



## Confederation of Resident & Ratepayer Associations in Toronto

The Confederation of Resident and Ratepayer Associations in Toronto (CORRA) is a not-for-profit corporation.

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July 12, 2021

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To: Mayor Tory, Mr. Gregg Lintern, Chief Planner and Councillors of City Council

Ref: City Council Agenda-PH25.10 A New Regulatory Framework for Multi-Tenant Houses-July 14, 2021

Further to our letter of June 24, 2021 to the Planning and Housing Committee, we confirm our position as outlined in our recommendation as written below. We continue to believe that the zoning attributes from different geographic communities were comprised by making changes and/or amendments beyond the needs of the New Regulatory Framework. Adjourning this matter to meet the consultation requirements should rectify the issues without the burden of appealing the whole initiative.

### **CORRA recommends:**

**THAT THIS MATTER BE ADJOURNED UNTIL OCTOBER OR NOVEMBER AT THE EARLIEST SO ALL AFFECTED GEOGRAPHIC COMMUNITIES ARE FULLY CONSULTED, AS SET OUT IN THE OFFICIAL PLAN'S PUBLIC CONSULTATION POLICY 5.5.1 A) B) AND C) ATTACHED BY HOLDING MEETINGS VIRTUALLY OR OTHERWISE FOR EACH GEOGRAPHIC COMMUNITY. SUCH MEETINGS TO BE CALLED BY THE LOCAL COUNCILLOR IF THEY SEE FIT.**

We support the request made by the Annex Residents Association to rescind the motion to exclude fraternities and sororities from the regulation and oversight of Multi-Tenant Regulatory Framework. We express our opposition to the motion, moved by Councillor Ana Bailao and adopted by the Planning and Housing Committee, regarding fraternity and sorority houses. They meet the definition of rooming houses and should be included under the umbrella of this regulatory framework. Unless this motion is overturned it will set a precedent for any group to be excluded from the regulation and oversight. In fairness to all Tenants and their Neighbours, licensing and enforcement needs to be applied consistently and uniformly across the City of Toronto bringing equity and successful outcomes to the Regulatory Framework.

While there are many issues to be addressed, we would like to clarify our major concerns as follows:

- **Insufficient public consultation** as is required for the rollout of City-Wide Zoning By-Law Amendments
- **Significant changes to the zoning designations and possible Secondary Plans** of various areas which are not necessary for and go beyond the requirements of the implementation of the Regulatory Framework
- **The need to test the feasibility of this major Regulatory Framework** in two areas where illegal Multi-Tenant dwellings (Rooming Houses) exist before it is passed at City Council.

CORRA must object to preserve the rights of appeal for our member groups that the proposal is making significant changes without regard to the unique circumstances in each geographic neighbourhood, and as such lacks sufficient good planning ground to support the same in addition to any procedural defects relating to the Official Plan policies and natural justice.

Yours truly

*William H. Roberts*

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**CORRA**

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



To the Chair and members of the Planning and Housing Committee  
INTRODUCTION AND RECOMMENDATION

The Confederation of Resident and Ratepayer Associations in Toronto (CORRA) is a not-for-profit corporation.

**CORRA recommends:**

**THAT THIS MATTER BE ADJOURNED UNTIL OCTOBER OR NOVEMBER AT THE EARLIEST SO ALL AFFECTED GEOGRAPHIC COMMUNITIES ARE FULLY CONSULTED, AS SET OUT IN THE OFFICIAL PLAN'S PUBLIC CONSULTATION POLICY 5.5.1 A) B) AND C) ATTACHED BY HOLDING MEETINGS VIRTUALLY OR OTHERWISE FOR EACH GEOGRAPHIC COMMUNITY. SUCH MEETINGS TO BE CALLED BY THE LOCAL COUNCILLOR IF THEY SEE FIT.**

PREVIOUS HISTORY

While the goal of providing affordable housing is in itself, a laudable goal, it must be remembered that the path to destruction is based on good intentions but poor execution.

This reminds the writer of what transpired in the mid 70s when the City kept reducing parking standards for boarding and lodging houses in order to facilitate the creation of more affordable units. As a result family size flats were gutted and turned into illegal bachelorettes.

At the time ratepayers deputed before the equivalent committee that there appeared to be problems with the previous loosening of standards, and if the City was not careful the result would be a loss of such housing. The City went forward and in the end the City was proven wrong and stringent standards were introduced to cure a problem ex post facto.

#### SIGNIFICANT CHANGE TO SEVERAL ZONES

The proposal attempts to introduce the concept of multi-tenant housing (formerly Boarding and Lodging Houses) into all zones which previously did not permit the same. This is a significant change within each affected geographic communities especially when it is happening at the same time as garden suites and before the completion of the review of lane-way housing.

#### PROBLEMS WITH THE CONSULTATION AND ITS FAILURE TO COMPLY WITH OFFICIAL PLAN POLICY 5.5.1

The Consultation lacked specificity. No draft by-laws were presented at the first meeting. Those present were advised they would be in a report going to Planning and Housing.

Having looked at the voluminous amount of material (over 300 pages) being presented at the public meeting, it is not possible to digest the same in 6 days. This is contrary to the aforesaid Official Plan Policy 5.5.1.

Previously the report would be tabled with the draft by-laws and supporting reports with a request for a public meeting to follow thereby allowing sufficient time for review and comment. Thus the consultation is deficient on that level.

Furthermore there are many geographic communities who have no organized group or if they do, they may not be sufficiently robust to properly respond and review the material within the limited time lines provided.

