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City of Toronto Council
c/o Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON
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Attention: Committee Members

**Re: Housing Action Plan: Avenues Policy Review Phase Two: Initial Study of Wards 9 and 11
Official Plan Amendment 861 and Official Plan Amendment 862 and
Corresponding Zoning By-law Amendments
Comments from the Roman Catholic Episcopal Corporation for the Diocese of Toronto, in Canada
Council Agenda, Planning and Housing Committee Item 2025.PH26.4**

We are counsel for the Roman Catholic Episcopal Corporation for the Diocese of Toronto, in Canada (“**RCEC**”). We are writing to the Planning and Housing Committee with respect to the proposed Official Plan Amendments 861 and 862 (“**OPA 861**” and “**OPA 862**”), together with the related Zoning By-law Amendments (the “**ZBAs**”), for the implementation of the City’s Housing Action Plan (“**HAP**”) for lands on *Avenues* within Wards 9 and 11. We understand that Phase Two of the City’s review is a study of *Avenues* to determine where redesignation to Mixed Use Areas or Apartment Neighbourhoods is appropriate to enable the mid-rise development envisioned for *Avenues*, together with the corresponding zoning permissions required to support the planned direction.

Background

RCEC has been actively tracking the progress of the City’s *Avenues* Policy Review, as the updates to the *Avenues* policies impact the RCEC. RCEC is one of the appellants to Official Plan Amendment 778 (“**OPA 778**”), which identified new *Avenues* throughout the City and comprehensively updated the *Avenues* policies. Through the OPA 778 appeals, RCEC has raised concerns with respect to the implementation of the *Avenues* policies and sought clarity on: the scope of properties intended to now be within an *Avenue*; whether the land use designation of those properties will be amended to facilitate the planned built form for *Avenues*; and whether those properties will subsequently be rezoned to provide as-of-right permissions for *Avenues* development. In short, RCEC is seeking clarification of the impacts of the *Avenues* Policy Review on the various RCEC properties throughout the City.

The proposed OPA 861 and OPA 862, together with the related ZBAs, represent the first stage of implementation of the HAP and the *Avenues* framework, proposing the redesignation of numerous properties along *Avenues* in Wards 9 and 11. RCEC currently holds 12 properties located on *Avenues* in Wards 9 and 11 ("**RCEC Properties**"). Please refer to Schedule A for a full list of the RCEC Properties.

RCEC Concerns

RCEC continues to be generally supportive of the vision and new policy direction of HAP and the *Avenues* policy review, recognizing the importance of considering additional housing opportunities along *Avenues*.

However, RCEC is concerned that, despite the stated scope of review for Phase Two of the HAP, the majority of RCEC Properties in Wards 9 and 11 appear to have been scoped out or overlooked by the City. The City has not considered the underlying designation issues for some properties subject to OPA 778, nor has it addressed the corresponding zoning implications that accompany these proposed amendments. This perpetuates one of the main issues from those appeals, being the lack of clarity on how land use designation and zoning will be handled to facilitate the implementation of the planned development of *Avenues*.

While a large number of properties on *Avenues* in Wards 9 and 11 have been recommended for proposed updates, the RCEC Properties have largely not been addressed, with the exception of St Agnes' parish at 15 Grace Street, and St Wenceslaus Parish at 496 Gladstone Avenue. RCEC is concerned that failing to comprehensively review designations of *Avenues* properties for both policy and zoning purposes at this stage of the HAP will potentially result in inconsistent and inappropriate land use planning and policy decisions. Where lands along *Avenues* are being reviewed, all the land should be under consideration. A piecemeal approach is not appropriate.

With respect to the RCEC Properties in Wards 9 and 11, we believe these lands should be considered in this phase of the City's review, including their potential redesignation and any associated rezoning. The high-level redesignation considerations relevant to OPA 861 and OPA 862 have been summarized in the table below.

Property	Name	Ward	Designation	Comment
1479 and 1481 Dufferin St	St. Mary of The Angels Parish	09	Neighbourhoods/ Mixed Use Areas	Propose redesignation to bring the entire property into Mixed Use Areas. The property is currently split between Neighbourhoods and Mixed Use Areas.
1674, 1678, 1680, and 1688 Dundas St W	St. Helen's Parish	09	Neighbourhoods/ Mixed Use Areas	Propose redesignation to bring the entire property into Mixed Use Areas. The property is currently split between Neighbourhoods and Mixed Use Areas.
15 Grace St; 938 Dundas St W	St. Agnes' Parish	11	Neighbourhoods	Propose redesignating the property to Mixed Use Areas. The property is along an Avenue and adjacent to other lands proposed for redesignation to Mixed Use Areas.



Should additional comments or concerns be identified, the TCDSB will communicate such additional comments and concerns at the earliest possible date.

RCEC Requests

We respectfully submit the above for consideration by the Planning and Housing Committee and request these written submissions be forwarded to Council for its consideration. RCEC also requests, through its counsel, that it be provided notice of any matter related to the HAP, particularly as it pertains to *Avenues*. RCEC requests notification of any modification to the draft OPA 861 and 862 text and mapping, proposed Official Plan Amendments with respect to land use re-designations and proposed Zoning By-law Amendments, and to be included in all notices or communications on this matter related to City of Toronto decisions, meetings or appeals with respect to any of the above-noted matters.

Should you have any questions or require further information with respect to the above, please do not hesitate to contact the undersigned or, in her absence, Sandra-Luna Martinez at sluna-martinez@millertomson.com or 416-595-8565.

Yours truly,

MILLER THOMSON LLP

Per:



Tara L. Purko

- c. David Finnegan, RCEC
- Migena Lako, RCEC
- Dana Anderson, MHBC Planning, Urban Design & Landscape Architecture



Schedule A

Ward 9

12 Pauline Ave; 20 Pauline Ave

1037 Bloor St W

496 Gladstone Ave

867 College St

1479 Dufferin St; 1481 Dufferin St

7 Croatia St

1118 St Clair Ave W; 133 Westmount Ave

1277 St Clair Ave W

1674 Dundas St W; 1678 Dundas St W; 1680 Dundas St W; 1688 Dundas St W

Ward 11

659 Markham St; 830 Bathurst St; 840 Bathurst St

1155 Yonge St

15 Grace St; 938 Dundas St W

