



October 10, 2023

Mayor Chow
Toronto City Councillors
City Hall, 100 Queen St W.
Toronto, ON M5H 2N2
ATTN: Sylwia Przewdziecki

Via email: councilmeeting@toronto.ca

Dear Mayor Chow and Councillors:

RE: PH6.2 - Bill 109 Implementation, Phase 3 - Recommended Official Plan and Municipal Code Amendments respecting Site Plan Control

On behalf of NAIOP Greater Toronto, I am writing to share our concerns with the recommended Official Plan Amendment No. 688 ("OPA 688") and its associated amendments to Chapter 415 of the Municipal Code (the "Municipal Code"). We are concerned with the City's proposed draft Amendments, including but not limited to:

- **Two-step implementation process:** the phased approach to require zoning compliance as step one, and then having the City clarify when and how zoning compliance will be applied in the second step by revising the Terms of Reference is onerous.
- **Zoning compliance as a pre-condition to a complete site plan application:** The ability to file Site Plan Control (SPA) and have it considered concurrently with an official plan and/or zoning amendment application is an important implementation tool commonly used to introduce greater efficiency. Further, it is common that the detail achieved in the site plan process results in important changes to the development that impacts built form standards that are set out in the specific zoning by-law. This amendment will increase planning timelines, lead to unnecessary and repetitive processes for zoning, official plan and site plan control applications and ultimately postpone development of all asset classes.
- **12-month validity period for Planning Application Checklist ("PAC") packages issued prior to April 3, 2023:** the introduction of a retroactive validity period is a punitive measure that does not consider the fact an applicant may need more than a year to prepare a site plan application, including engaging the community, arranging financing, updating design, or a change in ownership.

NAIOP Greater Toronto represents developers, owners and related professionals in office, industrial, retail, mixed use and multi-residential real estate. With over 1,200 members from approximately 300 companies in the GTA, we are the prominent voice advising on commercial real estate matters that affect the region. As part of our mandate, we undertake policy work to assist governments as they respond to ever-changing economic challenges.

We request that PH6.2 be deferred to allow for further consultation with industry to work on a new development review approach that meets both provincial housing goals and the City's planning needs. The proposed OPA 688 and Municipal Code amendments increase administrative pressure for the City, introduce new costs to the City and applicant, create uncertainty for the applicant, and ultimately detracts from City Council's commitment to deliver 285,000 new Toronto homes by 2031.

Sincerely,

A handwritten signature in black ink, appearing to read 'Leona Savoie', written in a cursive style.

Leona Savoie
Chair, Government Relations
NAIOP Greater Toronto