



DEPUTATION

To: Executive Committee
Date: Tuesday, July 16, 2024
Re: EX16.20 – Delegation of Development Review Related Authorities.

The Toronto Alliance to End Homelessness (TAEH) is a community-based collective impact initiative committed to ending homelessness in Toronto. Our network includes non-profit organisations that support those living with homelessness and those who are housed and who must spend a disproportionate amount of income on housing, as well as affordable and supportive housing developers, property managers, and landlords.

As part of our mission, TAEH works directly with the City of Toronto in its mandates surrounding homelessness and maintaining and growing affordable housing stock in the city, including engagement on client support services and funding. This includes TAEH co-chairing the Toronto Housing and Homelessness Service Planning Forum with both the City of Toronto Shelter, Supports and Housing Administration and the Housing Secretariat.

TAEH is also the non-Indigenous Community Advisory Board to the City of Toronto on housing and homelessness.

TAEH supports the Report for Action by the General Manager, Toronto Water; the Chief Engineer and Executive Director, Engineering and Construction Services; the Interim Chief Planner and Executive Director, City Planning; and the Director, Development Review and the recommendations contained therein.

Having previously identified the length of time it took for the City to give final approval as a significant factor in the resultant stalling of development projects, the City recognised the need for an administrative reorganization to speed up the development approval process. Earlier this month, the Deputy General Manager, Development and Growth Services, provided the Planning and Housing Committee with a quarterly report on the development review timetable. The Development Review Timeline Dashboard data shows that this reorganization has resulted in significant improvements in these metrics: [Attachment 1: Development Review Timeline Metrics - Q3 2024 \(toronto.ca\)](#).

The recommendations found in this agenda item build upon that success. As noted in the Report for Action, the rationale and purpose of the new Development Review Department are as follows:

Development Review's mandate is to expedite the review of all development applications received by the City, with a focus on getting more homes, notably affordable homes, built faster within complete communities. To help achieve this mandate, core staff who review development applications across a number of City divisions and disciplines, some working under previously delegated Council authorities currently in effect, will now be consolidated under Development Review. This is vital to streamline decision-making; improve consistency, transparency and accountability; improve service delivery for applicants and City staff; and ultimately, accelerate the City's development application review process. (p.2).

TAEH believes that this consolidation of the review process cannot but have a significant and positive effect on expediting the development application review process. Doing so will improve the likelihood that such developments not only break ground in a timely fashion but also achieve completion.

Speeding up the application approval process will save time and money for developers as well as result in a more efficient use of the City's resources through syncretic synergies that a project-based team approach will generate. Insofar as the non-profit Indigenous, non-Indigenous, and co-operative non-profit housing sectors face important structural hurdles to making the pro formas for (deeply) affordable and supportive housing developments cost out, any savings in time, and hence money, will have a positive impact on the capacity of the non-profit housing sector to build such housing.

In the face of a general disinclination in the private for-profit housing sector (with some notable exceptions) to incorporate affordable housing units into their developments, any and all ways to make it easier for the non-profit sector to build such housing must be pursued: while the creation of the Development Review Department will benefit all development applications, it is a vital administrative innovation to ensure (deeply) affordable and supportive housing continues to be built in Toronto. Even more so, it is a prerequisite for the pace of such building to accelerate. In that light TAEH is happy to note that its previous recommendation that all affordable housing projects approved pursuant to the Rental Housing Supply Program be automatically allocated to the Development Review Department's priority development stream has been adopted by the department.

In reviewing the details of the set of changes to the *Toronto Municipal Code* contained in this agenda item, TAEH specifically supports the transfer of delegation of authority from the City Planning Department to the Development Review Department respecting planning approvals, and the extension of delegated authority to the Development Review Department as it pertains to City infrastructure.

TAEH recognises that there is no need for a transfer of delegated authority for mandatory pre-application consultations, as set out in section 19.2 of Chapter 415 of the *Toronto Municipal Code*, since mandatory pre-application consultations have been abolished by the enactment of the *Cutting Red Tape to Build More Homes Act, 2024*. However, we believe that, like all other examples of authority currently delegated to City Planning in Article II, City Council should, to avoid confusion, explicitly delegate authority to conduct voluntary pre-application consultations to the Development Review Department. By doing so, the project-based team approach can begin with the pre-application process, and the project can then continue under the review and approval process of the same team, once the formal development application approval process begins.

TAEH believes that such an administrative consolidation of all aspects of the application approval process is the natural conclusion of the rationale for the creation of the Development Review Department, as referenced in the related Report for Action and set out above. To do so can only improve efficiencies by not duplicating the time needed to be taken by the review team to become familiar with any given project, and thus maintain continuity of process and improve upon the time required to approve applications.

In conclusion, TAEH is heartened by the City's continuing focus on using all available tools to make it easier for all parties, together, to achieve the goals of the City's 2020-2030 Housing Action Plan and the Generational Transformation Housing Plan. Not only that, but by establishing a comprehensive, robust, efficient and effective administrative process, the City of Toronto will have permanently improved its suite of tools in ongoing support of the creation of housing in general, and of (deeply) affordable and supportive housing in particular.

Thank you,

A handwritten signature in dark ink, appearing to read 'Peter G. Martin', with a stylized, flowing script.

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