

# Attachment 4

## City of Toronto Official Plan Five-Year Review Neighbourhoods and Environmental Policies Consultation Summary Report



Prepared by Lura Consulting for:  
The City of Toronto  
December 2014



This summary report was prepared by Lura Consulting. Lura is providing third-party consultation management services for the neighbourhoods and environmental policies consultations as part of the City of Toronto's Five-Year Official Plan Review. This summary report captures the feedback received during the consultations undertaken by the City between October and December 2014. If you have any questions or comments regarding the summary, please contact:

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## Executive Summary

The City of Toronto is in the process of conducting a Five-Year Official Plan Review. Municipalities in Ontario are required under Section 26 of the Provincial Planning Act to conduct a review of their Official Plan (OP) at least every five years.

Lura Consulting was retained by the City of Toronto to provide independent consultation and facilitation services for the neighbourhoods and environmental policies consultations as part of the Official Plan Review. This report provides an overview of the consultation process and a summary of the feedback received.

The consultations focused on obtaining comments on draft changes to the Healthy Neighbourhoods, 'Neighbourhoods', 'Apartment Neighbourhoods', and Environmental Policies of the Official Plan. The consultation process utilized several communication and engagement tools including the City's Official Plan Review website, online notifications, newspaper advertisements, targeted invitations, social media promotion, face-to-face consultation sessions and an online survey to encourage broad participation from key stakeholder organizations and the general public. The consultations were undertaken between October and December 2014.

The consultation program was designed to achieve participation from a diverse set of audiences including residents, community groups, the land development industry and environmental organizations. The consultation was structured to ensure that those who chose to participate are able to see their feedback accurately documented for consideration in the drafting of additional revisions to the draft policies. Face-to-face sessions included meetings and roundtable events with over 50 stakeholder groups and five Public Open Houses across the City's four Community Council Districts. Feedback was also received through an online survey and written submissions.

### Healthy Neighbourhoods, 'Neighbourhoods' & 'Apartment Neighbourhoods' Policies

The draft policy changes for the Healthy Neighbourhoods, 'Neighbourhoods' and 'Apartment Neighbourhoods' sections of the Plan were generally well-received. There was broad support among participants for policy changes to reinforce the protection of the physical character of 'Neighbourhoods' and implementing the Tower Renewal initiative in the Official Plan. However, there were many specific comments on how this could best be accomplished. A different view was expressed by the Building Industry and Land Development (BILD) association which favoured revamping the policies to modernize the landscape of neighbourhoods by supporting mixed use and intensification in these areas.

The most common theme that arose in the consultations was the difficulty in maintaining the existing physical character of neighbourhoods despite existing strong policies in the Official Plan to address this issue. Across all districts of the City, staff heard that applications and decisions on minor variance applications for replacement homes at the Committee of Adjustment and subsequent Ontario Municipal Board decisions often did not implement the Official Plan policies to maintain the physical character of 'Neighbourhoods'. As part of this discussion, the point was frequently raised that the geographic

delineation of the neighbourhood whose physical traits were to be maintained needed to be clarified and better reflect the area more immediately around a development application site.

The draft Plan amendments implementing the Tower Renewal initiative were strongly supported by participants, however there was concern that past infill on some sites in 'Apartment Neighbourhoods' has not maintained enough green space and amenities for new and existing residents.

Another common theme was the potential impact of more intensive development on sites designated as 'Mixed Use Areas' or 'Apartment Neighbourhoods' on surrounding low-rise neighbourhood. The increase in traffic levels in nearby neighbourhoods and the need for a proper transition in scale were among the key points raised, and the redevelopment of large sites such as plazas in the midst of low-rise neighbourhoods was the most common example cited.

While the diminishing affordability of housing in Toronto is part of the upcoming review of the Plan's Housing policies, there was an opportunity, which was taken frequently, to express concern through this consultation. The rise in housing prices in existing neighbourhoods and accompanying gentrification was a point of concern raised by several residents associations. It was suggested that the City's rental replacement policy should be extended to buildings with less than 6 units notwithstanding current legislation. The creation of tools, such as inclusionary zoning, and programs to build new affordable rental housing were also endorsed by participants.

## Environment Policies

There was a wealth of detailed information received through the consultation process on the draft Environmental Policies and designation of Environmentally Significant Areas (ESAs). Virtually all comments were supportive of the draft policies on natural heritage, climate change, energy and areas proposed for ESA protection. Through the process a number of priorities were identified, as well as suggestions for enhancements to the proposed policies and explanatory text.

While there was broad support for the natural heritage policies, many respondents proposed changes to the text to further emphasize the importance of protecting natural heritage for the long term. Suggestions were also made to strengthen policy language, strengthen buffer and setback policies and to bring the proposed policies more in alignment with the 2014 Provincial Policy Statement. The most common theme that arose throughout the consultations was the importance of managing and restoring natural areas. Key suggestions included the need to address overuse and inappropriate uses, invasive species, damage from extreme weather events and infrastructure replacement and maintenance. Another common theme was the need to expand the greenspace system by adding new lands that have natural heritage or recreational value and by enhancing connectivity to adjacent lands. Participants also emphasized the importance of community stewardship and the need to increase public awareness about the importance of natural areas and biodiversity.

There was strong support for using the Official Plan ESA designation to protect significant natural areas and for the proposed ESA designations. At the same time, participants wanted to ensure that identifying ESAs would not diminish the importance of the rest of the natural heritage system. A common theme was the need to protect the significant qualities of ESAs by preventing impacts from adjacent use, overuse and inappropriate use, by making ESAs more resilient and by providing buffers. Planning staff

heard requests to expand four of the proposed ESA designations to include adjacent lands and consider two new areas as ESAs.

The new draft policies and text changes relating to climate change and energy were well received. Many comments suggested that the City continue to raise the bar on requirements for new development both at the site and neighbourhood level for: energy conservation, efficiency, and generation; stormwater management; urban heat island effect reduction; and encouraging green infrastructure and urban agriculture. Some participants proposed that the policy language be more aggressive, replacing 'will' and 'encourage' with 'should'. It was also noted that technical terms such as 'bioswales' or 'high albedo' be explained or more generic text used and explanatory text be added such as a description of 'low impact' development.

