



November 24, 2021

Planning and Housing Committee (phc@toronto.ca)

**Re: Changing Lanes - Laneway Suites Zoning By-law Amendments,  
Planning & Housing Committee – November 25, 2021 meeting – PH 29.2**

Dear Committee Members:

The ABC Residents Association is writing with two specific objections to the proposed zoning by-law amendments for Laneway Suites.

We have participated in consultations on Laneway Suites from the inception of deliberations as part of our overall interest in preserving what makes Toronto's neighbourhoods special and desirable while also looking at increased densities and variety of housing options both within the neighbourhood and mixed-use designations. A part of the ABCRA area is covered by SASP 211 with affiliated Urban Design Guidelines. SASP 211 was exempted from the laneway suites by-law by City Council direction and the issue was referred to a long anticipated and delayed review of SASP 211 on a range of issues for the specific area that we hope will be done soon.

When considered and approved, the current standards for Laneway Suites represented a balance which allowed for the introduction of livable laneway suites while at the same time recognizing and mitigating adverse impacts on adjacent neighbours and the green environment.

Now only a few years later, City planners are recommending 13 changes. Our review of the rationale for these changes indicates a desire to provide more latitude in response to building industry requests. However, two proposed changes in particular are at the expense of the natural environment and adjacent neighbours thus compromising the balance created in the original standards.

**OUR OBJECTIONS:**

Our response to two specific proposed amendments is outlined below:

- 1. Height: Increase in maximum permitted height of a suite from 6.0 metres to 6.3 metres.*

The builders have suggested that an increase in height would enable better-insulated structures. However, our research with industry experts, one of whom will address the Committee on the 25th, shows there are standard construction options for the insulation of foundations and ceilings that work within the current height by-law as described in the attached letter. The proposed height increase:

- Strays from keeping Laneway Suites as secondary units that nestle into existing neighbourhoods
- Increases the adverse impact on adjacent neighbours.

2. ***Soft landscaping reduction: exempting a walkway from the minimum required percentage of soft landscaping space.***

The City has said the City's Neighbourhoods are losing pervious ground area at the highest rate in the City and that innovative and consistent approaches to maintaining green space and facilitating tree canopy growth and protection are necessary moving forward. Yet, the **City Planner is recommending reductions to the soft landscaping requirements at both the front and rear of the Laneway Suite.**

**Consistent with the City's recognition and concern about losing pervious ground area for drainage, carbon capture, and livability, any consideration of soft landscaping should be focused on it being enhanced rather eroded.**

**We see no reasonable rationale to reduce the current soft landscaping requirements.**

- The impact of the change is the total square metres for a walkway between the main house and the laneway unit would be *subtracted* from the minimum soft landscaping required percentage (85%)
- There already is 15% hardscaping allocation for this space that should be used and should be sufficient for a walkway.
- City staff is recommending a 5-foot-wide sidewalk. Curious when the emergency access is only .9 of a metre less than 3 feet.
- To calculate the percentage impact, we used a 1.5m width by a 7.5m length (the separation distance), which is 11.25 square metres. If this walkway is subtracted from soft landscaping, the soft landscaping percentage is **reduced from 85% to 60%**. and the **hard landscaping increased from 15% to 40%**.

This is a significant major reduction in soft landscaping, which the City says they will "maintain and improve".

**ABCRA'S REQUESTS:**

- **That the proposed amendment regarding "Increasing the maximum permitted height of a suite from 6.0 metres to 6.3 metres" NOT be approved.**
- **That the proposed amendment for an exemption for a walkway against the 85% soft landscaping allocation NOT be approved.**

ABCRA, in the spirit of compromise, is not objecting to the other 11 by-law changes, including ones to reduce the Rear Yard Setback and its soft landscaping, increasing the permitted height of

rooftop equipment, and adding roof skylight projections. However, we feel strongly that changes proposed related to increasing the maximum permitted height and exemption of a walkway from the minimum percentage of soft landscaping are unnecessary, inappropriate, and unacceptable to achieving the goals of the laneway suites program while supporting the green environment and respecting adjacent neighbours.

**ABCRA respectfully requests that the members of the Planning and Housing Committee not approve these two specific proposed amendments so there would be no change and the existing standards remain in the by-law.**

Thank you for your consideration of our concerns.

Sincerely,

Ian Carmichael  
ABCRA Co-Chair

Cc: Mayor John Tory and members of City Council ([Clerk@Toronto.ca](mailto:Clerk@Toronto.ca))  
Councillor Mike Layton ([councillor\\_layton@toronto.ca](mailto:councillor_layton@toronto.ca))  
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