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Ontario Growth Secretariat, Ministry of Municipal Affairs
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Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe 2017

Dear Dr. O'Hara:

The *Federation of North Toronto Residents' Associations* ("FoNTRA") is an umbrella organization representing over 30 residents' associations in central Toronto engaged in public policy debates on planning and development issues that directly affect our member organizations.

According to the government, the *"proposed changes address implementation challenges with the Plan that were identified by the municipal and development sectors and other stakeholders"* and *"are intended to provide greater flexibility and address barriers to building homes, creating jobs, attracting investments and putting in place the right infrastructure while protecting the environment."* We note for the record that FoNTRA, as one of the most significant stakeholder organization in the Province representing the interests of residents, had not been consulted.

The stated purpose of the proposed changes is *"to quickly address identified implementation challenges with the Plan and to not unfairly disrupt housing and other developments currently underway,"* so as *"to unlock land faster for residential and commercial development and support more jobs and housing."* This seems to suggest that there is a shortage of land available for development and may explain the proposed deletion of existing language describing one of the Growth Plan's key underlying concepts: *"There is a large supply of land already designated for future urban development in the GGH. In some communities, there may be more land designated for development than is required to accommodate forecasted growth to the horizon of this Plan."* Is there a shortage or a large supply of land designated for future development?

1. The Growth Plan's Impact according to BILD

The *Building Industry and Land Development Association* (BILD), together with the planning consulting firm *Malone Given Parsons Ltd.*, recently released the *'Greater Toronto & Hamilton Area Land Supply Analysis'*¹ and claimed that the 2006 and 2017 Growth Plans *"have had the unintended consequences of lengthening the land development and approval process,"* which has *"negatively impacted housing supply and affordability."* It offered the following specific observations²:

¹ Malone Given Parsons Ltd., **Greater Toronto & Hamilton Area, Simcoe County, Barrie & Orillia Land Supply Analysis**, November 2018

² Building Industry and Land Development Association (BILD), **News Release**, 21 November 2018

1. "The percentage of available land that has been approved for new housing communities in the GTHA is 4.5 per cent and decreasing.
2. Some municipalities in the GTHA have yet to conform to the 2006 Growth Plan requirements, missing the 2009 target by nearly a decade, resulting in less housing being built across GTA municipalities versus Growth Plan forecasts.
3. As land supply dwindles and as municipal delays increase, the value of serviced land has increased by over 300 per cent since 2006.
4. Existing low density neighbourhoods in the GTHA are resistant to intensification, pushing density to urban cores and to new communities near the fringes of the GTHA. The latter are far away from transit and infrastructure, putting a greater reliance on cars and increasing traffic congestion.
5. More gentle density homes (stacked townhouses and low-rise apartments) should be built within walking distance of transit in Built-Up areas of the GTHA. This will maximize investment in infrastructure and transit. However, community resistance to increased density makes building in this area time-consuming, expensive and subject to intervention at the municipal level."

2. The Growth Plan's Impact according to Victor Doyle

Victor Doyle, the Province's former manager of community planning for Central Ontario, refuted the development industry's repeated claims that the Growth Plan and the Greenbelt Plan limited the land supply which, in turn, increased housing costs in a detailed and compelling study titled *'The Growth Plan and the Greenbelt Plan - Setting the Record Straight'*³ which highlighted the following:

"For the last 5 years, elements of the development sector have invested significantly and intensively in mounting a multi-faceted communications campaign to undermine the Growth Plan and Greenbelt Plan. The campaign is comprised of: • the commissioning and/or funding of reports and publications conveying incomplete, selective and/or inaccurate information; • rhetorical opinion pieces released through various media, presentations and conferences; and, • intensive lobbying of elected representatives and senior executives at both the provincial and municipal levels - relying on materials based on the reports/publications described above. The key plank in the campaign is that the Growth Plan and Greenbelt Plan have constrained the supply of land for and/or the supply of ground related housing - and that this is largely responsible for increased housing prices in the Greater Golden Horseshoe.

Repetition of such claims in the absence of the real and complete facts has seemingly led to their acceptance - not only in individuals and the public - but also in the financial and real estate sectors, certain academic institutions and the federal government. The campaign is misleading and thus irresponsible for it is significantly contributing to instilling uncertainty and a profound anxiousness and frenzy that is leading to ill-informed blame on the plans, calls for pause, pulling back, or worse, changing direction.

