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Etobicoke York Community Council
Etobicoke Civic Centre
399 The West Mall
Etobicoke, Ontario
M9C 2Y2

Attention: Chair and to the Committee Administrator;

by E-mail etcc@toronto.ca

Dear Chair and Community Council Members

Re: Agenda Item EY 14.2
Being 200 Keele Street and 195 and 203 Oakmount Road
Official Plan and Zoning By-law Amendments, Consent to Sever, and Rental Demolition and Conversion Applications

I have been retained by the Lithuania Ravine Residents and Ratepayers Association to confirm their objection to the revised proposal and to indicate their support for the position set out in the report from the Director, Community Planning Etobicoke York District.

In particular I have been asked to respond to the letter dated March 15, 2012 from the firm of Blake, Cassels & Graydon, LLP.

It is not my intention to respond to every point but to touch on only a few of the salient points.

Planing Act, Provincial Policy Statement and Provincial Plans

I do not agree that the said documents support the type of intensification proposed by Sedona (High Park) Development Group Inc.

This part of Keele is clearly not in the downtown, one of the centres or shown as an

Avenue on Map 2. The site has a *Neighbourhood* designation and as such unlike a Mixed Use area is not designated for growth under the Official Plan.

The text on page 2-21 first full paragraph states:

> "By focusing most new residential development in the *Centres,* along the *Avenues*, and in other strategic locations, we can preserve the shape and feel of out neighbourhoods...Some physical change will occur over time as enhancements, additions and infill housing occurs on individual sites. A cornerstone policy is to ensure that new development in our neighburhoods respects the existing physical character of the area, reinforcing the stability of the neighbourhood.".

Similarly the Provincial policies do not encourage intensification throughout built up areas but within them with the emphasis for growt on *Urban Growth Centres, Intensification Corridors* and *Brownfield/Greyfield* (which refers to former commercial/industrial sites). These are the areas designated for intensification. This site does not fall within any of these areas, and thus is not intended for intensification in accordance with those policies.

Further the Provincial policies give deference to the local Official Plan to set out areas designated for growth. On more than one occasion the Ontario Municipal Board has indicated that the present City of Toronto Official Plan carries out the Provincial Policies. Under the City of Toronto Official Plan the site is not designated for significant intensification.

I disagree that with the interpretation that 4.1.7 of the Official Plan encourages intensification. This flies in the face of the plain reading of the section.

It specifically states:

> "**PROPOSALS FOR INTENSIFICATION OF LAND ON MAJOR STREETS IN *NEIGHBOURHOODS* ARE NOT ENCOURAGED BY THE POLICIES OF THIS PLAN.**" [Note bolding and underlining are not in plan but done for emphasis by the writer]

The policy then states that any development that is proposed must be reviewed in accordance with Policy 4.1.5 which the staff have done. They have found it does not meet the criteria set out in Policy 4.1.5..

It should be noted the proposals thrusts a different form of development into the heart of the *Neighbourhood* by introducing a second building using in part the severed lands that have been sought to be added to the site. This intensification is not acceptable under Policy 4.1.6 which states that where a more intense development on a major street in a *Neighbourhood* has been approved*,* it should not be considered for development in the interior of the *Neighbourhood.* The the second building which is behind the first is effectively introducing a more intense form of development within the *Neighbourhood* which does not respect and reinforce the physical character of that *Neighbourhood.*

Further 4.1.9 sets out various tests for development of an infill property. The addition of

the rear yards of the properties on Oakmount takes the proposal outside the standard infill which is generally a remanent property. Given that severance of lots within the *Neighbourhood* are involved the tests under 4.1.5 apply to those severed portions of the Oakmount properties.

The built form policies have been fully and properly analysized by the Planning Staff and I concur with that analysis.

A building behind a building relates to the access point which is Keele. There are internal site movement problems created by the fact there are two separate buildings. In addition there are specific issues in regard to the site, one of which relates to an easement that have to be dealt with before a unified garage could be considered.

The Natural Environment and Ravine Policies

There is a consistent attempt to down play the role the ravine plays within the green space system. Ravine control is not limited to pristine areas. The Natural Environment Policies deal with several factors including the maintaining of corridors.

The present green/open space is an asset for the existing residents that will be removed.

In addition there appears to be an attempt to appropriate the adjacent park as an amenity for the new residents while impacting on the feel and character of that park for the existing residents of the area and the site.

Conclusion

For the aforesaid reasons, it is respectfully requested that you support the position taken by the Director of Community Planning, Etobicoke York District in the report before you.

Yours truly

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Cc. Lithuania Ravine Residents and Ratepayers Association