



**Confederation of Resident & Ratepayer
Associations in Toronto**

Box 103, 95 Lavinia Avenue, Toronto
Ontario M6S 3H9
6 November, 2019

TO: Clerk of Planning and Housing Committee BY e-mail phc@toronto.ca

AND TO: Chair and Members of the Committee

RE: Official Plan Amendments pertaining to Public Realm and Built Form Official Plan Policies – Failure to Comply with Official Plan – Improper Meeting

Chair and Members;

On behalf of the Confederation of Resident and Ratepayer Associations in Toronto (CORRA), I wish to raise **an issue that goes to your ability to hold your Special Public Meeting**. To be blunt your notice is deficient and does not comply with Policy 5.5.1.c)iv of the Official Plan.

The particular Chapter of the Official Plan is attached hereto in its full length.

The particular sub policy is as follows:

- “iv. Ensuring that draft Official Plan amendments **are made available to the public for review at least twenty days prior to the statutory public meetings...**”

While notice was provided well in advance of the Statutory Special Public Meeting, the notice indicates that the amendments will not be available until December 3, 2019 for the December 10, 2019 Public Meeting, which is less than 7 days.

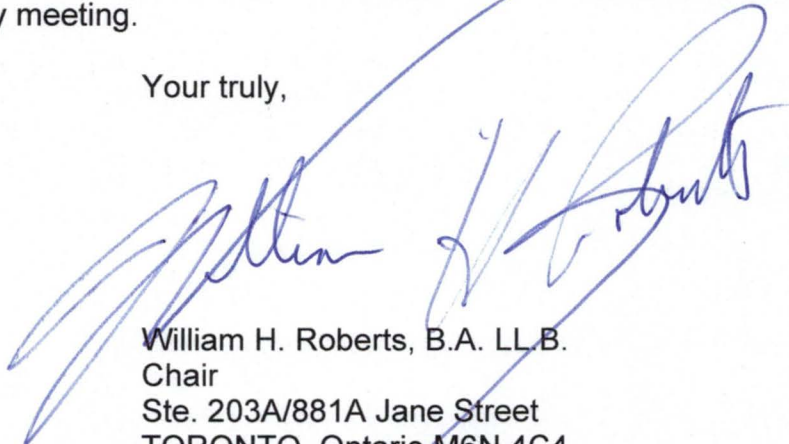
To be available means that bare notice is not sufficient. Given the size and detail of these amendments a minimum of 20 days for any volunteer group to review, make decisions and get approval from their group is necessary.

It is our further understanding that changes have been made to the July drafts and that final drafts will only be revealed on 3 December, 2019. This is not acceptable or appropriate.

You are required to conform with the Official Plan. At this point you are not in conformity.

CORRA therefor requests that you forthwith provide the final draft OPAs to the public and that notice of the same being available be sent to all those you have provided notice of the said public meeting. In the alternate you need to adjourn the meeting until the amendments are made available to the public twenty days prior to the any statutory meeting.

Your truly,



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- d) changes in the legislative environment; and
 - e) social and physical infrastructure improvements required and provided to serve growth in population and employment.
2. The need to review and revise this Plan will be considered every five years to ensure the continued relevance of the Plan's policies and objectives in light of changing social, economic, environmental, legislative and fiscal circumstances. This assessment will examine achievements in the Plan's growth management strategy, the quality of the living and working environments created, the impact of growth in population and employment upon the services and quality of life enjoyed by residents and workers and Toronto's evolving relationship with the broader urban region, among other matters. The need for new implementation initiatives will also be considered at least every five years, or sooner as circumstances warrant.

5.5 THE PLANNING PROCESS

The *Planning Act* encourages public involvement in the planning process and enables Council to require an applicant to provide, at the time a planning application is made, information Council determines is needed to make an informed decision. Regulations under the *Planning Act* prescribe minimum complete application requirements. The *Act* also enables a municipality to identify additional requirements, beyond the prescribed minimum, by having complete application policies in the Official Plan. Council may refuse to accept or further consider a planning application until all such materials have been received.

Applicants are encouraged, but not required, to consult with the Ward Councillor, City staff and local community prior to formal submission of a planning application.

Following receipt of a complete planning application, Council will determine whether the City is satisfied with pre-application community consultation, in particular any pre-application community meeting(s) held in accordance with City standards, and whether one or more subsequent community meetings will be required under the provisions of Policy 5.5.1(c)(ii).

In accordance with the *City of Toronto Act*, Council may delegate by by-law its duty to notify applicants as to the completeness of planning applications.

The application materials and related documents will be made available to the public in accordance with the requirements of the *Planning Act* and the provisions of this Plan.



CHAPTER FIVE

Information and materials to be made available to the public for review will be provided upon request in electronic and/or paper copy form at a fee not to exceed the City's actual cost in providing such information or material.

Schedule 3 outlines the City requirements for complete applications. When seeking development approvals from the City, applicants should also refer to "Building Toronto Together – A Development Guide" which outlines the City's development review processes. In addition to the requirements of the *City of Toronto Act*, *Planning Act* and/or Regulations, the City may require additional information to properly evaluate an application. Complete application requirements may be discussed during pre-application consultation.

