

March 9, 2026

Via Email to: [mbrennan@raic.org](mailto:mbrennan@raic.org)

To: Mike Brennan, Chief Executive Officer, Royal Architectural Institute of Canada  
Silvio Baldassarra, B.Arch, OAA, FRAIC, Chair, RAIC Advisors to Professional  
Practice (RAPP)

From: Kamal Gogna, P. Eng., Chief Building Official and Executive Director,  
Toronto Building Division

**Re: City of Toronto Response Letter Regarding Pre-Approved Designs**

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Dear Mr. Brennan and Mr. Baldassarra,

Thank you for your letter to Her Worship, Olivia Chow Mayor of Toronto, dated September 29, 2025, outlining the Royal Architectural Institute of Canada's (RAIC) feedback regarding the City of Toronto's Pre-Approved Garden and Laneway Suites Plans program.

We appreciated the RAIC's engagement on this matter and your organization's commitment to advancing high quality, safe, and sustainable housing solutions. As the Chief Building Official and Executive Director, Toronto Building, I am writing to provide you with clarity on the intent and objectives of the program and address some of the concerns identified in the letter. I can also share with you that Toronto Building is proceeding, in response to Toronto City Council direction, to expand the program to include multiplexes in the pre-approved Garden and Laneway Suite Plans program. We appreciate the RAIC's engagement quality, safe, and sustainable housing solutions.

The City shares your goal of delivering housing solutions that are safe, efficient, and contextually sensitive to Toronto. Our Pre-Approved Plans initiative is one component of a broader strategy to streamline small scale residential development, support expanded housing options in neighbourhoods, and provide more certainty for residents applying for a building permit, while maintaining the high standards of safety and compliance required by the Ontario Building Code. The pre-approved plans (for garden and laneway suites) have undergone a review for compliance with the Ontario Building Code and the City's zoning bylaw as they relate specifically to the building design.

## Pre-Approved Designs Program

As the program [webpage](#) states, permit applicants must still undergo site specific review to verify that the garden or laneway suite is appropriate for the particular lot and context (e.g., matters such as setbacks and lot grading). While the preapproved drawings can reduce design stage uncertainty, they do not eliminate the need for professional involvement, nor do they replace the important role of architects and other qualified design professionals in many projects.

It is important to note that the program has been designed to function within the legal framework of the *Building Code Act, 1992* and the Ontario Building Code. A homeowner is permitted under provincial legislation to take full responsibility for the pre-approved garden and laneway suite designs as part of their building permit application. While architects are not required through legislation for designs of this scale, homeowners may still choose to engage a qualified professional — such as a BCIN qualified designer, architect, or professional engineer — to support site specific considerations, create a site plan, address code and zoning issues unique to the lot, or provide additional design and construction expertise. This approach ensures that residents can select the level of professional support appropriate for the complexity of their project.

Homeowners also have the flexibility to amend or customize the plans if they wish. These designs are free and publicly available. The public is welcome to adapt them to better suit their property or needs. When amended, the plans are simply processed through the regular building permit stream, as the preapproved application pathway applies only to unmodified versions.

Looking ahead, the City is actively expanding the Pre-Approved Plans program. As directed by Toronto City Council in the Summer of 2025, Toronto Building has embarked on a design focused competitive procurement process. This involves the procurement of an architectural design firm to prepare pre-approved fourplex and sixplex designs, reflecting City Council direction to support gentle density and improve housing options across Toronto. Local architectural organizations were engaged early in this process. These additional plans are scheduled for release in mid-2026, further broadening the range of high quality, code compliant housing templates available to residents.

Finally, your letter contains several recommendations regarding service delivery. These ideas complement ongoing work within Toronto Building to strengthen certainty, clarity, and consistency in our processes and transparency for clients in our service delivery. We will take your comments under advisement as we develop and expand programs, as we do with a broad range of stakeholders, including professional designers and the

building industry. We thank you again for your feedback, engagement and commitment to safe, quality housing.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony D'Amico".

Tony D'Amico, acting Chief Building Official on behalf of  
Kamal Gogna, P. Eng.  
Chief Building Official & Executive Director  
Toronto Building Division  
Development and Growth Services