated interdepartmental processes.
- Align soft landscaping requirements with permeable surface options and green infrastructure goals.
- Encourage electrification and accommodate mechanical equipment via zoning flexibility.
- Enable two-unit configurations and explore the potential for garden suites to function as strata units.

# Toronto Building

November 13, 2024

## 1. Application Timelines and Review Process

- **Standard Timelines:** The internal review period for garden suites is consistent with other building permits—typically 10 to 15 business days.
- **Compliance Delays:** Delays are most often due to compliance issues, particularly related to **zoning** and **emergency access/fire protection**.
- **Screening and Intake:** Screening often flags issues such as missing fire access details (e.g., distance to hydrants or curb), requiring additional documentation or limiting distance agreements.
- **Application Quality:** Staff emphasized that better quality applications would improve efficiency. Incomplete or unclear submissions cause delays.

## 2. Key Compliance Challenges

- **Emergency Access & Fire Protection:**
  - One of the most consistent challenges.
  - Fire access, unprotected openings, and distance to hydrants often require alternative solutions (e.g., fire sprinklers or limiting distance agreements).
  - These requirements are frequently misunderstood or omitted from applicant drawings.
- **Limiting Distance Agreements:**
  - Necessary when fire access or proximity standards cannot be met.
  - Difficult to secure and a frequent source of delay.
- **Grading Plans:**
  - Required for new structures, not typically needed for existing ones, but sometimes inconsistently requested.
  - Certificates for grading must be submitted to complete the file.
- **Basement & Floor Area Interpretation:**
  - Basement space is excluded from gross floor area (GFA) calculations for garden suites and the main house.
  - However, confusion remains around inclusion in definitions and how this relates to multi-unit proposals.

## 3. Urban Forestry and Committee of Adjustment (CoA)

- **Separate Processes:** Urban Forestry review is not always integrated unless triggered by a CoA decision.
- **Conditional Reviews:** If a project goes to the CoA, Forestry will attach conditions that must be cleared before a building permit can be issued.



#### 4. Applicant Experience and Public Perception

- **Who Applies:** Most applicants are designers, not homeowners. Homeowners often underestimate the complexity of the permit process.
- **Neighbour Inquiries:** High volume of inquiries from adjacent residents about noise, parking, and perceived overuse.
- **Concerns with Multi-Unit Proposals:** Staff noted that some applications resemble rooming houses (e.g., 8 rooms), which raises life safety concerns, particularly near school zones.

#### 5. Tools, Programs, and Innovation

- **Certified Plans Program:**
  - Allows pre-reviewed building plans to be reused across multiple properties.
  - Uptake is low for garden suites due to varying lot sizes and zoning permissions.
  - More commonly used for standardized structures (e.g., portables, tents).
  - Still in development for garden suites—could reduce costs and timelines if standardized envelopes are feasible.
- **Digital Portal & Express Services:**
  - The current portal supports only limited service types (not for new buildings or additions).
  - Expansion of services and improved checklists is underway.
  - Staff support adding emergency access guidance to the City's garden suites webpage.

#### 6. Policy and Zoning Coordination

- **Disconnects in Interpretation:**
  - Differences exist between City Planning, Building, and CoA interpretations of terms like “dwelling unit” and basement inclusion.
  - Building considers garden suites to be dwelling units (for development charges), whereas Planning may define them as “living accommodations.”
- **Calls for Streamlining:**
  - Staff suggested aligning zoning and OBC requirements where possible (e.g., setbacks related to access vs. fire protection).
  - Improvements could be made through better communication between departments and clearer public-facing materials.

#### 7. Recommendations from Staff

- **Improve Communication:** Expand website content with better public guidance on fire access, space requirements, and checklists.
- **Support Alternative Compliance:** Broaden acceptance of solutions like fire sprinklers and certified plans where appropriate.

- **Encourage Better Applications:** Emphasize quality submissions and early coordination to reduce resubmissions and delays.
- **Clarify Definitions:** Resolve inconsistencies in terminology and compliance expectations between zoning and building code frameworks.
- **Evaluate Dedicated Process Stream:** Consider a more streamlined or specialized review path for garden and laneway suites to improve overall efficiency.

# Community Consultation Meeting #1: Residents' Associations and Grassroots Organizations

March 19, 2025

Virtual consultation. Short presentation by GPA and City Staff followed by Q & A and an open discussion with participants.

Attended by 11 participants.

City staff and planning consultants presented preliminary findings from the monitoring process and responded to a wide range of questions regarding zoning, the Committee of Adjustment process, tree protection, and the implementation of Ontario Regulation 462/24.

