

# ANALOGICA

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City Clerk's Office  
City of Toronto  
Toronto City Hall  
100 Queen Street West  
TORONTO M5H 2N2

Attention: Nancy Martins, Administrator  
Planning and Growth Management Committee

Members of the Committee:

Re: Item PG34.4 Official Plan Polices for Implementing a Development Permit System

I act on behalf of the Edithvale-Yonge Community Association (incorporated as the Edithvale Yonge Residents' Association) in respect of the above-captioned matter.

The Association's concerns regarding the proposed Official Plan Amendment include, but are not necessarily limited to, the following:

1. The identification of the entire City of Toronto – including Natural Areas, Parks, Golf Courses, Cemeteries, Public Utilities, Institutional Areas and Utility Corridors, as well as other stable areas such as Neighbourhoods and Apartment Neighbourhoods – as a development permit area, together with the lack of appropriate policies regarding (a) the selection of those areas in the City actually intended to be potentially governed by a development permit by-law, (b) specific goals, objectives and policies regarding each area selected, (c) the drafting of development permit by-laws, and (d) adequate community involvement in the foregoing.

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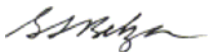
2. Lack of appropriate policies specifying the extent and nature of public involvement in development permit application review. Since third party appeals to the Ontario Municipal Board are precluded by a DPS, opportunity for meaningful public scrutiny at the municipal level is critical and should be secured in the Official Plan at the same time that authority for a development permit system is secured rather than relegated to the uncertainty of as-yet-unformulated future DPS by-laws.
3. Lack of appropriate policies specifying the delegation of Council's decision-making authority with respect to the approval of development permits and agreements. Since development often affects nearby properties and residents, this likewise is critical.
4. Various other drafting deficiencies, including failure to reference in Schedules 3 and 3A, DPS authority in a like manner as authority for the other listed complete application requirements (eg, zoning by-law amendments) and faulty titling.

*Contrary to the erroneous impression fostered by planning staff, **applicants will be able to appeal development permit applications and they will retain the right to apply for and appeal amendments to development permit by-laws, including site-specific amendments.** Only third party appeals of development permit applications – including those inappropriately approved due to lack of adequate public scrutiny at the municipal level – will be precluded. **A much better alternative would be to concentrate on growth areas, and prepare robust, well formulated Secondary Plans that discourage site-specific amendments and that require inclusion of a comprehensive planning rationale, public engagement and consultation strategy, together with related supporting materials, in any complete application proposing to amend such a Secondary Plan.** Unlike the proposed development permit system, such an alternative would ensure transparency and accountability, continue to allow for detailed public scrutiny of, and involvement in, development proposals, and preserve existing statutory appeal rights for everyone – not just applicants.*

The Association respectfully requests that Council not approve or adopt the proposed DPS OPA until the above concerns are adequately addressed.

Kindly notify the undersigned of Council's disposition of the proposed Official Plan Amendment.

Sincerely,



G.S. Belza

c Will deBacker, President  
Edithvale-Yonge Community Association