The claims that the plans are constraining the supply of land and ground-related housing are ill founded. The available facts and evidence, including the vast inputs to the Crombie Commission, are clear: • The Plans are absolutely the right direction to follow • The evidence is irrefutable that the Plans do not go far enough to address the impacts of urban sprawl and provide for a truly sustainable future • There is more than sufficient approved land and planned and existing ground related housing supplies to accommodate projected growth to 2031 - and likely 2041 - and any claims to the contrary are not borne out."

3. The Growth Plan's Impact according to The Neptis Foundation

Similarly, The Neptis Foundation, in an update of its earlier studies titled *'An update on the total land supply: Even more land available for homes and jobs in the Greater Golden Horseshoe'* confirmed the sufficiency of the land supply, as summarized in its conclusions⁴:

"The total unbuilt supply of land to accommodate housing and employment to 2031 and beyond now stands at almost 125,600 hectares. Most of that land is in the Designated Greenfield Area

³ Victor Doyle, **The Growth Plan and the Greenbelt Plan - Setting the Record Straight**, 17 May 2017

⁴ The Neptis Foundation, **An update on the total land supply: Even more land available for homes and jobs in the Greater Golden Horseshoe**, 9 March 2017

contiguous to existing built-up urban areas, where full municipal water and wastewater servicing is available or planned.

However, the second largest amount of land is in Undelineated Built-up Areas, areas that were never meant to be a focus of growth. Proposed changes to the Growth Plan would, however, allow municipalities to direct growth to these areas and count that growth as part of municipal intensification. Such a change would encourage leapfrog development and undermine the goals of the Growth Plan. The third largest amount has been added to the total by way of urban boundary expansions near Barrie and Brantford. The fourth and final amount is in the form of employment areas added to the County of Simcoe through Amendment 1 to the Growth Plan. Although at present residential growth is not permitted on these lands, there may be pressure to convert them to residential settlements, which would also undermine the goals of the Growth Plan.

The total inventory of land is sizable, and any future proposals for boundary expansions should take into account the amount of land already available for development. Understanding the total amount of land available for development outside the built-up areas in the region is the question Neptis set out to answer in this Brief. But understanding the location of that land is equally important. Not all the land is equally appropriate as the focus of growth in the Greater Golden Horseshoe. It is equally important to understand and calculate the supply of land available for intensification in the built-up urban areas of the region. This is an essential element of the land supply that needs to be monitored in order to deliver on the intensification-first principle of the 2016 Growth Plan.”

4. FoNTRA's Concerns regarding the Proposed Amendment 1

As outlined above, the BILD report does not directly challenge the conclusions of both the Doyle and Neptis studies that more than sufficient land for development is available in areas designated by the Growth Plan. Instead, it focuses on the length of the approval processes, the fringe locations, and the inadequacy of the infrastructure - all factors preventing the necessary supply of serviced lands in areas close to transit, at least according to BILD. Hence, it recommends reducing complex requirements and duplication in approval processes, identifying agricultural and rural lands in the inner ring as future urban areas in the Growth Plan, and encouraging more moderate intensification of built-up areas across the Greater Toronto and Hamilton Area.

The proposed Amendment 1 seems to be driven largely by issues and solutions identified by BILD with which FoNTRA has a number of serious concerns, as follows:

1. Jargon, Euphemisms, and Circumlocutions: FoNTRA questions the wisdom of saddling a key public policy document with vague language designed to camouflage the degrading of environmental standards and the continued acceptance of urban sprawl, as exemplified by the following suggested deletions and replacements:

- *“1.1 is amended by deleting “low-density urban sprawl” and replacing it with “unmanaged growth”.*
- *“It is further amended by deleting “, a clean and healthy environment” and “social equity” and replacing it with “an approach that puts people first”.*
- *It is further amended by deleting “offer a wide variety of choices for living” and replacing it with “have sufficient housing supply that reflects market demand and what is needed in local communities”.*
- *It is further amended by deleting “low-carbon” and replacing it with “environmentally sustainable” and deleting “, with the long-term goal of net-zero communities,”*
- *It is further amended by deleting “socio-economic” and adding “such as a lack of housing supply with record low vacancy rates”.*
- *It is further amended by deleting “There is a large supply of land already designated for future urban development in the GGH. In some communities, there may be more land designated for development than is required to accommodate forecasted growth to the horizon of this Plan.”*
- *It is further amended by deleting “further” and adding “while also providing flexibility for local decision-makers to respond to housing need and market demand”.*
- *2.2.1.4 f) is amended by deleting “build” and replacing it with “improve”, adding “and”, and deleting “towards the achievement of low-carbon communities” and replacing it with “to environmental sustainability”.*

