

April 11, 2024

Mayor Chow and Members of Council
Toronto City Council
100 Queen Street West
Toronto, ON
M5H 2N2

Sent via email to: councilmeeting@toronto.ca

RE: PH11.10 - Response to Including New Approval Conditions for Rental Demolition Applications

Dear Mayor and Members of Council,

The Building Industry and Land Development Association (BILD) acknowledges that at the April 5th Planning and Housing Committee meeting, agenda item *PH11.10 - Response to Including New Approval Conditions for Rental Demolition Applications* was adopted with amendments and will now be considered by City Council at its meetings on April 17, 18 and 19.

We acknowledge that these amendments included requirements to report back to Council and the Planning and Housing Committee on various matters. The content of a number of these items, has been part of ongoing stakeholder consultation with BILD and we appreciate the dialogue with City Staff.

However, Recommendation #6 which is tied to Recommendation 1 in the noted Decision Advice was not discussed through consultation prior to this Committee endorsement. Combined, these recommendations commit Staff to reviewing the use of a proposed new methodology and with determining the reliability of such data and how it can be implemented in a supplementary report to City Council on April 17, 18 and 19.

In addition, as of the date of this letter, the supplementary report is not available for review by the public. Although we understand that components of forthcoming supplementary report are generally underway, we are concerned with the speed at which Staff are being asked to undertake this important technical analysis for a new methodology.

Further, the limited time window presents fairness and procedural concerns, as we understand that the supplementary report will be provided directly to Council with no stakeholder consultation and very limited time for review. This is incongruous with the consultation process undertaken to date on these important matters and we assert that any new information that has the potential to result in a policy or procedural change at the City, should be afforded due course by conducting consultation and returning to Committee. We would appreciate the opportunity to have a meaningful discussion on the proposed methodology to understand why the data set would be limited to 2015-and-newer buildings.

In addition, there are significant procedural concerns in regard to the sequence of events set out in Recommendation #6 which recommends the imposition of a new approach to Tennant Assistance retroactively to conditionally approved applications.

As evidenced by the ongoing work on these important matters, this is a policy area that requires clarity, predictability, high quality communication, and understanding for all stakeholders including affected tenants. Confusion and lack of appropriate evaluation and consideration helps no one and creates significant uncertainty for housing creators, Councillors, members of the public, and tenants alike.

In the interest of fair and due process, especially in the absence of the supplementary report, we are requesting that Recommendation #6 and the Associated Decision Advice #1 be referred to City Staff to allow for consultation with BILD members on the supplementary report with the goal of returning this specific recommendation to the next Planning and Housing Committee.

We thank you for the opportunity to submit these comments. Please feel free to contact the undersigned with any questions.

Sincerely,



Danielle Binder, RPP MCIP

Senior Director, Policy and Advocacy, BILD