



February 11, 2019

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100 Queen Street West  
Toronto, ON M5H 2N2  
Attention: Julie Amoroso  
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RE: 2019 City of Toronto Budget

Dear Councillor Gary Crawford, Chair, and Members of the Budget Committee,

We provide this correspondence on behalf of the Federation of North Toronto Residents' Associations (FoNTRA), an umbrella organization of over 30 resident associations in North Toronto and North York. Our comments are divided into two parts: those directly related to City Planning resources for planning and development of our City; and other divisional resources and revenues from a broader standpoint as residents with an active interest and concern for the wellbeing of the City

A. Demands on City Planning and Support for Enhanced Area Based Planning

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. Planning activities such as Avenue Studies, Secondary Plans, Zoning By-law Updates, Heritage Conservation District (HCD) Studies and neighbourhood-specific Design Guidelines are urgently required, yet the waiting lists for such studies and plans are long.

The City Planning Division is swamped by site-specific applications, including Zoning By-law Amendments (ZBAs), and minor variance and consent applications to the Committee of Adjustment. In addition City Planning is forced to deal with the backlog of appeals resulting from the influx of appeals made before the cutoff for the OMB and the establishment of the Local Planning Appeals Tribunal. (LPAT). Meeting the processing requirements and deadlines targeted and imposed for regular applications and preparing for hearings regarding legacy appeals under the "old rules" inevitably pushes down the priority given to City-wide and area planning, notably 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. While

the 2019 Staff Recommended Budget includes a small staffing and capital funding increase for these studies, the Division still lacks the resources to develop and update any but the most critical Secondary plans. Planning for the City's future - for the population and jobs growth that is expected - necessarily suffers. And the lack of updated Secondary plans with clear population targets/densities and development guidelines necessarily means that too many planning decisions are left to be determined on an *ad hoc* basis by the Local Planning Appeal Tribunal and TLAB. .

With development effectively out of control in the Downtown and Midtown portions of our city, the City has recognized and acted on the urgent need for the formulation of updated Secondary plans in those areas to impose development controls that are in line with provincial population targets, new provincial policies regarding development near transit stations and available infrastructure.

Operationally, there are indications that City Planning staff are unable to cope with the large volume of planning applications. For example, it appears that the critical Preliminary Report process has been changed so that the Preliminary Report is not issued in advance of a Community Consultation meeting. The Divisional process for handling applications has been that the planner prepares a Preliminary Staff Report prior to a Community Consultation meeting, However, recently Community Consultation meetings have been held prior to issuance of the Preliminary Report. The Preliminary Report is essential in clarifying the proposal, and framing the major issues for discussion at the Community Consultation meeting. We hope that this is an aberration, not the new regular process.

We recommend

1. **that City Council provide funds to allow for additional staff for a period of two years to handle the backlog of development applications and appeals.**

#### B. Responsible City-Building Requires Plans to be Funded

Several policies and plans have been developed and approved by City Council, in the previous term, to respond to important issues that reflect real needs of Toronto as a caring and forward thinking community. These include the Ravine Strategy, TransformTO, and the Poverty Strategy.

#### The Ravines Strategy

We believe there is a lack of basic knowledge and understanding of the values of ravines, and especially the threats to ravines related to invasive species. There may be more public awareness and understanding of the physical issues related to erosion and loss of amenity due to increased flood frequency. The Ravines Strategy was approved in 2017 but without a significant budget for implementation This should be corrected in 2019 and subsequent years. In addition, City Council should ask the General Manager

of Parks, Forestry, and Recreation to report to the Infrastructure and Environment committee on implementation plans for 2019 as well as for subsequent years. The staff report should (1) include specific plans and proposals for dealing with key issues such as invasives control, erosion management, and achieving ecological integrity, (2) set out how these and other goals of the Ravine Strategy will be achieved in all parts of the City, and (3) set out how private donors will be encouraged to contribute private funds to add to what the City is able to do.

#### Transform TO,

Toronto's climate action plan, identifies how we can reduce our greenhouse gas emissions and improve our health, grow the economy, and improve social equity. In July 2017 City Council unanimously approved a set of long-term, low-carbon goals, and strategies to reach them. However the funding allocated is below what is required for planned implementation It is critically important that the City take the climate action steps required.

Toronto Poverty Reduction Strategy is a 20-year plan that was unanimously approved by City Council in 2015. It contains 17 recommendations linked to a set of actions to be carried over a four-year period. The strategy focuses on housing stability, services access, transit equity, food access, the quality of jobs and incomes, and systemic change. A key part, developing a Community Benefits Framework for key City capital investments to increase community well-being and job opportunities for residents, is currently stalled.

#### **We recommend**

- 2. that City Council follow through with funding for implementation of several previously approved major strategies**

#### B. Responsible City-Building Requires Revenues to be Sourced

We recognize that programs need to be funded and funds need to be responsibly sourced. We remain concerned about the need to address the longer term finances of the City, and concur with the increasing consensus that the City does indeed have a serious revenue problem. The current approach of borrowing from the capital aside to fund operating is a short term measure that fails to address the long term needs of the City.

We believe that revenue measures should be assessed not just from a financial perspective, or for their ease of administration, but also for their contribution (negative or positive) to "city building". In other words do they align with Official Plan objectives, such as building a city that reduces the need for travel, that encourages true mixed use development, that is transit, walking and biking friendly, that is green, and more equitable for all its residents? For example the water runoff charge that penalizes those

with large areas of impervious paving such as parking lots represents a revenue source that supports these values.

**We recommend**

- 3. that City Council ensure that “contribution to city building” is a key consideration in its consideration of revenue tools**

Thank you for the opportunity to express our ideas, concerns and recommendations regarding the 2019-City of Toronto budget.

Yours truly,

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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

- c.c. Chris Murray, City Manager  
Tracey Cooke, Deputy City Manager, Infrastructure and Development Services  
Gregg Lintern, Chief Planner and Executive Director, City Planning Division  
Will Johnston, Chief Building Official, Toronto Building  
Janie Romoff, General Manager, Parks, Forestry and Recreation Division  
Barbara Gray, General Manager, Transportation Services Division  
Joe Nanos, Director, Community Planning, North District  
Lynda Macdonald, Acting Director, Community Planning, Toronto and East York District

## Appendix

### Summary of the Draft 2019 Budget proposed for City Planning.

- A. Operating Budget of \$54.75M gross and \$15.4M net is \$0.69M for four new /enhanced service priorities arising
- Implementation of the TOCore and Midtown in Focus studies
  - Master planning of under-used lands at Ontario Place and Exhibition Place,
  - Coordination of projects with the TDSB and TCDSB to provide more schools as the city density rises;
  - Additional planner for Committee of Adjustment applications in North District
- B. 2019-2028 Capital Plan provides funding of \$67.1M primarily for growth related studies such as Jane Finch secondary plan phase 2 implementation, implementation and infrastructure strategies for TOCore, Yonge-Eglinton. Additional OP policies will be drafted for Inclusionary Housing and Built Form and Public Realm.
- C. Includes increase of \$4.4M in capital funding
- Additional funding for Growth Studies
  - Additional infrastructure studies for TOCore and Midtown in Focus