



**Confederation of Resident & Ratepayer
Associations in Toronto**

November 11, 2015

Planning and Growth Management Committee
10th Floor West Toronto City Hall, 100 Queen Street West
Toronto, Ontario M5H 2N2

AMENDED

Attention: Ms. Nancy Martins, Committee Administrator
Email: pgmc@toronto.ca

Dear Chair David Shiner and Members of Planning & Growth Management Committee:

RE: PG8.5 Final Staff Report – OPA No. 320 – Statutory Public Meeting
Healthy Neighbourhoods, Neighbourhood, Apartment Neighbourhood
Planning and Growth Management Committee (PGMC) November 16, 2015 at 10:00 AM

CORRA, an independent, incorporated association of resident and ratepayer groups across the City, has been involved with the mandatory review of the Official Plan since 2011, with particular attention paid to the policies concerning *Neighbourhoods*. Many of our groups have attended the consultation sessions and public meetings during this process. CORRA Executive have met with planning staff to raise the issues and concerns of resident / ratepayer groups and have formally provided concrete comments to the draft amendments leading up to the release of the recommended OP amendments attached to the final staff report dated October 15, 2015 that is the basis of this statutory public meeting.

We appreciate the efforts staff have made to date; however, CORRA is restating our position, as supported by CORRA Council, and ask Members of PGMC to request planning staff to reconsider and address the following issues, previously raised, that require further consideration in light of the OP amendments as presented:

A. Further Refinements to Neighbourhood Policy 4.1.5:

CORRA supports the use of geographic neighbourhood in the policies, however the newly added paragraphs require clarity to ensure proposed developments in established neighbourhoods are appropriately considered in the context of the new terminology of "geographic" neighbourhood that forms part of the larger *Neighbourhood* context. The distinction is important as the interpretation could render an analysis ineffective and allow approval of developments that do not respect and reinforce the development criteria (as amended and agreed to) in the policy as intended.

B. Strengthening Neighbourhood Infill Policy 4.1.9:

CORRA recognized the existing infill policy was not guiding development on large and irregular lots well, given the surrounding neighbourhood context. CORRA Council has supported the improvement of this policy from the outset of the review process and CORRA is reconfirming and identifying the issues where improved and additional language is needed:

Neighbourhood Policy 4.1.9 (a): The words "appropriate" and "compatible" are ineffective. CORRA supports amending the policy with the replacement words of "proportionate to and respectful of" or words that convey the same meaning.

Neighbourhood Policy 4.1.9(f): Adding a new clause that allows walk up apartments or stacked townhouses, no higher than 4-storeys to be located on major streets as identified on Map 3 of the OP; and in geographic neighbourhoods where these buildings exist AND is permitted by the zoning by-law.

Neighbourhood Policy 4.1.9: The last paragraph addressing infill development that can replicate the physical lot character and respect and reinforce the physical character of the geographic neighbourhood, CORRA asks for clarity in the last sentence: that "the infill development will conform with Policy 5".

Note: CORRA's specific amendments / suggested modifications are attached to this submission – the green underlined text represents the further amendments and the blue text represent staff amendments.

CORRA's further amendments focus on key policy concerns with the OP amendments as drafted. CORRA reserves the right to consider and raise non-policy amendments, following planning staff's consideration, as these sections are meant to assist in interpreting policy.

The main reasons supporting the request are:

CORRA, residents, ratepayers, and their groups have asked that the Neighbourhood Policies be strengthened following the mandatory review of the OP. This objective has not been adequately addressed by the OP amendments as drafted.

While on the one hand the development criteria have been improved for established Neighbourhoods, the assessment component is not clear. This lack of clarity will lead to arbitrary interpretation that could render the improved criteria meaningless.

Failing to make needed changes in the infill policies could allow anomalous development, including townhouses, stacked townhouse and 4-storey apartment buildings in most Neighbourhoods throughout the City.

In totality, the policies set out to respect the physical character and reinforce the stability of our established neighbourhoods will instead allow for inappropriate redevelopment, which over time would incrementally destroy their physical character and cause instability.

Should the amendments not be considered prior to or be resolved at PGMC and before advancing the OP amendments to Council, CORRA will seek to have the OP amendments be referred back to staff for reconsideration.

Thank you for considering CORRA's submission and request.

Sincerely,

CORRA's Executive Team
corratoronto@gmail.com

Attached: (i) Suggested Modifications, and (ii) Staff Recommendations

SUGGESTED MODIFICATIONS

Status of each item indicated in boldface italics

4.1 NEIGHBOURHOODS

A. Modifications to Policy 5, including *proposed staff revisions* as of 27 October 2015.

5. Development in established *Neighbourhoods* will respect and reinforce the existing physical character of the **geographic** neighbourhood, including in particular:
- a) patterns of streets, blocks and lanes, parks and public building sites;
 - b) **prevailing** size and configuration of lots;
 - c) **prevailing** heights, massing, scale, **density** and dwelling type of nearby residential properties;
 - d) prevailing building type(s);
 - e) **prevailing location, design and elevations relative to the grade of driveways and garages;**
 - f) **prevailing** setbacks of buildings from the street or streets;
 - g) prevailing patterns of rear and side yard setbacks and landscaped open space;
 - h) continuation of special landscape or built-form features that contribute to the unique physical character of a **geographic** neighbourhood; and
 - i) conservation of heritage buildings, structures and landscapes.

A **geographic neighbourhood** for the purposes of this policy will be delineated by considering the context within the *Neighbourhood* in proximity to **a proposed development**, including **^ zoning, prevailing dwelling type and scale, lot size and configuration, street pattern, pedestrian connectivity, and natural and human-made dividing features.** Lots fronting onto a major street shown on Map 3 and designated *Neighbourhoods* are to be distinguished from lots in the interior of the block adjacent to that street in accordance with Policy 6.

