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To: The Chair and Members  
Planning & Growth Management

And to: City Clerk  
Attn: Nancy Martins, Administrator e-mail: [pgmc@toronto.ca](mailto:pgmc@toronto.ca)

Re: Proposed City-Initiated Official Plan Amendment pertaining to the Second Units  
(Official Plan Amendment file No. 18 158698 SPS 00 TM)

The Swansea Area Ratepayers Group and the Swansea Area Ratepayers Association oppose the proposed amendments and wish to go on record in regard to the same.

Second Units are permitted as a right in all low rise areas of the City of Toronto.

THE PROPOSED WORDING IS NOT REQUIRED BY THE PLANNING ACT

Specifically the Planning Act does not allow second units in ancillary structures if they already exist in the existing building and conversely the same prohibition applies in the reverse, and states that you cannot have a second unit in an existing building if one exists in an ancillary building associated with the existing building.

The wording of the Wainfleet Official Plan wording would be preferable to the city's.

**The secondary suite may be contained within the primary residential dwelling or structure accessory to the residential dwelling, but not both.**

**Recommend:** Deleting the second sentence and replace with the following words:

**“ Second units may be provided within a detached or semi-detached or townhouse or a structure ancillary thereto, but not both.”**

This would make it clear that you cannot have more than one second unit.

THE PROPOSED NEW SIDEBAR ADJACENT TO THE NEW POLICY 10 LACKS SPECIFICITY AND CONTAINS PEOPLE ZONING LANGUAGE

While the sidebar does not contain policy, it is there to assist in understanding the policy. Including terms such as “granny flat, in law apartment or nanny sweet” seem to imply that such uses are temporal in nature or consanguinity or employment on the cessation of the person

residing therein, the use will end. This is patently false. Any one who has attended the Committee of Adjustment or TLAB will hear developers use these inaccurate terms to hide the fact they are creating a second unit that will be permanent in nature.

Often with new construction this is done to by-pass the more stringent requirements that would occur if they were building a duplex.

Additionally the terms imply people zoning which both the courts and the OMB (now LPAT) have found to be ultra vires.

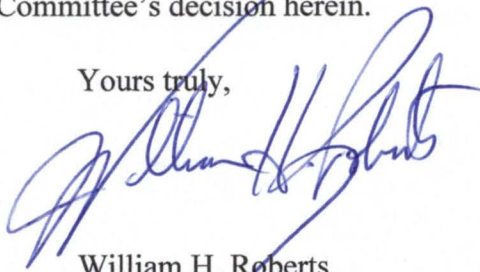
One fails to understand why such inaccurate terms find there way into a document. The end result will be every applicant to the Committee of Adjustment will describe the proposed second unit as a "granny flat", "in-law apartment" or "nanny suite" in order to market the proposal to the local community when the matter goes to the Committee of Adjustment.

**Recommend:** Delete the words "**granny flat**", "**in-law apartment**", and "**nanny suite**" from the sidebar.

At this point I do not believe I will be able to attend the meeting.

Kindly advise the writer of the Committee's decision herein.

Yours truly,



William H. Roberts  
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