Many of the comments heard were focused on policy implementation, for example, that small scale residential (less than 5 units) be subject to performance requirements for energy efficiency, stormwater management and light pollution. Currently, the Toronto Green Standard applies through site plan review to low-rise residential sites of more than 5 units.

The Roundtable on Climate Change, attended by 45 climate change experts, noted the urgent need to address climate change in new development and infrastructure and the high economic and social costs (direct and indirect) of not planning for resilience. Participants cited the need to address 'food deserts', encourage urban agriculture, understand the costs of climate impacts to assess the value of adaptation requirements, and to undertake a risk assessment for all City assets, services and policies. There was strong support for the City to continue to engage and educate the public on climate change mitigation and adaptation.

Additional detail on the feedback received is provided in Sections 3 and 4 of this report.

It should be noted that some additional feedback was provided directly to Planning Division staff including feedback from other City of Toronto departments. All feedback collected during the consultation process will be used by City Planning staff to report back to the Planning and Growth Management Committee in early 2015 with proposed amendments to the Official Plan.

## 1) Introduction

### a) Background

The City of Toronto is in the process of conducting a Five-Year Official Plan Review. Municipalities in Ontario are required under Section 26 of the Provincial Planning Act to conduct a review of their Official Plan (OP) at least every five years.

The City of Toronto's OP Review process has been underway since 2011. An initial round of stakeholder and public engagement to introduce the OP Review process took place in 2011 and resulted in suggestions from the public on the need to update or enhance specific OP policies. The current review process involves identifying changes to thematic areas of the OP. To date, City Planning has led a series of topic-based consultations on transportation, economic health and employment areas, and heritage resources and Council has enacted Official Plan amendments for these policy areas. In the fall of 2014 the City Planning Division undertook public consultations on draft policies for Healthy Neighbourhoods, 'Neighbourhoods', 'Apartment Neighbourhoods', and the Environment as well as directions for revising the Plan's urban design policies. Through this process staff are systematically developing proposed revisions to OP policies for further public review and approval by City Council. Engagement with stakeholders and the broader public is a critical element of this policy development process.

This report focuses on 'what we heard' in the fall 2014 public consultation on draft revisions to the Healthy Neighbourhoods, 'Neighbourhoods', 'Apartment Neighbourhoods' and Environmental Policies of the Official Plan. The draft policies have been formulated to implement the Tower Renewal initiative, and to address issues raised at the initial series of public open houses at the commencement of the Five Year Review of the Official Plan in 2011 as well as issues raised internally by City staff. The draft Environmental policies incorporate and implement Council motions and directives regarding the City's natural environment and climate change requirements, address concerns raised in the 2011 public open houses and in consultations with staff at the City, the Toronto Region and Conservation Authority (TRCA) and the Province.

The City's draft 'Neighbourhoods' policies are intended to strengthen and clarify the existing policies that protect the character and scale of established residential communities. Proposed changes to the 'Apartment Neighbourhood' policies focus on implementing the City's Tower Renewal Initiative to encourage physical improvements and adding amenities to existing apartment towers. Another key proposed policy addition is more extensive criteria for infill development on sites with an existing apartment building.

The intent of the City's draft environmental policies is to strengthen and build upon the existing policies and enable the City's continued leadership. The draft environmental policies will assist the City to continue to adapt to and mitigate climate change; promote energy conservation and resiliency; recognize connections to the Greenbelt; further protect natural heritage, including the addition of 68 new environmentally significant areas (ESAs) and extensions to 14 of the 18 existing environmentally significant areas; and promote biodiversity.

### b) Purpose of the Neighbourhoods and Environmental Policies Consultations

The purpose of this consultation was to gather comments and feedback pertaining to the draft changes to Toronto's OP policies for Healthy Neighbourhoods, 'Neighbourhoods', 'Apartment Neighbourhoods'

and the Environment. The approach taken for community and stakeholder engagement was to ensure that key stakeholder groups, as well as the general public, had an opportunity to participate in the refinement of Toronto's OP policies as they relate to neighbourhoods and the environment.

The objectives of the community and stakeholder engagement process were to:

- Provide an inclusive approach to engagement so that all Torontonians and key stakeholder groups have the opportunity to participate in the refinement of the draft policies;
- Present the draft policy changes in easy-to-understand and accessible language to enable Torontonians to provide informed feedback; and
- Document the feedback received in a manner that accurately reflects the input received during the engagement process and enables City staff and Council to make informed decisions about the draft policies.