The physical character of **a geographic neighbourhood** includes **^ the physical characteristics of the entire area comprising that neighbourhood as well as properties in the same block that ^ face the same street as a proposed development.** **New development within a Neighbourhood will be materially consistent with the prevailing physical character of ^ the entire geographic neighbourhood within which it is to be located.**

No changes will be made through rezoning, minor variance, consent or other public action that are out of keeping with the physical character of the **geographic** neighbourhood.

The prevailing building type **and physical character of a geographic neighbourhood** will be **determined by** the predominant form of development in **that** neighbourhood. Some *Neighbourhoods* will have more than one prevailing building type **or physical character.** In such cases, a prevailing building type **or physical character** in one **geographic** neighbourhood will not be considered when determining the prevailing building type **or physical character** in another **geographic** neighbourhood.

Except for apartment buildings and larger townhouse and stacked townhouse developments with common underground garages, driveways to below-grade garages that are integral to residences will be discouraged.

Outstanding item

B. Modifications to Policy 9, including *proposed staff revisions* as of 27 October 2015.

9. Infill development on properties that vary from the local pattern in terms of lot size, configuration and/or orientation in established *Neighbourhoods* will:
- a) have heights, massing and scale **that are proportionate to and respectful of** that permitted by the zoning for adjacent and nearby residential properties;
 - b) provide adequate privacy, sunlight and sky views for residents of new and existing buildings by ensuring adequate distance and separation between building walls and using landscaping, planting and fencing to enhance privacy where needed;
 - c) front onto existing or newly created public streets wherever possible, with no gates limiting public access;
 - d) **provide safe, accessible pedestrian walkways from public streets; ^**
 - e) locate, screen **and wherever possible enclose** service areas, garbage storage **and parking, including access to any underground parking, so as** to minimize the impact on existing and new streets and residences; **and**
 - f) **limit stacked townhouses and walk up apartments no higher than four storeys to sites fronting onto the major streets shown on Map 3 and to geographic neighbourhoods that already have four storey buildings permitted by the Zoning By-law.**

In situations where infill development can replicate the existing prevailing lot patterns to respect and reinforce the existing physical character of the geographic neighbourhood, infill development will conform with Policy 5.

Outstanding item

2015.11.04

STAFF RECOMMENDATIONS

Status of each item indicated in boldface italics

A. Policy 5, including *proposed staff revisions* as of 27 October 2015.

5. Development in established *Neighbourhoods* will respect and reinforce the existing physical character of the **geographic** neighbourhood, including in particular:
 - a) patterns of streets, blocks and lanes, parks and public building sites;
 - b) **prevailing** size and configuration of lots;
 - c) **prevailing** heights, massing, scale, **density** and dwelling type of nearby residential properties;
 - d) prevailing building type(s);
 - e) **prevailing location, design and elevations relative to the grade of driveways and garages;**
 - f) **prevailing** setbacks of buildings from the street or streets;
 - g) prevailing patterns of rear and side yard setbacks and landscaped open space;
 - h) continuation of special landscape or built-form features that contribute to the unique physical character of a **geographic** neighbourhood; and
 - i) conservation of heritage buildings, structures and landscapes.

A geographic neighbourhood for the purposes of this policy will be delineated by considering the context within the *Neighbourhood* in proximity to the development site, including: zoning; prevailing dwelling type and scale; lot size and configuration; street pattern; pedestrian connectivity; and natural and human-made dividing features. Lots fronting onto a major street shown on Map 3 and designated *Neighbourhoods* are to be distinguished from lots in the interior of the block adjacent to that street in accordance with Policy 6.

The physical character of the geographic neighbourhood includes both the physical characteristics of the entire geographic area and the physical characteristics of the properties in the same block that also face the same street as the development site. A proposed development within a *Neighbourhood* will be materially consistent with the prevailing physical character of both properties on the same block facing the same street and the entire geographic neighbourhood within which it is to be located.

No changes will be made through rezoning, minor variance, consent or other public action that are out of keeping with the physical character of the **geographic** neighbourhood.

The prevailing building type **and physical character of a geographic neighbourhood** will be **determined by** the predominant form of development in **that** neighbourhood. Some *Neighbourhoods* will have more than one prevailing building type **or physical character**. In such cases, a prevailing building type **or physical character** in one **geographic** neighbourhood will not be considered when determining the prevailing building type **or physical character** in another **geographic** neighbourhood.

Except for apartment buildings and larger townhouse and stacked townhouse developments with common underground garages, driveways to below-grade garages that are integral to residences will be discouraged.

Outstanding item

B. Policy 9, including **proposed staff revisions** as of 27 October 2015.

9. Infill development on properties that vary from the local pattern in terms of lot size, configuration and/or orientation in established *Neighbourhoods* will:
- a) have heights, massing and scale **that are** appropriate for the site and compatible with that permitted by the zoning for adjacent and nearby residential properties;
 - b) provide adequate privacy, sunlight and sky views for residents of new and existing buildings by ensuring adequate distance and separation between building walls and using landscaping, planting and fencing to enhance privacy where needed;
 - c) front onto existing or newly created public streets wherever possible, with no gates limiting public access;
 - d) **provide safe, accessible pedestrian walkways from public streets; and**
 - e) locate, screen **and wherever possible enclose** service areas and garbage storage **and parking, including access to any underground parking, so as** to minimize the impact on existing and new streets and residences.

In situations where infill development can replicate the existing prevailing lot pattern to respect and reinforce the existing physical character of the geographic neighbourhood, the infill development application will be reviewed under and conform with Policy 5.

Outstanding item

2015.11.04