



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



Tuesday, June 7, 2016

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

Atten: Ms. Marilyn Toft, Council Secretariat Support  
[clerk@toronto.ca](mailto:clerk@toronto.ca)

Dear Mayor Tory and Members of Council:

PG12.7: Mid-Rise Building Performance Standards Monitoring Council Meeting No. 19 June 7 and 8, 2016
---

The Mid Rise Building Performance Standards was referred back to Planning and Growth Management Committee and the recommendations before Council cannot be supported:

The reasons are:

- The recommendations are out of order and does not address what council directed staff / standing committee to do in the first place.
- The performance standards cannot change zoning, area zoning, area plans or secondary plans, procedurally. The process that delivered these laws is the same process that should be used to amend them.
- The performance standards, substantively are without localized comprehensive studies and therefore on their own are insufficient to amend zoning, area zoning, area plans or secondary plans. Studies and planning justification is needed.
- And furthermore the specificity and numerics are to be incorporated in the zoning, area zoning, and secondary plans representing applicable law and not as part of the Official Plan.
- Performance standards or guidelines are not law. They are not evaluated and passed with the same rigor or legislated requirements. Without law the communities, neighbourhoods, and people are left defenseless.
- In addition, Council asked staff to report back on the "effectiveness" of the standards as intended by the Avenues and Mid-Rise Buildings Study, as modified by Council direction. It is now 2016 and no such report speaks to the effectiveness of the standards.

- Council directed the inclusion of interested Resident and Ratepayers in any consultations anticipated to complete the review of the Mid Rise Building Performances Standards. To date including the direction from Council's referral, the approach has been uneven, arbitrary and discretionary. This is procedurally unfair – localized issues that affect many major streets have been ignored.
- Financial implications have been poorly reported. Planning department does not evaluate opportunity cost, the financial costs across time and does not prepare a cost /benefit analysis that includes the public interest / common good issues which generally include long term concerns. The short-term decision making taking place may not be in line with the City's long term objectives.

CORRA asks that standing committee and planning staff treat all groups fairly and equally. This means decisions should be uniformly spread to recognize localized importance and that decisions should be made for the benefit of many rather than a few.

Sincerely,

Eileen Denny, Chair  
Confederation of Residents and Ratepayer Associations in Toronto