

Teddington Park Residents Association Inc.

██████████ | Toronto, ON | ██████████ ██████████ | tpra@rogers.com

November 3, 2015

Mayor John Tory and Members of Council
City of Toronto
City Hall, 100 Queen Street West
Toronto, ON M5H 2N2

[Amended / Corrected Version]

Attention: Ms. Marilyn Toft, Council Secretariat Support
clerk@toronto.ca

Dear Mayor Tory and Members of Council:

PG7.1: Mid-Rise Buildings Performance Standards – Monitoring Update
City Council Meeting No. 10 – November 3RD, 2015

Teddington Park Residents Association Inc. (TPRA) has provided written and oral submissions at standing committee on these matters and our Association, unanimously supported by TPRA's Board of Directors, is now writing to request:

1. That City Council refer the staff report dated August 28, 2015, its attachments, and recommended actions for agenda item PG7.1 back and to direct City planning staff from the Strategic Initiatives, Policy & Analysis (SIPA) to report to Planning and Growth Management Committee (PGMC) at its March 2016 meeting with a supplementary report to address the substantive issues raised by members of the public, including residents, ratepayers and their groups, with Notice to allow for representations to be received on the proposed and / or revised recommendations.
2. That the base document and maps be amended by the identified corrections and / or mistakes that are technical in nature to allow for a clean base document on which substantive issues are to be considered.

TPRA provides the following reasons why the request is supportable and the right thing to do:

1. THE REPORT'S COMPLETENESS & ADEQUACY:

First, the report is 28 pages with attachments that include 15 pages of recommended actions that must be assessed in the context of the Avenues & Mid-Rise Buildings Study (A&MRBS). The extended monitoring period afforded by Council to use the Mid-Rise Building Performance Standards (MRBPS) in areas designated *Avenues* was to test their "effectiveness". What were the metrics to determine their effectiveness? How were they achieved? And will they serve the local contextual nuances that people value? And should the standards, as amended, proceed to (i) the "guideline" stage, and (ii) be applied in areas outside the *Avenues*?

Second, Council did not direct the use of these standards, under study, to be applied to areas outside the *Avenues* that would otherwise require an area study to determine their suitability. Yet this report clearly shows their use in areas not originally intended and makes recommendations of their applicability from the “under study” stage, to “guidelines” and to further recommend their precedence over existing law and policy. This raises further questions:

Where is the authority that allows “guidelines” to override Official Plan (OP) Policies / Area Plans / Secondary Plans?

- Where is the authority that allows “guidelines” to override existing zoning by-laws and area zoning?
- Where is the authority that allows “guidelines” to contain density ranges, that has the effect of predetermining the appropriate density for an area or site?
- Do the recommendations meet the legislated requirements, studies, consultation and Notice to amend policy, area or secondary plans / zoning?

These issues have not been addressed and would require written justification and / or amendments to the original report and recommended actions. Providing only a table of contents as a placeholder to the draft document is unacceptable given the extensive recommendations and potential revisions.

2. TO ADDRESS CITY-WIDE ISSUES:

- a. **Growth:** Our Official Plan is in conformity with the Provincial Policy Statement (PPS) and the Places to Grow Act as of June 2015.

The City’s Growth Plan Forecast is roughly 400,000 residential units (up to 2041). The current pipeline of residential units completed, approved and permits issued is 255,540 units, in other words 64% of the projected forecast has already been met. This leaves 26 years to meet the remaining projected 144,460 units.

[Source: p.4 <http://www.toronto.ca/legdocs/mmis/2015/pg/bgrd/backgroundfile-81678.pdf> ; PGMC Agenda: <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2015.PG5.1>]

Under this scenario is there a need to intensify outside the areas designated for growth? And how does the City propose to manage growth?

- b. **Costs:** What will the cost burdens be on the City’s current and future taxpayers when tall and mid-rise buildings (mid-rise buildings at 10+ storeys are tall buildings in low-rise areas) are permitted most everywhere outside areas designated for growth.

Has the City considered the unintended and indirect costs of displacement, housing affordability, additional service requirements and the potential cannibalization of existing vibrant communities that work?

Is the City to continue to rely on the existing hard infrastructure in place to service this widespread build out?

- c. **Local Issues:** Is the development of a generic mid-rise building template effective and responsive in enhancing local contextual nuances? How do the templates enhance local area business and economies? And if further area studies are needed, then why are spending limited human and financial resources to the creation of these generic guidelines?

3. DUE PROCESS:

The recommendations of moving the MRBPS from the “under study” to full “guidelines” and to act as precedent over policy and law to be applied outside the intended growth area should warrant Notice with the provision of adequate time to review and comment. Failed Notice should not be shrugged off.

TPRA once again is asking that Notice be sent to all interested parties and to residents/ratepayers that may be impacted by the changes proposed in this report and its recommendations to allow for adequate time to review and be given the opportunity to provide Council with meaningful representation that is considered.

SUMMARY:

TPRA urges members of Council to consider what is being recommended and whether the report and its recommendations adequately address the questions we have raised. TPRA is an independent volunteer residents’ organization of long standing. We are also an active member group of CORRA, the Confederation of Residents and Ratepayers in Toronto. TPRA supports CORRA’s position with our nuanced perspective.

Each of you were elected to make policy and law. [~~and g~~] Guidelines or standards under study should be justified and supportive of this legislation. Changes to law and policy should be backed by good research and robust public participation. Anything less will weaken everyone’s position.

TPRA is counting on Council to do the right thing – refer this item back to standing committee.

Sincerely,

Eileen Denny, President
Teddington Park Residents Association Inc.

cc. TPRA Board Secretary
Councillor Robinson
CORRA Executive
FoNTRA Executive
Others