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PH23.1 Expanding Housing Options in Neighbourhoods – Garden Suites Monitoring Program – Final Report

Dear Garden Suite Review Team, Councillor Perks, Chair and Members of the Planning and Housing Committee

July 14, 2025

I read through the 70 page consultant report and the final 34 page report on garden suites. Overall I felt there was a lot of integrity in the review and wanted to applaud the staff for the hard work they did to come up with their thought processes. I attended many of the public consultations and see that many of my concerns are voiced in the final report. Thank you for not ignoring me. I am simply a resident and the awareness that when I speak up, somebody listens, means a lot to me. Many implementation challenges remain unsolved. I don't agree with all the decisions, but did want to acknowledge that this was no easy task.

The review team brought together architects, planners, construction experts, builders, applicants, residents, building department and tried to acknowledge all their concerns.

Two years ago, Geoff Kettel suggested that simply looking at what variances were approved when Applicants went to the Committee of Adjustment, and then folding those approvals into amended garden suite guidelines would not give the original intent of the garden suite initiative justice. However, in essence, that is exactly what happened.

Some of the larger implementation challenges that industry and planning experts have brought to the table remain unsolved. I hope, as the reviewers continue to monitor this program, some of the solutions for causing delays will be monitored. They are the true causes of delays and not the need for variances at the Committee of Adjustment – which in fact, gives neighbours an opportunity to have a say in what happens on their street.

I hope that the amended emergency access and fire protection issues have been addressed by incorporating feedback from the frontline firefighters and EMS workers themselves. It is well and good when 'top down' suggestions are difficult to implement, because they suit the politics of the day. Will 90 meter fire access with sprinklers in situ do the trick if there is a fire in a garden suite in some of Toronto's denser neighbourhoods? Why are "minimum fire safety standards" the new norm instead of "best practice safety standards".

- Building says that emergency access and fire protection is one of the most consistent challenges. These requirements are frequently misunderstood or omitted from applicant drawings.
- Distance agreements have to be limited when fire access or proximity standards cannot be met

The online digital application process appears to bring clarity for Applicants. Hopefully some of the delays caused by lack of communication between departments will be resolved.

Some applications resemble rooming houses (8 rooms) which raises life safety concerns, particularly near school zones. The landlord and tenant board is so backed up and dysfunctional that it needs improving if it is going to be able to deal with the rental issues that arise if garden suites are being used as private rentals. If garden suites are primarily going to be used to age in place, then accessibility issues need to be properly addressed for the seniors who will be using them. Concerns remain about how the City plans to protect privacy and manage noise impacts for existing neighbours.

- Existing electrical service often lacks sufficient amperage. Increasing demand due to sustainability features like EV charging, induction stoves, and electric furnaces needed upgrades to 200 amps. For three units plus a garden suite, a 400 amp – electrical service is needed. Upgrading may require installing a transformer on a pole costing around \$50,000.
- Residents noted concerns about infrastructure capacity – particularly water, sewage and stormwater systems and questioned whether intensification via garden suites was being adequately coordinated with servicing capacity, particularly given the fourplex and Avenue builds that were concurrently being approved.
- Plumbing access costs can be high, especially if connection to adjacent lines is difficult.

There is a note in the final report that

- Rear yard access creates construction challenges for transporting materials and equipment. What will happen on through-lots where a tiny street becomes a permanent construction zone because garages are being transformed into 1200 square foot homes, twice the size of the tiny homes on our street, that they loom over?
- Garden suites typically cost \$200 - \$300 per square foot, with total costs ranging from \$400K - \$500K. This is certainly not affordable housing, when the main residence is already in the price range of 1.2 – 2.5 million dollars. This is not for the average citizen but well pocketed families will be able to afford this.
- If garden suites are supposed to enable low carbon transportation choices such as walking, cycling and public transport – a tracking system needs to be in place showing how many garden suite users own and use cars. The idea is great but in practicality you cannot decide for someone whether they own or use a car. If they do, then it simply becomes a parking issue in an already congested city that is losing its trees.

The mitigation of resident concerns have not been concretely addressed with actionable initiatives. How will our tiny street, 15 feet wide, absorb water and sewage issues that come up when the Danforth, Gerrard, Dundas and Queen build 6 to 12 storey buildings, 4 plexes sprout up within the

neighbourhood because they are allowed, and garden suites are now exceeding the size of 70% of the homes on my street.

I am encouraged that Toronto Water Staff are evaluating the cumulative impacts of all residential infill projects in Neighbourhoods, including garden suites, on stormwater management. When will that 'later date be' that we can expect this very important report back?

Wouldn't it make sense for certain city upgrades to proceed PRIOR to the increase in housing in certain of Toronto's neighbourhoods, that will overtax the water/waste/storm management system.

Why does the Building Code still not allow trees to be protected, and instead, Urban Forestry, an underfunded department, only levies \$850 fines for illegal tree cuts making way for garden suites? It is encouraging that there might be an initiative whereby two trees are planted for every garden suite built – but these are not garden suite site specific, leaving many neighbourhoods with swaths of tree dearth corridors.

Where is the motion we should be passing through Council saying that "Whenever a tree has been illegally removed to make way for a garden suite, then the garden suite will not be approved"? Why are trees under 30 cm in diameter, which make up 88% of Toronto's trees, still allowed to be removed without a permit? The new application portal could easily START with an urban forestry and environmental assessment link, putting the issue of tree preservation and green landscaping first in the lineup, rather than last.

We were told by Kamal Gogna, Acting Chief Building Official and Executive Director that although a customer might be told about the tree bylaw; through the building permit process **–it's not applicable law**. He stated that "A building permit is something that must be issued if it complies with the building code, so we do collect the declaration form; it's forwarded on to forestry but that's the extent that we're able to enforce it."

Challenges still remain associated with working through the tree protection and permit process.

I hope, that as Toronto tries to solve it's housing crisis, and the many EHON initiatives continue to be set in motion, that you continue to listen to the little guy. The little guy, who lives on a tiny street, that has a tiny voice, in a big city. I thank you for listening to my concerns and hope that people from WATER, WASTE MANAGEMENT and URBAN FORESTRY keep on speaking up, when these initiatives are rolled out.

Claudia Aenishanslin, Toronto