



January 9, 2017

Planning and Growth Management Committee
10th floor, West Tower, City Hall
City of Toronto
Attn: Nancy Martins

RE: **PG 17.4:** Additional staffing resources
for development application review

Dear Councillor Shiner, Chair, and Members,
Planning and Growth Management Committee:

We are writing to express our strong support for the staff proposals to add 17 temporary staff positions (9 for the City Planning Division) to deal with the pressures created by the large increases in applications for development review.

We view this as a necessary band-aid, helpful in reducing pressures on planning staff but still no substitute for adequate funding of area-wide city planning.

We attach a brief submitted to the City Budget Committee that expands on our concerns.

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 social renewal.



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TO: Budget Committee
City of Toronto

RE: 2017 City Planning Division budget

1. Demands on City planners and need for effective planning

The City Planning Division is swamped by site-specific applications. Meeting the requirements of dealing with these applications inevitably pushes down the priority given to city-wide and area planning, notably to the development of Secondary Plans and neighborhood-specific guidelines.

The Division does not have sufficient resources to be able to develop and update all but the most critical secondary plans. Planning for the City's future —for the population 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 Ontario Municipal Board.

The City Planning Division needs additional funding so that it can do its job of planning.

With development effectively out of control in the Downtown and Midtown portions of our city, there is an urgent need for the formulation of an updated Official Plan that takes transportation and other required infrastructure needs into account along with the availability of parkland, schools, and other social service requirements.

We recommend

- 1) that additional funds be provided in the 2017 Planning Division budget to fund an acceleration of pro-active planning of Toronto's future development.**

We are not opposed to growth. But we are opposed to growth beyond what can be supported by Toronto's current and currently planned infrastructure.

There is an urgent need to update the City's Official Plan (including area-wide secondary plans) to impose development controls that are in line with provincial population targets and available infrastructure. Doing so requires resources, notably more planning staff.

2. Staffing levels in the Planning Division

At its meeting of November 16, 2016, the Planning and Growth Management Committee reviewed the fees charged for development applications. The proposed 2017 budget includes increases in such fees to cover the costs of meeting the current development application review services **without any increase in planning staff**. Indeed, most of the additional funds raised by the proposed fee increases flow to other City departments involved in the application review process.

The existing City planning staff is unable to handle the expanded volume of development applications without substantial overtime work. (See the survey reported by CUPE Local 79 presented at <http://www.toronto.ca/legdocs/mmis/2016/pg/comm/communicationfile-64185.pdf>.) The pressures of application review cause work on area-wide planning issues to be postponed or set aside.

We strongly recommend

- 2) that staffing levels be increased to ensure that development application review performance benchmarks are met without undue staff overtime work and without reducing resources available for area-wide planning; and**
- 3) as an interim measure towards achieving this, that the staff recommendations for 9.0 additional planning staff positions (submitted to the Planning and Growth Management committee as Item PG 17.4) be adopted in the 2017 Budget.**

3. User fees

The staff recommendations submitted as PG Item 17.4 do not include any revision of the application fee schedule submitted as Appendix 7A of the 2017 City Planning budget. Instead, they propose that any increase in such fees be postponed to 2019.

We regard it as totally inappropriate that the additional costs of handling the increased volume of development application be financed by the property taxpayer. These are costs attributable to application review and should be paid for by the applicants who benefit.

We recommend

- 4) that application fees be increased beyond the levels set out in Appendix 7A of the proposed City Planning Budget; and**
- 5) that City staff be requested to report on the amount of such increases required to finance the proposed expansion in City staff.**

4. Revenue Measures and City Building

We submit that revenue measures under consideration should be assessed not just from a financial perspective, or for their ease of administration, but also for their contribution to “city building”. User fees and taxes influence behavior. Their effects on how the city works should be front and center when they are evaluated.

In other words, do proposed fees and taxes align with Official Plan objectives? Such as building a city that reduces the need for travel, that encourages true mixed use development, that is walking and biking friendly, green, and more equitable for its residents?

One such measure that aligns with positive city-building is the non-residential Parking Levy proposal. Currently the inequitable treatment of parking spaces works against Official Plan objectives. Users are charged for public spaces, such as those on main streets, yet private spaces such as big box parking lots and shopping malls are free. A parking levy on private spaces would start to rectify the inequity faced by small businesses and BIAs competing with shopping malls and big box stores.

We strongly recommend

6) that Council consider “contribution to city building” in its consideration of revenue tools.

5. Summary

Planning is important. And too many planning decisions are made by unelected hearing officers at the Ontario Municipal Board.

The City has in too many cases abdicated its responsibilities for city planning by failing to update its Official Plan, failing to develop Secondary Plans, and providing insufficient resources to deal with development pressures. We urge you to rectify this in making your budget decisions.

Yours truly,

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