

June 13, 2017

Chair Cesar Palacio and members of the Licensing and Standards Committee
City of Toronto
100 Queen Street West
Toronto, Ontario
M5H 2N2

Dear Chair Palacio and members of the Licensing and Standards Committee,

Re: LS20.2 Reviewing the City's Process to Authorize Access to a Neighbour's Property

On behalf of the Toronto Chapter members of the Building Industry and Land Development Association (BILD) we kindly submit the following comments to you with respect to agenda item *LS20.2 Reviewing the City's Process to Authorize Access to a Neighbour's Property*, to be considered at the June 14th Licensing and Standards Committee meeting.

BILD has just been made aware of this proposal to repeal the right of entry permit process and we strongly request that this proposal not be approved for the following reasons:

- While most residents of Toronto are neighbourly and would allow access, this is not true in all cases. This permit process is absolutely necessary for cases of denied access where access must be gained because no other path is accessible or safe. This is especially important as a means to continue necessary work that the City requires.
- As infill development and renovation projects of existing residential homes become more and more prevalent, this permit process will only become more important and the City should maintain this mechanism to permit access, where the City deems it appropriate.
- By eliminating this provision the proper maintenance of older building stock (in particular Heritage buildings of interest to the City) may be avoided altogether rendering the heritage stock at greater risk of deterioration, as most of these buildings are built property line to property line.
- We believe that the primary reason why the City has experienced historic lows in the number of these permits (3 per year in 2015/2016) is because there is a mechanism in place to seek recourse to the City for a remedy. This is a positive outcome of a City policy. The effect is that people understand that they should be reasonable with each other. This also shows that a limited amount of resources are actually being spent on these permits.
- Recognizing that City Staff find this process to be cumbersome, rather than eliminating it altogether, BILD members believe there is an opportunity to make this process more efficient. For example, the City could allow access as-of-right, subject to conditions (such as notification) where it is proven to be a critical and/or an isolated instance, to maintain properties to building code standards.
- No consultation with the Development Community took place prior to this proposal being presented. As interested stakeholders we would encourage staff to meet with BILD members prior to proposing process changes that affect our industry.

We thank you for the opportunity to make comments and should you have any questions or concerns, please feel free to contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Danielle Chin', with a stylized flourish at the end.

Danielle Chin, MCIP, RPP
Senior Manager, Policy & Government Relations BILD

Cc: BILD Toronto Chapter members

With more than 1,475 member-companies, BILD is the voice of the land development, home building and professional renovation industry in the Greater Toronto Area and Simcoe County. Our industry is essential to the City of Toronto's long-term economic strength and prosperity. In 2016 alone, the residential construction industry in Toronto generated over 68,000 on-site and off-site jobs in new home building, renovation and repair – one of the City's largest employers. These jobs paid \$4 billion in wages and contributed \$11.5 billion in investment value to the local economy.