



Confederation of Resident & Ratepayer
Associations in Toronto

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21 January, 2025

Toronto City Hall
13th flr. W., 100 Queen Street West
Toronto, Ontario.M5H 2N2

To: Planning and Housing Committee

Attention To: Nancy Martins

phc@toronto.ca

And To: Gord Perks, Chair
and Committee Members

SUBJECT: Item 2025.PH18.5 - Housing Action Plan: Avenues Policy Review –
Decision Report

The Confederation of Resident and Ratepayer Associations in Toronto (CORRA) having reviewed the report cannot support the same as it is in breach of the Official Plan, Planning Act and Provincial Policies insofar as it focuses solely on housing to detriment of sustainable communities and sound land use planning principles.

Except for allowing more intensification it does not support complete communities. In addition by focussing solely on retail and services, and not the provision of office and professional jobs it turns Mixed Uses areas into predominately residential and effectively into bedroom communities, where workers flow in one direction in the morning and return in the afternoon, which is not an effective use of high order transit.

Further the abandonment of Avenue Studies and Segment Studies is a return to the flawed policies of focussing on sole projects and not the impacts on the commercial and residential ecosystem.

CORRA RECOMMENDS THAT THE MATTER NEEDS TO BE SENT BACK FOR FURTHER REVIEW AND REFINEMENT AND AN ANALYSIS OF THE ADEQUACY OF PARKS, COMMUNITY SERVICES AND FACILITIES, AND WATER AND SEWER INFRASTRUCTURE PRIOR TO DESIGNATING AN AREA AN AVENUE.

CORRA FURTHER RECOMMENDS THAT THE CITY AUDITOR EXAMINE THE FINANCIAL COSTS OF THE PROVISION OF ADEQUATE PARKS, COMMUNITY SERVICES AND

FACILITIES AND WATER SERVICES IF INTENSIFICATION OCCURS WITHOUT A FULL ANALYSIS OF THE IMPACTS OF PROJECTS WITHOUT A FULL STUDY OF THE ADEQUACY OF SUCH MATTERS BEFORE LABELING THEM AVENUES WHICH IS TO ENCOURAGE INTENSIFICATION.

THE PROPOSED OPA WHILE CONTAINING STATEMENTS ABOUT COMPLETE COMMUNITIES THAT ARE ATTRACTIVE TO RESIDENTS AND BUSINESS, HERITAGE, AND ADEQUACY OF PARKS, COMMUNITY SERVICES AND FACILITIES AND WATER AND SEWAGE INFRASTRUCTURES BUT DOES NOT LAY DOWN A FRAMEWORK TO ENSURE THIS OCCURS.

Under 7 e, there is a statement that Avenues will be served by adequate parks, community services and facilities, and water and sewer infrastructure.

When at the open house the answer to a question as to whether studies have been done prior to the expansion of the Avenues to additional major streets, the only response was they looked at transit frequency and each project will have to produce studies in this regard. Needless to say the response is inadequate.

This a failure to comply with section 2 of the Planning Act, to wit:

- (f) the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;
- (h) orderly development of safe and healthy communities;
- (i) the adequate provision and distribution of educational, health, social, cultural and recreational facilities;
- (k) the adequate provision of employment opportunities;
- (p) the appropriate location of growth and development;

The Planning Act and this section came into being because of ribbon development where the fronts of farms were subdivided and residential buildings located on those roads in a manner that resulted in demand for sewers and water and other services in an inefficient manner with the general taxpayers having to pick up the bill. I will discuss this further under the decision to abandon segment studies and Avenue studies.

By showing a street an Avenue; based on 7 e. it can be argued that the City is warranting that the street has adequate parks, community services, etc. when it may not. Developers will rely on Map 2, and make applications based on what may turn out to be an inaccurate statement.

The City should encourage focused development were there are adequate services as set out in 7 e. not spread unevenly across the City.

