



June 9, 2021

10th Floor, West Tower, City Hall
100 Queens St West
Toronto M5H 2N2
Attn Nancy Martins
email: phc@toronto.ca

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

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

The Federation of North Toronto Residents Associations represents over 30 residents associations in Midtown, North Toronto, and North York.

Making pre-application consultation a mandatory, rather than a voluntary step in the development review process has been identified by internal and external stakeholders, and through jurisdictional review, as a first step in addressing inconsistencies that have implications for application quality, staff productivity, overall time to decision and city-building outcomes.

The report states that jurisdictional research indicates that improvements to the early stages of the development review process, including requiring pre-application consultation, results in the submission of higher-quality applications, increases the number of applications moving from pre-application consultation to actual submission, reduces the overall number of circulations, and helps to establish mutual accountability early on.

The report also states that the C2K team also engaged industry stakeholders through the Building Industry and Land Development Association (BILD) in a discussion of current practices. FoNTRA previously raised concerns, in the context of the review of Committee of Adjustment processes, that the C2K process focuses on the internal City processes and ignores the important perspectives of the affected communities. (April 21, 2021) Letter from Geoff Kettel and Cathie Macdonald, Co-Chairs, Federation of North Toronto Residents' Association (PH.New)
(<http://www.toronto.ca/legdocs/mmis/2021/ph/comm/communicationfile-130862.pdf>)

FoNTRA strongly supports mandatory pre application consultation as this will help make the application approval process more efficient for all involved. At present, the

“complete application” requirements mean that applicants must compile enormous amounts of detailed information, and then the process must be repeated when the application is better focussed on City objectives. This wastes time for all involved except the consultants who get more work as a result.

However, we note that the report recommends that this pre consultation step be required for staff input, but only “encourages” input from affected citizens, who can often provide further valuable information about the context and impacts of a potential impacts of an application and how it can be better for the community. Such pre consultations with community already takes place in some cases and the applicants report that the information received makes their projects better.

FoNTRA therefore recommends that mandatory pre-consultations also be extended to the public and affected communities. Further consideration should be given as how to do this; there are various options, such as online questionnaires, and holding of public consultation meetings, depending on the context.

Yours truly,

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