



January 23, 2020

10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Julie Amoroso

RE: **2020 City of Toronto Budget**

Dear Chair Gary Crawford and Members of the Budget Committee,

This represents the official submission to the Budget Committee by the Federation of North Toronto Residents' Associations (FoNTRA), an umbrella organization of over 30 resident associations in North Toronto and North York, further to our January 21, 2020 presentation to the Budget Sub-Committee at North York Civic Centre.

Our submission is about responsible city-building which requires: first, Support for Area based Studies and Plans; second, Approved Plans need to be Funded, and third, Additional Revenues_which align with Official Plan Objectives.

A. Responsible City Building Requires Support for Area based Studies and Plans.

FoNTRA understands the importance of a vital and active planning function to the long-term health of the whole city including thriving and complete communities. City Planning Division activities basically consist of two streams: undertaking planning studies, and creating plans; and managing development applications. Conducting pro-active planning activities such as Avenue Studies, Secondary Plans, Zoning By-law Updates, Heritage Conservation District (HCD) Studies, Cultural Heritage Resource Assessments (CHRA) and neighbourhood-specific Design Guidelines are vitally important. The underlying principle is that the Study Program is critical in order to strengthen the position of the City in dealing with development applications. Unfortunately the waiting lists for studies and plans are long, and getting longer.

And the province's legislative changes (Bill 108, Bill 138) will disrupt City Planning's agenda in ways that at this point we are not even fully aware, as the implementing regulations are still to be released.

Meeting the compressed processing deadlines for regular applications and preparing for hearings following an increased number of planning appeals will inevitably put pressure on City-wide and area planning. We are very concerned about the impact of provincial changes and the impact on the public of City Planning's response to these. We understand that for example a Preliminary Report may no longer be issued in advance of a Community Consultation meeting.

In order to assess part of the Study Work Program we have extracted and collated the Heritage Conservation studies (HCD studies and plans, CHRAs and other studies) by category i.e. 2020 Forecast, Hearings, Active beyond 2020 and On Hold (see attached). For example two projects from North York, Lawrence Park West HCD and Leaside CHRA, which were authorized in 2014, are shown as "On Hold" (see attachment). In addition, the Neighbourhood Design Guidelines template which commenced in 2016 is now scheduled to be completed in 2020. In the meantime these neighbourhoods are left without policies and tools to protect their built form. Every two weeks the Committee of Adjustment allows projects that do not fit the established character of the community (and if refused, likely to be allowed by the Toronto Local Appeal Body (TLAB)) so there is a risk that that eventually when the tools and policies are undertaken it may become difficult to demonstrate the prevalence of the character causing them to be unique.

This kind of concern is not restricted to North York or to Heritage, but to the City generally and to various types of plans. Meanwhile City Planning is facing the biggest threat to its ability to manage development applications with the announced issuance of the regulations pertaining to the province's legislative changes for planning and heritage under Bill 108, and Bill 138) in July 2020. This will disrupt City Planning's agenda in ways that at this point, we are not fully aware. Meeting the compressed processing deadlines for regular applications and preparing for hearings following an increased number of planning appeals will inevitably put pressure on City-wide and area planning. We understand that for example a Preliminary Report may no longer be issued in advance of a Community Consultation meeting.

We are very concerned about the impact of the provincial changes, and City Planning's consequential response to these.

The development of secondary plans that take transportation and other required infrastructure needs into account along with the availability of parkland, schools, social service requirements, heritage studies, Zoning Reviews and neighbourhood-specific design Guidelines are critical. It is important to get ahead of the development applications with completed plans, as is being demonstrated in Midtown (OPA 405) and Downtown (OPA406).

While the 2020 Staff Recommended Budget includes small staffing and capital funding increase for certain studies, the Division still lacks the resources to develop and update any but the most critical Secondary plans. Planning for the City's future - for the population and jobs growth that is expected - necessarily suffers. And the lack of updated Secondary plans with clear population targets/densities and development guidelines necessarily means that too many planning decisions are left to be determined on an *ad hoc* basis by the Local Planning Appeal Tribunal.

We recommend:

- **that City Council provide funds to allow for Planning Studies to be maintained and increased despite the disruption caused by provincial legislative changes .**

B. Responsible City-Building Requires Plans to be Funded

Several policies and plans have been developed and approved by City Council in the previous term, to respond to important issues that reflect real needs of Toronto as a caring and forward thinking community. These include the Ravine Strategy, TransformTO, and the Poverty Strategy.

The Ravines Strategy

"Ravines are to Toronto what canals are to Venice". However the threats to ravines related to invasive species, and erosion and loss of amenity due to increased flood frequency are becoming known. We are pleased that Mayor Tory has recently announced his support for a commitment to move forward on implementation of the Ravines Strategy. The Ravines Strategy was approved in 2017, but without a significant budget for implementation. This is now being partially corrected with an increase in the 2020 Parks, Forestry, and Recreation (PFR) operating budget of \$2.7 million (\$660,000 for ravine cleanup and \$2.05 million for invasive species management). However more funds are still needed for capital works to address bank erosion.