### c) Report Contents

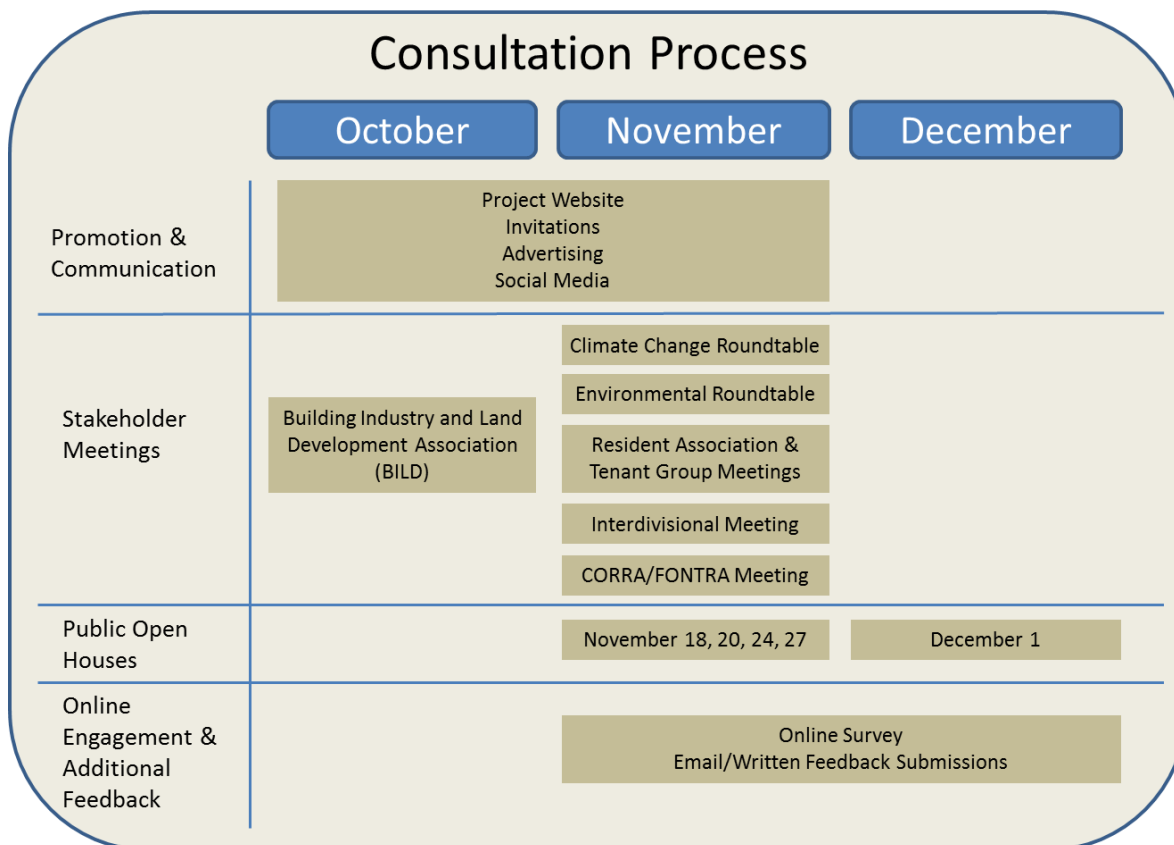
This report provides a description of the activities undertaken as part of the consultations for the Official Plan draft policy revisions for Healthy Neighbourhoods, 'Neighbourhoods', 'Apartment Neighbourhoods' and the Environment, as well as a summary of the feedback received during the consultation process. Section 2 provides an overview of the consultation process, the various consultation activities used to reach and engage different audiences, and the communication and promotional tactics used to encourage participation. A summary of key feedback on the draft policy revisions for Healthy Neighbourhoods, 'Neighbourhoods' and 'Apartment Neighbourhoods' is provided in Section 3, while Section 4 provides a summary of key feedback on the draft revisions to the Plan's environmental policies. Next steps in the Official Plan Review of these draft policies are outlined in Section 5.

## 2) Consultation Process Overview

### a) Consultation Process

The consultation process on the neighbourhoods and environmental policies took place during October, November, and December 2014. To ensure a well-rounded, inclusive, and accessible consultation process, a multi-faceted approach was taken, targeting key stakeholders and the general public through a number of different mechanisms. The following diagram provides an overview of the consultation process and timing. Each component is described in greater detail in the following sections.





## b) Communication and Promotional Tactics

### **Project Website**

A dedicated [webpage](#) on the City of Toronto’s Official Plan Review website acted as a landing spot for all information related to the draft neighbourhoods and environmental policy changes and consultation process. The website included all documents and resources related to the process, information about opportunities to get involved, and offered an opportunity to provide feedback through an online survey.

### **Social Media**

The [@CityPlanTO](#) Twitter account was used to promote the public consultation events, as well as increase awareness and encourage participation. Tweets were posted in advance of consultation events and included the hashtag #opreview.

### **Public Notice/Invitation**

A combination of public notices and invitations were used to promote public and stakeholder awareness of upcoming consultation events:

- An invitation letter was sent to over 300 Resident Associations to attend special Residents Forums for small-group discussions and informing them of the Open Houses;
- An invitation email was sent to approximately 115 environmental and climate change stakeholders to promote participation at the roundtables;
- A notice was sent via E-Updates to over 4,000 subscribers for news on the Official Plan Review process;

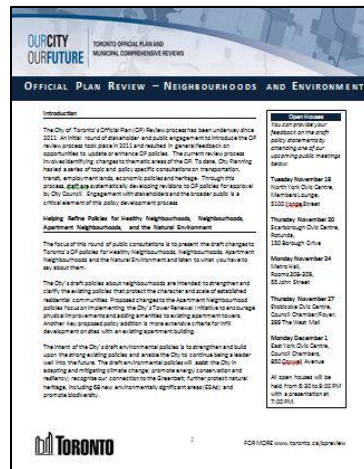
- Letters and emails were sent to all persons and groups who had requested to be informed of Official Plan Review events and reports
- A notice was placed in the Toronto Star publicizing the Public Open Houses;
- An advertisement for the Public Open Houses ran for two weeks on the Spacing Magazine website; and
- A flyer was distributed to Universities, Professional Associations, and new City Councillors.

### c) Consultation Resources

A number of resources were developed to facilitate participation in the consultation process. These resources were made available on the project website and at the Public Open Houses. An overview of each resource is provided below.

#### Discussion Guide

A Discussion Guide was developed which contained background information and discussion questions related to Healthy Neighbourhoods, 'Neighbourhoods', and 'Apartment Neighbourhoods', Natural Heritage and Biodiversity, Environmentally Significant Areas, and Climate Change and Resiliency. The Discussion Guide was provided to participants at all the consultation events and was available on the project website in a survey format.



Cover Page of Discussion Guide (left) and Photo of an Open House Display Panel (right).

#### Overview Presentations

Overview presentations for both the Neighbourhoods Policies and Environmental Policies were developed to explain the proposed changes and rationale. The presentations were delivered at Roundtable meetings, stakeholder meetings and Public Open Houses. A PDF version of the presentations was made available on the project website.

#### Open House Panels

Display panels were developed to provide an overview of the draft policy changes and provide space for participants to provide their feedback directly on the panels. These panels were on display at the Public Open Houses and were available for viewing on the project website.

### **Staff Reports**

The following Staff Reports detailing the draft policy changes were provided at all consultation events and were available for viewing on the project website:

1. Draft Policies for Healthy Neighbourhoods, *Neighbourhoods*, and *Apartment Neighbourhoods*, May 20, 2014
2. Draft Environmental Policies, July 11, 2014
3. Environmentally Significant Areas – Proposed Official Plan Amendment, July 10, 2014

### **Interactive Map**

The City of Toronto's web-enabled [interactive map](#) showing both existing and proposed Environmentally Significant Areas (ESAs) was available on a laptop during the Public Open Houses for participants to view areas of interest in more detail. A display panel available at the Open Houses also featured a map of the existing and proposed ESAs.

### **Information Resources**

Booklets from the City of Toronto Biodiversity Series and the Environmentally Significant Areas of Toronto brochure were made available as supplementary educational resources at all consultation events.

All materials developed in support of the consultation process can be found in Appendix B, with the exception of the City of Toronto Biodiversity Series booklets and the Environmentally Significant Areas of Toronto brochure.

