



July 15, 2025

Planning and Housing Committee

City of Toronto
100 Queen Street West
Toronto, ON, M5H 2N2

Attention: Planning and Housing Committee, Council of the City of Toronto

**RE: Expanding Housing Options in Neighbourhoods
Garden Suites Monitoring Program
PH23.1**

We are writing in response to proposed changes to the City of Toronto's permissions for garden suites through the Garden Suite Monitoring Program and the associated City-initiated Official Plan and Zoning By-law Amendment.

The Biglieri Group (TBG) is a land-use planning consulting firm of Urban Planners, Urban Designers, and Heritage Professionals. We work with landowners, builders and developers who are active in Expanding Housing Options in Neighbourhoods through the development of garden and laneway suites, multiplexes, and multi-family apartment buildings on Major Streets.

TBG supports proposed changes to performance standards guiding the garden suite built form, including increasing maximum height permission to 6.3 metres, eliminating the requirement for angular plane (in line with O. Reg. 462/24), and providing clarity regarding permitted lot coverage. Based on our experience supporting clients through garden suite development, we offer the following suggestions for Planning and Housing Committee to consider as you plan for the future of this built form.

1. Do not increase required minimum rear yard setback

We respectfully disagree with the City's proposed amendment to increase the minimum rear yard setback for garden suites from 1.5 metres to 3.0 metres in cases where second-storey openings are included. In our view, this change would discourage the inclusion of second-storey windows on the rear wall of garden suites, as the additional 1.5-metre rear yard setback will often not be feasible on residential lots. In many cases, increasing the setback would result in an encroachment into the required separation distance between the garden suite and the principal dwelling, undermining compliance with existing regulations. Moreover, the proposed increase would reduce the usable amenity space in the yard, negatively impacting livability and the overall function of the lot.

We urge the City to consider whether the marginal reduction in overlook into neighbouring properties justifies more significant design and livability constraints for future residents. In our

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opinion, enabling a second-storey bedroom to have a window – providing access to daylight and ventilation – should take precedence.

2. Reduce separation distance for two-storey garden suites

We recommend that the City adopt a consistent 5.0 metre minimum separation distance between two-storey garden suites and principal buildings across all neighbourhoods. While we understand the City's intent to limit the massing of garden suites, it is important to recognize that other zoning regulations, such as limits to gross floor area, rear and side yard setbacks, lot coverage, and landscaped open space already work together to control building size and impact. This separation standard should especially be relaxed when the principal building and garden suite are designed and constructed together, as doing so allows for integrated designs that fit cohesively on a lot. Greater flexibility in separation distance enables more efficient and functional interior layouts, resulting in more livable homes. In our opinion, a 5.0 metre setback still provides ample space for landscaping and outdoor amenity while enabling better design outcomes and improved housing options.

CONCLUSION

TBG commends the City on their work to expand permissions to enable more housing in existing neighbourhoods. We are pleased to support clients in the development of garden suites and appreciate the opportunity to share feedback about garden suite standards.

Best regards,
The Biglieri Group Ltd.

A handwritten signature in dark ink, appearing to read 'R. McQuillan', with a stylized flourish at the end.

Robert McQuillan, MPI, BCom | Planner