

CORRA

Confederation of Resident & Ratepayer
Associations in Toronto

May 6, 2013

Mayor Rob Ford and Members of Council

Toronto City Hall
100 Queen Street West
Toronto, ON M5V 2N2

Atten: Ms. Marilyn Toft, Manager
Council Secretariat Support

Email: clerk@toronto.ca
Fax: 416.392.2980

2013 MAY -7 A 8:10
CITY CLERK'S OFFICE
SECRETARIAT SECTION

Dear Mayor Rob Ford & Members of Council

**Re: PG23.5 Updated City-Wide Tall Building Design Guidelines
City Council Meeting No. 33 May 7 & 8, 2013**

CORRA, the Confederation of Resident and Ratepayer Associations in Toronto, is asking Members of Council to hold down PG23.5 City-wide Tall Building Guidelines for a full debate.

Do not pass this agenda item by consent. Doing so will put communities in your Ward at risk and potentially hand over Council's authority to a delegated few.

CORRA asks Council to amend PGM Committee

Recommendation 1:

- That The Tall Building Design Guidelines and the Downtown Tall Buildings: Vision and Supplementary Design Guidelines (Tall Building Guidelines) be restricted to the Downtown Core;
- the two Guidelines remain as guidelines as stated in OP 5.3.2 Policy 1 in its entirety (any references within the Guidelines that suggest equivalency or greater status to OP Policies, Zoning By-law, Area Specific By-laws or Secondary Plans should be deleted); and
- any intended OP inclusion in whole or in part of the Guidelines requires an OP amendment that will meet/exceed the statutory requirements of the Planning Act and the OP.

Recommendation 2:

CORRA asks that Council not abdicate their authority and recommend that any subsequent amendments to the Guidelines as outlined above including "administrative changes related to City policies, plans, guidelines and planning implementation tools" are to be considered at Planning and Growth Management Committee with Notice and following a Committee recommendation be referred to Council for final approval. It is from the Public Notice and from Council's Approval that make such Guidelines express Council Policy.

Recommendation 3:

CORRA asks that Council direct the Chief Planner and Executive Director prepare a Report with input from Legal Services identifying the requirements of a Development Permit System according to Ontario Regulation 608/06 Development Permits and the City's OP to Planning and Growth Management Committee with Notice for public input.

Background:

The Tall Building Guidelines were prepared based on the City's Downtown context, where tall buildings in the downtown core is supported by the City's Official Plan.

The Tall Building Guidelines were brought forward under public realm and urban design consideration which generally do not follow the rigour of statutory meetings and Notice as required by the Planning Act or the Official Plan before such guidelines are adopted by Council.

This is because the City OP Section 5.3.2 Policy 1 state:

"Implementation plans, strategies and guidelines will be adopted to advance the vision, objectives and policies of this Plan. These implementation plans, strategies and guidelines, while they express Council policy, are not part of the Plan unless the Plan has been specifically amended to include them, in whole or in part, and do not have the status of policies in this Plan adopted under the Planning Act."

Please find attached OP Section 5.3.2 Policy 1 for your reference.

To include any part the Tall Building Guidelines in the OP constitutes an OP amendment that will need to meet the statutory requirements of the Planning Act and the OP.

The development of Tall Building Guidelines largely involved stakeholders from the building Industry and land development groups and some residents living within the Downtown core. There were no oral deputations or written submissions from resident groups on this agenda item.

Applying these guidelines to the broader City without considering the context and the views of residents living outside the downtown core does not meet the essence of what planning is all about.

With respect to the Development Permit System (DPS), it appears the information is not provided in the Staff Report. There are two areas in the City's OP where the DPS is mentioned:

OP 5.2.3 Policy 1:	"Policies will be adopted as part of the Plan with respect to the passing of by-laws to implement a Development Permit System."
--------------------	---

OP 5.2.1 Policy 5:	"An implementing zoning by-law and/or development permit by-law will be prepared concurrently for new Secondary Plans unless Council determines that development is to proceed by site specific zoning."
--------------------	--

Ontario Regulation 608/06 Development Permits (http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_060608_e.htm#BK2) must be considered to ensure all the regulatory conditions are met.

The City of Toronto Act weighs in with respect to the delegation of powers. The DPS is not a system that remains outside the normal governing framework of the existing planning decision-making process—it requires OP policy; a by-law; and is informed by a separate provincial regulation. And depending how the system is structured it is a delegation of Council authority.

