



January 24, 2022

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

RE: **BU39.1 2022 Capital and Operating Budgets**

Dear Chair Gary Crawford and Members of the Budget Committee,

The Federation of North Toronto Residents' Associations (FoNTRA), an umbrella organization of over 30 resident associations in Midtown, North Toronto and North York.

Our comments include discussion of both strategic risks and opportunities, and specific budgetary program recommendations.

1. The importance of Good Planning in the Race to be Better

We recognize that this year the City continues to face fiscal challenges on a scale that is unprecedented. We believe that the City should be bold, not shy away from making investments and raising revenue. It is apparent that the way the City, the province, the country, and the world, work have been changed indelibly and permanently as a consequence of the pandemic. If people can work from anywhere, they will still work from somewhere. Will that somewhere be Toronto? Or Whitby, or Scottsdale, or Barbados?? The call has been “to build back better”. This is right. The legacy of the pandemic will be the “race to be better”. What has Toronto going for it? Its brand? “Diversity Our Strength”, “You Belong Here”? Toronto not only has to remain a good place to live for all its (diverse) people, but become a *better place*. Better in the important things like health, safety, affordability, space, and mobility that make for a great city. These are all public goods and require public investment, and public realm. Remember, the challenges do not end when the population is fully vaccinated and the pandemic is declared ended. The ongoing legacy is unknown at this time but is likely a new level of competition among cities – the race to be better.

2. The Critical Role of Planning Studies

Second, the race to be better means that an active and creative City Planning function is vital. The health of the whole city includes thriving and complete communities. City Planning has to have a key role.

City Planning Division activities basically consist of two streams: undertaking planning studies, 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 Design Guidelines are vitally important. Holistic plans are vitally important. 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 (OPA 406). The Planning Study Program is critical in order to strengthen the position of the City in dealing with development applications.

Meeting the compressed processing deadlines as a result of provincial legislative changes for regular applications, and preparing for hearings following an increased number of planning appeals has inevitably put pressure on City-wide and area planning. We are very concerned about the impact of provincial changes and the impact on the opportunities for public engagement of City Planning's response to these. Unfortunately the waiting lists for studies and plans are long, and seem to be getting longer.

In order to assess part of the Study Work Program we have extracted and collated the Planning Studies from North York (including Heritage studies and plans) by category i.e. 2022 Forecast, Active beyond 2020 and On Hold (see attached). There are many items on hold, for example, Lawrence Park West HCD and Leaside CHRA, which were authorized in 2014, are again shown as "On Hold". In addition, the Neighbourhood Design Guidelines template which commenced in 2016 appears to have been dropped from the schedule. In the meantime the 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.

The City has responded to the province's compressed processing deadlines for regular applications and preparing for hearings following an increased number of planning appeals is inevitably putting pressure on City-wide and area planning.

While the 2022 Staff-Recommended Budget includes small staffing and capital funding increase for studies, the Division 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 Ontario Land Tribunal.

We recommend:

- **that City Council provide funds for maintaining and expanding Planning Studies activity**

3. Neighbourhood Intensification Initiatives need to be carefully done

Expanded Housing Opportunities in Neighbourhoods (EHON) includes three parts: Laneway Housing; Garden Suites, and Multiplexes. These initiatives are being moved quickly through the approval process. So far the major issues have been

- The increase in lot coverage and the consequent risk to loss of green space and the need for tree protection;
- The need for properly resourced, comprehensive implementation plans that are properly resourced including enforcement through City Planning, Toronto Building and Urban Forestry.

The City needs to learn the lessons from two recent experiences:

- The inability of the Multi-Tenant Housing (MTH) (Rooming House) Project to receive City Council approval. We believe this is due to the City's failure to properly address the existing Rooming Houses enforcement issues, and a consequent loss of the public's trust in the City's ability to address issues under new regulations.
- The experience of other places with Garden Suites – in Barrie the project was quickly approved but had to be brought back following massive opposition from residents. Again full communication and enforcement are essential

So far we see no evidence that the City is applying the resources required to effectively implement EHON.

