DATE:       July 4, 2014
TO:         Members of Toronto City Council
SUBJECT:    PG34.4 – Official Plan Policies for Implementing a Development Permit System

We request that the above matter be deferred to address the following serious deficiencies, as identified in the letter dated June 18, 2014, from CORRA (the Confederation of Resident & Ratepayer Associations in Toronto).

1. The DPS OPA is deficient, overly broad, lacks clarity and does not meet the requirements of the Planning Act, Section 3.

2. Identifying the entire City as a development permit area is contrary to the Official Plan, which identifies only 25% of the City’s geographic area for growth over the next 30 years, while strengthening the existing character of 75%, the majority, of the City’s geographic area.

3. The DPS fails to identify criteria for selecting an area for a DPS by-law.

4. The DPS does not include a consistent, comprehensive, effective, and satisfactory public consultation process for identifying areas to be covered by a DPS by-law (and nor does the City have a consistent, comprehensive, effective, and satisfactory public consultation process in place for any other matter).

5. The DPS does not address how the “delegation of decision-making authority” for DPS will be made, and needs to be consistent and clear before creating a DPS OPA.

6. The DPS OPA does not include certain promises made to the public concerning DPS, such as: areas to be selected for the DPS by-law are to be made with the involvement of the community and local Councillor; and, the goals and objectives of DPS areas are to be determined following comprehensive consultation that is consistent with the DPS OP policies.
7. The final report on DPS and the draft OPA was issued by Planning Department on June 12, 2014, in preparation for a public statutory meeting on June 19, 2014, contrary to the legal requirement that the information, including the draft amendment, be made available to the public at least 20 days before the scheduled public meeting.

8. The DPS system is untested and not well understood. The various staff reports have not provided information on the use of DPS in other municipalities, or how the proposed DPS is supposed to work in place of the traditional zoning for the City.

9. There remain many more questions and inadequate answers which have not been addressed in the limited time frame provided for discussion of DPS (approx. 5 months) by the Planning Department with the public.

It is requested that members of City Council act responsibly and in the best interests of the public, and defer this matter until a DPS OPA is drafted that satisfactorily addresses the deficiencies noted above, as contained in the aforementioned letter from CORRA.

Thank you for your consideration.

Sincerely,

(signed)

Timothy Dobson, OALA
Chairman
Lakeshore Planning Council Corp.