



June 9, 2021

Chair Bailao and the Members of the Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto, ON
M5H 2N2

RE: PH24.5 - Mandatory Pre-Application Consultation: Proposed Amendments to the Official Plan and to the Municipal Code - Proposals Report (Ward All)

Dear Chair Bailao and the Members of the Planning and Housing Committee,

We are in receipt of the City Staff Report entitled - Mandatory Pre-Application Consultation: Proposed Amendments to the Official Plan and to the Municipal Code - Proposals Report and we would like to take this opportunity to provide preliminary comments as noted below.

Firstly, we would like to express our support for this much needed review. The pre-application consultation process was in need of improvements and we were encouraged to learn that city staff have taken on this initiative. As we first said to staff when we learned of this review, BILD and its members are ready and available to contribute to this review to ensure a positive and mutually beneficial result.

In preparation for this review, BILD formulated a working group. This group had an initial meeting with City staff on April 9, 2021. At that meeting, we learned that the City was considering a by-law and Official Plan changes for the pre-application consultation process. Our working group provided preliminary comments listed below.

Adopting a mandatory process must be accompanied with additional refinements as follows:

- The pre-application consultation process should be a two-step process. Whereby, developers seeking information at the due diligence stage would be able to obtain information from the City on a site without having to request a formal pre-consultation meeting.
- The success of a pre-application consultation meeting is based on the applicant's ability to understand what is truly required from the City. To do so - all affected departmental staff should be required to attend the meeting to provide their feedback. This would avoid any surprise comments or information requests being made, when the application is reviewed.
- As a best management practice, in other municipalities (i.e. City of Vaughan) pre-application consultation meetings are a thorough process and can have upwards of 25 staff participants.
- It is also essential that the staff participants at the meeting have the decision-making authority to provide proper guidance to the applicant. It is not beneficial to have junior staff attend that have to take all decisions back to their supervisors.
- Pre-application meeting need to be timely, particularly if these are mandatory meetings in advance of formal planning application submissions. In the event that a meeting is not able to be arranged within a specified period of a request - then this meeting should no longer be required as a pre-requisite to submitting formal planning applications.
- Lack of clarity upfront results in more complications down the road. A pre-application consultation checklist should be developed at the meeting and distributed immediately

following the meeting. Members should not have to wait for this information. In some extreme cases a follow-up checklist was never provided to the applicant.

We appreciate the opportunity to provide our initial thoughts on this reviews and we look forward to further dialogue on this topic.

Sincerely,

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

Danielle Chin, MCIP RPP
Director of Policy and Advocacy

*Cc: Matt Keliher, COO Development (I) and GM
Mary Bagnulo, Manager, Policy & Program Planning*