



Development Application 135 Plunkett Rd.

Application Number:

23203652WET07OZ

Application Status:

Under Review

Milestone Status:

Community Consultation Meeting
Scheduled May 13, 2024

Submission Grant Evers, President, Humber
Summit Residents' Association



May 3, 2024 Submission #2

135 Plunkett Rd. Development Application and Provincial and Municipal Policies

We respectfully submit that this development application is not consistent with the Provincial Policy Statement (including new proposals released for comment April 12/24) and the Official Plan, 2023.

The Provincial Policy Statement (PPS)

Increased housing supply is an important provincial goal. This does not infer that any form of housing is appropriate on a particular site. For example, a high rise apartment would be clearly unacceptable. Stacked townhouses are not appropriate for this site either. Maximum intensification should not be the goal that directs planning without full consideration of the neighbourhood context.

The *PPS* directs municipalities to provide infrastructure to support development. Plunkett Rd, which would serve as the principal means of ingress and egress flows into Milvan Dr., a busy street with a constant flow of residential and industrial traffic. Transport trailers travel east and west on Millwick Dr. regularly throughout the day and night. The Residents' Association has asserted and communicated with the City over the past ten years to improve safety at Millwick Dr. and Islington Ave. The implementation of improved infrastructure has also been recommended by the *Finch West Goods and Movement Study*. So far this need has resulted only in a promise from Transportation Services to offer options for improvement which it still has not released. Notwithstanding C.F. Crozier & associates Inc.'s *Transportation Impact*

Study's conclusion that the proposed development would not adversely impact the community, the reality is that at least 500 people would regularly use Millwick Dr. and Islington Ave. without the certainty of adequate planned infrastructure to protect personal safety.

Intensification is encouraged on Arterial Roads and Major Streets. Plunkett Rd. is neither; it is a residential street with heavy traffic now since it serves as the sole means to access Millwick Dr., Millwick Dr. provides the only traffic light at Islington Ave. for all residents in the immediate surrounding neighbourhood.

Intensification is encouraged on streets "adjacent to transit lines". Islington Ave. is a heavily used bus line and may become busier with the completion of the Finch West LRT. There is a walkway on Cabana Dr. for residents to access the busses on Steeles Ave. This stacked townhouse development would be appropriate on Islington Ave., not on a street that is not a transit line.

Municipalities are required to provide a mix of housing. Stacked townhouses offer a very intense alternative to the already completed semi-detached houses. A significant problem is that the community was promised more semi-detached houses for several years as the photo below illustrates. A change of heart from semi-detached houses to stacked townhouses is a big jump. Alternatives are available in the form of Street Townhouses which would satisfy the goal of a mix of housing.



This is the sign that was directly in front of 135 Plunkett Rd. for several years – the proposed site for the 146 stacked townhouses.

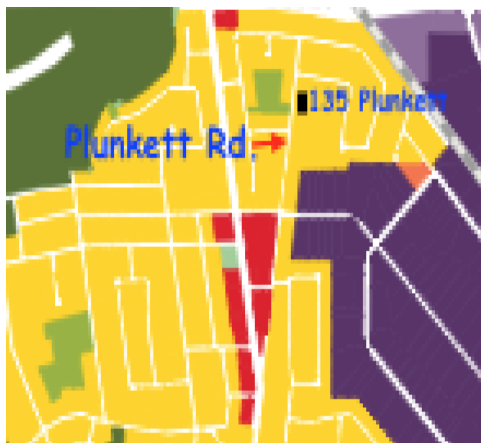
Redevelopment of Mixed-Use zones could accommodate stacked townhouses, but this is not a Mixed Use zone.

"Affordable Housing" is also encouraged, but this proposal does not mention "Affordable Housing". Units are projected to be sold at market value.

Educational facilities would be required to accommodate children, ironically on a site of a former school that was demolished. Neither the TDSB nor the TCDSB has indicated that their facilities can accommodate children from this stacked townhouse project.

