

Swansea Area Ratepayers' Association

Reflecting the interests of the Swansea Community



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Swansea Area Ratepayers' Group

Written on behalf of the Swansea Area Ratepayers Association & Group

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BY EMAIL to councilmeeting@toronto.ca

Attention:

Marilyn Toft Secretariat Contact

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Mayor John Tory: mayor_tory@toronto.ca

Councillor Perks Ward 4: councillor_perks@toronto.ca

Confederation of Resident and Ratepayers Associations corra@bell.net

Re: PH30.2 - Expanding Housing Options in Neighbourhoods - Garden Suites

The Swansea Area Ratepayers Association and Group (SARA/SARG) is an active Ratepayer Association working to support the Swansea Community and it has always been our hope that good planning and community consultation would be the driving forces behind any City of Toronto housing initiative. While we support the efforts to increase the residential dwelling/housing supply in Toronto, it should be done in manner which supports and respects the character, environment, tree canopy, safety, security and good planning for both owners and renters.

Lessons to be learned from Barrie's Mistakes

Mistakes:

The two most outstanding mistakes made in the Barrie introduction of Garden Suites were:

- a) The considerable loss of trees/canopy, green space, and resulting loss of wildlife diversity exacerbating and creating a further climate emergency with the loss of mature trees and greenspace
- b) The realisation that overwhelming properties with a second **main build** rather than an **ancillary build** does NOT create affordable housing due to the raising of property taxes and rents. In Toronto, the Lanescape Development Company advertises rents in the range of \$3, 000 to \$5, 000 a month as a 'return on their investment'
- c) By permitting Garden Suites everywhere, the reality is that investors/developers are buying up homes, even whole streets, an action which is cheaper than investing in apartments/condos. Investors have the money to outbid regular home buyers and are given free rein to build overwhelming properties raising property taxes and driving up home prices and rents. The result is that the community becomes the Developers' Hood rather than the Neighbourhood!!

Recommendations:

Barrie made several changes to the original zoning for garden suites. Toronto should consider the same;

- a) The max size was reduced to 807 square feet (previously 1500) identifying the Garden Suite as a true ancillary building

- b) Basements were no longer permitted in Garden suites. Toronto makes allowances for a basement.
- c) Max height is 4.5 metres; however, C of A was approving up to 7 metres. Toronto allows for a height of 6.2 meters making it a second full main building with the C of A agreeing to any variance.
- d) Side and rear set-backs were adjusted to 3 metres from the side and 7 metres from the rear in order to provide a “landscape buffer”.
- e) Scope Site plan approval is required with photos and diagram of trees
- f) The development of a topography map identifying where only Garden Suites are appropriate or permitted.
- g) The development of a proactive Infrastructure Plan to improve the existing City Systems and build new drainage and sewage systems to support the increased density.

DISCONNECT BETWEEN PUBLIC PERCEPTION AND ACTUAL BY-LAW

The general public perception is that garden suites are to provide additional secondary accommodation in conjunction with detached and semi-detached dwellings. Unfortunately, the use of a defined term “**residential building**” goes far beyond those permissions. It includes for example: apartment buildings, fourplexes and triplexes which already represent an intensive use of sites. In addition, these properties are tenanted. The garages attached and the rear yard spaces are amenities for the use of tenants. If we open up the conversion of lockers and parking spaces in apartment buildings into units, this will result in the loss of prior amenities for the existing tenants.

Amendment Revision: Define, identify the properties on which the Garden Suites may be built. This will make life easier for the C of A members to make informed decisions. Develop a Topography Map on which is identified the areas where Garden Suites are appropriate and permitted.

EMERGENCY ACCESS

The intent of these Amendments is to allow Garden Suites on lots with frontages less than 7.6 metres. A major concern here is that this may impact the ability of occupants of the Garden Suites to escape their suite safely in the case of an emergency.

Unlike Laneway Suites, which have as an alternate escape route to a lane, Garden Suites which are not adjacent to a lane will not have that option because of potential fencing and barriers bordering the lot and escape will not be easy. The defect of these amendments is the failure to mention the requirement of a 1 m wide access route to the street. The Fire Department dictates a 1-metre-wide access route to the street in the event of an emergency. The need for housing should not contain an inherent risk of not being able to safely exit the property.

Amendment Revision: The By-Law should contain the 1-metre-wide access to the street requirement included in the hard landscape component. If the lot cannot comply with this requirement, the application must be refused.

SMALL LOTS AND TOPOGRAPHY: IMPACTS ON DRAINAGE, TREE CANOPY AND AMENITY

Small Lots: The inclusion of very small lots in the Garden Suites initiative will result in more hard surfaces, reduced ability for down spot disconnects and removal of trees. The assumption that a 6 m lot can safely accommodate a Garden Suite needs to be carefully

examined with consideration of the impacts on combined sewers, water drainage and potential of run-off and climate change flooding, exasperating the existing heat island that is Toronto.