2. **Employment Planning:** The proposed Amendment 1 introduces the concept of provincially significant employment zones as determined by the Minister – the preliminary list identifies 29 such protected employment zones⁵ - and an opportunity for municipalities to ‘unlock’ non-protected employment land for residential development. The proposed ability to convert employment land to residential uses directly contradicts the government’s own claims underlying Bill 66 that there is a shortage of employment land requiring extraordinary open-for-business measures to secure it.
3. **Settlement Area Boundary Expansions:** The proposed Amendment 1 would permit local municipal decisions on expanding Settlement Area boundaries up to a maximum of 40 hectares outside of the Municipal Comprehensive Review “so as to unlock land faster for residential and commercial development and support more jobs and housing.” Since no shortage of land for development within the Settlement Area boundaries has been identified, FoNTRA objects to this proposed change which would only encourage further urban sprawl and fundamentally undermine the goals of the Growth Plan.
4. **Intensification and Density Targets:** The stated goal of the proposed Amendment 1 is to provide a “simplified approach to minimum intensification and density targets that reflects the objective of supporting provincial transit investments, planned growth rates and local realities, including market demand for housing” – read more urban sprawl in the form of low-density subdivisions. The proposed weakening of density targets is counterproductive and fails to support provincial transit investments and to achieve objectives that address climate change. FoNTRA’s member organizations – largely located along the Yonge Street corridor between Bloor Street and Highway 401 – are very familiar with a rapid intensification within the built-up areas and have absorbed the brunt of such intensification efforts in Toronto to the point that both the transit network and utility systems are seriously overloaded and the growth targets exceeded. Clearly, a much more even and judicious distribution of densities over the entire transit networks is called for, both within Toronto itself and within the Greater Toronto Area, linking the various communities in a more efficient and sustainable manner.

The next frontier in intensification, surely, has to be the underdeveloped suburban belt surrounding Toronto’s dense inner areas where the required infrastructure is already in place and/or can be augmented more efficiently than in Greenfield developments. This includes large residential and commercial areas in the 905 area (Durham, Halton, Peel, and York) and even within Toronto (Etobicoke, North York, and Scarborough).^{6,7} Unfortunately, the proposed Amendment 1 fails to address this very central issue.

5. **Major Transit Station Areas (MTSA):** While FoNTRA has no opinion on the proposed increase of the radius from 500 m to 800 m that defines the intensification zone outside of Toronto, it strongly objects to such an increase for MTSA intensification zones within Toronto. In its earlier submission to the *Ontario Growth Secretariat* on this topic (attached)⁸, FoNTRA had identified a number of serious deficiencies with Toronto’s MTSA density targets, as follows: “Without even considering any new subway extensions, such as the downtown relief line, the current MTSA density targets of the Growth Plan for the existing subway stations and the planned LRT stations and stops in Toronto would generate a minimum of 2,062,980 people or jobs combined – more than twice the 2041 growth target of 927,409 people and jobs combined stipulated by the Growth Plan.” Increasing the radius from 500 m to 800 m would further exacerbate this enormous discrepancy: an intensification zone with a radius of 800 m measures 201.0 hectares in area which represents a 2.56 fold increase over the 78.5 hectares covered by

⁵ Ontario Growth Secretariat, **Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017**, Overview Briefing hosted by BILD, 15 January 2019

⁶ Kathryn Gould, **Suburban Intensification: Cultivating Place in the Dispersed City**, UWSpace, 2009

⁷ The Neptis Foundation, “Patterns of Intensification: here, there, or everywhere?” in **Implementing Residential Intensification Targets: Lessons from Research on Intensification Rates in Ontario**, February 2010

⁸ FoNTRA, **Draft Guidance to Support Implementation of the Growth Plan for the Greater Golden Horseshoe, 2017: Application of the Intensification and Density Targets**, 25 May 2018

a 500 m radius. Without a corresponding decrease in minimum density, this proposed statutory directive, of course, would result in nonsensical planning since the minimum targets could never be achieved in light of the 2041 population and job targets of the Growth Plan. Furthermore, in the absence of any recognition of FoNTRA's submission in the proposed Amendment 1, it draws again your attention to its earlier recommendations regarding a more flexible application of the MTSA density targets in Toronto on a transit network wide basis.

