

June 25, 2020

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Dear Allison and David,

On behalf of the 62,000 REALTOR® Members of the Toronto Regional Real Estate Board (TRREB), I am writing to provide input on the “Garden + Suites” consultations. We participated in the City of Toronto’s recent public consultations, and appreciated the subsequent opportunity to further discuss this important issue when you met with TRREB’s Housing Affordability Sub-Committee.

We welcome the City’s initiative to allow garden suites as of right city-wide. We believe that this, in addition to other programs within the broader Expanding Housing Options in Neighbourhoods (EHON) initiative, will help with the increasingly acute housing supply and affordability challenges faced by residents in Toronto.

Focus on Housing Affordability and Supply

Facilitating broader market-based ownership housing affordability and more affordable market-based rental supply should be a primary objective of the garden suites initiative. Housing affordability is a particularly serious challenge in Toronto. With this in mind, the following benefits, for both ownership and rental housing, of garden suites should be considered:

- If a garden suite is offered into the rental market, it has the potential to be *relatively more* affordable than the average purpose-built rental suite or a comparably sized condominium unit.
- One of the largest obstacles to market-based housing affordability is *high land value acquisition costs*. Garden suites offer a way for homeowners to provide rental housing supply without incurring such costs, since they have already been incurred and are “*sunk*”.
- Garden suites can allow a broader option of lifestyle choices, compared to a basement secondary suite.

- As an added benefit, future home buyers also benefit from being able to borrow against the equity in the garden suite, and so it helps facilitate future homeownership as well.

Encourage Scalable Solutions for High Uptake

We believe the number of units created and the speed of development will be a key factor in determining if city affordability and supply constraints are overcome, or at the very least alleviated. If development doesn't occur, or occurs too slowly or in insufficient numbers, then there is unlikely to be any meaningful impact on supply or on affordability. There are some steps that the City can take to facilitate this. These include the following:

- Ensure that garden suites are in fact **made as of right city-wide as intended**, and not just in specific parts of the city.
- Set the **as of right parameters as broadly and flexibly** as possible in order to help homeowners move forward with creation of a garden suite expeditiously.
- Potentially consider permitting **a broad category of uses in garden suites**, including home office, home schooling, home gym, rental unit, family coach house, as well as for non-residential uses, such as light office/commercial.
- Potentially consider **minor variance applications to be fast tracked**, and applications that are made to increase rental supply to be fast tracked as a minor variance for homeowners who have lots which "aren't standard" or which fall outside of the norm for some reason and therefore cannot be permitted as of right.

Avoid Unintended Consequences

Ultimately the City is embarking on this process to facilitate supply and supply choice/mix. It must ensure that its processes and requirements don't unintentionally and unnecessarily get in the way of this objective.

- **Sustainability** – There is a risk for instance that the *requirements for sustainability*, while environmentally beneficial, may result in increased costs that in turn deter a homeowner from creating additional rental supply via provision of a garden suite.
 - Cost/benefit analysis should be done in advance by the City in cooperation with the development industry and the as of right permissions should be designed to minimize homeowner costs and facilitate supply at reasonable cost.

- *Certain desirable goals, such as sustainability, should perhaps be incentivized rather than required for the purpose of this program.*
 - Where existing or new programs are in place (e.g., the recently announced federal budget retrofit program), these *should be promoted* by the City to increase user adoption.
 - Sustainability requirements for garden suites could be phased in over time, after units have been built and after homeowners have had the ability to benefit from the rental stream – perhaps when renovations are required.
 - It is important to consider that any new garden suite will be constructed to today's building code, which is inherently better than what may have existed when the main house was constructed. The suite will also be smaller and less costly to heat and cool in comparison to the main home. These inherent benefits should be weighed against more costly requirements.
- **Parking** – There is also *a risk that parking requirements, if too onerous, can prevent the construction of a garden suite.* This should be avoided. Parking may legitimately be needed by a garden suite inhabitant, and in such cases, the City should find creative ways to enable that. Some suggestions for consideration include:
- Providing a homeowner more flexibility as of right in how they can use the front garden area of their home – it may be feasible to trim back some of the front lawn to permit an additional parking space in the front yard.
 - Giving consideration to allowing a garden suite owner to use the right of way (or boulevard or road verge) between the sidewalk and the road for overnight parking with a permit.
 - Enabling street parking with a permit.
 - Allowing nearby city owned property to be used for overnight parking with a permit.
 - Allowing modification to the rear of existing garages to build a tandem parking space or carport addition (either in front or at the back) as of right.

- Allowing parking lifts.
- The City could set specifications for garden suite cars (e.g., electric only, or up to a certain size only) to reduce visual impacts while still permitting car use.

Consider Innovative Approaches

As the City embarks on this initiative, it is important to consider innovative approaches in order to provide a supportive framework that will be conducive to ensure a successful program.

- *Ensure that **modular, prefabricated and tiny homes** are considered up front as part of the as of right permission structure. Such housing has environmental, cost and noise benefits, since construction can occur off-site. Furthermore, they can be preconfigured in a standardized fashion to meet city requirements, thereby further reducing the costs of providing a garden suite to a homeowner and potentially stimulating uptake.*
- Give consideration to *allowing **garden suites with basements***, where appropriate, to encourage family-friendly units.
- Similarly, the City should give consideration to enabling ***two-storey garden suites as of right*** in two-storey neighbourhoods, where appropriate.

Ensure Broad and Flexible Parameters

When determining the parameters that will be used to determine the as of right requirements for garden suites, we encourage the City to consider existing and planned infrastructure as well as existing and planned density. Elements to consider in the process could include the following:

- Walkable access of the neighbourhood to existing (and planned) higher order (or rapid) transit.
- Walkable access of the neighbourhood to cultural and other amenities, as well as schools, hospitals, libraries, shopping, etc.
- Proximity to places of employment.

I hope you will find TRREB's views helpful. Garden suites can contribute to the diversity of housing stock in neighbourhoods and provide additional housing options for existing homeowners while also helping to alleviate housing affordability and rental supply challenges.

We look forward to continuing to work with the City on this important initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Patel". The signature is fluid and cursive, with the first name "Lisa" written in a larger, more prominent script than the last name "Patel".

Lisa Patel
President