



January 11, 2022

By E-mail Only to phc@toronto.ca

Planning and Housing Committee
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, Ontario, M5H 2N2

Attention: Nancy Martins, Secretariat

Dear Members of Committee:

***Re: Planning and Housing Committee Item PH30.2
Expanding Housing Options in Neighbourhoods – Garden Suites
Jean Tweed Centre, Palmerston House
455 Palmerston Boulevard***

We are writing you on behalf of the Jean Tweed Centre, with respect to their property at 455 Palmerston Boulevard (located at the northeast corner of Palmerston Boulevard and Harbord Street, “the subject site”). The subject site is occupied by the Palmerston House and a single-storey rear yard garage, which has access from Harbord Street. As outlined in this letter, we are concerned that the proposed policies in draft Official Plan Amendment No. 554 (“OPA 554”) would limit the opportunity for the Jean Tweed Centre to expand their unique form of housing at Palmerston House.

Background and Expansion

The Jean Tweed Centre is a not-for-profit community-based organization which provides treatment, support and a safe place for women looking to overcome challenges with substance use, gambling and mental health. Palmerston House offers a unique one-year transitional housing program for women and mothers with infants by providing a safe environment with supportive programming to help residents overcome substance use and achieve their mental health goals.

The Jean Tweed Centre is currently exploring opportunities to improve and expand their programming by renovating the existing Palmerston House. Specifically, Jean Tweed Centre is seeking to add more bedrooms on the subject site through a second floor extension on top of the existing single storey rear addition, as well as a new rear yard building (replacing the existing garage). As the subject site does not have access from a rear laneway, City Planning Staff have advised they would consider this accessory building as a Garden Suite.

We have been in discussion with City Planning since early 2021 on this expansion project. This expansion would trigger variances to the zoning by-law. City Staff directed the Jean Tweed Centre to wait to file a Minor Variance application until the Garden Suites zoning by-law was in-force and effect, so the variances would be more reflective of the standards anticipated for this building typology.

Draft Garden Suites OPA and ZBA

We have reviewed draft OPA 554 and the associated draft zoning by-law amendment (“ZBA”) posted as part of this agenda item. We are concerned that if indeed the rear yard building is interpreted as a Garden Suite, proposed Site and Area Specific Policy (“SASP”) 670 sub-policy (d)(i)-(iv) would limit a proposed expansion of Palmerston House. The drafted language is as follows:

d) Where an application is made under Section 45 of the Planning Act, as amended in relation to the construction of a Garden Suite, such application shall maintain the intent and purpose of policy b), and one or more of the following policies:

- i. the construction of a Garden Suite will meet accessible building standards;*
- ii. the construction of a Garden Suite will meet the applicable performance measures of Tier 1 of the Toronto Green Standard and Tier 2 energy and emissions performance measures or higher of the Low-Rise Residential Toronto Green Standards;*
- iii. accommodating the Garden Suite within an existing ancillary building; and*
- iv. the location, massing and design of the Garden Suite will preserve existing trees protected under Municipal Code Chapters 608, 658, and 813, on the subject property and adjacent properties.*

As stated above, it is anticipated that variances to certain proposed regulations in the draft ZBA would be required, which would need be secured through an application under Section 45 of the *Planning Act*. It is currently unclear if the project would meet one of the four criteria, given the site-specific circumstances and the financial considerations of the not-for-profit organization. Our concern is that the strict application of the policy would limit City Staff from supporting the required variances.

In our opinion, the restrictiveness of the proposed policy limits unique opportunities for rear yard ancillary buildings, such as this one, which do not reflect a more traditional residential configuration. This limitation is counterproductive to the stated overall goal of expanding housing options in *Neighbourhoods* and providing missing middle housing. Assuming a “one size fits all” approach does not create the opportunity to provide inclusive forms of residential accommodation.

The proposed policies, particularly those introduced at an Official Plan level, should provide flexibility to accommodate for unique circumstances and balance certain City-

building objectives with other priorities, including providing a diverse range and mix of housing types and tenures to accommodate people at all stages and phases of life.

Requests of the Planning and Housing Committee

We respectfully request the Committee reconsider the language of Policy 670(d)(i)-(iv) to allow greater flexibility, in order to accommodate site- and project-specific circumstances. We recommend, at a minimum, the language be modified as follows:

*Where an application is made under Section 45 of the Planning Act, as amended in relation to the construction of a Garden Suite, such application shall **generally** maintain the intent and purpose of policy b), and **shall be generally consistent with one or more of the following:***

- i. the construction of a Garden Suite will meet accessible building standards;*
- ii. the construction of a Garden Suite will meet applicable performance measures of Tier 1 of the Toronto Green Standard and Tier 2 energy and emission performance measures or higher of the Low-Rise Residential Toronto Green Standards;*
- iii. accommodating the Garden Suite within an existing ancillary building; and*
- iv. the location, massing and design of the Garden Suite will **preserve avoid the removal of** existing trees protected under Municipal Code Chapter 658 and Chapter 813, on the subject property and adjacent properties.*

We note this revised language is in keeping with the language included in the in-force SASP 546 with respect to laneway suites.

Thank you for your consideration. Should you have any questions, please do not hesitate to contact the undersigned or Jocelyn Deeks at (416) 947-9744. By way of this letter, we formally request to be notified regarding any decisions or changes related to the proposed OPA 554 and Zoning By-law Amendment.

Yours truly,
Bousfields Inc.



Caitlin Allan, MCIP, RPP

cc. *Michelle Coombs, Executive Director, Jean Tweed Centre*
Lisa Rapoport and Patricia Joong, PLANT Architect Inc.