November 13, 2017

By Email:

City of Toronto
Planning & Growth Management Committee

Dear Chair Shiner and Councillors,

West Don Lands Committee has been following with great interest the release of Port Lands planning reports by City Planning and Waterfront Toronto – the Port Lands Planning Framework, the Villiers Island Precinct Plan, and the Port Lands Official Plan Modification. We have comments of support and concern that we hope Council will take seriously in considering these reports.

We commend and are grateful to Toronto staff, in City Planning and the Waterfront Secretariat, and to Waterfront Toronto staff for making time to meet and consult constructively with us to clarify the contents of these documents and to hear and comment on our concerns.

In broad terms we support the Vision and much of the Direction of the Port Lands Planning Framework, as well as the Villiers Island Precinct Plan. The precinct plan fits into a pattern of waterfront precinct planning exercises that have guided the extraordinary West Don Lands and East Bayfront precinct developments to date. The Villiers Island mixed-use community will address the waterfront and the new, reconfigured Don River Mouth through extraordinary parks and naturalized areas. It will be connected to the city through a new road, transit and path/trail network. It will provide convenient access to the water. It will make opportunities to live, work and play at the water’s edge.

We commend the result of years of consultation and work that has gone into the Planning Framework. Particularly we note the graceful accommodation of the expanding city core to waterfront natural functions through the naturalization and flood protection of the Don Mouth and the Biodiversity Plan, which we believe will be welcomed by Torontonians and emulated in cities elsewhere.

Our concerns are in several areas found in the Official Plan Modification that we sincerely hope may be addressed:

1) We believe that the commitment to 20% affordable rental housing on public lands that has been the Waterfront standard for 14 years should be the absolute minimum in mixed-use communities, including Villiers Island. We would welcome an amendment to make 20% the minimum on privately held lands or to move this standard higher.

Citizens for the Old Town / Architectural Conservancy of Ontario
Corktown Residents & Business Association
Distillery Historic District
Dixon Hall
Enoch Turner Schoolhouse Foundation
Friends of Corktown Common
Gooderham & Worts Neighbourhood Association
Little Trinity Anglican Church
St. Lawrence Market Neighbourhood BIA
St. Lawrence Neighbourhood Association
Task Force to Bring Back the Don
We are very disappointed with the commitment to affordable housing on private lands in the Villiers Island Precinct Plan and the Official Modification. The lower standards for privately owned lands – 5% built and conveyed to the city, or 10% maintained for only 25 years, or 20% land dedication – is not adequate and sends a wrong signal across the city. Either through amendment at this time, or though zoning by-law in future precinct planning stages, this should be increased to a minimum of 20%.

It is worth noting that the definition of “affordable rental housing” is housing that is affordable to households with median incomes or below. By definition, an equitable community would have in the vicinity of 50% rents “affordable”. Toronto has a long way to go to provide affordable rents to citizens.

2) We strongly recommend that Council explicitly direct staff to review the Port Lands OP Modification and the Central Waterfront Secondary Plan it modifies within the legislatively required 5-year period with wording such as this taken from Toronto’s Official Plan, (Policy 5.4.2):

“The need to review and revise this Plan will be considered every five years to ensure the continued relevance of the Plan’s policies and objectives in light of changing social, economic, environmental, legislative and fiscal circumstances.”

This five-year timing may be a crucial decision point for several reasons:

a. After five years the flood protection of the Port Lands from Don River flooding will be nearing its completion. Certain unknowns related to physical constraints for development and timing may be clearer, e.g. when will bridge, roads, transit and servicing be complete.

b. Market appetite for absorption and land development typologies in the area will be more predictable. Other significant infrastructure projects in the vicinity – Broadview extension, Gardiner reconfiguration, etc. should also be coming together. We will begin to see more clearly how the private sector views the potential for parts of the Port Lands – e.g. McCleary district and areas south of Commissioners and west of Turning Basin – that are logically next in line after Villiers Island.

b. Opportunities for re-envisioning the Port Lands may be forthcoming from the recently-announced partnership between Waterfront Toronto and Sidewalk Labs in Quayside. Both parties have expressed their interest in making Quayside a “testbed” of innovative Smart City initiatives like self-driving cars, digitally-enhanced service delivery and climate-positive moves on energy, waste and mobility. It may well be that a rethink of prescriptions related to the fundamental metrics of the public realm in the Port Lands will be needed, e.g. how wide do streets need to be for autonomous vehicles; what are space requirements for reconfigured sewer and waste utilities; what volumes of stormwater run-off can be diverted.

We thank staff for identifying a typographical error in Page 427, Section 5.7 “Making It Happen” describing the OP review period, which incorrectly states, “This Framework will need to be reviewed over the course of its implementation, coinciding with the 10-year Official Plan [emphasis ours] review periods specified in the Planning Act.”

In fact, the Planning Act, 26. (1.1) states, “The Council shall revise the plan no less frequently than, (a) 10 years after it comes into effect as a new official plan; and (b) every five years thereafter; [emphasis ours] unless the plan has been replaced by another new official plan.”
We have serious reservations about the designation for PIC-Core, embedded in the Land Use Direction and the OP Modification.

We are unconvinced that in the mid- to long-term there will be a need to perpetuate 20th century divisions between most high-value employment uses, such as those envisioned in the Productions, Interactive and Creative sector(s) (“PIC”), and residential uses. On the contrary, we see the most productive, growth-oriented trends moving toward the integration of home life and recreation with work and creative interplay. These trends are driving Toronto’s strong growth as a world urban centre. Dynamic, creative individuals are flocking to Toronto’s core from every corner of the earth to plant their families within our dynamic city. They are populating much of the breadth of our waterfront.

West Don Lands Committee’s call to ensure that this Framework Plan and OP Modification are reviewed in five years is largely driven by our belief that each passing year will increase our understanding of the need to break down the barriers segregating work from life.

West Don Lands Committee is a coalition of community-based organizations who have been working together for 20 years to promote positive revitalization of the West Don Lands and the positive expansion of the city’s central core into the neighbouring Port Lands. We are adamant that we seize this opportunity to provide a deep human engagement with the lake and natural landscape, intense urban liveability, and clean, green employment.

Our recommendations are:
1) to strengthen the commitment to affordable housing on privately owned land to the current 20% standard and
2) to include a Policy statement requiring a 5-year review of the Official Plan Modification.

Thank you.

[Signatures]

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