



June 14, 2016

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**RE: PG 13.1 Midtown in Focus: Growth, Built Form and Infrastructure Review - Status Report**

Dear Councillor David Shiner and Members of the Planning and Growth Management Committee

We provide this correspondence in support of the recommendations in the Report, especially Recommendation 1:

1. Direct that rezoning applications in the Yonge Eglinton Secondary Plan area be considered and reviewed in the context of the City Council directed Midtown in Focus: Growth, Built Form and Infrastructure Review;

We suggest recommendation #1 should be amended to:

1. Direct that rezoning **and Official Plan Amendment** applications in the Yonge Eglinton Secondary Plan area be considered and reviewed in the context of the City Council directed Midtown in Focus: Growth, Built Form and Infrastructure Review.

The Status Report acknowledges, perhaps for the first time, how the growth and the accelerating scope of development applications in the area has surpassed estimates, and targets, and “additional information is required to ensure that sufficient capacity exists to support continued growth and intensification” (page 16) and how “the area’s existing planning framework does not provide the clarity required to guide this growth” (page 25), and “City staff will use the planning tools available to it to coordinate growth with infrastructure provision... As such applications may be placed in abeyance pending completion of the Review and supporting technical studies” (page 28). (We note that this warning has already been issued in regard to a development application at 1674 Bayview Avenue).

We are supportive of the expanded scope of the second phase of the multi-year planning project, and its comprehensiveness. The Status Report helps to explain how the many complex interrelated components of Midtown in Focus come together. We note and concur with the concerns stated in the report re the urgency of developing new planning approaches for the area, including the idea of a holding bylaw. Given the Province is now developing new

growth targets, it is crucial to make this Review a top priority. Nevertheless there are weaknesses that must be addressed.

**1. The Growth Centre's growth and infrastructure Prospectus continues to be understated**

The Study will be making determinations about the area's future 'Urban Structure Plan' while describing only the projects 'on the books' in the "approval stream", representing an increase in population of 17,000 to 21,000. Meanwhile, new applications are emerging at a rate substantially exceeding 3,000 new population per year, bumping the Study's 'on the books' figure by a further 15% by the time of this Study's adoption. Furthermore, this planning exercise has not satisfied OP 5.2.1.1(a): "identify or indicate the overall capacity for development in the area, including anticipated population". Leaving the door open as to the extent of the Growth Centre's 'intensive' intensification is most disconcerting. The City must ensure that appropriate projections inform the Province's new Growth Plan review process

**2. Insufficient attention to Neighbourhoods within the Secondary Plan area**

The objective of the Review is to "ensure that growth positively contributes to Midtown's continued livability and vitality by establishing a clear and up to date planning framework and ensuring that local transportation, municipal servicing and community infrastructure keeps pace with development".

As a result the plan concentrates on the Growth Centre with some attention to the Avenues, but pays virtually no attention to the Neighbourhoods. These areas are under two types of pressures.

- i. Neighbourhoods in the Midtown area are under constant threat from intensification from the margins in. Developers are acquiring properties in the N-hoods adjacent to Mixed Use designated lands, then calculating axial planes from the new property line rather than from the property line in the Mixed Use area, resulting in a proposal with additional storeys, causing shadowing and overlook to adjacent housing, and creating oppressive street walls on the Avenues and "village main streets" as Midtown in Focus calls them. Examples include 90 Eglinton West, 1674 Bayview, 200-214 Keewatin Ave.,

As the report points out on page 8:

Policy 2.3.1.3 in the Healthy Neighbourhoods section of the Official Plan states that "intensification of lands adjacent to neighbourhoods will be carefully controlled so that neighbourhoods are protected from negative impact. Where significant intensification of land adjacent to a *Neighbourhood* or *Apartment Neighbourhood* is proposed, Council will determine, at the earliest point in the process, whether or not a Secondary Plan, area specific zoning by-law or area specific policy will be created in consultation with the local community following an Avenue Study, or area based study."

We assume that the Study now being conducted fulfils the requirement of Policy 2.3.1.3. and that the Study will clearly disallow this lone site specific application type of practice. There must be more attention paid to regulations regarding the transitions from Mixed Use Areas and Avenues.

- ii. Infill development (demolition and replacement with far more massive housing) continues to increase. The new OP Neighbourhood policies should help provide protection to these areas but the range of fixes required that are not highlighted in the report. For example the Built Heritage study is limited to the Centre, Avenues and "village main streets", and

does not consider cultural heritage in the Neighbourhoods. The Davisville Village Study which includes a review of zoning and other regulatory issues had been delayed over a year and is just restarting. The April 16, 2016 City/FoNTRA Planning Forum confirmed the concerns of active residents in the area regarding this issue.

**3. Recognition of Davisville (D2-Davisville Station area and F2-Davisville Community Street) as a secondary node**

Policies for development around this node need to be developed. A major under-used area is the TTC yard SW of Yonge and Davisville. Increased community services such as the hub project are needed.

**4. The lack of an Office and Retail Structure Plan**

While the report highlights office employment as a significant component for the YE Centre, but how is its development to be encouraged? The area has a major retail centre and significant retail along Avenues. How is this to be encouraged and supported?

FoNTRA looks forward to ongoing participation in this critical work.

Yours truly,

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**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.