Policies

1. Public Involvement

A fair, open and accessible public process for amending, implementing and reviewing this Plan will be achieved by:

- a) encouraging participation by all segments of the population, recognizing the ethno-racial diversity of the community and with special consideration to the needs of individuals of all ages and abilities;
- b) promoting community awareness of planning issues and decisions, through use of clear, understandable language and employing innovative processes to inform the public, including the use of traditional and electronic media; and
- c) providing adequate and various opportunities for those affected by planning decisions to be informed and contribute to planning processes, including:
 - i. encouraging pre-application community consultation;
 - ii. holding at least one community meeting in the affected area, in addition to the minimum statutory meeting requirements of the *Planning Act*, for proposed Official Plan and/or Zoning By-law amendments prior to approval;
 - iii. ensuring that information and materials submitted to the City as part of an application during the course of its processing are made available to the public; and
 - iv. ensuring that draft Official Plan amendments are made available to the public for review at least twenty days prior to statutory public meetings, and endeavouring to make draft Zoning By-law amendments available to the public for review at least ten days prior to statutory public meetings, and if the draft amendments are substantively modified, further endeavouring to make the modified amendments publicly available at least five days prior to consideration by Council.

2. Complete Applications

Applications to amend the Official Plan, to amend the Zoning By-law and applications for Plan of Subdivision, Plan of Condominium or Consent to Sever will comply with the statutory complete application submission requirements of the *Planning Act* and the requirements identified in Schedule 3.

In addition, applications for Site Plan Control Approval should satisfy the submission requirements identified in Schedule 3.

5.3 MOVING TOGETHER BEYOND THE PLAN

This Plan is the first Official Plan for the new City of Toronto. It is an important initial step on a journey to make a better Toronto. The Plan's policies set the stage for responsible growth and a sustainable future, but getting there depends upon thousands of decisions and actions by the City, the private sector and community partners. Some of the Plan's objectives will be achieved through changes to the Zoning By-law that will help implement the land use and growth strategies. Some will be achieved through direct municipal actions, such as capital expenditures, operating and service delivery decisions and policy decisions made by Council. Other objectives cannot be met without the concerted and combined efforts of a variety of partners, including the private sector, community groups, nongovernmental organizations and other levels of government. The mutually supportive linkages among these implementation activities are what will bring this Plan to life.

5.3.1 THE OFFICIAL PLAN GUIDES CITY ACTIONS

As a statutory document for guiding growth and change in the City, the Plan gives direction to Council's day-to-day decision making. The Plan provides geographic and urban structure policies to inform budget processes, corporate strategic planning and public investments and programs. If Toronto is to move closer to the future envisioned by the Plan, in addition to giving direction to capital expenditures for big infrastructure projects, the Plan must inform other related decisions of Council. The *Planning Act* requires that all by-laws enacted and public works undertaken by the City conform to its Official Plan. Whether a policy decision with a minimal price tag or a major capital expenditure, decisions should be evaluated against the goals and objectives of this Plan. All City departments, agencies, boards and commissions have a role to play in realizing the reurbanization and quality of life objectives of the Plan.

Policies

1. Municipal by-laws, including zoning by-laws, public works and public undertakings will conform to this Plan.
2. The decisions and actions of Council and City staff, including public investment in services, service delivery and infrastructure, will be guided by this Plan.
3. Amendments to this Official Plan that are not consistent with its general intent will be discouraged. Council will be satisfied that any development permitted under an amendment to this Plan is compatible with its physical context and will not affect nearby *Neighbourhoods or Apartment Neighbourhoods* in a manner contrary



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AND TO: Chair and Members of the Committee

RE: Official Plan Amendments pertaining to Public Realm and Built Form Official Plan Policies – Failure to Comply with the Official Plan

Chair and Members:

On behalf of the Confederation of Resident and Ratepayer Associations in Toronto (CORRA), I am writing in furtherance of the letter of 6 November, 2019. This letter should be read in conjunction with the prior letter.

Firstly on behalf of CORRA I wish to thank the Planning Department for making available on the web site the draft wording of the aforesaid policies and those of the Transportation Policies. CORRA appreciates the positive response.

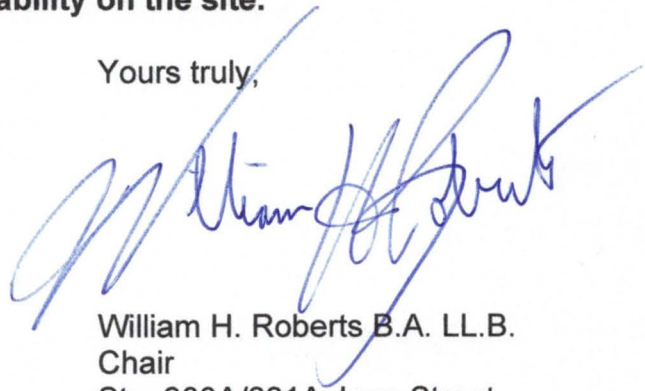
CORRA acknowledges that providing an hard copy for viewing in downtown Toronto may meet the letter of the wording of the policy concerning availability, it remains our position that in this day and age it does not meet the intent and spirit of the policy. Requiring the public to attend to physically look at drafts given the physical size of the City is not overly effective.

It remains the hope and the position of CORRA that the policy should be changes and all OPAs should be on the web site at least 20 days before any statutory public meeting, and that any notice should reference this in addition to the availability at the agenda stage and providing a physical copy.

Again CORRA wishes to thank staff for their response.

CORRA recommends that City amend its notice procedure to have all official plan amendments made available at least 20 days before any statutory public meeting and that any notice of such meeting should reference the availability on the site.

Yours truly,



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