

Confederation of Resident & Ratepayer Associations in Toronto

203A/881A Jane Street

Toronto, Ontario. M6N 4C4

20 September, 2024

To: phc@toronto.ca

To: The Chair and Members Planning and Housing Committee

Re: Amendments to Official Plan being OPA 528 – PH 15.1 – September 26, 2024

On behalf of the Confederation of Resident & Ratepayer Associations in Toronto (CORRA), the following comments are being raised in regard to OPA 528.

CORRA opposes the proposed amendments as presently drafted to the Official Plan.

A REVIEW OF THE PRIOR HISTORY SHOWS THE RISKS TO A UNIQUE AND LIMITED AMENITIES – THE OPA ENCOURAGES THE EXTRADITION OF THESE AREAS

I note CORRA was formed in part over the struggles in the late 60's to ensure that a key public amenity, being parks not be eviscerated.

Prior Attempt By the City

When the 2002 Official Plan came forward, it dropped the wording prohibiting the sale of parks and natural areas which meant such lands would be up for grabs. CORRA along with two other coalitions of ratepayers raised the point and the comments of the press resulted in the present wording which discourages the sale or disposal of Green Space System (natural areas) and Parks and Open Space Areas.

Lessons from the Exhibition District

Regrettably we missed the amendments that removed the policies in the prior City of Toronto Official Plan that ensured the Exhibition District would be primarily a public asset for recreation. Note the policy from the pre-harmonized O. P. Is attached hereto. Policy 14.13 clearly states the Exhibition District is a public asset to be used for public purposes and non-recreational uses should only be allowed if they contribute significantly and without adverse effect to the objectives set out in 14.13.

Since 2000 the public use of the CNE has been whittled down and it is CORRA's understanding the whittling continues. If similar care is extended to the green space system, parks and open space areas, these in turn will be extricated from the City's landscape.

Many Parts of the City are Parks Deficient

Many parts of Toronto, are parks deficient such as South Parkdale, Mimico, Junction Triangle, Central Area and many other areas as shown on the map identifying availability of parks and open spaces to population level. With the "densification" being encouraged more areas will become parks and open space deficient.

Making life easier for the loss of such areas should not be encouraged.

OPAs do not have an higher approval requirement than approving a zoning amendment. If a zoning amendment is needed than having a site or area specific OPA should not result in a significant hurdle or delay especially when we consider the impact on the availability of parks, open spaces and the green system. There is one significant difference. The 20 day notice period for the specific wording of an OPA versus the minimal notice period for the specific wording of an amendment for a zoning by-law.

Is the object to cut the public out of the process?

In addition an OPA can include conditions requiring land be returned if it is not required or declared surplus at a later date.

Councillor Nunziata should well remember what happened in the former City of York when certain parklands were to be sold which resulted in her becoming the Mayor of that City.

In Swansea there were two attempts to transfer open space to private persons when a two-thirds vote was required, both were refused. With these amendments there is a risk this will occur again and again with no public scrutiny.

Specific Concerns With the Wording

The wording of the new policy 4.3.9 has a typo which is highlighted. This raises questions about the rest of the policy is such a simple matter can be missed.

In addition "to a public agency" would appear to cover a multitude of sins.

The wording of an earlier draft (which is attached) was much tighter by specifying the tests to perhaps not need an OPA but not exclude the requirement.

What happens if the Public Agency declares the lands surplus to their needs?

Do the lands revert back to the City or can they be sold to a private developer?

CORRA should not be read as agreeing that the prior draft wording as fully acceptable. The wording "without an OPA" is problematic.

To summarize, CORRA RECOMMENDS:

1. OPA 528 BE REVIEWED AND SENT BACK FOR FURTHER REFINEMENT.
2. 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.

THAT IF OPA 528 IS ADOPTED THAT IT BE AMENDED TO DEAL WITH WHAT HAPPENS SHOULD THE PUBLIC AGENCY CEASE TO NEED THE LANDS.

Please note either I or another member of the CORRA Executive would like to depute to the matter either in person or virtually.

Attachments:

1. Highlighted OPA 528
2. Prior Public Draft Wording
3. Policy 14.13 of Prior City of Toronto O.P. Exhibition District

Submitted on behalf of the Confederation of Resident and Ratepayer Associations in Toronto (CORRA)

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