



June 11, 2020

10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins
By email: phc@toronto.ca

RE: PH 14.4 Growth Plan Conformity and Municipal Comprehensive Review (MCR) - Work Plan

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

We are writing in overall support of the comprehensive workplan proposed for the City's Growth Plan Conformity and Municipal Comprehensive Review (MCR) exercises as required by the Province. We offer for consideration some suggestions regarding the issues to be analyzed in light of the changing context of planning as a result of the COVID-19 discontinuity.

The staff report from the Chief Planner addresses provincial requirements, such as listing and prioritizing the Major Transit Station Areas (MTSAs) planning studies, which need to be undertaken. We are supportive of the methodology, the resulting list and the specified priorities. Our comments relate to the issues that will be dealt with in the MTSA planning studies.

It appears that the requirements for "good planning" need to be increased by what we have learned from the ongoing COVID 19 pandemic. Like most urban centres in the Western world we have found that the City's urban structure lacks resilience in the face of contagion, and the changed distancing requirements. It is imperative that strategic land use planning take up the challenge to increase the ability of the City and its residents to cope not only with the longer term impacts of the current pandemic, but also to increase resilience with respect to any future pandemics.

We suggest the Growth Plan Conformity and MCR exercises include consideration of the following issues:

- 1) the need to distribute density across the MTSAs to ensure that growth occurs along all current and proposed mass transit routes;
- 2) the need to ensure, through inclusionary zoning provisions, that new residential developments in MTSAs distribute affordable housing for low-income residents, including minimum required numbers of units of low income housing.

- 3) the need to ensure that new developments in MTSA's include a requirement for minimum amounts of office space with the intent of increasing walk-to-work employment in each MTSA in order to reduce requirements for new mass transit and furthermore, that office development is established in all major MTSA's.
- 4) the need to ensure adequate safe-distance walking/cycling space along all streets and pedestrian routes in all MTSA's through increased land allocation for public realm.
- 5) the need to ensure adequate allocation of park space and green space within each MTSA within easy walking/cycling distance of all new residential development.

In regard to 4) and 5) we appreciate the challenges of recent provincial legislation that affect these matters and encourage the City to continue to advocate with the province for improvements that benefit the public realm.

We also recognize the challenges to staff represented by this major exercise. We welcome and support the opportunity to participate in community engagement processes with planning staff, preferably meeting in person, when permitted to do so again.

Respectfully submitted,

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cc: Other Members of Council

Gregg Lintern, Chief Planner and Executive Director, City Planning Division
Kerri Voumvakis, Director, Strategic Initiatives, City Planning Division

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of more than 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.