



Grange Community Association
www.grangecommunity.ca

June 18, 2014

To: Chair Milczyn and Members of Planning & Growth Management Committee (PGMC)

Re: PG34.4: Official Plan Policies for Implementing Development Permit System (DPS)

Atten. Ms. Nancy Martins, PGMC Secretariat Support
Email: pgmc@toronto.ca

I write on behalf of the Grange Community Association (GCA) to register our opposition to the DPS OPA as presently drafted. We support the objections expressed by the Confederation of Resident & Ratepayer Associations in Toronto (CORRA) as follows:

1. The DPS OPA is deficient, overly broad, lacks clarity to be applied to the entire City, and does not meet the requirements as set out in Section 3 of O. Reg 608/06.
2. It is premature to adopt the DPS OPA without definitively ascertaining whether or not site specific appeals seeking height or density beyond DPS maximums can be precluded.
3. The DPS OPA lacks specificity. The geographic area encompassing the entire City is large (630 square kilometres) and its land use diverse and complex. Simplistically identifying the entire City as a development permit area is contrary to the Official Plan which contain policies that direct growth to certain areas while recognizing others are meant to be stable.
4. The DPS OPA fails to establish, identify and incorporate the criteria for selecting and identifying areas to be covered by the DPS.
5. The DPS OPA lacks a comprehensive public participation process in identifying the areas to be covered by a DPS By-law.

6. It is unclear how Council will determine when delegation of decision making authority is appropriate, since the DPS OPA lacks clear criteria for delegation.
7. The DPS OPA fails to meet commitments to consult with community and local Councillors regarding areas to be selected for the DPS by-law, and the goals and objectives for DPS areas.
8. Due process has not been followed, nor has adequate information been provided. The DPS is untested and not well understood. The various staff reports have not described the experience of DPS in other municipalities, or how the proposed DPS is supposed to work in relation to the traditional zoning for the City. There remain many questions that have not been addressed in the short time since this draft OPA has been disclosed to the public.

The GCA therefore requests that consideration of the draft DPS OPA be deferred until such time as the above matters have been adequately addressed.

Respectfully submitted,

Ralph J. Daley
President, GCA