



Planning and Growth Management Committee
City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Sent via email

June 18, 2014

RE: PG 34.4, City of Toronto Proposed Development Permit System

Dear Members of the Planning and Growth Management Committee:

Social Planning Toronto (SPT) is committed to independent social planning at the local and city-wide levels in order to improve the quality of life for all people in Toronto. SPT is committed to diversity, social and economic justice, and active civic participation in all aspects of community life.

Scadding Court Community Centre (SCCC) is a multi-faceted, community-based organization with programs and services geared toward under-served, culturally and racially diverse groups such as low-income women, children and families, at-risk youth, people with developmental and/or physical disabilities, and seniors. Scadding Court has priority centre designation in the City of Toronto. Our mandate is *“to support and foster the well-being of individuals, families and community groups by providing and encouraging both local and international opportunities for recreation, education, community participation and social interaction”*.

We are writing to you today to share our concerns about the proposed development permit system (DPS). While SPT and SCCC recognize that the city's intent is to streamline the development approval process, there appear to be some critical gaps in how this process will be implemented, and how decision-making will take place.

Our understanding is that the DPS offers an opportunity to move from site-by-site planning to more broad-based area planning which can be comprehensive with long-term vision, positive collective impacts and local opportunities. It also has the potential to give local communities an opportunity to limit height and density, which in some cases, helps to retain the character and fabric of a neighbourhood. But this alone will not be effective.

SPT and SCCC believe that when communities are organized and able to make collective decisions, the vision created may mean that more secondary plans are less likely to be appealed at Ontario Municipal Board (OMB). We believe that, in theory, this gives communities more power and limits the problematic top-down decisions of the OMB.

However, process is important, and how this system gets developed and implemented is critical to creating healthy and vibrant neighbourhoods *with* engaged residents.

Below is a list of concerns SCCC and SPT believe the Committee must have clarity on before approving any changes to the current system:

1. How will the “community visioning process” that is referred to, take place? This presupposes that there are local structures and processes for community engagement that will inform the creation of a community vision- everywhere. This may work in neighbourhoods where residents are active in planning and development, but does not take into consideration what happens in communities where resident engagement is limited due to a number of factors including race, income, socio-economic status, and housing. From an equity perspective, SPT and SCCC believe that all neighbourhoods should have the same access to participatory planning processes and have the same opportunities that development has to offer. How will the DPS account for this?
2. Who drives the DPS? The proposed DPS is unclear about whether communities are the real drivers in this process. It recognizes the role of a community vision but does not commit to any local-level decision- making structures or processes to ensure equitable planning and development processes. From our experience, we know that community consultations are often done using a top-down approach. This does not give the community (residents, businesses, stakeholders) any understanding of where and how they fit into this process. Without real clarity on the role of the community, decision-making processes and structures, any community visioning exercise will be ineffective. Ensuring communities are equal partners in the process will eliminate this challenge. We believe there may be potential in exploring the idea of community planning boards as one way to address this gap.
3. What happens to communities that are in the middle of creating or implementing existing secondary plans? DPS does not offer any clarity or framework for neighbourhoods with existing secondary plans or for those who are in the process of creating one. In the absence of a framework for this, it is unclear as to how the intent of the DPS will actualize and reflect a community direction and vision. Focused on height and density, a question remains around where and how a community is involved in the architectural design/development of an as-of-right project, for example. Does the city have enough resources to support transition processes, and how has this been addressed?
4. How much power will lie in the hands of a local Councillor? Traditionally we have seen different roles city councillors play in planning and development where communities have mixed experiences. It appears DPS will be very dependent on the local Councillor at the time the DPS will be introduced. SPT and SCCC both understand that local councillors will have the authority to decide on whether they want a DPS, and the planning department will work with the Councillor and local residents to develop an implementation plan. Given our experience in planning, consultation and engagement of rental or Toronto Community Housing (TCH) buildings, among other affordable housing models, the engagement of non-owners would likely be restrained by how inclusive the local councillor is. What is in place to address this, and will this mean the OMB will continue to have the final say when disagreements take place in planning and development? If this is the case, it is a strong indication that there is no paradigm shift towards advancing progressive planning practices.

5. The DPS determines height, density and built form, but there is no indication that there will be opportunities for residents to inform design, conservation, economic opportunity (such as local jobs during construction phase), green space, safety issues, accessibility or environmental impact. It appears this function and determination will sit exclusively with the city's planning department, which means communities are only peripherally engaged. This is a serious concern as residents are most concerned about liveable neighbourhoods and having access to the amenities that are needed for healthy communities. The newly released Growing Conversation initiatives from city planning is a good start but our experience shows city planning would need to demonstrate substantial ways to engage local communities and move away from top-down approaches. Addressing tenure models and housing affordability in order maintain and enhance inclusive neighbourhoods/communities should be a priority in this process.
6. The height/density cap to be achieved in a DPS system will effectively take the speculative market out of an area which we believe will free up more properties for mid-rise developers who would not compete with the speculative market. There is no indication where the community fits into this process or how they drive it. In this regard, it is open to be interpreted as a 'reactive' tool – giving planners more control and power in the process, rather than creating a vehicle for community decision-making. DPS could be pitched as a proactive tool that could allow communities to determine, through compromise and dialogue, an acceptable rate of change and the benefits to communities as a result of change. Creating a proactive framework, the DPS has the potential to give planners a strong tool to use at the OMB if a developer chooses to undermine the entire DPS neighbourhood/process, which, in turn, is an opportunity for communities.
7. This system needs to be explored in great length through appropriate and broad-based public input. The open house on June 9th had between 12- 15 people attend, as well as 4 city staff, which is not reflective of a meaningful conversation or dialogue on the city's part. Some of the attendees were concerned that the system lacked clarity and a framework. The city must reach out to all communities to get public input in a meaningful way and defer this item until this has occurred.
8. It appears the DPS asks communities to be proactive and trust that the DPS tool will give the city more power with the developer and the OMB, however, residents are not given any opportunity to evaluate the results the City is hoping to achieve. People are expected to 'trust' city planning that the outcome will produce the results they want. There must be a mechanism that allows communities to take a stronger role in the process and outcomes of their neighbourhood change processes.

We do hope the Committee feels as strongly as we do about the role of civic engagement and decision-making in local planning processes. In summary SCCC and SPT respectfully recommend that:

- a. Item PG 34.4 be deferred for consideration in the Fall of 2014 when a new city council is in place;
- b. That the planning department conduct broader consultations on the DPS prior to the item coming back to Committee, including recommendations and findings on community input;

- c. That a framework be put into place regarding interim processes should the DPS be implemented, with clear plans for what will occur, how and what resources are in place to achieve this;
- d. That a clear process be developed where conditions are in place for communities to actively participate at all stages of the process, and that resident-based decision-making mechanisms are introduced to inform any change;
- e. That any process developed applies the City of Toronto's Equity Lens to ensure public policy directions are improved and undergo a thorough equity analysis;
- f. That the Chief Planner report back on the Committee decision of May 16, 2013 regarding motion PG24.10 as it pertains to DPS. This motion asked the Chief Planner and Executive Director of City Planning for consideration and inclusion in the 2014 Work Plan, to report back to the Planning and Growth Management Committee on the role, feasibility, and efficiency of the City establishing Community Planning Boards or other mechanisms to engage communities more effectively.

Sincerely,



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Social Planning Toronto
Centre



Kevin Lee
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Scadding Court Community