

PG34.4.57

ROBERT TRUMAN  
PLANNING & DEVELOPMENT CONSULTANT

July 4, 2014

Nancy Martins, Administrator  
Planning and Growth Committee  
Clerks Department, City of Toronto  
City Hall, 100 Queen Street West  
Toronto, Ontario M5H 2N2

Re: Proposed Official Plan Amendment: Development Permit System

Dear Ms Martins:

I understand this matter will be before City Council at its meeting of July 7, 2014

I am writing to you on behalf of H&R Real Investment Trust and H&R Developments and related companies. The companies are owners of several of properties within the City of Toronto, and are continuously active in the acquisition and development of new projects. My clients are very concerned about the policies which would be enacted in the proposed OPA with regard to a Development Permit System (DPS), as approved by the Planning and Growth Management Committee. A great part of that concern stems from the very general nature of the proposed amendment and the potential application of unclear general principles to the entire City.

Since the introduction of the DPS provisions into the Planning Act, very few municipalities have taken up the additional regulatory powers offered. In Brampton, the development of the system for a very limited area of the downtown part of that City, has taken many years, including appeals to the Ontario Municipal Board, to get close to the point of being a functioning system. The same extensive and expensive experience can be expected in Toronto. The application of a policy which is unclear in both its application and its impact on land use regulation in the entire City would not be appropriate.

In staff reports, certain areas were identified as being appropriate candidates for the application of this system. In communications Council has received from other concerned parties, the position was put forward that a specific area should

63 BRUMELL AVENUE, TORONTO, ONTARIO M6S 4G6  
TELEPHONE: (416) 416 767 5354 E-MAIL: [rtruman@sympatico.ca](mailto:rtruman@sympatico.ca)  
MOBILE: 416 347 6637

Pl →

ROBERT TRUMAN  
PLANNING & DEVELOPMENT CONSULTANT

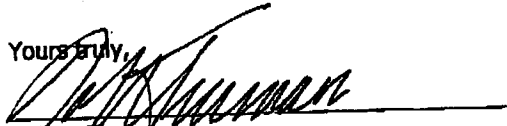
be chosen at this time to examine the feasibility and applicability of the Development Permit System. If Council should choose to proceed with the use of the Development Permit System, a sensible option would seem to be one that directs the staff to proceed with a limited implementation of the system. On the basis of that experience, Council could then determine if they want to proceed with a larger application of the power, based on the results of the first, limited effort.

My clients believe that the existing development control system in Toronto has proven its value in balancing the interests of the development industry with the interests of the residents of Toronto. It is a system that has sufficient tools to provide flexibility for builders and protection for residents. The need to replace it with a Development Permit System has not been demonstrated.

However, if Council wishes to proceed with a Development Permit System, I would urge Council to refer the current proposal back to City staff with a direction for staff to identify a specific area for the application of the Development Permit System and bring back appropriate recommendations to carry that out.

Could you please advise the undersigned of the decision of Council in this matter and advise of any future meetings which might be held.

Yours truly,

  
Robert Truman

63 BRUMELL AVENUE, TORONTO, ONTARIO M6S 4G6  
TELEPHONE: (416) 416 767 5354 E-MAIL: [rtruman@sympatico.ca](mailto:rtruman@sympatico.ca)  
MOBILE: 416 347 6637