

Teddington Park Residents Association Inc.

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July 26, 2018

TO: MAYOR JOHN TORY
Head of Council and
Chief Executive Officer of the City of Toronto

TO; MEMBERS OF CITY COUNCIL
City of Toronto, City Hall

CC: MS. MARILYN TOFT
Secretariat Support, City Council

SENT VIA EMAIL

PG31.4: SECOND UNITS – OFFICIAL PLAN AMENDMENT – FINAL PG28.1: SECOND UNITS – DRAFT OFFICIAL PLAN AMENDMENT
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<u>PG31.4</u> Second Units: Official Plan Amendment - Final Recommendation Report (Ward All - Statutory: Planning Act, RSO 1990)	Held By Mary Fragedakis
<i>Bill 1118 has been submitted on this Item.</i>	

I am considering the materials in PG28.1 and PG31.4 with respect to the proposed amendment to the City's Official Plan concerning Second Units. The City has ONE Official Plan.

I request that the proposed Policy and the interpretative text be referred back to Planning and Growth Management Committee (PGMC) with corrected Notice (2nd bullet point) requesting Planning Staff to provide a supplementary report identifying:

- The relevant sections of the Planning Act concerning “second residential unit” polices and Planning Staff interpretation of the legislation;
- The planning process and to specify under what section of the Planning Act this Official Plan (OP) amendment is being enacted, including the timing, and disclosure of the planning process as required by the City's OP and Planning Act including appeal rights, if any, with re-Notice;

- The consultation undertaken and any amending area specific zoning by-laws be brought forward with the proposed draft Policies.

OTHER CONSIDERATIONS FOR AMENDING THE PROPOSED OP POLICY:

1. In the Toronto context, “secondary suites”, incidental and ancillary in use and space that are provided within an existing detached house or semi-detached house or townhouse, are permitted with conditions in all residential areas in the City.
2. Again, in the Toronto context, “second residential units” as prescribed by the Planning Act are permitted uses in residential areas where zoning permits. For example under Zoning By-law 438-86 (former City of Toronto and the inforce zoning), duplex buildings are permitted in the R2 zone. This is generally covered in the Neighbourhood Policies concerning prevailing building types and density to reflect intensity of use.
3. “Secondary suites” and “Second residential units” are not the same.
4. There is also a distinction between the “use” and the “building and locating” of the second residential use”.
5. The building and locating of the second residential use outside a single unit use of a detached house, a semi-detached house or a townhouse located in a residential zone would represent an “intensification” that would require an OP and Zoning amendment.
6. The original intent of the “second residential unit” was to provide for affordability (not “rental” per se) and should be consistent with the tenure of stable neighbourhoods.
7. Interpretative text should be considered following the Policy.

IMPACT:

Adopting the Policy as proposed without greater specificity or identifying the area intended will signal an interpretation of a potential 2 buildings on one lot and incite speculation. This will create instability for established neighbourhoods already suffering from the ever-changing, ill-defined comprehensive Zoning By-law 569-2013 now entering a fourth Administration (12-years) that never worked and was used to tear down the fabric of neighbourhoods across the City. Creating instability is contrary to the intent of City’s Official Plan where growth is intentionally directed elsewhere in the City. The issue is affordability across all socio-economic divisions.

Additionally, why are we creating as of right conditions using taxpayers funds to allow a second use contrary to the inforce zoning without having to receive development application fees to process the request as an OP and Zoning amendment?

REQUEST TO NOT TO ADOPT the draft and proposed OP amendments as extracted below for ease of reference:

PG28.1 Second Units – Draft Wording

New Policy No. 10 under OP Section 3.2.1 Housing:

Second units will be encouraged to increase the supply and availability of rental housing across the city and within neighbourhoods. Second units may be provided within or ancillary to a detached or semi-detached house or townhouse.

PG31.4 Second Units – Proposed Wording, amended from the Draft

New Policy No. 10 under OP Section 3.2.1 Housing

Second units will be encouraged in order to increase the supply and availability of rental housing across the city and within neighbourhoods. Second Units may be provided within a primary dwelling in a detached or semi-detached house or townhouse. Second units may also be provided within a building that is ancillary to a detached or semi-detached house or townhouse.

IN SUMMARY:

Teddington Park Residents Association Inc asks Council to refer the proposed OP amendment and associated interpretative text back to Planning and Growth Management Committee (PGMC) requesting Planning Staff to provide a supplementary report responding to the above issues and to provide a revised Policy for reconsideration with Notice.

Please direct any feedback or questions directly to me and I would be happy to respond. Also please place ensure that I receive all public notices concerning any decision with respect to this OP amendment.

Respectfully
Eileen Denny, President
Teddington Park Residents Association Inc.