



January 21, 2020

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

RE: PH12.3 City Planning Division - Study Work Program

Dear Chair Ana Bailao and Members, Planning and Housing Committee,

This is to present comments in support of the City Planning Division Study Work Program on behalf of the Federation of North Toronto Residents' Associations (FoNTRA), an umbrella organization of over 30 resident associations in North Toronto and North York.

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. The Study Work Program includes such activities as Avenue Studies, Secondary Plans, Zoning By-law Updates, Heritage Conservation District (HCD) Studies, Community Heritage Resource Assessments (CHRA) and neighbourhood-specific Design Guidelines. 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.

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.**

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

Yours truly,

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CC. Gregg Lintern, Chief Planner and Executive Director, City Planning Division
Joe Nanos, Director, Community Planning, North District
Lynda Macdonald, Director, Community Planning, Toronto and East York District
Lorna Day, Director, Urban Design, City Planning Division

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 social renewal.

**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