Ensuring that for example water and sewage is adequate for the projected growth is expensive and should be focused and concentrated so that the cost benefit ratio is valid. The City should do comprehensive studies because each development is like a drop of water in a bucket at some point it will over flow. The costs related to upgrading will be borne by the general taxpayer not the developers. This is even more true with the Province's decision in regard to Development Charges.

The pattern is that developers do not follow mid-rise guidelines but seek heights far in excess of what the guidelines stipulate. These are treated as minimums by the development industry.

THE PURPOSE OF SEGMENT STUDIES AND AVENUE STUDIES WAS TO ENSURE AN AREA COULD SUPPORT THE LEVEL OF INTENSIFICATION PROPOSED. THIS IS COMPLIANT WITH SECTION 2 OF THE PLANNING ACT.

The Planning Department in 2000 wanted to get away from site by site development and to look at intensification comprehensively to ensure that services were available or be brought in in advance or at the same time as the intensification of development, and have it focused rather than spread out (i.e. avoid the ribbon form of development).

By encouraging intensification without requiring the equivalent of segment studies this is a reversal back into the 1990's methodology which resulted in failures such as Liberty Village.

FAILURE TO PROTECT HERITAGE PROPERTIES

The wording of draft policy 5 is precatory (i.e. motherhood, more of a wish) rather than effective strong wording. At a minimum Policy 5 should reference wording to the effect of "in accordance with Chapter 3.1.6 policies".

FAILURE TO ENSURE THAT TRANSIT OPERATES IN TWO DIRECTIONS

The amended Avenue policies reference ground floor of Mixed Use Areas in Policies 4 and 6 referencing retail and servicing indirectly discourages the location of office space above the ground floor area. In many main streets professional offices such as dentists, doctors and lawyers are located on the third and fourth floor, in addition there is reference to consultation but no requirement to ensure potential return to the site. In fact the policies can be read to acknowledge this will occur and so long as they are consulted there are no protections for those providers.

There is no drive to ensure job creation beyond retail and community service providers at hubs.

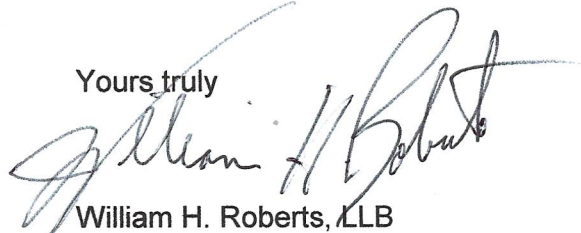
This is a housing focused plan to expense of jobs.

CORRA THEREFORE HOLDS:

1. **THAT BEFORE EXPANDING THE AVENUES THE NECESSARY STUDIES IMPLIED BY 7 E. NEED TO BE CONDUCTED TO ENSURE INCREASED DENSITIES WILL BE ADEQUATELY SERVED BY PARKS, SEWERS AND WATER, AND OTHER SERVICES. IN FACT THESE SHOULD BE COMPREHENSIVE ALL THE WAY TO THE SEWAGE TREATMENT PLANTS TO ENSURE THERE IS SUFFICIENT CAPACITY DOWN STREAM TO NOT HAVE COMBINED SEWER OVERFLOWS.**
2. **THAT EVEN IS AVENUE STUDIES ARE DROPPED THERE SHOULD BE CLEAR POLICIES SIMILAR TO THE SEGMENT STUDIES TO ENSURE THESE ARE NOT ONE SITE AT A TIME PLANNING.**
3. **THE CITY AUDITOR SHOULD EXAMINE THE COSTS RELATED TO SUPPORTING UNCONTROLLED INTENSIFICATION.**
4. **THERE NEEDS TO BE A BETTER BALANCE TO ENSURE THAT A GREATER RANGE OF JOBS OTHER THAN RETAIL AND COMMUNITY SERVICES IN AVENUES AND IN PARTICULAR IN HUB AREAS.**

Please advise the writer of your decision. Someone other than myself will attend to speak on behalf of CORRA.

Yours truly

A handwritten signature in black ink, appearing to read 'William H. Roberts', is written over the typed name.

William H. Roberts, LLB
Chair CORRA
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