The Official Plan, 2023

This new proposal is compact; it is unseemly, dense and offers a barracks-like built form that is incompatible with the neighbourhood: six blocks of 4-storey back-to back stacked townhouses. City Planners have told us that these blocks are really apartment buildings in a community designated as *Neighbourhoods*.



This screenshot is taken from map 13 of Toronto's Official Plan. The yellow colour identifies 135 Plunkett Rd. as clearly located within a *Neighbourhoods* zone.

What type of new structures can be constructed within *Neighbourhoods*? According to the Official Plan, *lower scale buildings such as detached houses, semi-detached houses, duplexes, triplexes and townhouses, as well as interspersed walk-up apartments that are no higher than four storeys*. We have been informed that the

proposed stacked townhouses qualify under these criteria.

The community respects the City objective for a mix of housing, but 146 units in 6 blocks, separated by 3.8 metres, north to south and 18m east to west with an underground parking garage of 164 parking spaces, is an entirely inappropriate built form for the context of this neighbourhood.

This property on a residential, interior street is 1.85 acres; 146 units are proposed; the *Belmont Towns* development at nearby Muir Ave. and Islington Ave. was originally proposed in 2016 as 136 stacked townhouses on 2.42 acres; it was strongly opposed by residents and City Planning who wrote a *Refusal Report* for it because of its incompatibility with the surrounding neighbourhood. The proposal was eventually amended to 46 street townhouses which have now been constructed with a public street. The *Belmont Towns* offer a mix of housing, although still perhaps too dense, they can be considered more reasonable, given that Islington Ave. is an arterial road. We believe that the 135 Plunkett Rd. application warrants a *Refusal Report* too.

Compared to the *Belmont Towns*, this proposal for 135 Plunkett Rd. proposes to construct 217% greater number of units on a property that is 24% smaller than the *Belmont Towns*! This makes no sense whatsoever. Additionally, it offers a less desirable type of built form. When stacked townhouses are located in a new area or an area with similar style of homes, they would be reasonable, but not in a well-established neighbourhood comprised entirely of semi-detached houses. It would be an undesirable anomaly.

It is disturbing that this proposal is being considered in a community that the City has designated as a *Neighbourhood Improvement Area*. The proponent has not provided any

evidence that the development would improve the liveability of the Plunkett Rd. neighbourhood or the wider Humber Summit community. It claims that it would not have any adverse impact. As presently conceived, it would undermine the character of a stable neighbourhood. We submit that In other EYCC neighbourhoods, it would not reach first base. This in an attempt to push through an inferior development, under dubious circumstances; in a neighbourhood that is less likely to challenge it. The City needs to stand up for the less politically engaged, not acquiesce to questionable ambition.

The objective of offering a mix of housing is admirable and necessary in a city, in need of housing. It can be achieved by the construction of semi-detached homes or possibly street townhouses that would be fewer in number with a built form that is more consistent with the prevailing type of homes in the neighbourhood.

We maintain that the language of The Official Plan supports our position.

- *The stability of Neighbourhoods' physical character is one of the keys to Toronto's success*
- *Neighbourhoods are considered physically stable areas*
- *While communities experience constant social and demographic change, the general physical character of Toronto's residential Neighbourhoods endures. **Physical changes to our established Neighbourhoods must be sensitive, gradual and "fit" the existing physical character. A key objective of this Plan is that new development respect and reinforce the general physical character of the Neighbourhood ... including prevailing heights, massing, scale, density and dwelling type of nearby residential properties ... and prevailing patterns of rear and side yard setbacks and landscaped open space***
- *No changes will 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.*
- *Where a more intense form of residential development than that permitted by existing zoning on a major street - Note again that Plunkett Rd. is not a Major Street - in a Neighbourhood is proposed, the application will be reviewed ... having regard to both the form of development along the street and its relationship to adjacent development in the Neighbourhood.*
- *The prevailing building type and physical character of a geographic neighbourhood will be determined by the most frequently occurring form of development in that neighbourhood. Some Neighbourhoods will have more than one prevailing building type or physical character.*
- *Zoning by-laws will contain numerical site standards for matters such as building type and height, density, lot sizes, lot depths, lot frontages, parking, building setbacks from lot lines, landscaped open space and any other performance standards to ensure that new development will be compatible with the physical character of established residential Neighbourhoods.*