## **d) Consultation Activities**

### **Stakeholder Meetings**

Meetings were held with key interest groups including: the Building Industry and Land Development Association (BILD), the Confederation of Residents and Ratepayers Associations, and the Federation of North Toronto Residents Associations. The purpose of these meetings was to brief these stakeholders on the proposed policy changes and solicit feedback. Individual summaries from the stakeholder meetings can be found in Appendix B.

### **Resident Association and Tenant Group Meetings**

Four forums for Residents Associations and umbrella resident organizations were held across the City for small-group face-to-face discussions. A separate meeting was held with tenant associations to discuss the issues of concern in 'Apartment Neighbourhoods'. The purpose of these meetings was to brief these stakeholders on the proposed policy changes and solicit feedback. The format of the meetings included an overview presentation, questions and answers, and open discussion about the draft policies. Individual summaries from the resident association and tenant group meetings can be found in Appendix B. Overall, 36 representatives of resident and tenant groups participated in the meetings.

The following resident association and tenant groups were represented at the meetings held throughout November 2014:

- Advocacy Centre for Tenants Ontario (ACTO)
- Association of Community Organizations for Reform Now (ACORN)
- Bayview Village Association
- Beach Residents Association of Toronto
- Beach Triangle Residents Association
- Bloor West Village Residents Association
- CD Farquharson Community Association
- Confederation of Resident and Ratepayer Associations in Toronto (CORRA)
- Cottingham Square Community Association
- Federation of North Toronto Residents' Associations (FoNTRA)
- Federation of Metro Tenants' Associations
- Greater Beach Neighbourhood Association
- Lakeshore Planning Council (LPCC)
- Maryvale Community Association
- Mimico Lakeshore Network
- Riverside Area Residents Association
- South Eglinton Ratepayers' & Residents' Association (SERRA)
- St. Andrew's Ratepayers Association
- Swansea Area Ratepayers Association
- Teddington Park Residents Association
- Thompson Orchard Community Association
- West Lansing Homeowners Association

### ***Environmental Roundtables***

Two roundtables were held at Metro Hall to discuss the draft environmental policies. Key stakeholders from a range of sectors were invited to attend. The Climate Change and Resiliency Roundtable was held on November 7, 2014 with approximately 45 participants. The Environmental Roundtable was held on November 19, 2014 with approximately 16 participants. The purpose of these consultation events was to brief stakeholders on the proposed environmental policy changes (with a focus on natural heritage and biodiversity, Environmentally Significant Areas, climate change and energy) and to solicit feedback. Each session consisted of an overview presentation, questions and answers, small group discussions on the draft policies, and a full group report back. The Climate Change and Resiliency Roundtable included a presentation by guest speaker Alec Hay from University of Toronto's Centre for Resilience of Critical Infrastructure. Individual roundtable meeting summaries can be found in Appendix B.

Organizations represented at the Climate Change and Resiliency Roundtable on November 7, 2014 included:

- Building, Industry and Land Development Association (BILD)
- Canadian Standards Association
- Clean Air Partnership
- Creating Healthy and Sustainable Environments (CHASE)
- DIALOG Design
- Dillon Consulting
- Environmental Defence
- GO Capital Infrastructure
- Greater Toronto Apartment Association
- ICLEI Canada
- Metrolinx
- Ministry of Environment and Climate Change
- Ministry of Municipal Affairs and Housing
- Office of the Environmental Commissioner of Ontario
- Ryerson University
- Sustainable TO
- Toronto and Region Conservation Authority (TRCA)
- Toronto Atmospheric Fund
- Toronto Environmental Alliance
- Toronto Hydro
- Toronto Public Health
- University of Toronto
- University of Waterloo

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Organizations represented at the Environmental Roundtable on November 19, 2014 included:

- City of Toronto – Environment and Energy Division
- City of Toronto – Parks, Forestry and Recreation
- City of Toronto – Transportation Services
- Environmental Defence
- Friends of the Greenbelt Foundation
- Ontario Federation of Anglers and Hunters
- Toronto and Region Conservation Authority (TRCA)
- Toronto Atmospheric Fund



Photo of Environmental Roundtable, November 19, 2014.

**Public Open Houses**

Five Public Open Houses were hosted to inform community members of the proposed changes to the Neighbourhoods and Environmental policies and collect comments and feedback from participants. Public Open Houses were held in North York, Scarborough, Downtown Toronto, Etobicoke, and East York with an overall attendance of approximately 130 community members.

<b>North York Civic Centre</b> 5100 Yonge St.	<b>Tuesday, November 18, 2014</b> 6:30 pm to 9:00 pm
<b>Scarborough Civic Centre</b> 150 Borough Drive	<b>Thursday, November 20, 2014</b> 6:30 pm to 9:00 pm
<b>Metro Hall</b> 55 John Street	<b>Monday, November 24, 2014</b> 6:30 pm to 9:00 pm
<b>Etobicoke Civic Centre</b> 2 Civic Centre Court	<b>Thursday, November 27, 2014</b> 6:30 pm to 9:00 pm
<b>East York Civic Centre</b> 850 Coxwell Avenue	<b>Monday, December 1, 2014</b> 6:30 pm to 9:00pm

The format of the meetings was designed to encourage as much discussion as possible through a number of different methods:

- **Discussion Guide** – The Discussion Guide described above was distributed to each participant at the Public Open Houses. Participants were encouraged to provide feedback by completing the discussion questions and handing it in at the end of the meeting.
- **Open House Display Panels** – Each session included panels that provided an overview of the draft policy changes for participants to review at their leisure. City of Toronto Planning staff were available to provide any additional information, explain the draft policy changes, and listen to feedback on a one-on-one basis. Participants were also able to provide comments directly on the panels through the use of “sticky notes”.
- **Presentations** – Two presentations were given by City of Toronto Planning Division staff that provided an overview of the draft Neighbourhoods and Environmental policy changes.
- **Questions of Clarification** – Following the presentation, participants were able to ask any further questions of clarification regarding the draft policy changes that were not addressed in the presentation or through individual conversations during the open house component.
- **Discussion Session** – Approximately one hour was provided for further discussion, questions and feedback on the draft policy changes. Discussion occurred either in small tables or as a large group, depending on the number of participants in attendance. Individual open house summaries can be found in Appendix C.



