

December 1, 2025

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**Re: Economic and Community Development Committee:  
Item EC 25.4 - Mount Dennis Community For All Action Plan**

**Dear Chair and Members of the Economic and Community Development Committee:**

Gladki Planning Associates (GPA) submits this letter in the public interest to support the Mount Dennis Community for All Action Plan.

During the *Picture Mount Dennis Planning Framework Study*, a critical tension emerged between the statutory planning process and the lived reality of the community. While the study sought to establish a vision for the neighbourhood's physical evolution and built form, meaningful dialogue on these topics was often precluded by the urgent necessity of discussing affordability and displacement. Residents found it difficult to engage in a conversation about the long-term future of the neighbourhood when their own ongoing presence within it felt uncertain.

There is a need for new tools to respond to this uncertainty. As documented in the staff report before this Committee, Mount Dennis, like other historically underinvested neighbourhoods in the City, faces significant displacement pressure. With a high share of renters, lower average incomes, and a concentration of naturally occurring affordable housing, the area is uniquely vulnerable to the risks associated with the new Mount Dennis Station and the Crosstown.

This Action Plan fills that gap. By translating high-level City strategies into tangible and community-driven actions, the plan allows local leadership to leverage broader City goals. It ensures that anti-displacement measures are applied exactly where they are needed most, creating the stability required for residents to participate in the neighbourhood's future.

### Addressing the Limits of Land Use Regulation

Mount Dennis stands at a complex intersection of opportunity and risk. As the staff report notes, increased transit access and higher development permissions will drive new investment and housing construction. However, Mount Dennis is distinct from the citywide average. It possesses a higher proportion of renters, lower average incomes, and a significant share of racialized residents living in naturally occurring affordable housing.

In this specific context, major transit investment often creates unintended pressures, including:

- Rising land values and increased rents in existing stock.
- Externalities associated with the acquisition and assembly of development sites including the potential for vacant homes and storefronts as lands are detenanted.
- Pressure on affordable apartments and dwelling rooms, increasing the risk of renoviction or repositioning of naturally occurring affordable housing stock.
- The reinvention of the main street character and the potential loss of culturally specific retail and services.
- The displacement of community-serving organizations as commercial and institutional properties increase in value and usual real estate churn in tenancies leads to a decrease in the availability of local affordable, suitable spaces and storefronts for these organizations.

These dynamics are difficult to address through the Planning Act alone. While the Secondary Plan provides a robust framework for land use and built form, the statutory planning system lacks the standalone tools to preserve affordable housing, stabilize local businesses and retail, or manage the cumulative impacts of displacement.

We see the Action Plan as filling this gap. It introduces a toolkit that works alongside statutory planning to stabilize the community and operationalize City-wide strategies at the neighbourhood level. Key mechanisms include:

- A Community Land Trust: Establishing a trust and a community of practice to ensure long-term affordability and stewardship of housing and commercial space.
- Anti-Displacement Measures: Creating an Education Fund and expanding legal and advocacy supports for renters and small businesses facing displacement pressure.
- An Equity Scorecard: A tool to track how development affects residents, identifying barriers and guiding responses to ensure fair outcomes. This includes proposed integration with the development review process.
- Community Space Strategy: Securing the return of the Mount Dennis Community Hall and creating new community spaces within future developments.
- Implementation Governance: Establishing a Mount Dennis Community Partnership Table and an interdivisional working group to guide and monitor the plan over a ten-year horizon.

Taken together, these recommendations provide the necessary infrastructure to support good planning where land use regulation is insufficient.

## Operationalizing City-Wide Strategies

In June 2020, GPA released an Open Letter addressed to the Mayor and Chief Planner on Confronting Systemic Racism in our local planning system. That letter signalled our own focus

on understanding how existing planning tools have contributed to patterns of exclusion and identifying where new responses are required.

Since that time, our work has deepened this understanding. Through the participation of one of our firm's Principals in the Urban Land Institute (ULI) *Building Healthy Places* initiative on the historical presence and displacement of Black communities in Toronto, service on the ULI Toronto Technical Assistance Panel titled *Preserving Black Communities Apartment Affordability Around Transit In Toronto*, and ongoing collaboration with local community members in Mount Dennis, we have heard a consistent message.

