



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

203A/881A Jane Street
Toronto, Ontario. M6N 4C4
3 May, 2024

To: phc@toronto.ca

To: The Chair and Members
Planning and Housing Committee

Re: Amendments to Official Plan being OPA 727 – PH 12.3 May 9, 2024

On behalf of the Confederation of Resident & Ratepayer Associations in Toronto (CORRA), the following comments are being raised in regard to OPA 727 and the amendments to 569-2013.

CORRA opposes the proposed amendments as presently drafted to the Official Plan and 569-2013.

I note CORRA was formed in part over the struggles in the late 60's to have the public have a role in planning. At that time the public could depute but not be listened to. Planning was the realm of the Development Department, developers and speculators.

CORRA notes the wholesale assault by the Ford Government, much as the regime in Animal Farm, has decided all citizens are equal but soon some will be more equal than others. To wit only developers, applicants and speculators may soon be the only entities that can appeal a decision of Council, with the result the only effective voices that will be heard are the voices of the development industry.

In addition CORRA further notes that Committee of Adjustment matters other than a severance do not go through the same analysis as Zoning and Official Plan matters. In the past when there was a right of appeal, that a full analysis would happen at the TLAB. Under these circumstances, and noting that applications which involve renovations and increases in height and stories are not uncommon and often approved by the Committee that the City needs to step forward to ensure participatory planning does not simply become a motherhood statement with neither force nor effect.

It is with this in mind that CORRA makes the following points firstly in regard to OPA 727 and then the proposed amendments to 569-2013.

OPA 727

PROBLEMS WITH IDENTIFYING MAJOR STREETS ON MAP 3

CORRA notes that Policy 1 references all major streets shown on Map 3, while the maps attached to 569-2013 only show some of those streets. In addition member groups, who attending public meetings were advised that those maps may be further refined. Given the disconnect, CORRA makes the following recommendation:

Recommend that Policy 1 be amended by adding between “along” and “major streets” the following words “certain portions of”.

Further recommend that Policy 12 opening paragraph be amended by adding between “along” and “major streets” the following words “certain portions of”.

SETBACKS STANDARD SET OUT IN POLICY 12 C

CORRA has a further concern with New Policy 12 c which references setbacks that generally meet those permitted for adjacent residential properties.

Putting aside the minimal setback standards set out in the actual zoning amendment which are not reflective of requirements in all adjacent residential areas, CORRA has a serious concern that the vast majority of adjacent residential areas have height limits of 11 metres or less. CORRA opposes applying side yard setback standard for buildings with lower heights to buildings that are 19 m. Such 19 m buildings are for all intent and purposes double the height of apartments in the adjacent residential areas.

Recommend that 12 c be reconsidered given the significant difference between 19 m and 11 m or less in the adjacent residential zones.

PROPOSED AMENDMENTS TO 569-2013

The present requirement set out in 569-2013 has one standard for apartments less than 12 m in height and a different standard for those greater than 12 m. It presently requires a 7.5 m side yard setback for apartments in excess of 12 m. While that standard may be viewed as problematic by those pushing the development agenda that standards should be minimal because we need housing. There needs to be a balance with increasing setbacks for apartments greater than 10m in height.

Six storey apartment buildings and not common in neighbourhoods, thus the reference to four storeys in the Official Plan. Anyone walking through the old neighbourhoods will note that apartments tend to be 2 and half, to three storeys and therefore are not completely out of context with the low-rise buildings around them.

References to this being gentle intensification similar to existing apartments in the former City of Toronto does not hold water. In addition the Variance Provisions under the Planning Act do not require conformity to the Official Plan; only requiring that a variance maintain the intent of the Official Plan. It follows that 7 or 8 storey buildings may be approved by the Committee and given there is no right of appeal, it is likely that applicants will go that route rather than seeking the more onerous zoning and OPA route because of the complete application requirements for a zoning or official plan amendments.

Many of CORRA member groups question the appropriateness of the proposed minimum side yard setbacks given the impacts seen with “midrise” developments adjacent to residential areas, where there are hydrology and soil stability issues, along with impacts on adjacent heritage structures and trees.

As previously noted, Site Plans do fall under the Complete Application process. Thus the City should direct staff to review if the site plan process should apply to all areas where six storey apartments are permitted so that matters such as heritage, trees flooding, drainage and soil instability will be considered.

In addition CORRA is concerned that many existing low rise apartments that are affordable will be now be viewed as buildings that should be torn down and replaced by 6 storey apartments that most likely will be condominiums, resulting in renovations of many long term tenants.

CORRA recommends that before you approve the zoning changes that the proposed zoning be sent back to deal with such matters.

RECOMMEND THAT SITE PLANS BE APPLIED TO ALL AREAS WHERE 6 STOREY APARTMENTS ARE ALLOWED AS OF RIGHT.

To summarize, CORRA RECOMMENDS:

- 1. OPA 727 STANDARDS BE REVIEWED AND SENT BACK FOR FURTHER REFINEMENT.**

2. **THAT IF OPA 727 IS ADOPTED THAT AT A MINIMUM IT SHOULD BE AMENDED TO INDICATE THAT THE FOLLOWING WORDING BE INSERTED IN POLICY 1 AND 12 “CERTAIN PORTIONS OF” BEFORE THE WORDS MAJOR STREETS.**
3. **THAT IF OPA 727 IS ADOPTED THAT 12 C BE AMENDED TO NOT REFERENCE STANDARDS SET OUT IN ADJACENT NEIGHBOURHOOD BUT STANDARD THAT APPROPRIATELY MITIGATES THE IMPACTS ON ADJACENT PROPERTIES.**
4. **THAT COUNCIL DIRECT STAFF TO CONSIDER THAT SITE PLANS BE APPLIED TO ALL AREAS WHERE 6 STOREY APARTMENTS ARE ALLOWED AS OF RIGHT TO ENSURE SUCH MATTERS AS “RENOVICITONS”, DRAINAGE AND FLOOD MATTERS, SOIL STABILITY; AND IMPACTS ON TREES AND HERITAGE PROPERTIES AND TO REPORT BACK TO THE PLANNING AND HOUSING COMMITTEE.**

We ask that Council seek a balance between the need for housing and ensuring tenants are protected, along with trees.

We further ask Council to note Doug Ford has stripped the rights of neighbours to challenge decisions of the Committee of Adjustment at the TLAB therefore Council must ensure standards are appropriate because they are likely to be maximums in the case of setbacks and minimums in terms of height and density.

Please note either I or another member of the CORRA Executive would like to depute to the matter.

Submitted on behalf of the
Confederation of Resident and Ratepayer
Associations in Toronto (CORRA)
William H. Roberts, Chair
(W) 416-769-3162
(C) 416-277-7209
Willadvocate@aol.com