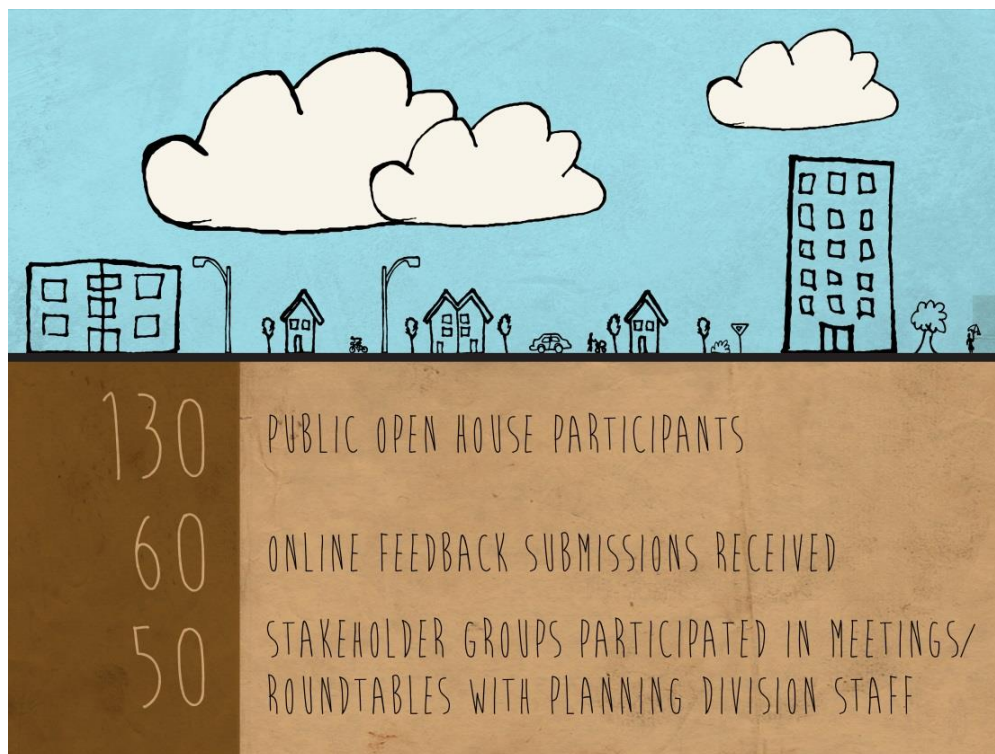
Photos of the North York (left) and East York (right) Public Open Houses.

### **Online Engagement**

In parallel with the above face-to-face engagement activities, online options were also available for the public to learn about the draft policy changes and provide feedback.

- **Online Survey** – An online version of the Discussion Guide was made available in a survey format in order for community members to provide additional feedback outside of the consultation events until December 5, 2014. Sixteen online survey submissions were received and have been compiled in Appendix D.
- **Email** – Participants were encouraged to provide feedback directly to the Official Plan Review email address – [opreview@toronto.ca](mailto:opreview@toronto.ca). Over forty submissions were received by email and are summarized in this report. Letters received from stakeholder organizations can be found in Appendix E.
- **Twitter** - Twitter was used primarily as a mechanism to promote the Public Open Houses.





### 3) Summary of Key Feedback on Neighbourhoods Policies

Throughout the consultation process, participants provided feedback and suggestions on the draft Healthy Neighbourhoods, 'Neighbourhoods' and 'Apartment Neighbourhoods' policies. Common topics of discussion were: the criteria and method for determining existing physical character in 'Neighbourhoods', protection of greenspace in 'Apartment Neighbourhoods', the protection of established neighbourhoods from adjacent intensification in 'Mixed Use Areas' and 'Apartment Neighbourhoods', and the provision and protection of affordable rental housing units. Key feedback is summarized below.

#### a) Strengths and Challenges of Toronto's 'Neighbourhoods' and 'Apartment Neighbourhoods'

As an introduction to the discussion on the Neighbourhoods policies, participants were asked to identify the current strengths and challenges of Toronto's 'Neighbourhoods' and 'Apartment Neighbourhoods'. Highlights of the feedback received are provided below:

Strengths	Challenges
<ul style="list-style-type: none"> <li>▪ Proximity to diverse services and shopping.</li> <li>▪ Mature tree canopy and proximity to parks and ravines.</li> <li>▪ Neighbourhoods are mixed (i.e. single family dwellings and low-rise</li> </ul>	<ul style="list-style-type: none"> <li>▪ Insufficient public transit infrastructure and development.</li> <li>▪ Confined space for public service enhancements including stormwater ponds, bike lanes, etc.</li> <li>▪ Lack of Affordable housing.</li> <li>▪ Apartment buildings in disrepair.</li> </ul>

Strengths	Challenges
<p>apartment buildings).</p> <ul style="list-style-type: none"> <li>▪ Walkability and access to public transit in some neighbourhoods.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Engaging tenants and landlords to care about and maintain the places they live in.</li> <li>▪ Lack of access to green space near high-rise apartment buildings.</li> <li>▪ Local services that are part of strong communities (e.g. parks, schools) are at/over capacity.</li> <li>▪ Overdevelopment is a threat to established residential communities.</li> <li>▪ Improving quality of housing stock (single family and multi-family residences) while maintaining unique neighbourhood characteristics.</li> </ul>

### b) Section 2.3.1 Healthy Neighbourhoods

Participants provided the following feedback and suggestions regarding the draft policies in Section 2.3.1 Healthy Neighbourhoods. The draft policies are attached as Appendix F to this report:

- **Policy 1 and 2** – These are the policies that describe the nature of 'Neighbourhoods' and 'Apartment Neighbourhoods'. Comments on these policies included the need to describe the type of development anticipated (i.e., low density development in 'Neighbourhoods' and higher density development in 'Apartment Neighbourhoods'). At least one participating group recommended the portion of Policy 2 outlining circumstances and criteria for infill on a lot with an existing apartment in an 'Apartment Neighbourhood' should be deleted as some of the same matters are dealt with in Section 4.2 of the Plan.
- **Policy 10** – There was widespread support for Policy 10 which encourages small-scale commercial, community and institutional uses in 'Apartment Neighbourhoods' to better serve area residents. Participants recognized that clusters of apartment towers are often isolated and a long walk from retail stores and the City should encourage and not just permit retail and institutional uses on the ground floor of buildings.
- **Policy 11** – There was also widespread support for Policy 11 which encourages food gardens in underutilized portions of landscaped open space and mobile food vendors, particularly in areas where residents do not have convenient walking access to sources of fresh food. One suggestion was that the policy could be enhanced by promoting environmental education and programming related to these activities.
- The Healthy Neighbourhoods policies should provide greater emphasis on human elements (i.e., 'Neighbourhoods' and 'Apartment Neighbourhoods' support diverse households, enable residents to raise and care for children and dependents).

