N
June 5, 2N18 N
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Etobicoke York Community Council, N
Etobicoke Civic Centre N
399 The West Mall N
Toronto, ON M9C 2Y2 N
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C/o Ulli S. Watkiss, City Clerk N N N sent via email to: clerk@toronto.ca N
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Dear Mr. Chair and Members of the Etobicoke York Community Council, N
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Ret t Draft Official Plan Amendment No. 419 At
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Thank you for the opportunity to provide input on the draft Official Plan Amendment No. N 419, prepared as one of the outcomes of the High Park Apartment Neighbourhood Area N Character Study. N
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We represent 299 Glenlake Avenue (Toronto) Limited, the owners of 299 Glenlake N Avenue. 299 Glenlake is located on the southwest corner of Pacific Avenue and Glenlake N Avenue. The property is located within the area covered by the draft Official Plan N Amendment. N
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The owners of 299 Glenlake were involved in the High Park Apartment Neighbourhood N Area Character Study, together with SGL Planning & Design Inc., participating as a N member of the Working Group. As a member of the Study’s Working Group, SGL N Planning & Design Inc. provided numerous comments to City Staff throughout the course N of the study. N
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We commend City staff on their work on the study and the comprehensiveness of the N work undertaken. In particular, we appreciate City staff’s consideration of the previous N comments we submitted through the process. N
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We have reviewed the draft Amendment. A recurring comment that we have previously N made throughout the Study process is that the draft Official Plan Amendment provides a N level of detail and specific standards that are typically reserved for the zoning by-law or N urban design level. Overly prescriptive Official Plan policies limit innovative solutions on N a site-specific basis. They can also hamper opportunities for development in the area, N with the effect of restricting the efficient use of land and promotion of intensification as N directed in the Provincial Policy Statement and Growth Plan. The level of detail proposed N

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in the draft materials will require Official Plan Amendments for minor matters, such as to N permit a 5.9 metre setback where 6 metres is required. Although we do not discuss every N policy individually in this letter, it is our opinion that many of them should be implemented N through zoning or urban design guidelines and addressed only broadly and without N detailed numerical requirements at the Official Plan level. N

For Community Council’s consideration, we provide specific comment on some of the N policies: N

1. /We are Concerned With the Policies requiring a minimum building separation N distances. From our previous discussions with staff, it was understood that the N setback requirements between buildings with primary elevations applied in respect N of window to window or window to balcony conditions. However, as worded in this N draft Amendment, the setbacks would apply even where just one of two facing N walls had windows or balconies. The requirement for the larger separation N distances is to provide privacy between facing units. No such privacy concern N exists if one of the buildings contains no windows or balconies. As such, we N recommend that any sections that address building separation distance for primary N elevations be reworded as follows: N

“Minimum separation distance of a building wall(s) from the tw between   tw primary elevations of an existing or new buildings.” t

Of particular note, for 299 Glenlake, an opportunity exists to integrate an existing N ramp to an underground garage into a new building, aligning with the intent of draft N policy 6.e). However, incorporation of an existing ramp into a building makes it N impossible to provide the building separation distances required in draft section N 5.2, unless the policy is revised as recommended above. Otherwise, achieving N the requirements of policy 5.2 directly conflicts with achieving the intent of section N of 6.e). N

2. /We are concerned of the phrasing of section 2.g), which reads: N

“Development/redevelopment t and t public t works t should t maintain unencumbered soil areas to provide opportunities for water infiltration t and to sustain the growth of mature, healthy trees over the long term.” t

Our concern is that the word “maintain” implies that no change is permitted, thus N no new or extensions of underground parking garages would be permitted. This N conflicts with policy sections 5.c) and d), which clearly allows for new or expanded N underground garages. We respectfully request that section 2.g) be revised to read:N

“Development/redevelopment t and t public t works t should t maintain prov ide unencumbered tsoil tareas t o tprovide topportunities tfor twater t
infiltration and to sustain the growth of mature, healthy trees over the long term.”

3. We are also concerned with the requirement for a 6-metre setback between the N street and underground garages proposed in section 5.c) and the requirement for N a 3-metre setback between a lot line and an underground garage proposed in N section 5.d). We provided previous comment on these same provisions in an N earlier submission to City Staff. Numerical setback should not be addressed at a N Policy level. Providing a specific setback number will restrict the efficient utilization N of the site. If the policies also contemplated a reduction in parking requirements, N then these policies would be less likely to restrict development. In our discussions with N Staff, Nhey Nindicated Nthat Nreduction Nin Nparking Nstandards Nshould Nbe Nconsidered on a site by site basis. If that is the case, it is our opinion that any N specific setback requirement for underground garages should also be considered N on a site by site basis. As such, we request that draft policies 5c) and e) be deleted.

4. We wish to reiterate our previous comment that section 5.i), which requires 25% N of new units be 2-bedroom and 1N% of new units be 3-bedroom or larger, should N be altered to consider the existing stock of larger units in the area. The provision N should be considered on a site by site basis to account for circumstances where N an existing building already contains a number of larger units that exceed this N requirement. We suggest the following wording: N

“O a site, a minimum of t 5% of all new dwellings units will be two t bedroom units or larger; a minimum of t0% of all dwelling new units will t be three bedroom units or larger. N

In summary, the policies of OPA 419 are very prescriptive, more so than typically found N at the Official Plan level. Collectively, the policies, as currently proposed, limit the infill N opportunities, counter to the growth and intensification policies of the Provincial Policy N Statement. We have identified 4 key changes that will address this concern while still N providing the City with a tool to control and guide infill development within the apartment N neighbourhood. We hope Community Council will consider our above noted suggested N changes. N

Thank you for the opportunity to provide comments.

Yours very truly,
SGL PLANNING & DESIGN INC

Paul Lowes, MES, MCIP, RPP
Principal N