



160 John Street
Suite 300
Toronto, ON M5V 2E5

IAN FLETT, J.D., B.A.
Telephone No.: +1 (416) 939-6396
Direct Line: +1 (416) 703-7034
Facsimile No.: +1 (416) 907-9147
Email: iflett@gillespielaw.ca

October 7, 2020

North York Community Council North York Civic Centre Main floor, 5100 Yonge Street Toronto, ON M2N 5V7	
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Dear Committee Members;

RE: NY 18.9 – Preliminary Report – Official Plan and Zoning By-law Amendment Applications – 4050 Yonge Street

We represent the following ratepayer associations in respect to the matter referenced above:

- South Armour Heights Residents' Association
- York Mills Heights Residents Association
- St. Andrew's Ratepayers Association
- York Mills Valley Association

In addition, we understand that Yonge Ridge Homeowners' Association is supportive of the positions set forth in this letter on behalf of our clients. These residents' associations represent residents in each of the quadrants of the Yonge-Wilson intersection proximate to the proposed development.

We are writing at this early stage in the process to ensure the public consultation in respect of this matter is truly informative, deals substantively with concerns raised by our clients' members and contributes to a meaningful dialogue between various stakeholders. In its current form, we are concerned this application cannot achieve those objectives.

In addition, given the reference in the Report dated September 21, 2020 from the Acting Director, Community Planning, North York District Wards to the Council that the parties to be given notice of the community consultation meeting be those landowners and residents within 120 metres of the application site, and to additional residents, institutions and owners to be determined in consultation with the Ward Councillor, we specifically request that we be provided

with notice on behalf of our clients of such meeting and any other matter relevant to this proposed development.

Our clients' highlight three principal areas of initial concern in respect of the proposed development. In summary, these relate to proposed density levels at the subject site and the massing required to accommodate it; traffic and parking; and impacts on the natural heritage. These are briefly discussed in turn below.

Density

The Subject Lands are surrounded by lands zoned for open spaces and commercial residential development with lower but still effective densities. The proposal, in its current form, proposes far greater density than what was contemplated by its recent rezoning in 2016 and a level density that is many times greater than nearby commercial residential development.

Further, the Applicant's consultants refer to the Growth Plan (2019) policies concerning Major Transit Station Areas as encouraging greater levels of density at this site. It is conceivable that greater densities may very well be appropriate in certain cases, but the Growth Plan policies encouraging intensification around transit stations is part and parcel with an upcoming Municipal Comprehensive Review, which must be considered in connection with the proposed development.

As Staff indicated, and our clients agree, the study of appropriate density assignment at this site must not be determined on an *ad hoc* site-specific basis in reference to MTSA policies but rather through the study of what ought to be delineated as the MTSA with appropriate land use designations in the delineated area. This includes the ability of public facilities and services to keep pace with development and the implementation of inclusionary zoning to help address the dire need for housing in this city.

Planning staff has indicated the study of the York Mills station will form a part of the 3rd phase of MTSA studies, which phasing was approved in May of this year. To this end, our clients are of the view that the correct planning approach will take a holistic view of the area to determine an appropriate scale of density taking the City's myriad policy objectives into account rather than cherry-picking specific policies to suit the Applicant's desired outcome.

Traffic and Parking

Likewise, the Applicant's consultants' examination of issues concerning traffic and parking are inadequate. It is not clear the entire impact on area traffic patterns have been taken into account. Neither have the Applicant's consultants considered the impact of their proposed solution on active transportation objectives in the area.

Natural Heritage

The Applicant proposes a major redevelopment on a site with a number of natural heritage protections. Including designations as *Open Spaces – Natural Areas*; *Green Space System* and *Greenbelt River Valley Connections*, among others. The Applicant's consultants have failed to demonstrate that its proposed development will not adversely impact these areas, let alone improve them.

Further, the Toronto Region Conservation Authority (“TRCA”) has provided a number of comments in correspondence dated April 17, 2020 that include:

- a request for the resubmission of up-to-date line work to determine accurate representations of hazard/feature limits, including driplines, which in turn will impact the actual developable area on the site;
- an inquiry into the conclusion there are no species of risk on the site when it appears no studies were conducted to reach that conclusion; and
- a concern over consultants taking certain policies out of context to justify outcomes, among many other concerns.

These concerns taken together lead the TRCA to indicate that:

“Given the above, TRCA staff are of the opinion that the application does not meet the Natural Hazard and Natural Heritage policies of the PPS, the City of Toronto’s Natural Environment Official Plan policies, or the TRCA’s Living City Policies. We anticipate major revisions being necessary in order to meet these policies...” [emphasis added]

Given the significant concerns above, any public consultation in respect of this application in its current form would be time wasted. We expect it is as clear to the Committee members as it is to our clients that this development proposal requires significant revisions before it may be considered suitable and realistic for the site.

Yours truly,

ERIC K. GILLESPIE
PROFESSIONAL CORPORATION

Per:



Ian Flett

- c. Councillor Michael Colle
Councillor Jaye Robinson