



**BUILDING A GREATER GTA**  
Building Industry and Land  
Development Association

June 18, 2014

Chair and Members of the Planning and Growth Management Committee  
City Hall, City of Toronto  
100 Queen Street West  
Toronto, Ontario  
M5H 2N2

**RE: June 19<sup>th</sup> Statutory Public Meeting for the Official Plan Policies for Implementing a Development Permit System**

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Dear Chair and Members of the Planning and Growth Management Committee,

On behalf of the Toronto Chapter members of the Building Industry and Land Development Association, we submit the following comments with respect to the City's staff report on the *Official Plan Policies for Implementing a Development Permit System – Final Report*, to be tabled at the June 19<sup>th</sup> Planning and Growth Management Committee meeting.

As written in past correspondence to this Committee, in principle, BILD believes that the implementation of a development permit system (DPS) could provide enhanced certainty, streamlined approvals and a means to create investment-ready communities across the City of Toronto. A DPS, if implemented seamlessly, would facilitate certainty for BILD members, as well as both new neighbours and businesses, with regards to the Official Plan vision and updated zoning standards in the City of Toronto.

We appreciate that staff have hosted or attended stakeholder consultation meetings since March, as we believe that collectively, these meetings are essential and require continuance in order for the DPS to evolve into a commonly understood and successful system. We believe that the DPS should be a continuously evolving process where flexibility is afforded in the beginning stages of implementation, especially for the first set of DPS by-laws that come forward.

The DPS is new to many of our members and as such, a degree of uncertainty remains, even after our consultation meetings. This applies specifically, *but not limited to*, the omission of a minor variance capability and treatment of new or existing development applications.

While we understand that the intent is that minor variances would simply not be required once a DPS by-law has been established, we have heard from our membership that this is an anomaly to the DPS in other areas. We believe that at least for the first set of DPS by-laws, the City should allow for the continuance of this mechanism to support any minor refinements that may be required during the system's infancy.

We appreciate that City staff have expressed to our members that existing applications could be grandfathered from a DPS by-law review if they are far along in the development approval process. Although this is not acknowledged in their report. While it may appear early to discuss the treatment of new and existing development applications, we believe that this will be a defining factor in the seamless success of the DPS.

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For your future consideration, please note that BILD and its members do not support the use of an interim control by-law as a means to allow time for a DPS area to be reviewed. Rather, BILD supports transition provisions that would allow a development applicant to proceed in parallel.

With these objectives and enduring thoughts in mind, we continue to be optimistic that the DPS will provide clearer guidance and predictability to our members. It is our hope that these consultation meetings will continue and our members will be able to lend their practical expertise to this initiative, as it is in the best interest of all stakeholders to have a system that is executed seamlessly and successfully.

As a key and critical stakeholder, we hope that you will consider our comments and draw from the experience that our members have with a DPS in other areas. If you have any questions or concerns, please contact the undersigned.

Sincerely,



Danielle Chin, RPP, MCIP  
Senior Planner

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