Topography: While attending a small group meeting of our CORRA executive and the Garden Suite Steering Committee, the Planners recognized the problems of special topographies across Toronto with special significance for Communities such as Swansea. They agreed that ravines, hilly & narrow roads, irregular shaped lots and trail-like roads etched out by history add impossible obstacles to the installation of Garden Suites. They said that there was a consideration to map out those areas where small lots and topography were prohibitive to the installation of Garden Suites.

Amendment Addition: Add a map as a schedule to the Amendment which indicates where Garden Suites are not permitted due to small, irregular lots and the topography of the areas. The Amendments are supposed to direct us to what & what not to do

LIMITS IN FSI CONTROLLED AREAS AS TO THE MAXIMUM SIZE OF A GARDEN SUITE

Separate from the fact that unlike in Coverage controlled areas where there is a maximum limit on the size of a garden suite, no similar provision appears in regard to FSI areas. The requirement that it be less does not mean that it must be significantly less. The only requirement is that it is less than the **residential building**. This could mean that it is less by a cm to be in compliance??!!

In the case of an apartment building, fourplex and triplex which are by their nature large, this amendment would allow a very large garden suite on the lot. Next, the fact that FSI (gross floor area) will be measured internally rather than externally, which is how it is generally measured for residential buildings, will allow a building with the same mass and footprint as the residential building. The FSI is apparently less because of the technical use of not including the external walls.

Amendment Revision: Specific and definitive height measurement **shall** be part of these zoning By-Law Amendments. This direction is essential if we are to allow the C of A members to make informed and responsible decisions which will respect the impacts on their neighbour's privacy, right to light and off-set drainage and other technical problems.

FAILURE TO DO APPROPRIATE INFRASTRUCTURE STUDIES

As with Laneway suites there has been no analysis taking into account re flood plains, flood zones, etc. In addition, the problems with the supporting reports re laneway suites makes this proposal premature.

Amendment Revision: As a condition of approving Garden Suites in any area the City will be proactive in providing the infrastructure (storm water and sewage drains) to support the overwhelming onslaught of increased density and hard landscape

USE OF ZONING BY-LAW LENGTH

Zoning by-law lengths can be as long as 17m (56') and often variances are granted by the CofA for even greater lengths. The owners of those lots will be quite dismayed when they understand how the measurements will work out on their size lot with their house length, compared to what is depicted in the Illustrations.

Then we also have to deal with future renovations as well as knock-downs and rebuilds. Every year we see Committee of Adjustment variance applications to 'increase' the house length.

We need to avoid the situation where the rear wall of the current residence (perhaps a bungalow with a 43' length) is used for Garden Suite measurements and then they want to do an extension or a complete rebuild of the main residence.

It is also not equitable to the adjacent neighbours who might well already be a 17m or greater length to position a Garden Suite next door further up on the lot than what would be possible using the zoning by-law length.

We are therefore opposed to the suggested EXEMPTION to the soft landscaping by-law provision that would assume to REDUCE the soft landscaping percentage from 85% down to 60% or less, all for the sake of wide/long walkways in the back yard. The necessary walkway should be provided for within the 15% allocated to hardscaping.

Amendment Revision: Build both the ancillary Garden Suites and the Main Residence according to the Zoning and distancing of the Garden Suites. The Green Space in between the two residences shall be maintained at 85% and any sidewalk hard landscape shall be accommodated within the allotted 15% - no exceptions!

CONCLUSION

It is the SARA/SARG position that there are significant drafting problems and a failure to properly consider impacts on the environment and the adjacent neighbours in these Permissions and Zoning By-Law Amendments. Expanding housing options can have a positive effect on Neighbourhoods if done in a manner which enhances the quality of life and character of the neighbourhood community. With the push and rush to roll out the projects of the Expanding Housing Options in Neighbourhoods document, neighbourhoods feel overwhelmed rather than excited by the arrival of such initiatives as Garden Suites. Let's restore the balance and equity between the developers' perceived right to build and the adjacent neighbours right to the safety, security, privacy and comfort of their homes.

We support the CORRA proposed amendments regarding the specific drafting issues of the draft amendments.

Yours truly,



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Some Other Thoughts and Questions about Garden Suites

- 1. Will the City protect the Green Landscape against the anticipated flooding of Climate Change's torrential rains?**
- 2. Will City Planning identify topography such as flood planes etc. when**

refusing permissions for Garden Suites as suggested by the City Steering Group Planners in their consultation meetings with Resident Associations and their communities?

3. Will City Planning define the specifics of the size of Garden Suites to ensure that they are clearly an ancillary building and much smaller than the main residential building?

4. Will the emergency 1(one) metre wide exit/access be identified in the By-Law?

5. Will the City be proactive in providing the infrastructure (storm water and sewage drains) to support the overwhelming onslaught of increased density and hard landscape?

6. Will City Council pass a motion to cover city-wide communities with Flood Insurance when Insurance Companies refuse it to their customers as was the case in BC?

Neighbourhood??

