

From: [William Roberts](#)
To: [Planning and Housing](#)
Subject: [External Sender] My comments for 2025.PH26.2 on December 3, 2025 Planning and Housing Committee
Date: November 28, 2025 12:29:29 PM

Yours truly

William H. Roberts

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To the City Clerk:

Please add my comments to the agenda for the December 3, 2025 Planning and Housing Committee meeting on item 2025.PH26.2, Growing Space for Trees: Protecting and Enhancing the Tree Canopy While Supporting Infill Housing and Addressing Concerns with Iceberg Homes - Recommendation Report

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

Comments:

More formal comments will follow. The Swansea Area Ratepayers Association and the Swansea Area Ratepayers Association (SARA/SARG) support the amendments.

SARA/SARG where instrumental in the development of the Ravine Control By-law in the late 70s and 80s in the former City of Toronto, along with the former City of Toronto Private Tree By-law.

We view these amendments are critical to ensuring that Toronto remains a City within a Park, dealing with climate change, reducing the heat island effect and maintaining the amenity of neighbourhoods.

There appears to be a pattern of one car garages being replaced by two car garages with the garden suite" on top of the garage. The result is the paving over of the back yard to access the second spot. The result of this is the garden suite and secondarily the laneway suite are not accessible since the suite is not a grade.

RECOMMEND

1. Planning and Housing adopt the Official Plan amendments and proposed zoning amendments.
2. Direct Planning to review and study the impact of the expansion of single car garages to two car garages the soft landscaping.

Yours Truly,

William H. Roberts
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SWANSEA AREA RATEPAYERS' ASSOCIATION

&

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2 December, 2025

To: The Chair and Members of
The Planning & Housing Committee

e-mail: phc@toronto.ca

Re: 2025.PH26.2 – Growing Space for Trees: Protecting and Enhancing the Tree Canopy
While Supporting Infill Housing and Addressing Concerns with Iceberg Homes –
Recommendation Report

This is a more detailed analysis than in the e-mail already sent on behalf of the Swansea Area Ratepayers Association (SARA) and the Swansea Area Ratepayers Group (SARG). We support the Official Plan Amendments and the proposed By-law Amendments, as necessary to support expansion of the tree canopy for environmental reasons such as reducing the green house effect, the heat island effect and the absorption of carbon.

SARA/SARG has seen applications where a one car garage was replaced by a two car garage with a wider driveway leading to the new two car garage with a laneway suite or a garden suite on the second level. There was one example in the Parkside area where we supported the neighbours opposing the two car garage and drive way because one of the neighbours was a member of the Swansea Horticultural Society and it was one of the first applications. We pointed out to the Committee about the reduction of soft landscaping because of the new second car garage which was reduced to less than 20% with the application. The Committee listened and directed the Applicant to go out and see if they could get closer to the 50% requirement. They did but it was still well below the 50% requirement. Had these policies been in place, SARA/SARG would have had a stronger argument.

SARA/SARG also supports making it clear that interlocking brick and pools are not soft landscaping. Far too often the expansion of the driveway widths has been supported by Applicants saying interlocking brick is permeable and of similar effect to soft landscaping. Far too often the Committee of Adjustment and TLAB has accepted this argument.

In fact interlocking brick can have a more significant impact than asphalt or cement driveways in terms of the level of compaction. Depending on the soil conditions, the ground must be dug out between 18 and 24 inches. Then gravel in 6 to 8 inch level are put into the hole and then a compactor is used to compact the gravel until it is rock hard. This is repeated until the gravel is within 3 to 4 inches. Scree tings are placed down and then the interlocking brick,. All this will have a significant impact of fine and large tree roots.

SARA/SARG is aware of one example where the sub basement was to be under a newly constructed house traveling under the ground to and under the garage/laneway suite. The Committee turned it down. The Applicant came back with a reduced sub basement .45 m from the garage/laneway suite. The Committee turned it down the Applicant appealed to the TLAB. In preparation for the hearing the Neighbours became aware of these policies and they proved useful in having the Applicant not extend the basement beyond 19 m.

SARA/SARG supported Ravine Control and Private Tree By-laws in the late 70s and into the 80s when these were developed by the former City of Toronto. We did so to protect trees and to ensure slope stability.

SARA/SARG is aware of other applications to the Committee where garages are expanded from one to two cars, or where there were no garages the replacement of the garden shed with a one or two car garage and the garden or laneway suite above.

On a different note on larger lots, SARA/SARG is aware of applicants producing minimal secondary suites so the Applicant can avoid FSI and have as of right the 19m depth. We have seen examples where the secondary suite is around 20 to 30% but the private detached house is now classified as a duplex and therefore a multiplex. To be a duplex there should be two units of almost equal size or at least one not less than 40% of the mass.

SARA/SARG recommends:

1. Planning and Housing support the proposed Official Plan Amendments and the Zoning By-law Amendments.
2. Secondly we request that your Committee direct staff to look at the impacts of the replacement of garden sheds or one car garages with large or two car garages with pavement reducing the amount of potential soft landscaping from what did exist.
3. Thirdly that the Committee direct staff to examine the impacts of classifying a detached house with a small secondary suite as a duplex thereby using this as a loophole to create a large house.

It is my intention to make a virtual submission.

Thank you for considering our submission.

Yours truly,

William H. Roberts

William H. Roberts, LLB
director