In summary, CORRA seeks Council not to abdicate its responsibilities and to respect the City's Official Plan Policies. CORRA's recommendations are consistent with the OP. CORRA asks for a fair, open and meaningful dialogue for resident and ratepayer associations concerning all planning matters.

CORRA is requesting to be kept informed and is seeking Notice from Council and other standing committees that may be involved in deciding this matter.

CORRA is requesting to be kept informed and is seeking Notice concerning the Tall Building Guidelines and the Development Permit System (DPS) from Council and other Standing Committees that may be involved in deciding on these matters. CORRA's contact information is:

CONFEDERATION OF RESIDENT AND RATEPAYER ASSOCIATIONS IN TORONTO
William H. Roberts, CORRA Chair
c/o 63 The South Kingsway
Toronto, Ontario M6S 3T4

Email: corratoronto@gmail.com
Direct Email: willadvocate@aol.com
Direct Line: 416.769.3162

CORRA is seeking your Council support. Thank you for considering CORRA's views.

Sincerely,

Eileen Denny

Eileen Denny
Vice-Chair, CORRA

cc. Resident and Ratepayer Executive and CORRA Members

Existing and Proposed Implementation Plans/Strategies

Implementation plans, strategies and guidelines that will help implement the Plan's objectives over time will include:

- a transportation plan to set priorities for new transit investment;
- regular Municipal Housing Statements to identify Toronto's housing needs and find ways to meet them;
- urban design guidelines to provide a more detailed framework for built form and public improvements in growth areas;
- a Wet Weather Flow Management Master Plan to prevent flooding and erosion, to improve the water quality of our lake and rivers and to restore groundwater recharge/discharge and aquatic habitats;
- a watercourse acquisition strategy to improve storm water management;
- a water efficiency plan to better conserve our water resources;
- an energy strategy to reduce energy consumption and promote sustainable energy sources;
- a Public Art Master Plan to identify important sites and opportunities for public art installations;
- a parks acquisition strategy to create parkland where it is needed most;
- green design guidelines to promote high standards of environmental performance in the construction and maintenance of buildings;
- guidelines for environmental impact studies to ensure the impact of development on the natural heritage system are fully understood and accounted for in decision making;
- an air quality strategy to improve air quality and promote public health and well being;
- a solid waste management plan to increase waste diversion;
- a pedestrian master plan to create a safe, comfortable and attractive pedestrian environment throughout the City;
- a bicycle master plan that identifies improvements to the bicycle path and lane system across the City;
- a food and hunger action plan to promote food security for Torontonians; and
- cultural and recreational facility strategies to identify service gaps and opportunities to provide cultural and recreational facilities.

5.3.2 IMPLEMENTATION PLANS AND STRATEGIES FOR CITY-BUILDING

The Official Plan provides a long term vision based on principles that are durable, but detailed action-oriented plans, programs and strategies will be needed to implement the Plan and to adapt to changing circumstances and challenges over the life of the Plan. For many initiatives requiring significant resource investment and/or involving multiple stakeholders, an implementation strategy is also critical to success, helping to set priorities over time and promoting an orchestrated implementation response among corporate and community partners. *Council's Strategic Plan*, the *Economic Development Strategy*, *Social Development Strategy*, *Environmental Plan* and a *Fiscal Sustainability Plan* are all examples of broad plans and strategies that are needed and that must be updated regularly to help guide municipal investment and decision making. Other implementation plans, strategies and guidelines are needed to support the Plan's objectives overtime and provide more detailed implementation guidance.

Implementation plans and strategies are not amendments to the Plan, but they are needed for its effective implementation and must be consistent with it. They help to ground the Plan's policies and vision and bring balance to decision making to ensure priorities are addressed over the life of the Plan. They provide on the one hand, more detailed guidance and precision about implementation that cannot be captured in the Plan itself and on the other, the ability to respond to changing circumstances and priorities over time.

Policies

1. Implementation plans, strategies and guidelines will be adopted to advance the vision, objectives and policies of this Plan. These implementation plans, strategies and guidelines, while they express Council policy, are not part of the Plan unless the Plan has been specifically amended to include them, in whole or in part, and do not have the status of policies in this Plan adopted under the *Planning Act*.

5.3.3 STRATEGIC REINVESTMENT

As Toronto grows and evolves over the life of this Plan, there will be a constant need for investment in infrastructure and services to maintain and improve our quality of life. The demands for investment are great and choosing priorities will always be a