### c) Section 3.2.1 Housing

The proposed change to the Plan's Housing policies was relatively minor and intended to implement the City's Tower Renewal initiative. Policy 5 is proposed to be revised to state that when a new development takes place on a site with existing housing that is remaining, the City's priority under Section 37 should be improving and retrofitting the existing housing without charge-through to the tenants. However,



participants made additional suggestions which will be passed through to the review of Housing Policies. These suggestions include:

- Amending the City of Toronto Act and extending rental unit replacement to buildings with less than six units to be more effective in preventing the cumulative loss of rental units during small scale development, such as the loss of rental units above retail stores on main streets during redevelopment.
- The City should call on the Provincial government to give the City authority to create affordable housing through new tools such as inclusionary zoning.
- The City should request the Province for legislative changes that would permit the City to impose rent controls on rental housing units.

#### d) Section 4.1 'Neighbourhoods'

Participants strongly supported the direction of the existing 'Neighbourhoods' policies to respect and reinforce the existing physical character of the area, and desired to further strengthen these policies. There was extensive discussion on the best means of doing so. The exception to this consensus was the position of the Building Industry and Land Development (BILD) association that wished to see the modernization of the landscape of neighbourhoods by supporting mixed use and intensification in these areas, while still being sensitive to the existing built context.

The most common theme of the consultations was the impact of large-scale replacement houses on the character of existing neighbourhoods, which participants believed were being approved through inappropriate minor variances approved by either the Committee of Adjustment or the Ontario Municipal Board (OMB). The point was often made that the Official Plan policies were not heeded in these decisions and were therefore ineffective on the ground. Concerns were also raised over the gentrification of neighbourhoods, which diminished both the economic diversity and affordability of some neighbourhoods.

The following section sets out critiques of and suggestions for the draft policies in Section 4.1 'Neighbourhoods':

- **Policy 1** – A CORRA representative made the case that the qualifier “walk-up” when applied to four-storey apartment buildings in 'Neighbourhoods' should not be removed since it is a well understood term that works well with the planning rationale for limiting the height of apartment buildings to four-storeys in 'Neighbourhoods'. If necessary, a sidebar could be added to provide clarity that elevators are permitted in all neighbourhood building types.
- **Policy 3** – The qualifier “incidental to” regarding small-scale commercial uses on major streets in 'Neighbourhoods' should not be deleted from Policy 3 as it indicates that any commercial uses should be subordinate to the primary residential use of the area rather than a standalone commercial enterprise that is intended to draw clientele from a broader area.
- **Policy 5** – Policy 5 is a foundation Official Plan policy for neighbourhoods that states new development will respect and reinforce the existing physical character of the neighbourhood and sets out the criteria to be examined when defining the physical character of the neighbourhood. Apart from the submission from BILD, the direction of the existing policy was

supported by participants, as was the desire to further strengthen and clarify the policy. Changes that had been proposed to this policy included a sidebar on how to determine the geographic boundaries of a neighbourhood, addition of the prevailing design and elevation of the driveways and garages as a criteria, and a prohibition on a second house being constructed on the same lot. This policy garnered the most conversation and response in the public consultations.

- The issue of how to define a neighbourhood was the source of considerable debate. There appeared to be a consensus that the evaluation of where to draw the lines on a neighbourhood should have more emphasis on proximity to the actual development site. Some wanted more importance given to the immediately adjacent properties and the block face. Others did not want the immediately adjacent property to be determinative since the property next door may be the outlier in the neighbourhood. It was also suggested that the criteria for delineating a neighbourhood be a statutory policy rather than just a sidebar to provide more 'weight' at OMB hearings. There were also suggestions that the zoning by-law no longer permitted should not be taken into account when retaining the existing character of the area.
- There were also numerous comments on the addition to Policy 5 of a prohibition of a house behind a house on the same lot. The first issue was that the policy would not allow for multiple houses or townhouses in a condominium-registered development where subdivision had not occurred, which was an inadvertent consequence of the drafting of the policy. Another issue raised with the draft policy was that the intent could be circumvented through a severance at Committee of Adjustment. Another issue raised was that the policy as drafted could be read as a prohibition on laneway housing, where the laneway house was not severed. Several participants were of the opinion that the Official Plan should allow for laneway housing where it is compatible with the character of the neighbourhood. There was general support for the concept of not building a second house in the backyard in neighbourhoods, but many concerns were raised with the policy addition as drafted.
- There was a general consensus that adding the prevailing design and elevation of driveways and garages to the criteria for respecting neighbourhood character was desirable, as well as support for discouraging below-grade integral garages for safety, stormwater flow and neighbourhood character reasons. Several participants suggested below-grade garages should be prohibited not simply discouraged. The few participants opposed this policy on the basis that if the integral garages were above grade they could add height to a new home in order to achieve the same gross floor area. There was some concern expressed about the elevated first floor being built in new homes regardless of the design of the driveway and garage. Finally, in the East York open house, there was concern not just with the design and elevation of driveways, but also the location of access. This concern arose from rear access to through lots whose front and rear lot lines fronted on public streets where the community considered this to be poor planning.

#### e) Section 4.2 'Apartment Neighbourhoods'

Policy 3 in Section 4.2 'Apartment Neighbourhoods' is the policy that sets out the criteria for infill development on a site with an existing apartment building that has sufficient space for additional development. This policy is also related in some instances to the Tower Renewal Initiative. There were a number of comments on this policy. The intent of preserving landscaped open space and amenities for

both existing and new residents was supported. Some participants suggested that not enough green space was being preserved in such infill to date. Others were concerned about how it would be determined that there was 'sufficient' or 'underutilized' space for infill development, and not all sites with existing buildings could handle additional infill development. There was general support of adding the criterion that the infill development should respect the scale, height and massing of the existing apartment building(s) on the site. CORRA and FoNTRA suggested adding the criterion that adequate separation distance between buildings be maintained on the site.

