



**MORE NEIGHBOURS  
TORONTO**

Dear Members of Toronto and East York Community Council,

**Re: TE26.6 - Zoning By-law Amendment for Garden Suites on Parkmount Road Facing Craven Road - Final Report**

***About More Neighbours Toronto***

[More Neighbours Toronto](#) is a volunteer-led organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that has dominated Toronto's politics, created an affordability crisis, and cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

***Position***

**More Neighbours Toronto opposes the proposed Zoning By-law Amendment to create a new exception which requires increased restrictions on garden suites abutting Craven Road.**

We thank City Planning and Development Review staff for their thorough work in organizing and managing the public consultations and preparing the background information for this item. The section on the history of development along Craven Road was especially interesting.

However, we are confused by the staff recommendation for an exception to the Zoning By-law for garden suites abutting Craven Road.

In the section of the report on Impacts and Issues raised, staff note that none of the concerns commonly raised, including stormwater management, solid waste, parking, fire access, and tree protection would be a unique concern along Craven Road that would justify an exception to the generally applicable By-laws for garden suites. Nevertheless, staff recommend an exception for Craven Road.

Staff have recommended an increase of 1.1 m in the rear setback for new garden suites abutting Craven Road. They have not proposed any offsetting measures that might preserve the allowed size of a garden suite such as reducing the required minimum separation distance between the main building and the garden suite by 1.1 m. This therefore reduces the permitted size of new garden suites abutting Craven Road, which makes them less viable as homes and

less likely to be built. An exemption such as this to reduce permissions below general City wide rules should have a strong justification.

The section on the recommended increase to the rear setbacks of garden suites does not provide any real explanation for that recommendation. It states that 2.6 m is equal to the average front yard setback on Craven Road, that increasing the setback would result in a distance which is consistent with the minimum facing proposed in the City's Townhouse and Low-rise Apartment design guidelines, and 11.0 is consistent with the facing distance between houses on other narrow streets.

These are facts, they are not reasons. Staff do not explain why having a garden suite with a setback equal to a front yard setback across the street is good or consistent with City policies. Garden suites are not townhouses or low-rise apartments, so it is not clear why guidelines which apply to those building types should be implemented as a By-law which applies to garden suites. And given, as noted several times throughout the report, that Craven Road is unique, it is not clear why the facing distances of houses on other narrow streets should apply to garden suites.

Staff note that rear yard setbacks for garden suites are important to address privacy issues but they do not state what type of privacy issue is created by having a 2 storey building across the street. That creates no more of a privacy concern than the sidewalk out front. The facing distance between the houses on Craven Road and potential garden suites would be no different than distance to the existing garages and sheds. It would also be similar to the distance between laneway houses which face each other, which are allowed City wide. There is no privacy concern along Craven Road that would be addressed with an additional 1.1 m setback.

In the section on Analysis of Other Through Street Lots, staff note that some streets were removed from their analysis because "garden suites already exist as part of the built form". But these are exactly the type of streets that should have been included in the analysis. They would show what expanded housing options along Craven Road would look like.

When proposing area specific exemptions, it is crucial that staff present clear objective reasons for their recommendations. To do otherwise gives the impression that the recommendations were arbitrary. We understand that the request to review garden suite permissions, and specifically setbacks, came from an item raised by the local Councillor. This places staff in a difficult position with significant pressure to defer to the wishes of the local Councillor. We suppose the local Councillor and outspoken residents are within their rights to request staff study arbitrary exemptions to the Zoning By-law, but it should not be the expectation that staff will endorse these exemptions.

We urge Community Council to reject this proposed amendment to the Zoning By-law. There is no good reason why Craven Road needs an exemption to the generally applicable By-laws for garden suites. Approving area specific exemptions to add additional restrictions without clear reasons will encourage yet more requests for site specific exemptions. Each of these

exemptions undermines the goals and effectiveness of the Expanded Housing Options in Neighbourhoods initiative.

Given the ongoing housing crisis, City Council has an obligation to the people of Toronto to make it easier and cheaper to build housing. Council should not be spending its time or staff's time on attempts to make it harder.

Regards,  
Damien Moule,  
More Neighbours Toronto