

Swansea Area Ratepayers' Association

Reflecting the interests of the Swansea Community



Mailing Address: Swansea Area Ratepayer's Association
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Swansea Area Ratepayers' Group

Mr. David Shiner, Chair, Planning and Growth Management Committee,
Ms. Nancy Martins, Secretariat Contact,
10th floor, West Tower, City Hall
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Toronto, ON M5H 2N2
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September 11, 2015

Ref: Agenda Item PG6.6: Mid-Rise Building Performance Standards Monitoring
Planning and Growth Management Committee consideration on September 16, 2015
Committee Room 1, City Hall, Toronto.

(<http://www.toronto.ca/legdocs/mmis/2015/pg/bgrd/backgroundfile-83197.pdf>)

Attachment 1: Chart of Comments and Recommended Actions

(<http://www.toronto.ca/legdocs/mmis/2015/pg/bgrd/backgroundfile-83198.pdf>)

Dear Mr. Shiner,

On behalf of the Swansea Area Ratepayers Association/Group, we are requesting that you defer consideration and approval of this agenda item for at least two months. The rationale for such a request is the urgent need for the Ratepayer Groups and our Communities to review this first draft of the recommendations' document that was received by us on September 9, 2015. We were not given official notice and with this agenda item scheduled for consideration by the Committee on September 16, we are allowed only a week to review it and make suggestions for improvement.

We understand that the first draft of the Environmentally Significant Areas Report was sent to the community in June 2015 and scheduled for final consideration on October 8, 2015. This allowed the Community at least 3 months in which to review this important document. The Mid-Rise Building Performance Standards document is of equal importance and requires our equivalent oversight. It should be considered a first draft with input for tightening up the several areas of ambiguity which will continue to daunt the Community and the City Planners in their ability to come to consensus on successful development.

On first glance there are a number of areas which have been greatly improved but other areas have been left ambiguous to the detriment of future planning. Two of these that come quickly to mind are the references to some Employment Areas and Apartment

Neighbourhoods as included in the Mid-Rise Guidelines and overriding the importance and standing of Secondary Plans considered to be 'too old'. These ambiguities and references will continue to be a source of contention and litigation if not properly respected and described.

We respectfully request that you table an amendment to defer consideration and approval of this extensive document for **two months** until the Community can submit revisions that will enhance and firm up the intention and direction of the recommendations. This will get us well past the Federal Election and the Thanksgiving Weekend!

Yours sincerely,

V Wynne

Veronica Wynne, Director,
Swansea Area Ratepayers Association,
swanseratepayers@bell.net
c. John Meijer, President, SARA

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October 6, 2015

Ref: [Agenda Item PG7.1: Mid-Rise Building Performance Standards Monitoring](#)
Planning and Growth Management Committee consideration on October 8, 2015
Committee Room 1, City Hall, Toronto.

(<http://www.toronto.ca/legdocs/mmis/2015/pg/bgrd/backgroundfile-83197.pdf>)

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Dear Mr. Shiner,

On behalf of the Swansea Area Ratepayers Association/Group, we are requesting a further continuance of the receipt and approval of this agenda item until at least the meeting on November 16, 2015. The Planning Department needs time to revisit and review the changes suggested by the CORRA communities in collaboration with community representatives.

The concerns and benefits of this document of recommendations are many. We appreciate that many items have been firmed up to the benefit of our community but the majority of recommendations reaches beyond the authority and jurisdiction of the Mid-Rise Guidelines document. There are a number of areas where recommendations contradict each other and even assume jurisdiction for Official Plan amendments.

CORRA (Confederation of Ratepayer and Resident Associations) has summarized the main areas of concern and need for amendment. SARA is fully in support of these amendments as they protect our communities as well as enhancing the process of responsible development in Toronto.

CORRA Council recommended that CORRA take the following position to:

1. object to the mid-rise guidelines being applied beyond the Avenues, and recommends deleting staff's recommendation extending the policies to Mixed Use Areas, Employment, Institutional or some Apartment Areas;
2. object to a clause, under performance standards, that begins "As well, they may apply in some secondary plan areas where the plan may not be "up to date," and recommends that the clause be deleted;
3. request that the City do full infrastructure studies throughout the City prior to considering any City-wide intensification beyond the Avenues;
4. request Guideline 5b (concerning "Enhancement Zones") be deleted from the guidelines, as per Council's decision of July 16, 2010 which directed staff to not apply this standard;
5. request that guidelines for flanking streets include statements that setbacks, stepbacks, and appropriate transition be provided not just to low-rise residential buildings across from the proposed mid-rise building, but also in relation to the flanking low-rise residential buildings on the same side of the street;
6. request that the height-to-ROW ratio in character areas not exceed 0.8:1, and that the guidelines specifically flag that a lower number may be more appropriate given the local context;
7. request that the guidelines should require replication of fine-grained retail and any other contextual features relevant to the preservation of the character of character areas;
8. request that the guidelines reference the concept set out in the side bar in Chapter Three of the Official Plan on page 3-7 which stipulates that:

"Where there are no height and density limits in the Plan and no area zoning implementing the Plan, height and density aspects of the planned context will be determined on the basis of an area review such as that undertaken to implement Subsection 2.2.3.3 b) of the Plan. In this case, in determining an application, Council will have due regard for the existing and planned contexts";
9. place on record that we disagree with any suggestion that the guidelines remove the need for Avenue Studies. Such studies look, at a minimum, at the whole of a segment, not simply the site, and take into consideration soft and hard infrastructure to support such intensification;

10. recommend that the staff recommendations be amended generally to require that any amendments to the Official Plan or other documents and any further meetings reviewing the guidelines by City staff will follow the notice requirements for such meetings and that all stakeholders including BIA's, tenant associations, ratepayer & resident associations and property owners be fully consulted and involved.
11. While not part of the staff report, it is noted that Official Plan S4.5.5 which allows for the consideration of cash-in-lieu of amenity space in cases where lots are near parks be deleted since it is inappropriate to put more pressure on parks especially those in park deficient areas which most often occur in the downtown and other centres.
12. In addition to the above, CORRA will be requesting a further deferral to November 16, 2015 to allow all groups to more fully digest the staff report and recommendations especially groups that are just learning and assessing how the mid-rise buildings performance standards as presented will impact their local neighbourhood and communities.

An example of incongruity and contradiction occurs in the section **Applicability of Performance Standards**. This section identifies clearly where the Mid-Rise Guidelines apply and where and when they don't. These directives are very specific in terms of Secondary Plans and that ***'Furthermore, until additional work can be done, it is recommended that the Mid-rise Building Performance Standards NOT apply to the following sites and conditions: □ Secondary Plan Areas unless they are specifically referenced.'*** This is why the clause referenced as #2 in the CORRA amendments listed above must be deleted as well as being beyond the jurisdiction of the Mid-Rise Guidelines to suggest it.

We respectfully request that you table an amendment to defer consideration and approval of this extensive document until **November 16, 2015** until the Planning Department, CORRA and our Communities can work on CORRA's amendments listed that will enhance and firm up the intention and direction of the Recommendations Document. We all wish for a productive and positive process without the constant potential of contention and litigation.

Yours sincerely,

V Wynne

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