

Swansea Area Ratepayers' Association

Reflecting the interests of the Swansea Community



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Swansea Area Ratepayers' Group

On behalf of the Swansea Area Ratepayers Group (SARG)

In support of the Confederation of Resident & Ratepayer Associations in Toronto (CORRA)

Attn: Ms. Nancy Martins phc@toronto.ca Planning & Housing Committee
Councillor Perks, Chair, councillor_perks@toronto.ca Planning & Housing Committee
Members of the Planning and Housing Committee

RE: PH15.1 – OPA 528: Updating Policies for Infrastructure Projects in Parks and Open Space Areas Thursday, September 26, 2024

They say that imitation is the highest form of flattery but in the case of the updates of the OPA 528, it is the highest form of folly.

The Premier and the Provincial Government is selling off the Greenbelt by removing prohibitive regulations in the interest of providing more Mega Mansions.

With the removal of the requirement of an OPA and clearly defined regulations, the Mayor and Toronto City Council are opting to sell or dispose of **'City-owned lands in Parks and Open Space Areas, within or outside of the Green Space System, to be permitted without the requirement of an Official Plan Amendment (OPA)' and without public input or consultation.** The future and sale of our natural heritage is taken out the hands of City Council and public oversight and placed in the hands of a Public Agency.

The irony of the folly of this supposed Amendment is its purpose is to 'Restore and Enhance' Toronto's infrastructure and development by selling off its natural and heritage infrastructure for which it is renowned. The Swansea area is adjacent to the natural heritage of the largest (probably) urban park in Ontario. Is High Park on the chopping block like Exhibition and Ontario Place? Already vehicle restrictions at the weekend prohibit its recreational use by the public from across Toronto. Will this be Exhibition Place part 2, gradually whittled away as a natural heritage, infrastructure and recreational site?

The purpose and intent of Official Plan Amendment 528 is to facilitate conservation projects and essential public works and utilities that support Toronto's development and growth, provided certain criteria are met. The OPA does not make allowances for **when there is surplus land left after its use as a conservation project is completed.** Does the new Public Agency sell off this surplus land to developers to build any size or type of building without any input from the City of Toronto?

Having read through some of those letters written of support for this OPA528, I can see why this OPA has to go back to the drawing board. All of them seem to have missed the point of selling off the green space as facilitating conservation projects rather than building 'healthy' houses or installing the same outdated energy transmission projects.

Let's consider Toronto Hydro's submission and how it already is resentful of the requirement to restore and enhance. It is dismissive of the Public's input and consultation, thankful that there is no OPA requirement to do so. They see these updates as the opportunity to continue building their infrastructure in the traditional way above ground with the possibilities

of blackouts, wires, poles, pylons and grids. They are resentful of the more progressive European model for constructing energy transmission underground. Instead of selling them our natural infrastructure, require them to plan for the future (see the link) in the Public's interest.

<https://www.power-grid.com/td/going-underground-european-transmission-practices/#gref>

Mr Kennedy of Tenblock says that 'his company has developed and managed multi-family apartment buildings in Toronto for over sixty-five years. As a company, we are deeply committed to building sustainable, high-density communities.' He is missing the point that we are not selling the Green Spaces to build houses(I hope). Perhaps the City of Toronto should make this energy saving construction process a condition of approval for a building permit and construction on every application in Toronto.

As mentioned initially, we support the submission on behalf of CORRA and we also require that City Legal and Planners go back to the drawing board and firm up the requirements and regulations of OPA 528 before its approval. I repeat CORRA's necessary changes/ recommendation in the best interest of the natural infrastructure and heritage of our System's Green Spaces. The CORRA recommendations include reference as follows:

1. The wording of an earlier OPA draft was much tighter by specifying the test to perhaps not need an OPA but not exclude its requirement
2. OPA 528 be reviewed and sent back for further refinement
3. That if OPA 528 is adopted that at a minimum, it should be amended to have wording similar to the earlier draft which has a much higher hurdle such as a prior environmental assessment
4. That if OPA 528 is adopted that it be amended to deal with what happens should the **Public Agency** cease to need the lands.

Yours sincerely,



Veronica Wynne
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