



April 4, 2018

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Toronto, ON M5H 2N2
Submitted by email

Subject: PG 28.1 Second Units: Draft Official Plan Amendment

Dear Chair David Shiner and Members, Planning and Growth Management Committee,

The ABC Residents Association is a volunteer organization committed to enhancing the quality of life in our neighbourhood through active participation in municipal Issues. Originally established in 1957, we serve the residents, including condo and apartment residents, living in Toronto's Yorkville / North Midtown community between Yonge Street west to Avenue Road and Bloor Street north to the CPR tracks.

We are writing to express our concern about agenda item: PG 28.1 Second Units: Draft Official Plan Amendment as follows:

1. The range of second units this amendment is intended to cover is unclear, not in terms of name, but in terms of the type and number of structures. All of the names referenced in the proposed sidebar to the amendment are ones that could apply to secondary units within a primary dwelling. There is no reference to laneway suites, garden suites, or coach houses which are generally ancillary secondary structures on the same lot. ***There is also no clear idea of what types of structures might be envisioned in terms of standards or by-laws. Nor is it clear if there would be a possibility of a third or fourth unit covered by this amendment; i.e., additional "secondary" units or structures.***
2. The Official Plan Amendment applies to the entire city. ABCRA raised the issue of considering laneway housing from a city-wide perspective in its submission to Toronto and East York Community Council in TE25.108 dated June 8, 2017 as follows:
Toronto and East York or City-wide? The (Landscape) report references city-wide application, but the recommendations (before TEYCC) are restricted to Toronto and East York. Many areas in Toronto are already intensively developed and have small lots and narrow laneways unsuitable

for development while other areas outside the Toronto and East York areas may have less intensive development and larger lots. Different areas may also provide a different opportunity for affordability.

We request: Laneway housing development should be considered in the context of its impact and application across the City of Toronto as a whole.

If ancillary suites are to be permitted, then the full range of options should be explored in the context opportunities across the entire city, both at present and in terms of the growth in transit access. It should not be rushed through or done in a fragmented or patchwork manner.

3. There should be recognition of diverse, unique neighbourhoods and explicit reference to existing neighbourhood protections through policy and frameworks applying. The purpose of this is not to frustrate growth, which is inevitable, but to ensure that it does not fundamentally alter the unique characteristics of neighbourhoods. ***Ancillary structures should complement the primary dwelling, dwellings in the immediate proximity, and the neighbourhood in general. The amendment should explicitly indicate that ancillary second units will be subject to Polices 2, 3 and 4 of the Official Plan in similar manner to that of the primary dwelling.***
4. The current Laneway Suites consultation. While there have been 2 public consultation meetings and one with representatives of Residents' Associations, there were many topics related to laneway suites impacts where information was fragmented, not available, speculated, or omitted. This covered a broad range of topics: aggregate density calculation at the time and in the future, impact on assessments for the property and neighbourhood, scale and form of suites, condition and suitability of laneway, why just Toronto & East York, garden suites, affordability, short-term rentals, etc. Attendees, whether proponents or those raising concerns, did not have access to:
 - a. Specifics around any proposed Official Policy or Plan changes/language, (This proposed amendment, even though public at the time of the recent public Laneway Suites consultation on March 29th. was not shared.)
 - b. Proposed by-law changes/language,
 - c. Fleshed out Laneway Suites Guidelines, or
 - d. Proposed review and approval process under "as of right".

What is actually being proposed will not be clarified until the report is available with the agenda of the May 2nd TEYCC meeting.



We believe any amendment to the Official Plan should be informed by adequate specifics of what is being proposed to ensure it represents good planning and is in the best interest of the City overall.

Yours truly,

John Caliendo
Co-President,
ABC Residents Association

Ian Charmichael
Co-President,
ABC Residents Association

Cc: Gregg Lintern, Chief Planner and Executive Director, City Planning Division
Kerri Voumvakis, Director, Strategic Initiatives
Councillor Kristyn Wong-Tam
Geoff Kettel, Co-Chair, FoNTRA