We recommend that

- **That EHON initiative be carefully implemented with comprehensive plans and resources**
- **That the City increase its budget for enforcement staff to address outstanding MLS issues, current illegal rooming houses/ramp up staff in anticipation of more MTHs, anticipated staff needed for inclusionary zoning, landscaped open space , and noise infractions, etc.**

4. Additional Revenues which align with Official Plan Objectives

We recognize that programs need to be funded and funds need to be responsibly sourced. We are extremely 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, that is being barely covered over by pandemic related federal and provincial, funding.

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 (and therefore being more supportive of a circular economy/complete communities)?

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. We are pleased that the City is poised to implement this in 2022 (and support an even higher tax).

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

A Stormwater 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. This charge has been implemented in certain adjacent municipalities such as Mississauga.

And the Vehicle Registration Tax, perhaps with an exclusion for Electric Vehicles.

We recommend:

- **that City Council ensure that “contribution to city building” is a key consideration in its consideration of revenue tools**
- **that the City implement a stormwater charge for properties (residential, commercial, and industrial) that have inadequate permeable surfaces and look at incentives for property owners to increase permeable surfaces and increase urban tree canopy.**
- **that the City consider increasing the vacancy tax**
- **that the City consider increasing the premium on land transfer tax on “high end” residential transactions**
- **That the City consider implementing a Vehicle Registration Tax**

Thank you for the opportunity to express our ideas, concerns and recommendations regarding the 2022 City of Toronto Budget.

Yours truly,

Geoff Kettel, Co-Chair,
gkettel@gmail.com

Cathie Macdonald, Co-Chair,
cathie.macdonald@sympatico.ca

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 200,000 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.

c.c. Mayor John 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 – North York
Area Planning/Heritage Conservation/City-wide Guidelines
2020, 2021 and 2022**

Secondary Plans and Area Planning	2020*	2021*	2022*
Allen East District Plan	Forecast	Approved	
Downsview Lands Secondary Plan - Phase 1 (Update Downsview)	Forecast	Forecast	Forecast
Jane-Finch Planning Study- Phase 1- Ideas report Phase 3 - Policy and Plans	Forecast -	Approved -	- Active
Keele-Finch Plus: Final Report	Forecast	Approved	-
Midtown Implementation Strategies – Interim Report Final Report	Forecast -	Approved -	- Forecast
North Yonge Secondary Plan Implementation	Forecast	-	Forecast
Sheppard/Don Mills Context Plan Study	Forecast	Approved	-
Wilson Visioning Study	Forecast		Active
Bayview Ave. (North) Townhouses Guidelines	-	-	Hold
Partial settlement to OPA SPA – Hoggs Hollow	-	-	Active
North York Centre Secondary Plan	-	-	Active
Heritage Planning Project	2020	2021	2022
Glebe Manor Estates HCD Study	Hold	Hold	Hold
Lawrence Park West HCD Study	Hold	Hold	Hold
Leaside CHRA	Hold	Hold	Hold
City-wide Guidelines	2020	2021	2022
Cultural Heritage Landscape Guidelines	Active	Hold	Hold

Historic Main Street Properties – Guidelines/best practices for conserving and enhancing	Hold	Forecast	Hold
Toronto Heritage Survey – Interim Report	-	-	Forecast
Neighbourhoods planning			
Neighbourhood Design Guidelines Template	Forecast	Hold	-
E HON Garden Suites – Proposals report Final Report		Approved -	- Forecast
E HON Multiplex Study – Interim Report Final report		Approved -	- Forecast

*Forecast = currently underway and targeted for completion by year end

Active = preliminary completion dates beyond the year

Hold = potential study on hold

Source: Attachments to City Planning Study Work Program Report - Jan 2020, Jan 2021, Jan. 2022