Residents know that due to historic underinvestment and the sudden new public and private investment in their neighbourhoods, they are subject to significant risk of gentrification and the displacement of the services and retailers that sustain the everyday enjoyment of their communities. However, misalignments in municipal, provincial, and federal governance, program gaps, and the lack of mechanisms within the planning system to respond, leave the forces that should be empowered to aid them, each pulling in different directions.

We have observed that City-wide strategies, such as HousingTO, the Poverty Reduction Strategy, and the Action Plan to Confront Anti-Black Racism, can remain abstract at the local level. City-wide strategies are drafted at a scale that is difficult for residents and community organizers to interpret or utilize. Frequently, there is no clear pathway for applying these strategies to a specific neighbourhood or for communities to partner with the City on implementation. Existing planning instruments like Secondary Plans and Site and Area Specific Policies, while focused on implementation at a neighbourhood scale, are not appropriate for the coordination of non-statutory planning issues that are *ultra vires* the *Planning Act*.

The *Community for All Action Plan* addresses this problem by creating a structured interface between these City-wide strategies, the planning policy framework, and the community realities of Mount Dennis. It provides a framework where community-defined objectives guide how these strategies are applied, monitored, and adjusted over time.

## Framework for Shared Governance and Implementation

GPA supports the adoption of the Action Plan as it advances good planning in the public interest. Beyond its value to the local community, the Plan aids the City in advancing the Provincial interest in housing. It directly responds to the priorities of the Provincial Planning Statement, specifically:

- **Policy 2.1.6 c)** regarding the promotion of social equity.
- **Policy 2.2.1 b) 1)** regarding the provision of housing options that support social and economic health and well-being.
- **Policy 2.4.1.2 d)** regarding the support of affordable and equitable housing.

The Action Plan also operationalizes the principles and priorities of the City of Toronto Official Plan, particularly the commitments found in Chapter 1.

Chapter 1.2 of the Official Plan explicitly mandates a "human rights-based approach to housing." It directs us to look "beyond the height and look of buildings" and toward making the best use of space to enable housing where it is needed most. The Official Plan acknowledges that many residents, particularly those from marginalized communities, face systemic barriers that limit access to essential amenities. The Action Plan responds to the City's commitment to dismantle these barriers through proactive measures that promote accessibility, equity, and inclusion.

Furthermore, the Action Plan provides the necessary framework to meet the requirements of Chapter 1.4. This chapter requires that "equity outcomes of policies and actions are monitored and measured" and that municipal practices reinforcing "systemic exclusion, discrimination and displacement" are identified and eliminated.

By adopting this Action Plan, the Committee addresses a critical gap in existing tools and delivers on the core mandate of the Official Plan. It advances the Provincial Interest by ensuring the neighbourhood remains welcoming, with a diverse range of housing forms, tenures, and genuine affordability.

The plan operationalizes this mandate through the Community Partnership Table and interdivisional working group. This formalized structure respects existing local leadership and makes City-wide strategies comprehensible to residents. By aligning City objectives with community-defined goals, the Plan ensures that resources are directed where they are most needed to protect the people and cultural assets of Mount Dennis.

Critically, this creates a durable framework. It establishes a commitment that is less vulnerable to shifting priorities or staffing changes, securing shared accountability for community priorities and City responsibilities over the Plan's ten-year horizon.

## Conclusion

GPA supports the adoption of the *Mount Dennis Community for All Action Plan*. We view it as a necessary complement to the Secondary Plan and an important precedent for how planning can respond to complex neighbourhood change. We also see it as a model that should be adapted in other communities experiencing displacement pressures, particularly where long periods of underinvestment are followed by sudden new investment and major public announcements such as transit projects.

More broadly, we support community-led planning initiatives like this. An approach that bridges internal City divisions and calls the community to the table as partners should be seen as a necessary response to maintaining the community trust that planning in Toronto requires in order to continue to serve the public interest.

We thank the Economic and Community Development Committee, Councillor Frances Nunziata, and the staff across the Housing Secretariat, Social Development, Development Review, Parks and Recreation, and Economic Development and Culture for advancing this work.

We respectfully request the Committee to endorse the Action Plan and recommend its adoption by City Council.

Sincerely,

**Gladki Planning Associates**

Per:

A handwritten signature in black ink, appearing to be 'RWJ', written in a cursive style.

Robert Walter-Joseph, RPP, MCIP, PLE

**Principal**

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