

SWANSEA AREA RATEPAYERS' ASSOCIATION  
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SWANSEA AREA RATEPAYERS' GROUP

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To: Planning Policy Branch  
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By e-mail: [PlanningConsultation@ontario.ca](mailto:PlanningConsultation@ontario.ca)

Dear Sirs;

**Who We Are**

The Swansea Area Ratepayers' Association (SARA) is celebrating its 95<sup>th</sup> year of existence. The Swansea Area Ratepayers' Group is a not for profit corporation. They both strongly recommend serious consideration should be given to changing the trust of the proposed amendments. In our collective opinion supported by an unanimous vote of the members at a general meeting, find that the proposed amendments are unduly limiting local municipalities without regard for the environmental impacts that may result from the proposed limits of democratically elected councils.

**Environmental Issues**

Separate from the detailed specifics, the thrust of the proposals seem to be driven by the desires of the development industry to emphasize the need of private interests without regard to several of the PPS and Golden Horseshoe statements in regard to amenity of communities and storm water impacts and the public weal in general.

A 4 metre separation between the main building and the ARU leaves little area for soft landscaping. In fact if a 2.5 metre rear deck is attached to the main building and a 1.5 metre deck or patio to the front of the ARU there will be no soft landscaping between the structures.

This leaves no room for large trees to grow thereby preventing the provision for maintaining or increasing the tree canopy. In addition with all the hard surfacing where will the water go? Most likely on to adjacent properties and in turn into the public realm. This will place the burden on Municipalities to address the impacts on the streets and potential flooding.

In addition trees are critical for carbon capture, reducing the heat island effect and absorbing storm water. Given the results of the changing weather patterns heavy rainfalls are becoming more not less common.

This combined with the removal of FSI controls and having a 45% minimum lot coverage also increases the massing of ARUs, again impacting the amount of soft landscaping available.

## **Massing issues**

The City of Toronto does not use FSI to control the ARUs. The only requirement is that the mass be less than the main building. There are examples of ARUs being more than 200 sq. m's or 2,000 sq. ft. The original concept was that these ARUs were supposed to provide smaller homes and consequently be more affordable. Loosening the requirements even, more may result in the ARU being larger than the main building or if not larger a mini-mc mansion. Again the soft landscaping will be lost with the problems re tree canopy, heat island effect, and water runoff being exacerbated.

## **Coverage issues**

Not all areas in the City of Toronto use coverage to control the size of the main building. Some use FSI. This change will require a reexamination of those by-laws to make them compliant and may have the effect of creating more not less red tape.

Further a minimum standard for all buildings on the lot of 45% will encourage anywhere from 60 to 90% coverage and will certainly allow builders to seek more not less than that standard since it is a minimum standard.

Again the issues of tree canopy, water runoff, heat island effect will become an issue.

## **Reducing the Separation distance to 4 m's**

This has already been discussed, but assuming this is to permit two storey structures with no angular planes, there will be shadowing effect on the area between buildings, and impacts on air flow.

## **Removal of Angular Planes**

Angular planes were used by the City of Toronto as a selling point to neighbourhoods that this would mitigate the effect of two storey ARUs. In addition garden "suites" are located in backyards where there previously a presumption of privacy and no overlook and potential impacts on adjacent gardens.

Removing Angular planes may be viewed as desirable by speculators, investment property owners and builders as a plus but may not be so viewed by those that have to live next to such buildings. This may result in pressure to review permissions for second storeys even more so with the 4 m separation between an ARU and the main building. It may result in increases in the side yard setbacks.

## **ARUs as Affordable**

They were originally described to the media and the public as "cottage like" and affordable. The reality is somewhat other than that.

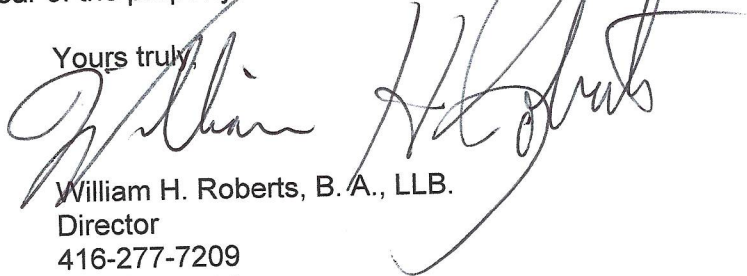
## Micro-management

It appears given the references to angular planes that the removal will facilitate building and ARU and the costs of going to the Committee of Adjustment that this is being driven not by public issues but by private profit. There should be a balance.

More importantly not all lots are suitable for ARUs. There may be issues with flooding, water run off, lack of sewer capacity and other infrastructure matters that may dictate a lot is too small, not the least of which may be access by emergency services. Surely each municipality is aware of those unique issues and having an upper tier dictate all lots regardless of their suitability is an over reach and almost a colonial attitude.

For the aforesaid reasons SARA and SARG recommend a careful and sober second thought taking into consideration the wider public. We do not agree with the assumption that there are no environmental impacts or that all lots are suitable for garden and or laneway suites. In some areas the sewers are at or near capacity as a result of development on main streets or adjacent blocks and safe access to the rear of the property cannot be achieved by firefighters.

Yours truly,

A large, stylized handwritten signature in black ink, appearing to read 'William H. Roberts', is written over the typed name and title.

William H. Roberts, B. A., LLB.

Director

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