



**MORE NEIGHBOURS
TORONTO**

RE: PH 9.4 Improving Community Consultation in the Development Review Process - Proposals Report

About More Neighbours Toronto

[More Neighbours Toronto](#) is a volunteer-only organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that has dominated Toronto's politics, created an affordability crisis, and cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

Major Takeaways:

- Current community process only brings voices from well-housed people to the forefront, and does not promote equity or inclusion.
- The purpose of a system is what it does – Toronto's public consultation system has made Toronto wealthier, older, less inclusive and less diverse
- Current scope of work does not improve the currently flawed system. Instead seeks to replicate it.
- The City should not frustrate the intent of Bill 109. We are in a housing crisis and interest rates are high. Delays mean fewer homes for people in desperate need.

We at More Neighbours believe the work plan as proposed by staff, while well-intentioned, is based on flawed premises. More Neighbours supports the goals outlined by staff. However, staff have a distorted view of the merits and drawbacks of public consultation generally and in the context of Toronto's land-use planning regime in particular. By replicating these systems into the new pre-application process, staff will perpetuate the existing structural barriers to diversity, equity and inclusion.

Public Consultation Reinforces Existing Hierarchies

Staff in their Equity Impact Statement contend that “[p]ublic consultation is integral to building inclusivity and equity into planning processes”^[i]. However, the emerging academic consensus on this issue has found the opposite to be true. For example, in a review of public consultation in the United Kingdom, Bedford, Clark and Harrison found that “political realities of the planning system serve to reproduce existing structures of power^[ii]”. In the United States, Einstein, Glick and Palmer, found that people who participate in planning discussions to limit or oppose development “oppose new housing projects far more strongly than their broader communities and... are likely to be privileged on a variety of dimensions^[iii]”. More Neighbours agrees with the growing academic view on public consultation. If it is to be saved at all,

it must be reimagined in such a way as to be inclusive of all Torontonians, not just older incumbent residents. Future residents deserve inclusion.

Toronto has become a less equitable place in the public consultation era

More locally, Dr. David Hulchanski has documented the loss of middle-income Torontonians since the 1970s^[iv]. The 1970s are a crucial decade in the history of Toronto land use. The fight over the expansion of St. James Town led to the creation of the old city's planning regime which limited new development by restricting heights and uses. The old city's population fell through the 70s and didn't fully recover until after amalgamation. While the city still serves as a crucial landing point for new Canadians, many of the historical landing sites have been abandoned by their communities. Is a new Chinese-Canadian more likely to move to ChinaTown on Spadina or to Markham? Is a new Jamaican-Canadian more likely to move to Little Jamaica on Eglinton West or Brampton? While Toronto is admirably diverse, it is less diverse than its neighbours in Mississauga, Brampton and Markham which have seen, proportionally, far more growth in the last 50 years.

Current Work Plan Reinforces Mistakes

More Neighbours supports a review of the public consultation process. The one outlined in the report in this item does not address the systemic barriers to inclusion that exist in the current system. While planning staff have, on some projects, made an explicit effort to include under-represented groups, the average public meeting does not reflect the diversity of the city.

Bill 109 is flawed but should not be frustrated

We at More Neighbours understand that Bill 109 creates big challenges for staff and members of council as it relates to new development. However, the intent of the legislature is clear: planning approvals must be done more quickly. By moving processes that used to occur after the submission of a completed application to the pre-application process, Toronto (and other Ontario municipalities) are perpetuating the culture of delay that has put us in this housing crisis. Delays ingrained in the planning process as proposed in the workplan in front of you impact the city's admirable goals on producing new affordable housing as much as they impact a new luxury development. In both cases, time is money. This is true in terms of the carrying costs of the existing land and in terms of the dramatic climb in construction costs that we've experienced in the GTA since the pandemic.

Conclusion

More Neighbours Toronto asks the Planning & Housing Committee to defer the item before the committee today and to ask staff to re-examine the equity impacts of public consultation. More Neighbours Toronto stands ready to provide constructive input to a new public consultation regime in Toronto.

Sincerely,



Aaron Ginsberg
More Neighbours Toronto

[i] Page 2 of the Report to this item

[ii] <https://www.jstor.org/stable/40112516>

[iii]

<https://www.cambridge.org/core/books/neighborhood-defenders/0677F4F75667B490CBC7A98396DD527A#fndtn-information>

[iv] <http://3cities.neighbourhoodchange.ca/>