



December 6, 2022

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

**RE: EX1.4 Implementing Bill 109, the More Homes for Everyone Act, 2022**

Dear Mayor John Tory and Members of Executive Committee,

FoNTRA represents over 30 residents associations in the area generally bounded by Sheppard Avenue, the Don Valley Parkway, Bloor Street and Bathurst Street.

We like many across the City are extremely concerned about the legislated changes made by the Province to the City's development approval system, which are being introduced without meaningful consultation with municipalities or the public. We note, with great concern, the significant reduction of public consultation in the revised application review process, which will deprive the public of important information for consideration and will be extremely detrimental to the outcome.

We strongly support the concerns raised in the report about the risk to good city building outcomes, as well as the risk to cost recovery of development review services. We support many but not all of the recommendations in the report, and note the following:

1. Recommendation 5 calls for an increase in staff involved in reviewing applications. This is long overdue.
2. Recommendation 6 removes authority of the Ward Councillor to request City Council to consider certain site plan applications. This provision has allowed further consideration of resident concerns in certain cases where these have not been dealt with satisfactorily and should continue.
3. Recommendation 9. re elimination of Preliminary Reports must not be approved. They provide essential information to the public that is even more essential due to reductions in public consultation. Members of the public then can contact the planner directly with their comments. Some of the information

provided in the Preliminary report is reused in the Final Report/Request for Direction so is not wasted staff time.

4. Recommendation 10 removes authority of the Ward Councillor to request that certain condominium applications be considered by Council that are otherwise delegated to the Chief Planner. We propose that an option could be for the Ward Councillor to provide the Planner with comments in the review process and those comments to be considered and included in the record of the review.

While not mentioned in the staff report, it has been reported that a separate Development Division is to be established. We oppose this idea as review of development applications needs to be based on approved policies and plans. The other part of City Planning is developing and implementing those plans and zoning bylaws!

We believe that, while coordination of development review is essential, a much more effective solution is to have a strong coordinating committee of involved Divisions. This ensures that the staff are aware of their priorities and policies of their Division. Also staff can be assigned to applications in an as needed basis and can also work on issues in their Division as needed. For example, in City Planning this means working on area planning studies and policy studies etc. We are of the opinion that the City's investment in the end to end review and Concept 4 Keys does provides this needed type of coordination. Please don't separate Development Review from City Planning!!

Respectfully submitted,

Yours truly,

Geoff Kettel  
Co-Chair, FoNTRA

Cathie Macdonald  
Co-Chair, FoNTRA

Cc: Gregg Lintern, Chief Planner and Executive Director, City Planning Division  
Will Johnston, Interim Deputy City Manager, Infrastructure and Development Services

**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.