Transform TO,

Toronto's climate action plan identifies how we can reduce our greenhouse gas emissions and improve our health, grow the economy, and improve social equity. In July 2017 City Council unanimously approved a set of long-term, low-carbon goals, and strategies to reach them. However the funding allocated is below what is required for planned implementation. It is critically important that the City take the climate action steps required.

Toronto Poverty Reduction Strategy is a 20-year plan that was unanimously approved by City Council in 2015. It contained 17 recommendations linked to a set of actions to be carried over a four-year period. The strategy focuses on housing stability, services access, transit equity, food access, the quality of jobs and incomes, and systemic

change. A key part, developing a Community Benefits Framework for key City capital investments to increase community well-being and job opportunities for residents, is currently stalled.

We recommend

- **that City Council follow through with funding for implementation of several previously approved major strategies**

C. Responsible City-Building Requires Additional Revenues which align with Official Plan Objectives

We recognize that programs need to be funded and funds need to be responsibly sourced. We remain concerned about the need to address the longer term finances of the City, and concur with the consensus that the City does indeed have a serious revenue problem. We are relieved that the City is finally moving forward with a long term strategy and not continuing the old approach of borrowing from the capital side to fund operating, which is a short term measure that fails to address the long term needs of the City.

We believe that revenue measures should be assessed not just from a financial perspective, or for their ease of administration, but also for their contribution (negative or positive) to “city-building”. In other words do they align with Official Plan objectives, such as building a city that reduces the need for travel, that supports affordable housing, that encourages true mixed use development, that is transit, walking and biking friendly, that is green, and more equitable for all its residents?

Three measures that we believe represent revenue sources that support responsible city-building are:

A Vacancy Tax would produce money which is badly needed for affordable housing. When this tax was introduced in Vancouver it raised \$38 million its first year.

A Land Transfer Tax on “high end” properties, that needs to be distinguished from increased property taxes on “high end” properties.

A Water Runoff charge that penalizes those with large areas of impervious paving such as parking lots, that would tend to target large retail malls, and would not penalize retail on main streets.

We recommend

- **that City Council ensure that “contribution to city building” is a key consideration in its consideration of revenue tools**

Thank you for the opportunity to express our ideas, concerns and recommendations regarding the 2020 City Planning Division Study Work Program.

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Yours truly,

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The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not whether Toronto will grow, but how. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and

c.c. Mayor Tory and City Council
Chris Murray, City Manager
Tracey Cooke, Deputy City Manager, Infrastructure and Development Services
Gregg Lintern, Chief Planner and Executive Director, City Planning Division
Will Johnston, Chief Building Official, Toronto Building
Janie Romoff, General Manager, Parks, Forestry and Recreation Division
Barbara Gray, General Manager, Transportation Services Division

**City Planning Study Work Program
Heritage Conservation
2020 Forecast, Active (beyond 2020) or On Hold**

2020 Forecast (Service level 5)

Bloor West Village HCD Study
Kensington Market HCD Plan
Parkdale Main Street HCD Plan
Rosedale HCD Plan Review
West Queen West HCD Plan
Weston Phase 2 HCD Study

LPAT Hearings

Garden District HCD Plan
Historic Yonge HCD Plan
King-Spadina HCD Plan

Source: Attachment 3 to City Planning Study Work Program Report Jan 2020

Active (beyond 2020)

Baby Point HCD
Bloor-Yorkville CHRA
Cabbagetown SW HCD Plan
Cultural Heritage Landscape Guidelines
Danforth Avenue (Broadview to Coxwell) CHRA
Distillery District HCD Plan
Elm Street CHRA
Fort York HCD Study
Gerrard Carlaw CHRA
Indigenous Heritage Engagement
Liberty Village CHRA
Mount Dennis CHRA
Scarborough Centre CHRA
Sunshine Valley HCD Study
The Junction Phase 1 HCD study
West Hill Avenue HCD Plan
Wychwood HCD Plan Review

On Hold

Agincourt CHRA

Beaconsfield HCD Study

Belmont-Hillsboro HCD Study

Glebe Manor Estates HCD Study

Harbord Village Phase 3 HCD Study

Historic Main Street Properties – Guidelines /best practices for conserving and enhancing

Lawrence Park West HCD Study

Leaside CHRA

Queen Street East HCD Study

St Lawrence Neighbourhood Phase 2 HCD

Summerhill CHRA

West Annex HCD Study

Source: Attachment 4 to City Planning Study Work Program Report Jan 2020