



October 20, 2020

Mayor John Tory & Members of the Executive Committee  
City of Toronto  
100 Queen Street West  
Toronto, ON M5H 2N2

*Submitted electronically*

Dear Mayor Tory and Executive Committee members:

**RE: EX17.1 Towards Recovery and Building a Renewed Toronto**

We applaud the comprehensive work that the City has undertaken regarding Toronto's economic recovery. The City Manager's report, *Towards Recovery and Building a Renewed Toronto*, along with the accompanying report from the Toronto Office of Recovery and Rebuild are comprehensive and necessary documents to the recovery efforts by the City. We believe that within those documents, especially within the 83 recommendations of the TORR report, there many opportunities for the City to improve itself post COVID19.

We have provided some brief commentary on recommendations that align with our industry's objectives and work. We understand the breadth and scope of these recommendations are significant, therefore continued dialogue with industry must take place regarding each of the recommendations. We have worked closely with City staff, especially since the beginning of the pandemic, and look forward to continuing to have an open and collaborative dialogue as the City and industry address the economic impacts and recovery of COVID19 together.

The construction industry employs hundredths of thousands of workers across Toronto and will play a major role in Ontario's economic recovery from COVID19. Housing will also continue to be an economic driver for the City. Research shows that in times of a challenging recovery such as the one we are experiencing, it is critical for the construction sector to be working as efficiently as possible and look for ways to streamline the approvals process.

Regards,

Richard Lyall  
President



***Recommendation 29: Identify affordable housing projects with the provincial and federal governments and establish dedicated and appropriate funding to develop more modular housing units and accelerate the supply of additional housing units to assist in moving people from shelters into permanent and affordable housing.***

Industry has been exploring modular construction for market housing for quite some time. The benefits of modular housing include improved quality, fast and quiet infill construction resulting in much less disruption. We are happy to see the City pursue such innovative technologies in its housing delivery efforts.

***Recommendation 31: Explore opportunities to expand the definitions of "Municipal Uses" to include affordable housing, supportive housing, long-term care facilities and public schools, freeing space for additional housing by increasing density above existing and future community infrastructure to realize previously unavailable opportunities, while enhancing green space.***

We agree with the spirit of this recommendation but would also add that the City should consider expanding "municipal uses" to industry to further generate revenue to bolster coffers. For example, allowing mixed-use, commercial and residential, buildings to be incorporated into public facilities such as above existing or future facilities. We urge the City to consider partnership opportunities with the private sector as it considers these types of recommendations. These partnerships could provide significant revenue generating opportunities for the City while increasing density in existing urban areas.

***Recommendation 39: Establish a process with provincial and federal governments to create the most effective programs for assisting businesses with forming internships, apprenticeships and demand-driven skills training, among other supports, with an emphasis on expanding job opportunities for youth, women and gender-diverse peoples, especially for Black and Indigenous populations and people from other vulnerable populations. This will be critical for those just now entering, re-entering or trying to increase their participation in labour markets, as also noted by the Mayor's Task Force sector table on Child and Youth, chaired by Councillor Shelley Carroll.***

We are very pleased to see the focus on skilled trades and apprenticeships. The success of our industry is dependent on attracting and retaining a skilled and stable workforce, which includes greater representation of women and other marginalized groups into the skilled trades. We would advise the City of Toronto to explore how it can get involved with many of the existing programs and skilled training centres on this issue and foster partnerships with these endeavours.

***Recommendation 64: As part of the commitment to lead "net-zero retrofits of Toronto-owned buildings", work with the provincial government to identify building retrofit projects, at scale, that would be candidates for innovative financing methods and to identify specific opportunities for training and upskilling to support the development of jobs and workforce capacity. A similar point was recommended by the Mayor's Task Force Sector Table on Workers and Unions, chaired by Councillor Layton.***

We appreciate and support the environmental goals by the City of Toronto and believe that we all have a responsibility to protect the environment. This recommendation would signify that the City is leading by example when it comes to environment stewardship. We hope the City gains first-hand



experience of constructing and retrofitting high performance buildings and can further refine its climate and resiliency strategy based on lessons learned.

***Recommendation 68: Build upon initiatives put in place during COVID-19 to accelerate progress toward a modern, green and less car dependent City, which is a network of connected complete communities, and includes a more extensive, integrated public transit system supporting complete streets – for all uses, all ages, all abilities – and public spaces with quality materials, shade, public art and green space.***

We understand that the City has identified applying a wellness lens to transportation planning, prioritizing gentle density and improving and refining the use of curb lanes. We are very interested in these topics as well and we look forward to discussing this further with the City.

***Recommendation 76: Continue with the significant business process redesign efforts in making City services more digitally capable and streamline the City's customer interface.***

We strongly support the innovative approaches taken by the City regarding its efforts to transform and enhance the customer experience, especially from the perspective of development approvals and building permitting. Through its Concept to Keys initiative, the City has taken a bold new approach to adopt an iterative, customer-centric approach to transforming the development application review process. This new approach is necessary to modernize the application system and process in the City and will have a direct positive impact on housing supply and affordability. We have worked collaboratively with the City on its Concept to Keys initiative and will continue to provide feedback as more modernization and streamlining efforts are introduced.

***Recommendation 78: Reduce regulatory burden for businesses, develop small business initiatives and continue with revitalizing main streets while applying a small-business-first lens.***

Reducing the regulatory burden for businesses such as developers and builders is an essential component of not only increasing housing supply in the City, but also helping in Toronto's economic recovery efforts. RESCON's recent [report](#) found that an additional 33,100 homes could be built in Ontario above and beyond current baseline trends over the next five years if the overall development approval processes were reduced by just six months. A six-month reduction in the approvals processes could also result in an additional contribution of \$4.5 billion to Ontario's economy annually by 2025 and support 40,500 jobs. Having a lengthy and often unpredictable development approvals process is a regulatory burden that the City of Toronto should continue to focus on addressing and improving.

Streamlining approvals can also be further facilitated by the modernization and digitization of current paper-based processes, moving towards an electronic permitting system as exists in other advanced jurisdictions. A properly implemented e-permitting system can remove bottlenecks, increase transparency, accountability and link all necessary approval agencies.