



February 27, 2023

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

RE: PH2.6 - City Planning Division - Study Work Program Update

Dear Chair, Councillor Bradford, and Members, Planning and Housing Committee,

The Federation of North Toronto Residents' Associations (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. As the report states: "in responding to the ever shifting legislative landscape, the Division continues to promote the City's and public interest, and manage uncertainties and risks to its Study Work Program as new demands are placed on finite resources".

We concur that in 2022, and continuing, the Study Work Program is heavily affected by the requirement to update and advise Council on the impacts of legislative change. One would only wish that the herculean effort required by the City to understand and adjust to the tsunami of change was reciprocated by the Province in making timely decisions following the City's response. The MTSA jobs and employment definition reports is a good example – 9 months after the City met the provincially imposed deadline, you are still waiting for a decision!

Looking ahead to 2023, the Study Work Program captures a range of city building activities under the Corporate Strategic Plan's four Strategic Priorities, with an emphasis on those that will support an increase in the supply of housing, including more affordable housing, as part of an integrated approach to building complete and inclusive communities.

City Planning Division's activities basically consist of two streams: the Study Work Program, and Development Review. The Study Work Program, which includes such activities as Avenue Studies, Secondary Plans, Zoning By-law Updates, Heritage Conservation District (HCD) Studies, Community Heritage Resource Assessments (CHRA) and Design Guidelines, is critical in order to advance the City's strategic priorities, and also to assist the City in developing its response to development applications. It is also vital in dealing with a provincial government that does not respect the authority and jurisdiction of the City.

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 development applications with completed plans, as demonstrated in both Midtown (OPA 405) and Downtown (OPA406).

However, examination of the Study Work Program updates from 2020 to 2023 reveals some concerning trends. The waiting list for studies and plans is long, and getting longer. This trend appears to be especially true for heritage related studies, including HCD studies/plans, and CHRAs, and City-Wide and Area Guidelines. We have compiled the Study Work Program data for 2020 to 2023 for these categories by status (Completed, Forecast, Active and Hold) using the update reports - see attached.

This summary chart indicates that several studies have fallen back from Active to Hold, continue to be on Hold, and several more have disappeared. For example the Neighbourhood Design Guidelines template project, which commenced in 2016, has been downgraded from Forecast (2020) to Hold (2021) to not categorised (2022). The latter is especially concerning as of two pilot areas (Long Branch and Willowdale) chosen for study, only one (Long Branch) was completed, and it appears now that the project is abandoned?

The result of the inaction on these projects is that established neighbourhoods like Leaside, Lawrence Park, Summerhill, and Ramsden Park are left without policies and tools to protect their built form. Every few weeks the Committee of Adjustment, in failing to take neighbourhood character into consideration, allows projects that do not fit the established character of the community. The risk is that that eventually when the policies and guidelines are at last in place it may have become difficult to demonstrate the prevalence of the neighbourhood character that drove the need for protection tools in the first place. Meanwhile the Expanding Housing Options in Neighbourhoods (EHON) projects present additional threats to the character of established neighbourhoods.

City Planning is facing the biggest threat to its ability to manage development applications with the province's legislative changes for planning and heritage under Bill 23, Bill 108, Bill 109, and Bill 138. Meeting the compressed processing deadlines for regular applications and preparing for hearings following an increased number of planning appeals is inevitably putting pressure on essential City-wide and area planning agenda.

We recommend:

- **that City Planning Division ensure that Studies, Plans and Guidelines directed to City building such as those that revitalize and protect neighbourhood character, i.e. HCD, CHRA, and Neighbourhood Guidelines are prioritized.**

In conclusion we are extremely supportive of the efforts of City Planning Division, but are concerned that we are falling back in some areas.

Thank you for the opportunity to express our ideas, concerns and recommendations regarding the 2023 City Planning Division Study Work Program.

Yours truly,

Geoff Kettel
Co-Chair, FoNTRA

Cathie Macdonald
Co-Chair, FoNTRA

CC. Gregg Lintern, Chief Planner and Executive Director, City Planning Division
Kerri Voumvakis, Director, Strategic Initiatives, City Planning Division
Jana Neumann, Senior Planner, Strategic Initiatives, Policy & Analysis, City Planning Division
Emilia Floro, Director, Urban Design, City Planning Division
Mary MacDonald, Senior Manager, Heritage Planning, City Planning Division

Attachment: City Planning Study Work Program – Heritage Conservation Plans/Guidelines
2020 to 2023 Reports

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.