## Key Themes Raised:

- **Concerns with Variances and Oversight:** Participants had limited experience with Garden Suites. Some expressed strong concerns with variances in general, feeling that they were being too readily approved at the Committee of Adjustment. Several comments suggested that cumulative approvals may be impacting privacy and neighbourhood character.
- **Tree Protection and Urban Forestry:** Attendees expressed skepticism about tree removal data and concerns about enforcement. While the City reported that no healthy trees had been removed in connection with approved garden suites, participants noted broader issues with non-compliant removals and lack of follow-up on enforcement, especially in Scarborough. Participants acknowledged that these concerns regarding tree removals were not necessarily related to Garden Suites but voiced concerns about variances requiring tree removals or non-compliant removals not associated with variance applications. Attendees were pleased to learn about the focus on urban canopy and tree protection as part of the Garden Suites program.
- **Neighbourhood Context and Infrastructure:** Participants from South Etobicoke and Scarborough raised issues about stormwater, water pressure, and the impact of garden suites on aging infrastructure. Some noted that not all areas have strong public transit or street parking options, complicating assumptions about car-free living.
- **Enforcement and Compliance:** A recurring concern was the City's ability to monitor and enforce compliance post-approval. Residents cited cases of developers submitting different plans post-permit and raised questions about oversight to prevent illegal rooming houses or overbuilding. Participants acknowledged that these concerns were not necessarily associated with Garden Suites projects.
- **Equity and Tenure:** While some participants acknowledged the potential of garden suites to support multi-generational living and housing affordability, others cautioned that without safeguards, they risk being used primarily as speculative investments.
- **Diverse Perspectives on the Policy's Merits:** While some attendees were skeptical or critical of the policy's impacts, others noted that garden suites could offer necessary flexibility for families, aging in place, or increasing housing options if well managed.

## **Community Meeting #2: City-wide CCM**

March 25, 2025

Virtual consultation. Short presentation by GPA and City Staff followed by text and virtual Q & A session.

Attended by over 70 participants.

On March 25, 2025, City Planning hosted a virtual city-wide Community Consultation Meeting (CCM) to present interim findings of the Garden Suites Monitoring Review and to gather public feedback on the City's approach to garden suites. The meeting was attended by over 70 participants from across Toronto.

The meeting included a presentation by City Planning staff and consultants, followed by a facilitated Q&A session. Over 80 questions were submitted through the virtual Q&A platform, highlighting a wide spectrum of concerns, perspectives, and suggestions. Several attendees were residents in the area of Craven and Parkmount Road for which additional consultation and engagement is ongoing.

Below is a summary of the key themes raised:

### **Design and Policy Concerns**

- Several participants expressed concern about garden suite dimensions on typical lots, particularly on through lots or in older neighbourhoods with narrow lot patterns.
- Several comments urged the City to re-evaluate angular plane removal and recommended maintaining or introducing stronger massing and privacy controls, especially on lots adjacent to other dwellings.
- Clarification was sought around differences between laneway and garden suites. Some comments were made to harmonize the zoning rules between the two typologies.

### **Tree Protection and Environmental Impact**

- A recurring issue raised was the removal of mature trees—both legally and illegally—in advance of or during garden suite development. Residents voiced concern that enforcement was weak and that fines for infractions were insufficient.
- Several comments suggested that even when tree injury permits are denied, unpermitted removals occur without consequence. There was strong public support for increased monitoring, stronger enforcement, and higher penalties.

### **Equity, Tenure, and Housing Use**

- Questions were raised about how garden suites are being used in practice—whether as rental housing, family dwellings, or other forms of occupancy. Some expressed skepticism about their contribution to affordable housing given current costs of construction and examples of high-end listings.
- Concerns were also raised about the potential use of garden suites as short-term rentals or as multi-unit dwellings outside permitted zoning.

### **Infrastructure and Servicing**

- Some residents noted concerns about existing infrastructure capacity—particularly water, sewage, and stormwater systems—and questioned whether intensification via garden suites was being adequately coordinated with servicing capacity.
- Others noted that City data should be kept more current to reflect the pace of applications and approval trends in areas like Scarborough.

### **Process, Transparency, and Enforcement**

- Many participants sought greater transparency in the City's monitoring, approval, and enforcement processes. Questions included how the City ensures post-construction compliance, how decisions are made about variances, and whether complaints are tracked or responded to.
- Several participants requested that the Q&A from the meeting be made publicly available and that staff commit to ongoing consultation and the release of draft proposals in advance of reporting to Council.

### **Support for Implementation Improvements**

- Some attendees expressed support for standardizing designs or offering pre-approved plans to reduce complexity, drawing on examples from other municipalities like Mississauga.
- There was interest in process modernization, including clearer communication with applicants and neighbours, better enforcement coordination, and increased support for applicants pursuing compliant projects.

### **Conclusion**

The March 25, 2025 CCM underscored the continued interest and concern among residents about the Garden Suites By-law.

While there is general support for the policy's intent to provide flexible and gentle housing options, the meeting highlighted concerns about scale, enforcement, neighbourhood fit, and environmental/open space protections.