



Confederation of Resident & Ratepayer
Associations in Toronto

c/o 203A/881A Jane Street
Toronto, Ontario.M6N 4C4
24 June, 2025

My summary comments for PH22.4, PH22.3 and PH22.8 on June 25, 2025 City Council

To Mayor Chow and

City Council

No doubt you are inundated with multiple letters on the above matters.

Fundamentally the City's approach is flawed and fails to follow Section 2 of the Planning Act.

No studies have been provided concerning the capacity of sewers to take the additional population levels created by the various EHON proposals.

The fact populations may have dropped within neighbourhoods does not mean there is sewer capacity. Neighbourhood sewers flow into main sewers that have developments that based on your various proposals will see a significant increase in populations and effluent going into the main sewers along the Avenues and in mixed use areas.

In the 1980's I was involved in a hearing for a relatively small development near the Don River in former East York while the neighbourhood population had diminished, the sewers were connected to a main sewer which had combined sewer overflows for up to 7 days after a rain event due to all the development to the north that resulted in the sewer operating at or over capacity close to 24/7.

Given the Development Industry wants to pay no HST or Development charges and the Province and Federal governments are considering such requests. It is clear the costs will be borne by the general taxpayer in the City of Toronto through property taxes. Prior to development charges and subdivision agreements there was an OPB case that went to Divisional Court twice. The first time the developer who wanted the municipality to build sewers to support his development where there were no sewers planned for 5 to 10 years appealed the refusal to the OMB. The OMB approved the development on the condition the Developer pay for the sewers. The Developer went to Divisional Court and argued the OMB had exceeded its jurisdiction. The Court agreed. He went back to the Municipality, it still refused. He went to the OMB which dismissed his appeal. He went back to Divisional Court who dismissed the appeal on the ground that the general taxpayer should not be burdened with development.

A proper Sewer Capacity Study would confirm what excess capacity (if any) a sewer in a given area and what the costs would be to upgrade it, and then the City can decide whether that area or areas should have intensification approved by a general amendment to the zoning by-law for that and similar areas and those that cannot until they are upgraded can have intensity.

This is the basis of section 2 of the Planning Act and why subdivision agreements came into existence.

Until such studies are done the City should pause its wholesale push for Housing without proper planning justification that such a push is feasible.

For almost 20 years the City despite promises to CORRA during the hearings re the 2002 Official Plan to do such studies.

William H. Roberts, B.A. LLB. Chair

CORRA (Confederation of Resident and Ratepayer

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