



June 11, 2021

10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins

**RE: PH24.4 Concept 2 Keys Development Application Review Program -
Second Quarter of 2021 Update**

Dear Ana Bailão, Chair and Members, Planning and Housing Committee,

The Federation of North Toronto Residents Associations represents over 30 residents' associations in Midtown, North Toronto, and North York.

The Concept 2 Keys (C2K) program is being implemented in response to the City's End-to-End Review of the Development Review Process. The C2K program established applies an “iterative and customer-centric approach to transformation involving improvements to the development review process that are service-oriented, accountable, predictable, transparent, performance-based and collaborative”.

As directed by City Council in September 2020, the report brings forward updates on the C2K work completed to date, including preliminary results of Phase 1, updates on preparatory work for Phase 2, and additional City-wide development process improvements. The results to date, such as a prioritization tool developed to identify and evaluate high-priority affordable housing applications, and a new file circulation platform, and improving pre-application consultation, are appropriate and needed.

However we have a key concern that is not addressed. The Concept 2 Keys (C2K) program focuses on reducing costs¹ and increasing efficiency. This is laudable, except that for a government service this singular focus is fundamentally flawed – you are the City and you exist to serve the public, not just customers, i.e. development applicants. The vital element that is missing from the report is how the C2K process takes into account the concerns and interests of the public, and not just the applicant or (undefined) stakeholders?

We previously raised similar concerns¹ specifically in regard to an earlier report on the virtual Committee of Adjustment process which focused on application

¹ (April 21, 2021) Letter from Geoff Kettel and Cathie Macdonald, Co-Chairs, Federation of

productivity metrics and failed to discuss the rampant rubberstamping of applications, the failure to take account of resident concerns, and generally the lack of transparency, and effective public participation.

We request that you reconsider the C2K process to ensure that resident concerns are properly taken into account.

Yours truly,

Geoff Kettel
Co-Chair, FoNTRA

Cathie Macdonald
Co-Chair, FoNTRA

gkettel@gmail.com

cathie.macdonald@sympatico.ca

Cc: Gregg Lintern, Chief Planner and Executive Director, City Planning Division
Matt Keliher, Chief Operating Officer, Concept 2 Keys (C2K)
Mary Bagnulo, Manager, Policy & Program Planning, Concept 2 Keys (C2K)

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.