In established *Neighbourhoods*, infill development on properties that vary from the local pattern in terms of lot size, configuration and/or orientation will:

- a) have heights, massing and scale that are respectful of those permitted by zoning for nearby residential properties, while taking into account the existing form of development on the infill property; (proposed 14.5m. height of stacked townhouses, exceeds by 10.5m heights of Phase 1 semis and is higher than adjacent 1960s's semis)
- b) have setbacks from adjacent residential properties and public streets that are proportionate to those permitted by zoning for adjacent residential properties, while taking into account the existing form of development on the infill property;
- c) provide adequate privacy, sunlight and skyviews for occupants of new and existing buildings by ensuring adequate distance and separation between building walls and using landscaping, planting and fencing to enhance privacy where needed;
- d) front onto existing formerly created public streets wherever possible, with no gates limiting public access;

It is acknowledged that The Official Plan does permit exceptions to the most common form of housing in a neighbourhood. However, that applies principally to Major Streets. Plunkett Rd. is not designated as a Major Street.

This is an in-fill project on a former institutional site. The City may see this as an opportunity to fill in the "gaps" in housing to improve neighbourhoods as described above, but as residents who live on Plunkett Rd. across from the site expressed at the meeting of April 30 with City Planners, they see the proposal as a detriment to the neighbourhood. They certainly don't believe that 146 units across the street from their homes will improve the community. Their concern is not "nimbyism". This is a request to the developer and the City to demonstrate respect for the neighbours who live on Plunkett Rd. and surrounding streets. The mountain of dirt across from their house to which they have been subjected since Phase 1 construction began, does not instill confidence. (See photograph below). They fear their concerns will be realized.

To change the form of housing in such a drastic way from the semi-detached homes that were originally proposed in 2018, is to reject *The Official Plan's* promise to ensure that *physical changes to an established Neighbourhood must be sensitive, gradual and "fit" the existing physical character.*

According to the *Planning Rationale* submitted by *Sajecki Planning*, Planner for the proponent, *The proposed development at 135 Plunkett Rd. containing 151 (now 146) new residential units seeks to introduce a more compact, dense form of stacked back-to-back townhouses ...the proposed development and associated ZBA conform to provincial and municipal planning*

policies ... The development is respectful and appropriate in the context of the existing neighbourhood ... the proposed development contributes to a complete community within the Humber Summit community by providing additional housing ... The proposed development does not create significant adverse impacts on the surrounding area ... It is our professional opinion that this proposal is representative of good planning and urban design. 135 Plunkett Rd. will enhance the existing and planned built form, streetscape, public realm and community.

We can agree with *Sajecki Planning* that the proposed development is compact and dense and that it proposes an additional mix of housing.

We respectfully disagree with its other arguments. In our view,

- it does not conform to provincial and municipal policies;
- it is not respectful and appropriate in the context of the existing neighbourhood;
- nor does it contribute to a complete community.
- the proposed development will produce adverse impacts on the surrounding area.
- It is not representative of good planning and urban design
- It will not enhance the existing built form, streetscape, public realm and community.

The Humber Summit community was generally initially supportive of Phase 1 of the proponent's redevelopment of the former St. Gaspar Catholic school site, even though the 42 semi-detached houses tower over the surrounding 1960's built semi-detached houses and the amenity of a school no longer is integral to the neighbourhood. But Phase 2 as it is currently proposed, is "a bridge too far". After rezoning was approved by City Council in 2018 for 15 similar, semi-detached houses and one detached house, the proponent elected to allow this approval to become null and void upon expiration of the condition of a five-year window, rather than proceed with the approved rezoned project.

To the community, this new proposal appears deceitful. Phase 1 homes were sold in a highly priced market to prospective buyers who were led to believe that they were buying into a neighbourhood of semi-detached homes, not stacked townhouses that are proposed to be built adjacent to them.

There's little wonder that residents in the Plunkett Rd. neighbourhood are upset and not supportive of this application.