- 6. Greater Local Autonomy and Flexibility for Municipalities:** One of the stated goals of the proposed Amendment 1 is *“ensuring that municipalities will have the ability to implement the Plan in a manner that better reflects their local context while protecting the Greenbelt.”* While this is a laudable goal, the reality of provincial-municipal interaction in planning matters differs substantially: the inefficiencies inflicted upon local governments by the Province changing its plans and policies with head-spinning frequency are enormous, particularly for smaller municipalities with limited resources. For example, the Growth Plan 2006 introduced the concept of Municipal Comprehensive Review (MCR) as distinct from the Official Plan review requirements under the *Planning Act* (which are also changing regularly), the Growth Plan 2017 limited MCRs to upper- and single-tier municipalities but increased the number of policies that can only be implemented through a MCR, and now the proposed Amendment 1 exempts certain implementation steps from the MCR requirements. No wonder then that conformity with the Growth Plan remains patchy and obsolete zoning prevalent given such legislative confusion and, even more so, absent of effective provincial oversight and enforcement.

FoNTRA is available to discuss these issues in more detail and looks forward to the government's response to the public input on the legislation.

Sincerely Yours,

Federation of North Toronto Residents' Associations

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Attachment: FoNTRA Submission on the *Application of the Density and Intensification Targets*, dated 25 May 2018

Copies:

Hon. Doug Ford, Premier of Ontario
Hon. Steve Clark, Minister of Municipal Affairs and Housing
Ms. Andrea Horwath, Leader of the Opposition
Mr. John Fraser, Interim Leader, Liberal Party
Mayor John Tory and Toronto City Council
Mr. Gregg Lintern, Chief Planner and Executive Director, City of Toronto
FoNTRA Members and Others

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of more than 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.

Attachment



25 May 2018

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Hon. Bill Mauro, Minister of Municipal Affairs
c/o Business Management Division
Ontario Growth Secretariat
Ministry of Municipal Affairs
777 Bay Street, 17th Floor
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Draft Guidance to Support Implementation of the Growth Plan for the Greater Golden Horseshoe, 2017: Application of the Intensification and Density Targets

Dear Minister:

The *Federation of North Toronto Residents' Associations* ("FoNTRA") is an umbrella organization representing over 30 residents' associations in central Toronto engaged in public policy debates on planning and development issues that directly affect our member organizations. FoNTRA commends the Government for releasing a Public Consultation Document to solicit public input prior to finalizing the implementation mechanisms and criteria related to the intensification and density targets of the *Growth Plan for the Greater Golden Horseshoe, 2017* ("Growth Plan").

1. FoNTRA has Consistently Called for Density Targets in Official Plans

FoNTRA had publicly raised in August 2002 - prior to Toronto's adoption of its new Official Plan - many of the central questions now addressed by the Growth Plan, including the following ones:

- *“Does the draft Plan reflect both the existing travel needs of Toronto’s residents and the City’s future requirements with the pending population growth?”*
- *Does the proposed Plan recognize the need for transportation infrastructure to either precede or coincide with increased population growth?*
- *Are there appropriate policies in the draft Plan to address Toronto’s intra-city and city-suburb automotive transportation challenges? For example:*
 - *Does the proposed Plan address the commuting needs of the City’s residents based upon the much greater job creation in, and head office movement to, the 905 region versus Toronto?*
- *Does the draft Plan direct growth to under-utilized public transit corridors -- or do its policies increase the usage of those subway lines already under serious capacity pressures?*
- *Does the proposed Plan provide specific policy initiatives and, as noted above, set out realistic funding commitments for the transit infrastructure?*
- *Are the pedestrian and cycling needs of Toronto’s residents addressed regarding such areas as safety and access in the proposed re-urbanization approach?*
- *What is the impact of the draft Plan on residents’ (particularly older people without cars) opportunity to shop for food and other basic essentials in their neighbourhoods?*
- *What is the basis for the draft Plan’s implementation:*
 - *Where are the specific population allocations to guide the preparation of the Secondary (Part II) Plans and Avenues studies?*

- *Are there well-defined standards in the draft Plan and guidance for, as well as firm commitments to, the corresponding infrastructure outlays?*
- *How can the draft Plan policies be monitored and assessed -- are there measurable objectives or vague promises of future targets and indicators?"*

FoNTRA considers population allocations and density targets essential elements of intelligent planning guidance and, accordingly, had formally requested the Minister on several occasions to make them mandatory requirements under the *Planning Act* – unfortunately, so far to no avail.