#### f) General Feedback

The following general feedback was provided:

- It is important to make the Official Plan language become more statutory / prescriptive as there is a general feeling that Official Plan language is being challenged by OMB processes.
- There is concern by community members with the ease at which minor variances can be granted at the Committee of Adjustment in 'Neighbourhoods', and that many of the variances were not indeed minor.
- Intensification (apartment infill, 'Avenues') should not be permitted near or adjacent to natural heritage areas.
- The City should consider a way to monitor and evaluate the implementation of the Official Plan on a neighbourhood level in relation to measuring quality of life as neighbourhoods evolve.
- The City should ensure that adequate community services and facilities such as schools, libraries and community centres are provided when intensification is occurring in an area.
- The lack of affordable housing in Toronto needs to be addressed by the City by means such as advocating for new tools such as inclusionary zoning, rent controls and extending the required replacement of rental units to sites with less than 6 units.
- Development of larger sites designated as 'Mixed Use Areas' that are adjacent to low-rise residents must be guided by new criteria that account for the impact of the intensified development upon those neighbourhoods.

## 4) Summary of Key Feedback on Environment Policies

Throughout the consultation process participants provided comments and suggestions on the environment text and policies. Feedback is summarized below and is divided into three sections: a) Natural Heritage and Biodiversity, b) Environmentally Significant Areas, and c) Climate Change and Energy.

### a) Natural Heritage and Biodiversity

#### **Priorities for Protection and Enhancement of Natural Heritage and Biodiversity in Toronto**

Participants identified the following priorities for protection and enhancement of natural heritage and biodiversity in Toronto:

- As the city grows it is important to make greenspace a higher priority.
- Add land to expand the natural heritage system whenever possible; consolidate large tracts of parkland and acquire significant parcels as part of redevelopment.

- Connect waterfront lands, create more greenspace along the waterfront and ensure existing waterfront greenspace and habitats are protected from development.
- Enhance the connectivity of natural heritage features including utility corridors, back yards, street trees and canopy coverage.
- Continuously improve the City’s understanding of how biodiversity and natural heritage will be impacted by climate change (i.e. through risk assessment and continuous monitoring).
- Promote stewardship and provide outreach and education about the importance of ESAs and natural areas and how to protect and use these areas appropriately. Highlight the connection between biodiversity / natural heritage and human health.
- Enhance management and restoration of natural areas to address invasive species, encroachment, overuse and damage from flooding events.

### **Suggested Changes to Natural Heritage and Biodiversity Text and Policies**

Participants provided the following comments on natural heritage and biodiversity text and policies. Feedback is organized according to recurring themes:

#### *Policy Context and Language*

- Include more historical context about natural heritage in the Official Plan (e.g., significant habitat loss has already occurred and restoration efforts are underway).
- Strengthen flexible language by deleting terms such as “should” and “when feasible” (e.g. Section 2.3.2 policies).

#### *Restoration and Management*

- Recognize the important role of volunteer stewardship (e.g., Section 2.3.2 text).
- Address encroachment of recreational uses that cause damage to natural areas and ravines (e.g., off leash dogs and off trail bikes).
- Emphasize restoration of natural heritage features as part of infrastructure maintenance / replacement in natural heritage areas (e.g., water infrastructure maintenance in valleys).
- Strengthen policies for invasive species management and pest mitigation planning (e.g., Emerald Ash Borer, Asian Longhorn Beetle).
- Encourage the use of native and diverse species in all plantings (e.g., green roofs, urban agriculture, lawns, and ornamental plants).
- Emphasize ravine protection from impacts of heavy rainfall events.
- Emphasize the importance of maintaining the urban tree canopy.
- Include language on the potential of hydro corridors and the importance of seeking opportunities to improve the natural environment in hydro corridors in partnership with Hydro One, community groups and other interested parties.

#### *Buffers/Setbacks*

- Strengthen setback and buffer policies (e.g., ancillary structures, such as new garages, should not be exempt from policy regarding set back from hazards).
- Greater setbacks from valleys are needed to enhance public access and provide greater protection of natural heritage (e.g., where tall buildings are proposed on tableland adjacent to narrow valleys).
- It should be clearly stated that Environmental Impact Studies and buffer areas will be established near the beginning of a development application process.

- Development situated on lands adjacent to significant natural areas should accommodate large tree and vegetation growth on the site to help provide buffer function.

#### *Connectivity, Protection and Resilience*

- Use a risk assessment approach to see where resiliency can be built (i.e. when infrastructure is considered).
- Consider indirect and cumulative impacts of development on natural heritage areas.
- More attention should be given to protecting habitat for migratory birds and butterflies.
- The Humber and Don River Valleys and Etobicoke Creek should be designated as Greenbelt Urban River Valleys rather than river valley connections.
- 'Avenues' should not be applied to streets which are too close to natural features, especially ESAs and Areas of Natural and Scientific Interest (ANSIs).
- Provide clarification in the sidebar on “Lands Adjacent to Provincially Significant Areas” with respect to the types of studies that will be carried out to demonstrate that there will be no negative impacts (e.g., site specific study versus large scale study on an entire natural feature).
- Revise Policy 3.4.14 to prohibit development or site alteration in fish habitat and all habitats of threatened or endangered species to align with the 2014 Provincial Policy Statement.
- A Parks Master Plan developed through the lens of the Natural Heritage Reference Manual (NHRM) can determine activities suitable for natural heritage and adjacent areas.

#### b) Environmentally Significant Areas (ESAs)

##### **Feedback on Proposed ESAs**

Participants were asked if the proposed ESAs ensure an appropriate level of protection for key features of the City's natural heritage system, any issues or concerns, and suggested changes. Highlights of feedback include:

- There was broad support for using the Official Plan ESA designation to protect significant natural areas and for increasing the number of ESAs across the City.
- ESAs should be protected for the long term.
- ESA designations should be kept up to date and expanded to include additional areas.
- ESAs should be managed to protect natural features and functions and prevent overuse and inappropriate use.
- ESAs should be protected from adverse impacts of adjacent development and uses.
- Increase public awareness about the importance of ESAs.
- ESAs on watercourses will be vulnerable to upstream events (e.g., flooding) and habitat quality issues. Areas upstream of the ESAs need attention and protection.
- Consider future-proofing the ESAs and forecasting how climate change will impact species' survival in the future (i.e. disaster tolerance).

