



June 12, 2025

Nancy Martins

Toronto City Hall

100 Queen Street West

Toronto, Ontario M5H 2N2

Email phc@toronto.ca

Attn: Planning and Housing Committee

PH31.12 - Overview of Bill 98 Implications with Respect to Planning Matters

In Long Branch, parkland dedication shouldn't just be about meeting a percentage or taking whatever land is easiest to secure. It needs to be treated as part of how we actually build a more resilient city.

Parkland should function as **green infrastructure**, not leftover fragments of developable land. In a place like Long Branch—at the mouth of Etobicoke Creek and the Lake Ontario shoreline—that means parkland has to do real work: managing stormwater, reducing flood risk, supporting tree canopy, and strengthening ecological connections between the creek and the lake.

Priority should be given to lands that actually advance those resilience goals:

- Floodplain and creek-adjacent lands should be park-first, not development-first
- Shoreline lands should protect continuous public access and natural buffers
- Remnant or constrained parcels should only be accepted if they create usable public space, not fragmented or unusable green space

At the same time, we need to be clear about encumbrances. Contaminated or heavily restricted lands shouldn't automatically be treated as equivalent to functional parkland unless they are properly remediated or safely engineered. Otherwise, we risk inheriting liabilities instead of usable parks.

Long Branch already has a history of **brownfield sites that have been successfully remediated for development**, which is a positive precedent. But that process is not complete or evenly understood across the neighbourhood. It's still unclear what lands in the future may be identified as contaminated, flood-constrained, or otherwise encumbered in ways that limit their actual usability. That uncertainty matters, because it affects how we plan for parkland now versus what we might be forced to accept later under pressure.

The standard shouldn't just be "how much parkland do we get," but what that land actually contributes to the neighbourhood. Does it help manage flooding? Does it expand canopy? Does it connect into systems like Marie Curtis Park and the Etobicoke Creek corridor? Does it improve equitable access—

and does it do so in a way that is **proportional to equitable access needs across the neighbourhood**, so that growth in density is matched by fair, walkable access to quality green space.

In Long Branch, parkland dedication has to be treated as part of the city's climate resilience and infrastructure system—not an afterthought, and not a transactional land swap that ignores long-term function or distributional fairness.

We sincerely advocate that this Committee recommend the City of Toronto use all necessary means to retain the climate-focused policies in the Official Plan that promote long-term sustainability in the face of retaining the Green Infrastructure that makes Neighbourhoods livable.

Sincerely,



Christine Mercado
Chair,
Long Branch Neighbourhood Association
Longbranchnato@gmail.com

Cc

Planning and Housing Committee

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