Notwithstanding FoNTRA's general support for intensification targets, the proposed implementation of the Growth Plan through the application of density targets for MTSA's raises some significant questions and concerns outlined below.

2. Toronto's Minimum MTSA Density Targets are Based on Miscalculations

The City of Toronto's population is projected to grow to 3,400,000 by the Growth Plan's planning horizon of 2041. Since the 2016 census identified an existing population of 2,731,571, the projected population growth is 668,429.

Similarly, Toronto's employment is projected to grow to 1,720,000 jobs by the Growth Plan's planning horizon of 2041 from the 1,461,020 jobs existing in 2016. The projected employment growth of 258,980 jobs represents only 15% of the employment target in 2041. Accordingly, a maximum of 927,409 persons and jobs combined need to be generated across the entire city area to meet the population and employment targets for 2041.

The Growth Plan requires a minimum density target of 200 people and jobs combined per hectare, generally, within a 500 m radius of every Major Transit Station that serves subways – meaning a minimum of 15,700 persons or jobs need to be accommodated within an area of 78.5 hectares around each subway station. Toronto's subway system, with its 73 stations within its boundaries, would need to accommodate within its MTSA's a minimum of 1,146,100 persons and jobs combined. This figure alone is already 218,691 higher than the combined population and employment 2041 growth target of 927,409.

In addition, the Eglinton Crosstown LRT (25 stations/stops), the Finch West LRT (18 stations/stops), and the Sheppard East LRT (30 stations/stops) - with a minimum density target of 160 people and jobs combined – would generate a minimum of 12,560 people or jobs combined per station/stop for a total of 916,880 people or jobs combined on 5,730.5 hectares. This does not take into account the 19 GO-stations generating an additional 223,725 people or jobs combined at a minimum density of 150 people/jobs per hectare.

Without even considering any new subway extensions, such as the downtown relief line, the current MTSA density targets of the Growth Plan for the existing subway stations and the planned LRT stations and stops in Toronto would generate a minimum of 2,062,980 people or jobs combined – more than twice the 2041 growth target of 927,409 people and jobs combined stipulated by the Growth Plan.

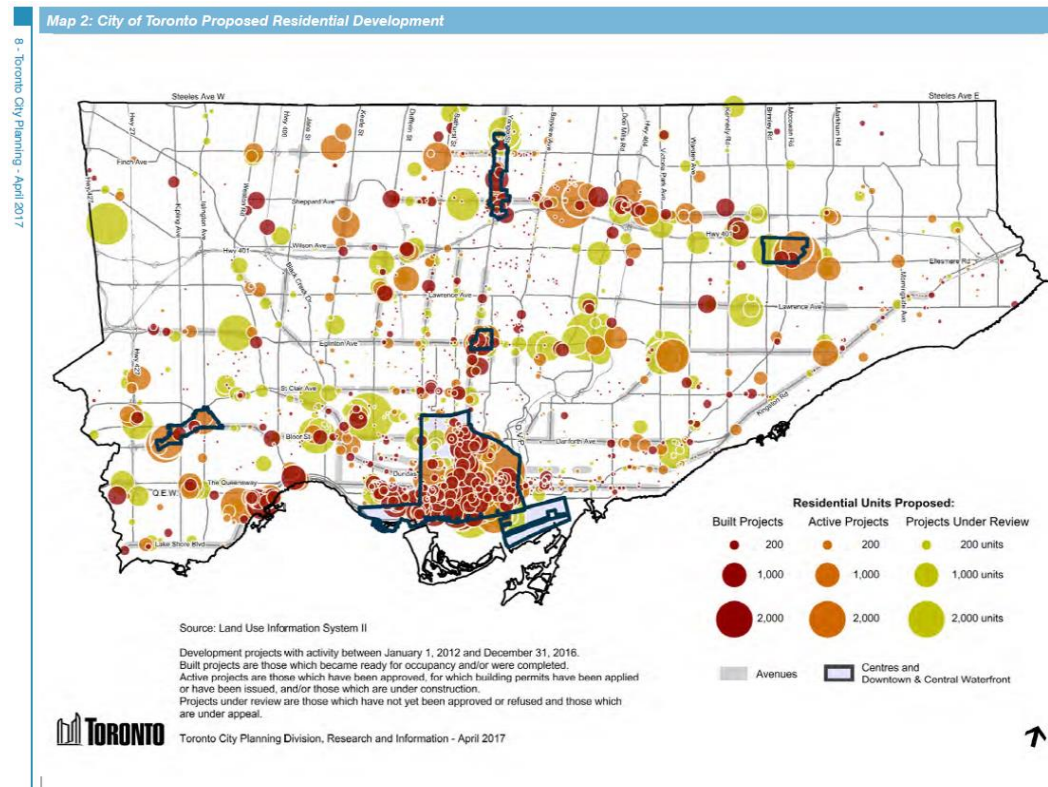
3. Toronto's Intensification Needs to be Directed More Strategically

