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June 5, 2018

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Project ID: LG.TO N N

Etobicoke York Community Council, N

Etobicoke Civic Centre N

399 The West Mall N

Toronto, ON M9C 2Y2 N

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C/o Ulli S. Watkiss, City Clerk N N N sent via email to: [clerk@toronto.ca](mailto:clerk@toronto.ca) N

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Dear Mr. Chair and Members of the Etobicoke York Community Council, N

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**Re: Draft Official Plan Amendment No. 419 At  
At**

Thank you for the opportunity to provide input on the draft Official Plan Amendment No. 419, prepared as one of the outcomes of the High Park Apartment Neighbourhood Area Character Study. N

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We represent 299 Glenlake Avenue (Toronto) Limited, the owners of 299 Glenlake Avenue. 299 Glenlake is located on the southwest corner of Pacific Avenue and Glenlake Avenue. The property is located within the area covered by the draft Official Plan Amendment. N

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The owners of 299 Glenlake were involved in the High Park Apartment Neighbourhood Area Character Study, together with SGL Planning & Design Inc., participating as a member of the Working Group. As a member of the Study's Working Group, SGL Planning & Design Inc. provided numerous comments to City Staff throughout the course of the study. N

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We commend City staff on their work on the study and the comprehensiveness of the work undertaken. In particular, we appreciate City staff's consideration of the previous comments we submitted through the process. N

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We have reviewed the draft Amendment. A recurring comment that we have previously made throughout the Study process is that the draft Official Plan Amendment provides a level of detail and specific standards that are typically reserved for the zoning by-law or urban design level. Overly prescriptive Official Plan policies limit innovative solutions on a site-specific basis. They can also hamper opportunities for development in the area, with the effect of restricting the efficient use of land and promotion of intensification as directed in the Provincial Policy Statement and Growth Plan. The level of detail proposed N

in the draft materials will require Official Plan Amendments for minor matters, such as to permit a 5.9 metre setback where 6 metres is required. Although we do not discuss every N policy individually in this letter, it is our opinion that many of them should be implemented N through zoning or urban design guidelines and addressed only broadly and without N detailed numerical requirements at the Official Plan level. N

For Community Council’s consideration, we provide specific comment on some of the N policies: N

1. ~~We are concerned with the policies requiring minimum building separation distances.~~ From our previous discussions with staff, it was understood that the setback requirements between buildings with primary elevations applied in respect of window to window or window to balcony conditions. However, as worded in this draft Amendment, the setbacks would apply even where just one of two facing walls had windows or balconies. The requirement for the larger separation distances is to provide privacy between facing units. No such privacy concern exists if one of the buildings contains no windows or balconies. As such, we recommend that any sections that address building separation distance for primary elevations be reworded as follows: N

*“Minimum separation distance ~~of a building wall(s) from the~~ **between** ~~tw~~ primary elevations of an existing or new buildings.” t*

Of particular note, for 299 Glenlake, an opportunity exists to integrate an existing ramp to an underground garage into a new building, aligning with the intent of draft N policy 6.e). However, incorporation of an existing ramp into a building makes it N impossible to provide the building separation distances required in draft section N 5.2, unless the policy is revised as recommended above. Otherwise, achieving N the requirements of policy 5.2 directly conflicts with achieving the intent of section N of 6.e). N

2. ~~We are concerned of the phrasing of section 2.g),~~ which reads: N

*“Development/redevelopment t and t public t works t should t maintain unencumbered soil areas to provide opportunities for water infiltration t and to sustain the growth of mature, healthy trees over the long term.” t*

Our concern is that the word “maintain” implies that no change is permitted, thus N no new or extensions of underground parking garages would be permitted. This N conflicts with policy sections 5.c) and d), which clearly allows for new or expanded N underground garages. We respectfully request that section 2.g) be revised to read: N

*“Development/redevelopment t and t public t works t should ~~t maintain~~ **pr v ide** unencumbered tsoil tareas t o tprovide toopportunities tfor twater t*

*infiltration and to sustain the growth of mature, healthy trees over the long term.”*

3. We are also concerned with the requirement for a 6-metre setback between the street and underground garages proposed in section 5.c) and the requirement for a 3-metre setback between a lot line and an underground garage proposed in section 5.d). We provided previous comment on these same provisions in an earlier submission to City Staff. Numerical setback should not be addressed at a Policy level. Providing a specific setback number will restrict the efficient utilization of the site. If the policies also contemplated a reduction in parking requirements, then these policies would be less likely to restrict development. In our discussions with Staff, they indicated that a reduction in parking standards should be considered on a site by site basis. If that is the case, it is our opinion that any specific setback requirement for underground garages should also be considered on a site by site basis. As such, **we request that draft policies 5c) and e) be deleted.**

4. We wish to reiterate our previous comment that section 5.i), which requires 25% of new units be 2-bedroom and 1% of new units be 3-bedroom or larger, should be altered to consider the existing stock of larger units in the area. The provision should be considered on a site by site basis to account for circumstances where an existing building already contains a number of larger units that exceed this requirement. We suggest the following wording:

*“O a site, a minimum of 5% of all new dwellings units will be two bedroom units or larger; a minimum of 10% of all dwelling new units will be three bedroom units or larger.”*

In summary, the policies of OPA 419 are very prescriptive, more so than typically found at the Official Plan level. Collectively, the policies, as currently proposed, limit the infill opportunities, counter to the growth and intensification policies of the Provincial Policy Statement. We have identified 4 key changes that will address this concern while still providing the City with a tool to control and guide infill development within the apartment neighbourhood. We hope Community Council will consider our above noted suggested changes.

Thank you for the opportunity to provide comments.

Yours very truly,  
SGL PLANNING & DESIGN INC



Paul Lowes, MES, MCIP, RPP  
Principal

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