##### **ESA Text and Policies**

- Add explicit language about managing and preserving ESAs for the future.
- Clarify that all of the natural heritage system is “significant” so that it cannot be argued that the remaining natural heritage system is not “significant” enough for protection.

- As is indicated in Table 12-1 of the Natural Heritage Reference Manual (NHRM), the Official Plan should acknowledge that it may not reflect the most up-to-date information on the location and boundaries of significant features that are identified or approved by the Ministry of Natural Resources as set out in the Provincial Policy Statement.

### **Suggested Additions/Modifications to the ESA Designations**

The following suggestions for additions and revisions to the proposed ESA designations were provided during consultations:

- **Colonel Samuel Smith Park** – Given the significance of Colonel Samuel Smith Park as a habitat for migrating birds and butterflies, the proposed ESA should be expanded to include: two adjacent areas to the north known as North Creek and Dogwood Thickets; the four-acre woodlot adjacent to the south-east corner of Kipling Ave. and Lake Shore Blvd. West; and the entire “spit” south of the bike path.
- **Lower Duck Pond** – The wetlands around the Lower Duck Pond in High Park should be included in the ESA boundary as the area provides suitable habitat for Blanding's turtle species.
- **Guild Wood Forest** – The Guild Wood Forest ESA designation should extend further east because the same ecological environment carries through the Guild Inn Property eastward to the Jack Minor Public School.
- **Humber Bay Park East** – The north-east portion of Humber Bay Park East should be considered as an ESA because this area contains a mix of deciduous trees, shrubs, meadow and a diversity of shoreline habitats that provide an important stopover for a variety of migratory bird species.
- **Etobicoke Creek Valley** – The area in the lower Etobicoke Creek Valley, between Horner Ave. and Lake Shore Blvd. West should be considered as an ESA as it consists of an uncommon mixed forest dominated by mature Hemlock and White Pine.
- **James Gardens** – A larger portion of James Gardens should be considered for ESA designation.

### **c) Climate Change and Energy**

Participants were asked what the main priorities are for the City related to climate change and energy, any issues or concerns with the draft policies and suggested policy changes.

#### **Climate Change Priorities**

The following priorities were identified for climate change:

- Address climate change adaptation through new building and infrastructure design standards.
- Focus on complete community design and low impact development; consider stormwater management on a neighbourhood level.
- Recognize permeability and heat island effect issues.
- Encourage sustainable transportation. Guide new development towards locations with transportation efficiencies.
- Support localization of food systems.
- Recognize the positive impacts of an enhanced natural heritage system on climate change resiliency.
- Understand the economic and social (direct and indirect) costs of not planning for resilience to justify the costs of acting on climate change resiliency.
- Embed climate change mitigation and adaptation into all levels and scales of decision-making.

- Promote a public awareness campaign on climate change mitigation and adaptation.
- Engage other levels of government for coordinated actions on climate change.

### **Energy Priorities**

Participants identified the following priorities related to energy:

- Focus on building materials, building design, and distributed energy generation to encourage better energy efficiency.
- Go beyond energy neutral targets to achieve energy positive built environments.
- Institute carbon budgets for all new development and major retrofits.
- Reduce peak energy demand through Community Energy Plans.
- Create a culture of energy conservation through education.

### **Comments on Policies Addressing Climate Change and Energy**

Participants provided the following suggestions regarding the draft policies addressing climate change and energy. Feedback is organized according to recurring themes:

#### *Stormwater*

- The Official Plan needs to address stormwater management in more detail and other incentives for requiring permeable surfaces should be implemented (e.g., a certification process for permeable surfaces as part of the development application process).
- There was strong support for bio-swales and green roofs.
- Providing payment in lieu of stormwater management on a site should not be permitted.
- Policies should make reference to water sensitive urban design.
- Consider adding a sidebar on low impact development.

#### *Natural Areas*

- Better recognize how green infrastructure and natural heritage work to improve resiliency and help the City adapt to climate change.

#### *Food Security/ Vulnerable Populations*

- Address food deserts and encourage urban agriculture.
- Understand how vulnerable populations can recover more quickly from climate stresses.

#### *Built Form*

- Set more aggressive performance metrics for new buildings and restrict the use of energy inefficient building materials such as glass.
- Prohibit the building of concrete and glass structures that use enormous amounts of energy to cool and heat.
- In Policy 5, Section 4.8: Universities, colleges and hospitals should be required (rather than encouraged) to create campus plans in consultation with nearby communities that will provide for energy conservation, etc.
- A policy to bury overhead wires should be considered to increase the City's resiliency and energy security in response to climate change.
- The City should look at enhancing sustainable technologies and techniques on 'Avenues' for commercial/retail and residential properties.

- The policies and goals for creating an energy neutral built environment, improving stormwater management and mitigating light pollution should also be applied to small-scale residential development (less than 5 units).
- Provide a greater focus on retrofits to existing built form (e.g., apply the Toronto Green Standard to major renovations and retrofits).
- Undertake a risk assessment for all City assets, services and policies.

#### d) General Feedback on Environmental Policies

The following general comments were provided on the environmental policies:

- Plain language rather than technical terminology should be used in the environmental policies (e.g., replace or define terms such as albedo and bio-retention swale).
- A holistic ecosystem approach should be applied to the Official Plan that focuses on impacts to the fixed materials and cycles in an ecosystem.
- Policies should address the interdependency between systems (e.g., power/water/natural gas/tree canopy).
- Ensure Official Plan chapters speak to and reinforce one another.
- Bring holistic economic development models into decision-making.
- Identify a strategy to determine the city's priorities between mitigation, adaptation and resiliency and then allocate the resources since funds are limited.
- Ensure the City has adequate staffing and budget based on the impacts of the proposed changes to the Official Plan (e.g., having additional ESA designations will require more resources to be effectively managed).
- Environmental initiatives should require an accompanying maintenance plan and budget including funding sources to ensure they can be carried out in the long term.
- The Official Plan should take a holistic, ecosystem approach.

## 5) Next Steps

The feedback collected during the consultation process will be used by City Planning staff to report back to the Planning and Growth Management Committee in early 2015 with proposed amendments to the Official Plan.