The projected population growth of 668,429 represents only 20% of the 2041 target population. Put another way: 80% of the target population is already accommodated now and, therefore, the limited add-on growth in new housing stock needs to be distributed judiciously across the City's land area of 630 km² over the next two decades in order to effectively support an efficient transit system.

The proposed MTSA density targets for Toronto would mean that with 73 subway stations and 73 LRT stations or stops, 2,062,980 people or jobs combined (1,146,100 from subway plus 916,880 from LRT) would have to be accommodated on 11,461 hectares. This means that of the projected total of 5,120,000 people or jobs combined 40% would have to be

squeezed onto 18% of the city's 63,020 hectares of land. However, as noted above, the minimum of 2,062,980 people or jobs combined generated by the Growth Plan policies exceed the total growth projected by the same Growth Plan of 927,409 people or jobs combined by a whopping 124% - thereby leaving much less actual development that can be deployed strategically to better balance the transit network.

Given the current imbalance in ridership volumes across Toronto's subway network, such a one-size-fits-all density target applied indiscriminately to each and every subway station would be counter-productive: It will syphon off some of the limited add-on growth from under-populated and under-utilized transit corridors where it is badly needed and further exacerbate the situation on Line 1 between Union and Finch which is already at capacity if not overloaded.



As the above 2017 diagram from Toronto City Planning illustrates, most of the recent major development projects are strung along the Yonge Street corridor from the Downtown area to Yonge/Eglinton and to Yonge/Sheppard – at the expense of intensification along more under-utilized transit corridors. Adding further development along this corridor within the City limits would militate against, for example, the extension of the subway line into Richmond Hill given the system's inherent capacity limitations.

4. Eligibility and Criteria for Alternative MTSA Density Targets need Refinements

The current proposal provides that Alternative MTSA Density Targets can only be considered in areas where MTSA Density Targets cannot be achieved due the following conditions: 1) development is prohibited by provincial policy or severely restricted on a significant portion of the land; or, 2) planning for MTSA Density Targets would be premature given the potential for redevelopment of the existing built form within the planning horizon (see Section 7.5.1 of Draft Guidance document).

Given the Toronto-specific issues outlined above, eligibility for Alternative MTSA Density Targets should be extended to the following two additional conditions: 1) the limited add-on growth needs to be concentrated on under-utilized higher order transit corridors; or, 2)

the prescribed MTSA Density Targets cannot be achieved since they overestimate the overall growth rate within the specified planning horizon.

Alternative MTSA Density Targets can only be used following a specific request to the Minister with appropriate evidence in support, including appropriate delineation of the area, current and potential density, timeframes for redevelopment, proposed approach for addressing development constraints, corridor level information demonstrating that the average planned density would at least equal the target density for stations on that line.

FoNTRA has two concerns with this approach. First, Alternative MTSA Density Targets should be approved through the normal Official Plan approval process under the *Planning Act*, where planning issues are considered on a more comprehensive basis – not following a special written request to the Minister. Second, transit planning in a large urban centre like Toronto, where the operation of a complex and integrated transit system needs to be optimized, cannot simply rely on maximizing individual transit corridor densities.

5. FoNTRA's Recommendations

In summary, FoNTRA supports the concept of Minimum MTSA Density Targets but recommends that the government refine the implementation, as follows:

1. **Amend the *Planning Act* to make population allocations and development densities mandatory components of an Official Plan;**
2. **Integrate the approval of Alternative MTSA Density Targets into the standard approval processes for Official Plans and Amendments under the *Planning Act*;**
3. **Extend eligibility for Alternative MTSA Density Targets beyond considering transit corridor average to transit network average; and,**
4. **Extend eligibility for Alternative MTSA Density Targets to permit corrections in areas where the prescribed minimum density targets would generate development volumes in excess of the specified overall growth targets of a municipality.**

FoNTRA is available to discuss these issues in more detail and looks forward to the government's response to the public input. .

Sincerely Yours,
Federation of North Toronto Residents' Associations

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