



September 16, 2019

Councillor Ana Bailao, Chair,
and Members,
Planning and Housing Committee
City of Toronto Council

email: phc@toronto.ca

Re: PH 8.7: End-to-end Review of Development Review Process

I am appearing on behalf of FoNTRA regarding the letter it has filed on this matter from Cathie Macdonald and Geoff Kettel, neither of whom are able to appear before you because of conflicting obligations.

There is no question that the development review process can be made more efficient, and the consultants' report make a number of organizational recommendations that may have a productive impact, depending on how they are implemented. Our major concern is with the role of public consultation and involvement in the process. In this connection, we must state our disappointment that the stakeholder consultations undertaken by the consultants remarkably did not include members of the public.

City planning is difficult, involving many competing interests. Community building is not a mechanical process easily capable of fast, automated response. Efficiency (defined as accelerating development approvals) is not the same thing as planning effectiveness.

Two examples of the potential conflicts between efficiency and effectiveness are provided by Figure 11 of the consultants' report ("Opportunities for dedicated staff teams"):

- Creating a separate staff to handle LPAT appeals: Does this mean that the planners who have become knowledgeable regarding an application through their participation in development review would be replaced by a specialized staff that are not familiar with the relevant planning and community issues?
- Creating a specialized team to deal with site plan agreements and related matters: Many of the issues of detail raised in community consultation need to be implemented in SPAs. Separating community planning from oversight of SPA implementation may result in a loss of information regarding such issues.

These are randomly chosen examples. The essential point is that community planning is most effective when the community is involved and when community planners are involved throughout the development review process. Making involvement by the public and their political representatives effective is neither easy nor costless. There is a real danger that the drive for efficiency will be at the expense of community involvement.

A further concern is that the drive for efficiency may divert resources from planning to development review in order to realize better efficiency metrics. The key problem underlying problems in the development review process is the extent to which the review and updating of outdated City Official Plan policies has fallen behind over the past decade due to the diversion of resources to site-specific OMB hearings.

As the consultants' report notes in its Executive Summary, the number of applications for residential units currently under review is equal to eight times the average number of residential units approved in each of the last ten years. The problem of the last ten years has only been magnified by the development industry's response to Bill 139.

The only truly effective way of both increasing development review efficiency and making community planning more productive in its results is to provide more resources to City Planning.

We urge you to refer the End-to-end Review report back to staff with a direction for more public consultation with regard to the implications for community planning of its recommendations. Alternatively, since this is before you merely as an information item for your committee and for Council, we recommend that you direct staff to report back to you on how its implementation is being made consistent with an enhanced role for public consultation and more effective community planning.

Sincerely,

John Bossons