

April 10, 2015

Secretariat, Planning and Growth Management Committee
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attn: Ms Nancy Martins - email: pgmc@toronto.ca

Re: **PG3.6** “Official Plan Review: Results of Public Consultations and Revised Policies for Healthy Neighbourhoods, *Neighbourhoods* and Apartment *Neighbourhoods*”

Councillors:

I live in the Deer Park Neighbourhood where we recently had a most distressing experience with the Committee of Adjustment and the OMB around a quite inappropriate project. Deer Park is an older very mixed neighbourhood, which has seen a lot of changes over the years. The 57-71 Heath St W application was to replace 2 traditional single family houses with 3 tall townhouses with raised ground floors and garages and driveways at the front. These traditional houses were in a pocket and the permitted redevelopment of the 2 properties will mean the loss of the rest of the traditional houses, when it was looking like the potential development properties would remain as traditional form houses.

These applications were approved despite the fact that the site is an area designated in the Official Plan as “Neighbourhood” where the existing character is to be respected and where intensification is not to be encouraged. The project of course required consents and many variances as the zoning bylaw specifically allow does not encourage tall townhouses on narrow lots with garages at the front and all that entails. The Committee member said the options were to reject the applications as they were not supportive of the area’s character or to support them on the basis of intensification. The latter won out and the many neighbours in attendance were horrified.

A study is now underway for the Yonge and Eglinton area, regarding issues with replacing existing houses with the tall townhouse building types. Hopefully this study will provide improvements to the current planning framework for neighbourhoods. Some of the issues with these house forms are being reflected in proposed amendments.

I believe more is needed in the policy framework.

First, it should be really clear that Neighbourhoods are not areas designated for intensification so that the C of A and OMB cannot just say this application is intensification and so lets approve whatever the developer wants, without any consideration of impacts.

The second problem is that use of “neighbourhood” to define a local sub area for review of an application is confusing and vague and misleading. It may be fine for large areas with similar building types but not in older neighbourhoods that are characterized by a wide range of housing

types. For example, in the Heath OMB hearing “neighbourhood” was applied to cover blocks of Heath St. W. which of course included many different building types. Under this approach, any would be acceptable but they aren’t, given the immediate and strong context of traditional houses. A much better term would be “context”. The Heath St. local “context” was a clearly continuous row of traditional houses, part of a housing pocket extending north and within a very mixed neighbourhood of building types. Replacement of traditional houses with similar houses is happening in this housing pocket. As the proposal site was part of a continuous row of traditional houses, it was clearly inappropriate to replace it with a group of townhouses. “Context” or “local context” requires a much more fine-grained consideration of a property. Without this, the special character in areas like Deer Park will be lost. Other streets in Deer Park that used to have traditional houses are now almost only tall townhouses. This happened without any local planning study, although the Deer Park Residents’ Group has asked for one, recognizing the issues we face.

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