



**MORE NEIGHBOURS
TORONTO**

Dear North York Community Council,

RE: 2023.NY8.9 - 155 St. Dennis Dr. OPA/ZBA

About More Neighbours Toronto

[More Neighbours Toronto](#) is a volunteer-only organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that has dominated Toronto's politics, created an affordability crisis, and cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

Position

We enthusiastically support the development proposal at 155 St. Dennis Dr.; we praise the efforts to rehabilitate the golf course and river bank landscape; turn the non-residential component of the land over either to public agencies or to Indigenous stewardship; to potentially add land into the Greenbelt and park systems and lastly, to add much-needed housing to Wynford. We believe they constitute innovative planning and merit consideration. Likewise, we regret to learn that North York Community Council is pursuing refusal of this application. The refusal is premised on the entire development site lying below the erosion hazard. However, this report has also found that the residential portion of the site lies above the watershed horizon. Based on the applicant's materials, we believe that the residential towers will sit on terrain resilient against future erosion.

Firstly, we would like to take the opportunity to respond to some of the arguments from the refusal report. It is important to address the twin motives in the Provincial Planning Statement (Policies 2.1.1-2.1.3) and the City's Official Plan to protect the existing landscape. As intended, this tenet is meant to protect ecologically sensitive lands and prime agricultural land and indeed, part of the land implicated is ecologically sensitive land. However, golf courses, which mainly offer lawns primed for the game of golf, present a relatively inefficient and environmentally deleterious land use for the City. Both levels of government enabled the initial deforestation of the site circa 1959 and the subsequent deterioration of the site's ecosystem.

We believe this application is in line with the Growth Plan. The applicant has thoroughly demonstrated through their submitted documents that the residential development will not violate the natural heritage features in the area and that the renaturalization program will restore and improve the ecology and biodiversity of the site, satisfying policies 2.1.2 and 2.1.8 of the Provincial Policy Statement.

Additionally, the applicant has shown that the residential portion of the subject site sits above the 100-year floodline, that it complies with an additional 10 m setback from said floodline and lastly, that it sits “stable” and “safe” on a Paleo Terrace. For anyone unfamiliar, this geological form is defined as “an erosional remnant of a terrace that retains the surface form and alluvial deposits of its origin, but was not emplaced by, and commonly does not grade to, a present-day stream or drainage network”. With this definition in mind, we believe that the four tests of policy 3.1.7 of the PPS can be satisfied and that safe access to the apartments will be provided in all scenarios. The applicant has also invoked the Wynford Park Condominiums as precedent, which are located to the west of the subject site and which sit on a similar terrace close to the river.

As for the residential portion of the application, the application would add 2,170 residential units, 5% (108) of which will be designated as affordable housing across various buildings ranging from 42-56 storeys. We understand that this decision will come in the aftermath of a provincial scandal surrounding the removal of Greenbelt lands, but with the proposal lands being privately-owned, this site is exempt from §6 of the Greenbelt Plan. There should be no issue with allowing for residential development on the proposal site and the intent to donate the rest of the land in fact supports the Greenbelt as well as the City’s parks system. The application also sits slightly outside the Wynford MTSA, some minutes away from the nearest Line 5 station, but is as appropriate as any within the boundaries for providing homes close to transit.

The comments highlighted from the community consultation, in the report, were mainly those submitted by residents and attendees opposed to the development and did not represent the comments from residents and attendees that supported the development.

Moreover, the site is located in the Flemingdon Park Neighbourhood Improvement Area, “where the City of Toronto has identified the need for targeted investments into community infrastructure” (it ranks 17th out of 140 in the City’s Neighbourhood Equity Index). Denying this application directly denies these much-needed investments into the people and place of Flemingdon Park and contravenes the TRCA’s and the City’s mutual identification of the Subject Site as “an important location and opportunity for new trail connections”. With these goals and opportunities to create new cycling routes and expand the cycling network around the site, the parking ratio of 1/2 and the nearly 100% bike parking to unit ratio of the development proposal makes it well suited to the neighbourhood.

All things considered, a report which considers a golf course as “good [or tolerable] planning” and residential towers with a substantial parkland donation/environmental rehabilitation component as “not ... good planning” caters to a few constituents who oppose new development as opposed to many more Torontonians who could benefit from it.

The text of the report and the feedback from the TRCA's review of the application suggests a lack of political will to engage with the substance of the application, despite the proposed biome restoration in the Natural Areas inviting a joint effort with the TRCA. Indigenous consultation was also undertaken as part of this development proposal and to see that and a potential future partnership with Traditional Territory and Rights Holders flatly disregarded means that Toronto, in seeking to preserve a golf course, risks perpetuating white supremacy, settler-colonialism, car dependency and classism in its planning practice.

A motion to refuse would be out of step with Mayor Chow's and City Council's stated ambitions of enabling more housing to be built for more neighbours. Please approve this proposal to help move transit-oriented development, reconciliation and a uniquely large parkland contribution forward.

Sincerely,

Thaddeus W. Sherlock
More Neighbours Toronto