



LYTTON PARK RESIDENTS' ORGANIZATION INC.
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2 March 2021

Councillor Mike Colle
Linda McCarthy, Planning Assistant [email: *linda.mccarthy@toronto.ca*]
Constituency Office
2952 Dufferin St.
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Dear Councillor Colle and Linda McCarthy:

Garden Suites 'As of Right' Zoning - Meaningful City-Wide Consultation Needed First

While we support expanding housing options in neighbourhoods, we have numerous concerns attached to Garden Suites “as of right” zoning. These need to be addressed prior to implementation of such zoning changes across the City.

We request that the Garden Suite initiative be deferred until

(1) there has been proper assessment of the Laneway-Suite initiative with any potential revision of Laneway Suites as-of-right permissions; and (2) there has been a comprehensive public consultation regarding and addressing concerns related to Garden Suites well in advance of implementing any proposed Garden Suite zoning by-laws.

Laneway Suites Report

Before proceeding with the Garden Suite initiative, the City should first complete and make public its monitoring report of Laneway Suites, so that these results can inform the Garden Suite initiative. Garden Suites could have far more impact than Laneway Suites, and residents city-wide should be highly engaged in the consultation process with respect to the various aspects of a permissible Garden Suite.

Housing Supply and Affordability

A study should be commissioned by the City to understand whether permitting Garden Suites would actually address the housing supply and affordability issue. The economic impact of garden suites should be well understood. A second dwelling on the property might increase the land value and speculation, and lead to higher house prices.

Emergency Access

Emergency Access to the structure needs to be determined given the lack of a public street or laneway. This could be a safety issue.

The Lytton Park Residents' Organization (“LPRO”) is an incorporated non-profit association, representing member households from Lawrence Avenue West to Roselawn and Briar Hill Avenues, Yonge Street to Saguenay and Proudfoot Avenue.

www.lyttonparkro.ca

As-of-Right Zoning

Like Laneway Suites, Garden Suites are expected to be 'as-of-right' - that means straight-to-building permit, with no variances or Committee of Adjustment meetings required. Garden Suites should not be permitted as-of-right, but the permit should be issued only for sites that have been carefully studied and planned and for which neighbours have been consulted to provide input. As-of-right zoning for Garden Suites would exclude community members from providing input even when they are likely to be directly and significantly impacted.

Infrastructure Needs, Hard and Soft

Before proceeding with the Garden Suite initiative and any associated changes regarding as-of-right permissions, the City should conduct an infrastructure study or studies, to ensure that there is sufficient hard and soft infrastructure to support such changes in affected neighbourhoods.

Loss of Green Space and Permeable Land; Loss of Trees

The effect of loss of green space must be considered when a 'Garden Suite' covers grass and other permeable land which would absorb heavy rainfall. There often are mature trees close to the property line; consideration should be given to preservation of trees and their roots. Less landscaped areas lead to more stormwater runoff.

Height, Setbacks

Height, floor-space index, and coverage provisions should be in place, similar to those for other ancillary structures in R zones; and with further consideration of side and rear setbacks, given the nature of the use and impacts on adjacent properties.

Massing, Shadowing, Lack of Privacy on Neighbours

The effect of overlook, massing, and shadowing on neighbouring properties must be considered. In addition to the main house, a Garden Suite might impose on three adjacent properties.

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Thank you, Councillor Colle, for considering deferring the as-of-right Garden Suites initiative until after the monitoring report of the Laneway House initiative is made public, and until there has been broad consultation with the community on key issues.

Sincerely,
Maureen Kapral, Vice-President
Lytton Park Residents' Organization

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