



Nov 23, 2021

TO: Planning and Housing Committee ([phc@toronto.ca](mailto:phc@toronto.ca))

**Re: PH 29.2 Changing Lanes – Laneway Suites – Nov 25, 2021**

The South Armour Heights Residents' Association ("SAHRA") represents approximately 850 households in the area between Yonge Blvd over to Avenue Road, from the 401 down to Brooke Avenue within Ward 8 (Eglinton-Lawrence).

We have participated in the Laneway Suites Monitoring and Evaluation reviews and have considered in detail the 13 proposed changes to the rules implemented only two years ago, based on experience with only 239 building permit applications as of May 31, 2021.

We are writing to express our opposition to two of the proposed by-law amendments for Laneway Suites:

**Height**

The industry has asked for an increase to accommodate improvements to the heat envelope which can be dealt with by using higher R-value foam insulation, an insulated concrete floor assembly and other height saving measures. NO INCREASE to the height is required to improve the heat envelope. Higher ceiling heights and allowing for "creative designs" has also been suggested as reasons to increase height – these should not be considered as valid criteria. Increasing the height will even more so negatively impact the adjacent neighbours – the maximum height should be maintained at 6.0 metres.

**The proposed amendment "Increasing the maximum permitted height of a suite from 6.0 metres to 6.3 metres" should be deleted/removed.**

**Soft Landscaping**

The proposed amendment calls for "Exempting a walkway from the minimum required percentage of soft landscaping space between a suite and house where a lot exceeds a width of 6.0 metres."

The City Staff proposal is saying that the total square metres for a walkway would be **subtracted** from the soft landscaping minimum required percentage; and the 15% hardscaping allocation of the yard would **not** be used for the walkway. Why is the 15% hardscaping allocation now not being used for the walkway?

**A maximum WIDTH dimension has been defined as 1.5 metres** (5 feet) for the walkway. The 1.5 metre width is excessive for a private walkway in a backyard where they do not have to deal with 2-way traffic. Why is a 1.5m walkway required when the emergency access walkway width can be only .9 metres?



A major oversight is that **no maximum LENGTH or maximum SIZE (square metres) has been defined** for the walkway – this should be corrected. With no defined maximum size, the walkway could consume a huge area between the house and the suite.

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%**. If the walkway was greater in length, the percentage would drop even lower.

The 15% hardscaping allocation should be used for the walkway.

**By the proposed change hardscaping would increase to 40% (or more) and soft landscaping would decrease to 60% (or less) depending on the length of the walkway. This is a very major reduction in soft landscaping, which the City says they will 'maintain and improve'.**

The rationalizations stated in the Final Report do not change our position from the environmental and neighbor privacy perspectives.

We maintain that a permeable 1 metre walkway can easily be provided between the house and the suite within the 15% hardscaping allocation with NO REDUCTION to the 85% soft landscaping requirements.

There will be serious impacts to the environment by the reduction of soft landscaping if the walkway exemption is allowed – this is not justified and is not acceptable.

Also, the proposed amendment for reducing the Rear Yard Setback to 1 metre (from 1.5) reduces the soft landscaping requirement at the rear of the suite by a range of 2.44 to 4.12 square metres, depending on various scenarios on the width of the lot and whether or not a 3m or 6m driveway is also permitted. The resulting area could be added to the area between the house and the suite or could be used in conjunction with the 15% hardscaping to provide for a 1 metre walkway. A further reason not to reduce the 85% soft landscaping by-law provision.

**The proposed amendment for an exemption for a walkway against the 85% soft landscaping allocation should be deleted/removed.**

We ask the Planning and Housing Committee to NOT allow changes to the current provisions controlling Height of laneway suites and to NOT allow any changes that will reduce the current soft landscaping allocation of 85% in order to protect the neighbours and the environment.

Sincerely

Sheila Dunlop (Secretary)



*South Armour Heights Residents' Association*



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