CORRA notes in particular that you will be amending several by-laws of the former City of Scarborough in accordance with the Official Plan there should be a community meeting convened in regard to each by-law with a presentation as to how the new regulations will relate to that area's specific zoning. Similar meetings should be convened by the ward councillors for each ward in the other affected geographic communities for the ward. In addition it is likely each Councillor would have contact information for individuals broader than those represented by community groups.

#### ADDITIONAL POINTS

While quickly reviewing the draft by-laws CORRA notes the by-law refers to Apartment buildings in a RD zone, and such use would be legal non-conforming use for a RD zone, it would appear the City by so doing is stating that apartment buildings will be acceptable in a RD zone. This in and of itself is a significant change or it could be simply poor and hasty drafting.

There appears to be no analysis of each geographic community as to infrastructure, parking requirements, or social services to make such an experiment viable.

There is a real risk that affordable family units will be lost in the drive to provide affordable housing as occurred in the ?Os.

When questioned on infrastructure and parking studies, the response appeared to indicate that inadequate infrastructure or parking studies were done in regard to each geographic neighbourhood which is contrary to Official Plan Policy 4.1.5.

This is not sound land use planning.

That Policy states:

"No changes with be made through rezoning, minor variance, consent, or other public action that are out of keeping with the overall physical character of the entire Neighbourhood."

Elsewhere in Policy 4.1.5 there is a reference to "geographic neighbourhood".

CORRA must object to preserve the rights of appeal for our member groups that the proposal is making significant changes without regard to the unique circumstances in each geographic neighbourhood, and as such lacks sufficient good planning grounds to support the same in addition to any procedural defects relating to the Official Plan policies and natural justice.

You can act in haste but you may find in the end that there will be several appeals and your by-law may be struck down for prematurity and any drafting defects will come back to haunt you.

Yours truly

*William H. Roberts*

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- d) changes in the legislative environment; and
  - e) social and physical infrastructure improvements required and provided to serve growth in population and employment.
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 assessment will examine achievements in the Plan's growth management strategy, the quality of the living and working environments created, the impact of growth in population and employment upon the services and quality of life enjoyed by residents and workers and Toronto's evolving relationship with the broader urban region, among other matters. The need for new implementation initiatives will also be considered at least every five years, or sooner as circumstances warrant.
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## S.5 THE PLANNING PROCESS

The *Planning Act* encourages public involvement in the planning process and enables Council to require an applicant to provide, at the time a planning application is made, information Council determines is needed to make an informed decision. Regulations under the *Planning Act* prescribe minimum complete application requirements. The *Act* also enables a municipality to identify additional requirements, beyond the prescribed minimum, by having complete application policies in the Official Plan. Council may refuse to accept or further consider a planning application until all such materials have been received.

Applicants are encouraged, but not required, to consult **with** the Ward Councillor, City staff and local community prior to formal submission of a planning application.

Following receipt of a complete planning application, Council will determine whether the City is satisfied with pre-application community consultation, in particular any pre-application community meeting(s) held in accordance with City standards, and whether one or more subsequent community meetings will be required under the provisions of Policy 5.5.1(c)(ii).

In accordance with the *City of Toronto Act*, Council may delegate by by-law its duty to notify applicants as to the completeness of planning applications.

The application materials and related documents will be made available to the public in accordance with the requirements of the *Planning Act* and the provisions of this Plan.

## Policies

### 1. Public Involvement

A fair, open and accessible public process for amending, implementing and reviewing this Plan will be achieved by:

- a) encouraging participation by all segments of the population, recognizing the ethno-racial diversity of the community and with special consideration to the needs of individuals of all ages and abilities;
- b) promoting community awareness of planning issues and decisions, through use of clear, understandable language and employing innovative processes to inform the public, including the use of traditional and electronic media; and
- c) providing adequate and various opportunities for those affected by planning decisions to be informed and contribute to planning processes, including:
  - i. encouraging pre-application community consultation;
  - ii. holding at least one community meeting in the affected area, in addition to the minimum statutory meeting requirements of the *Planning Act*, for proposed Official Plan and/or Zoning By-law amendments prior to approval;
  - iii. ensuring that information and materials submitted to the City as part of an application during the course of its processing are made available to the public; and
  - iv. ensuring that draft Official Plan amendments are made available to the public for review at least twenty days prior to statutory public meetings, and endeavouring to make draft Zoning By-law amendments available to the public for review at least ten days prior to statutory public meetings, and if the draft amendments are substantively modified, further endeavouring to make the modified amendments publicly available at least five days prior to consideration by Council.

Information and materials to be made available to the public for review will be provided upon request in electronic and/or paper copy form at a fee not to exceed the City's actual cost in providing such information or material.

Schedule 3 outlines the City requirements for complete applications. When seeking development approvals from the City, applicants should also refer to "Building Toronto Together - A Development Guide" which outlines the City's development review processes. In addition to the requirements of the *City of Toronto Act*, *Planning Act* and/or Regulations, the City may require additional information to properly evaluate an application. Complete application requirements may be discussed during pre-application consultation.

### 2. Complete Applications

Applications to amend the Official Plan, to amend the Zoning By-law and applications for Plan of Subdivision, Plan of Condominium or Consent to Sever will comply with the statutory complete application submission requirements of the *Planning Act* and the requirements identified in Schedule 3.

In addition, applications for Site Plan Control Approval should satisfy the submission requirements identified in Schedule 3.