



June 12, 2017

Toronto and East York Community Council
2nd Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Sent by email: teycc@toronto.ca

Dear Toronto and East York Community Council Members:

Re: TE 25.108 – Bringing Laneway Suites to Toronto, East York District

The Annex Residents' Association (ARA) represents the area bounded by Avenue Road, Bloor Street, Bathurst Street and the CPR tracks to the north. Our resident population is almost 16,000 people. We are a heterogeneous group with homeowners, renters, students, businesses and institutions. In existence since 1928, we have been and remain actively engaged in all aspects of planning and development policy in the City with a view to maintaining an appropriate mix of built form and use to enhance our quality of life.

The built form of the Annex is primarily Victorian with newer elements of apartments, condominiums, and commercial and institutional use along the high streets. It is home to many creative infill buildings that exist in harmony with the neighbourhood context.

The Annex is home to and embraces a substantial number of units of community housing, transitional housing, group homes and shelters. Today, the Annex, along with many of the downtown neighbourhoods, is subject to unprecedented development pressure, in part driven by the Province's intensification policy, overwhelming available infrastructure. The pressure of development is mitigated somewhat by the existence of an official plan, zoning by-laws, visioning studies and the like. These offer some protection to maintain the character of neighbourhoods and protect their livability by contextualizing development.

Currently the official plan is being updated. The Annex is also included in the TO Core Study that is ongoing. While some would argue that the horse has already left the barn, these thoughtful planning undertakings are essential tools to protect the diversity and livability of the City. Thoughtful planning developed through extensive and rigorous analysis and consultation form the core of future growth.

With this in mind we offer these thoughts on TE 25.108 - Bringing Laneway Suites to the Toronto East York District. We did not propose to restate the comments from our neighbouring residents' associations such as ABCRA and HVRA. They are thoughtful and bear serious consideration.

- TE 25.108 starts with the proposition that the planning case for laneway suites across TEYD has been made and all that remains is for City staff to implement the initiative. We submit that the proposal is based on a short form proponent driven process that is not in keeping with the robust public and City planning staff engagement that typically forms a critical part of the development of new planning proposals, particularly those that propose to impact the entire TEYD.
- In our views, City staff should be directed to consider the proposal independently in the context of the overall work that is being undertaken on the official plan, TO Core and many neighbourhood visioning studies.
- In the same vein, one person's "red tape" is viewed by most as a basic tool for maintaining neighbourhood character. We have plans and by-laws that are thoughtful and have been drafted with a purpose in mind. The case hasn't been made as to why we should throw the baby out with the bathwater.
- One-size fits all solutions are fraught. Even the most clever built form and design guidelines cannot address the condition of sites as unique as laneways without sensitivity to the surroundings. This has been demonstrated clearly in the infill housing proposal by the University of Toronto in the Huron Sussex Residents' Organization area. No two neighbourhoods in TEYD are the same and neither are their lanes. We question whether a single standard would be appropriate.
- While there may be 2,400 publically owned lanes, how many are suitable for development of suites? How many are "under utilized"? In the Annex, most lanes are 6 meters or less in width. Many are dead ends. Many provide access to the row houses on their street fronts. They in fact are performing their intended purpose, that is to service their street front property. For example, if a parking pad or garage is redeveloped, where would the vehicle go? If the vehicle is to remain as part of the garage, the garage would need to be multi-stories in order to achieve a 400 square foot living space. Would a street parking permit or two be issued to an owner who choses to monetize a garage thereby increasing pressure on already scarce street parking? The matter would be exacerbated if the development encroached into the garden space of a property, thereby reducing green in the area. Greening is a matter of great importance in the Annex.
- A business case has not been made for the initiative. How many possible suites could realistically be expected to be delivered? What would be the cost of a development? Would an owner expect to receive a market rent? What would be that rent? Would the assessed value of the host property increase? Would this solution for housing in fact be a solution at all?

- What would be the incremental cost to the City in servicing these lanes? It is hard not to imagine that people dwelling in these structures will demand better service than lanes currently receive. Lanes are way down the food chain when it comes to attracting City maintenance dollars.

In conclusion while the proposal may have merit, we would submit that it is premature to instruct City staff to implement it. We submit that the laneway suite initiative be referred to City staff for independent consideration and broader public consultation.

Yours truly,

A handwritten signature in black ink that reads "Henry Wiercinski". The signature is written in a cursive style with a large, prominent "H" and "W".

Henry Wiercinski
Vice Chair

cc: City Counsellor Joe Cressy