



Planning and Housing Committee

July 15, 2025

Re: Expanding Housing Options in Neighbourhoods – Garden Suites Monitoring Program – Final Report

Dear Committee Members

The new vision through Chapter 1 of the Official Plan seeks to apply a climate change lens to all aspects of planning and ensure the City is becoming resilient and adaptable to the future impacts of a changing climate.

This letter requests that this Committee not accept the proposed amendments in this report when it comes to increasing height, increasing massing of the second storey, reducing rear yard soft landscaping and room for trees. The changes proposed in this Report fail to align with this vision in the following areas.

1. There is no data or evidence in this report that any of the Garden Suites that have received building permits have resulted in affordable housing.
2. Although the report states that a key objective is to protect and enhance the urban forest by providing suitable growing environments for trees and increasing tree canopy coverage and diversity there is no data or evidence provided in this report to show that this is being achieved when it comes to Garden Suites

Issues with the Proposed Amendments in this Report

1. The height of Garden Suites should be lowered, not increased. Limiting the height of Garden Suites to one storey would address a lot of the concerns heard during the public consultations and that are not reflected in this report. The location of Garden Suites are typically in the growing space for trees, unlike Laneway suites that are located where garages already exist.
2. This report should be deferred until the strategies to protect and enhance the city's tree canopy while also supporting infill housing are before Council. There needs to be sufficient soft landscaping on site to preserve the existing trees and if no trees exist plant new trees. Allowing payment for planting trees elsewhere in the city does not provide the benefits to the existing and new residents on the intensified property.
3. Increasing the size of Garden Suites before Toronto Water staff evaluate the cumulative impacts of all residential infill projects in Neighbourhoods on stormwater management is premature. In Neighbourhoods, such as Long Branch, where there are a number of buried streams that already contribute to flooding this is particularly problematic.
4. Insufficient analysis has been provided on the impact of Garden Suites on the tree canopy

Tree Protection and Garden Suite Permit Applications

Toronto Building reports on 812 building permits for Garden Suites through to May 2025, yet this report only analyzes data on 568 sites to the end of 2024 on the impact of Garden Suite applications on trees. This means that this report is missing an analysis of 30% of the building permits (244 building permits). This is now July. Surely more current data could have been provided.

143 of the 568 sites (25%) requested tree injury and/or removal. This apparently included sites with multiple permits at one location for tree injury and/or removal. 76 tree removals and 108 tree injuries were authorized across 88 different sites. This is almost a 1:1 protected size tree removal for every Garden Suite application. There is no data provided whether trees were even planted on site for each of these tree removals / injuries.

There is also no analysis as to how many of the 108 trees that were injured survived so that number may very well be much higher. In our experience, mature trees that are injured take a number of years to fully show the negative impacts of their injuries due to construction.

55 sites (almost 40%) were still being reviewed, revised, withdrawn or permit refused. No details are provided as to how many fell under each of these categories.

I attended the Community Consultations in March and heard residents' concerns regarding the size and massing of garden suites and the overlook privacy concerns with two storey garden suites. The proposed amendments in this report do not address the concerns raised by those experiencing the negative impacts of Garden Suites and will actually make them worse due to the increased heights proposed, increased 2nd storey massing and removal of the angular planes. All of which will further impact tree canopy.

Removing the ability to have second storeys and basements would be a positive step forward to making Garden Suites more compatible in Neighbourhoods. And would make them actually better align with the photos shown by City Staff during the consultations.

Sincerely,



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