

January 12, 2022

VIA E-MAIL

Ms. Nancy Martins  
Planning and Housing Committee  
10th Floor, West Tower, City Hall  
100 Queen Street West  
Toronto, Ontario M5H 2N2

RE: **PH 30.1 — Mandatory Pre-Application Consultation: Recommended Amendments to the Official Plan and to the Municipal Code – Final Report**

Dear Ms. Martins:

I have read the December 14, 2021 [staff report](#) and recommendations respecting the Mandatory Pre-Application Consultation (“**Mandatory PAC**”) and wish to raise a number of important concerns and issues with this report. As many of you are well-aware, Tridel has an 85-year history in developing and building over 85,000 homes in predominantly mid and high-rise buildings in the City of Toronto and across the GTA.

Tridel staff have participated in numerous pre-application consultation meetings with City staff over many years. These meetings have been often useful and productive, however some of the information contained in the staff report for a mandatory PAC meeting is concerning. I would strongly recommend further consultation take place before any recommendations for the mandatory PAC process is adopted.

On page 1 of the report, staff write that the interest in pre-application consultation meetings coupled with the critical role of development review in accelerating the recovery from COVID-19 demonstrates the need to improve the City’s existing voluntary practice. The critical piece not referenced here is that it is essential for the City to assign staff resources and enforceable timelines towards these meetings and processes. Properly resourcing all aspects of the development review process is a key priority to ensure this process does not hinder the timely filing and processing of development applications.

Further on page 1, City staff state that the implementation of the mandatory PAC process will be appropriately supported by a team-based structure. This is absolutely required, but I am concerned that this will not happen when pre-application consultation meetings become mandatory, without commitment and resources from supporting divisions such as Engineering and Construction Services, I urge the City to ensure necessary staff resources are put in place for these team-based structures. Lengthy delays formally submitting development applications and receiving the Notice of Complete Application letters will have negative impacts on the availability and affordability of the housing supply in Toronto.

On page 4, the staff report states that in 2019, 71% of the pre-application consultation meetings were scheduled with staff in the same year, and in 2020 it was 67%. The percentage rose to 72% by October 2021. No context is provided for these statistics to offer a meaningful understanding of how long it takes to schedule, on average, a PAC meeting, Staff should be directed to **schedule and hold a pre-application meeting within 30 days** of the request being made to City staff. From our

experience, pre-application meetings are sometimes scheduled several months after the original request has been made. This is absolutely unacceptable and City Council needs to direct City staff to schedule and hold these meetings within firm timeframes.

On page 4, the staff report lists various objectives including:

- Improve consistency of approach and staff productivity city-wide;
- Increase staff and applicant satisfaction with the process through improved communication, consistency and application quality; and
- Reduce the overall time to decision by providing consistent information about application requirements and resolving critical issues earlier in the application review process.

I certainly agree these objectives for the pre-application consultation process should be achieved but it is unclear from the City report on how these objectives will be furthered.

On page 14, the staff report notes that the City currently accounts for an estimated cost of delivering pre-application consultation within development application fees but does not charge a specific stand-alone fee for pre-application consultation. I do not support an additional fee for the mandatory PAC process as I believe this cost is already covered through the existing development application fees, which increases each year. A new mandatory PAC process fee will be passed along to home buyers and renters which will contribute to the housing affordability challenge in Toronto which has been well-documented.

I have several concerns for the changes proposed in Chapter 415, Section D. My concerns are as follows:

- (2) “the request made under D.(1) above shall be accompanied with any information and materials required by the Chief Planner and Executive Director, City Planning or their designate;” – **I believe “any information” is too open-ended and a transparent list should be provided as part of this amendment.**
- (3) “an applicant shall attend one pre-application consultation meeting with the relevant City staff, and, as deemed necessary, such external commenting agencies, at a time, in a location and in a format determined by the Chief Planner and Executive Director, City Planning or their designate;” – **I am concerned that this could delay or frustrate the process and it is too open-ended. As noted above, there should be a prescribed timeline of 30 days. If it cannot be held within 30 days, the PAC meeting should be deemed not to be required.**

(5) “notwithstanding Subsection D.(3) above, where more than one application described in Subsection B. above is intended to be made concurrently to the City for the same



- lands, one pre-application consultation meeting may be sufficient to satisfy the requirement for such identified concurrent applications for the same lands at the discretion of the Chief Planner...;” – **This provision needs to be clarified that if a subsequent development application is required following the filing of the first development application for a particular development, subsequent pre-application consultation meetings should not be required. For example, if a Zoning Amendment Application is submitted first and subsequently at a later date, the site plan application is filed, no further pre-application consultation meeting should be required.**
- (7) “the prescribed fee, if any, pursuant to Chapter 441, Fees and Charges, is paid to the City.” – **For the reasons stated above in this letter, this subsection should be removed.**

### Conclusions and Requests

Although pre-application meetings can be a useful tool to have developers and City staff engage in dialogue to provide parameters for development proposals which could lead to a more streamlined process for the filing of development applications, recent experience has shown this is often not the case in Toronto. More often, the PAC meeting has led to significant delays in the filing and processing of development applications. In order to ensure the mandatory PAC process becomes more streamlined and efficient, we would request the following:

1. The mandatory pre-application consultation staff report be directed back to staff for further consideration in light of all the comments that have been received.
2. We also request staff be directed to consult further with industry and stakeholders in order to come up with recommendations that will lead to a more streamlined and efficient Mandatory PAC process including the following:
  - a. ensuring the necessary resources are provided to City staff to avoid staff shortages and lengthy timelines for responses;
  - b. providing firm timelines (no greater than 30 days) for how long the Mandatory PAC Process will take including when staff will provide responses;
  - c. acknowledging the pre-application consultation cost recovery is currently provided within development application fees and no new fee be considered.

I appreciate you taking the time to review my letter. Please be advised I would like to receive all notices and decisions with respect to this matter.

Sincerely,

TRIDEL BUILDERS INC.



Michael Mestyan  
Vice President  
Development Planning