



Jan. 11, 2022

10<sup>th</sup> Floor, West Tower, City Hall  
100 Queens St West  
Toronto M5H 2N2  
Attn.: Nancy Martins, Secretariat

**RE: PH30.1 Mandatory Pre-Application Consultation: Recommended Amendments to the Official Plan and to the Municipal Code - Final Report**

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

Pre-application consultation is encouraged and supported as a component of the Province's land use planning system, and its use is clearly necessary given the reduced statutory review timelines introduced by Bill 108, the More Homes, More Choices Act, 2019.

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 focused on City objectives. This wastes time for all involved except the consultants who get more work as a result.

However, this pre-consultation step will be required for City staff input, but not from residents and 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 made better for the community. Such pre consultations are frequently encouraged by City staff, and already take place in some cases, and the applicants report that the information received makes their projects better.

This was specifically requested in our earlier comments on the Preliminary Report. (June 9, 2021) Letter from Geoff Kettel and Cathie Macdonald, Co-Chairs of Federation of North Toronto Residents' Association (FoNTRA) (PH.New)  
(<http://www.toronto.ca/legdocs/mmis/2021/ph/comm/communicationfile-132825.pdf>)

Unfortunately the Final Report ignores this request.

FoNTRA again recommends:

- that mandatory pre-consultations be extended to the public and affected communities.

**At a minimum, we recommend that pre-application consultation include mandatory notification of affected Resident Associations.**

Yours truly,

Geoff Kettel  
Co-Chair, FoNTRA

Cathie Macdonald  
Co-Chair, FoNTRA

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Cc: Gregg Lintern, Chief Planner and Executive Director, City Planning Division  
Michele Drylie, Manager, Strategy & Business Improvement, Concept 2  
Keys, City Manager's Office  
Kris Hornburg, Director, Concept 2 Keys Program, City Manager's Office

**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.