

PH22.8 - Housing Action Plan: Avenues Policy Review - Phase Two Work Plan, Lenka Holubec, ProtectNatureTO

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Dear Chair and Committee Members,

Thank you for this opportunity to comment on **PH22.8 - Housing Action Plan: Avenues Policy Review - Phase Two Work Plan**.

As many other members of public, I am concerned with the speed and haste with the proposal **PH22.8 - Housing Action Plan: Avenues Policy Review - Phase Two Work Plan** for across the City and the limited time available to understand and respond to the proposal.

City Planning has presented six reports reflecting three key directions

These reports are of great importance to the future of communities across the City of Toronto and of great interest to residents of those communities. But these six reports also include a total of 35 attachments representing hundreds of pages of policy and technical details. Resident associations and other stakeholders require time to review and discuss these reports.

One week is simply inadequate.

- The proposed pilot is too limited in scope and does not reflect the diversity of neighbourhoods across Toronto. A more representative approach is needed to develop fair and effective rezoning criteria. Zoning should not be finalized in Wards 9 and 11 — or in any early pilot areas — until a stronger, citywide framework is in place.

- The proposed rezoning criteria focus too narrowly on lot size and street frontage. Council directed that other key factors — such as infrastructure capacity, traffic, parking, proximity to protected natural heritage.

- At this stage of this proposal, there is still lacking desirable clarity: ***“One of the really important roles for municipal government to play is to ensure that we have clarity as to where growth will go, as well as where growth won’t go.”***

[Chief City Planner Jennifer Keesmaat on how to fix Toronto, By Riley Sparks in News, Politics, April 21st 2017](#)

- It ignores the original vision and the backbone of Toronto’s Official Plan which was to build city that cherishes and embraces its remaining natural heritage and therefore implemented into the guiding policies the checks and balances to prevent the growth to take over all.

"The natural heritage system is important to the City, both within and beyond our boundaries, and needs to be protected for the long term." **CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-43**

"Protecting Toronto's natural environment and urban forest should not be compromised by growth, insensitivity to the needs of the environment, or neglect. To this end, proposals for new development may need to be accompanied by a study assessing their impact on the natural environment." **CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-44**

- Official Plan Environmental Policies included in Chapter 3 of the City Official Plan must be robustly acknowledged along all HAP proposals to guide growth in vicinity of Toronto's remaining protected natural heritage and must be fully integrated into the analysis and final recommendations

[Official Plan Amendment 583 Environment and Climate the ESAs - backgroundfile-225898.pdf](#)

[Official Plan Amendment 583 Environment and Climate PSW ANSI - backgroundfile-225898.pdf](#)

[Official Plan Amendment 583 Environment and Climate Key Hydrologic Features updates - backgroundfile-225898.pdf](#)

-Criteria presented in Report **"Table 1: Scoping Criteria to Determine which Lands will be Examined Further"**, as set now are vague and do not explicitly talk about protected natural heritage and the relevant policies of the Official Plan. This is weakening of the environmental policies as these were adopted and meant to be implemented (directly) not over another process.

- Consultations should be postponed until the fall, when more residents can participate. Outreach should include direct mail notices, multilingual materials, and active engagement with local community groups to ensure that all voices are heard.

- With OPA 778 eliminating future Avenue Studies, this may be the only opportunity for public input. I urge you to ensure that the process is inclusive, transparent, and meaningful.

- The consultation process should help determine not only how redesignation might proceed, but also whether it is appropriate in each context. In some cases — particularly where six-storey buildings are already permitted under existing zoning — additional changes may not be necessary.

Definitely, "one size fits all" does not apply here. Rezoning should not be assumed.

This to ASK for referral providing enough time for the committee to provide direction to City Staff to address the concerns highlighted above.

Sincerely,

Lenka Holubec, on behalf of [ProtectNatureTO](#)

Reference:

[Chief City Planner Jennifer Keesmaat on how to fix Toronto, By Riley Sparks in News, Politics, April 21st 2017](#)

National Observer: Toronto has hit growth targets much earlier than expected. What can the city do to integrate more people, without building a condo on every corner?

Jennifer Keesmaat:

*"One of the challenges that we have is that we are experiencing something of a vortex sucking all kinds of growth right into the heart of the city. **One of the really important roles for municipal government to play is to ensure that we have clarity as to where growth will go, as well as where growth won't go.***

Seventeen per cent of our city is ravines; we've just brought forward additional environmentally-sensitive areas. We don't want growth in those areas. There are also some areas that have heritage designations, and we want to be very careful in terms of how we manage growth in those areas.

We also recognize that there are areas that can benefit in a really significant way from growth. Our downtown, of course, 40 years ago – there were a ton of surface parking lots. Today, we in fact are in-filling the downtown, turning it into a truly walkable place."