

From: [Joshua Benard](#)
To: [Executive Committee](#)
Subject: [External Sender] My comments for 2025.EX21.9 on March 19, 2025 Executive Committee
Date: March 18, 2025 10:08:44 PM
Attachments: [Item - 2025.EX21.9 Letter from J. Benard.pdf](#)

To the City Clerk:

Please add my attached comments to the agenda & please post them publicly on TMMIS for the March 19, 2025 Executive Committee meeting on item 2025.EX21.9, Backlog of City Approvals for School Board Projects

I understand that my comments and the personal information in this email will form part of the public record and that my name will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, I understand that agendas and minutes are posted online and my name may be indexed by search engines like Google.

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I am writing today to provide the Executive Committee with an additional perspective based on my professional experience working with City Planning, Engineering, City Legal, and Toronto Water through my work at two different Non-Profit Housing organizations over the past 6 years.

The overall relationship between The City of Toronto and the Non-Profit sector is a symbiotic, mutually beneficial relationship. I want to begin by saying that I have a great deal of respect for the City staff that I have worked with over the years and I have built many positive relationships. I also want to acknowledge that staff have an overflowing workload, and I understand this workload contributes greatly to slowdowns. However, I feel it prudent that I share with you that there have been areas that cause significant pain points and a high degree of uncertainty for projects to proceed in a timely manner. These delays and uncertainty put important non-profit projects at risk and in some cases, sadly, results in projects not proceeding because timelines don't align with specific funding calls or are negatively impacted due to cost escalation.

Though Bill 23 and the changes that provide statutory timelines for responses to applications have helped provide more certainty on timelines, a number of issues remain, as outlined in the submission by the TCDSB, and are not unique to only their projects.

A significant challenge I have seen is around uncoordinated comments that conflict with one another and can negatively impact the viability of a project unnecessarily. I have participated in multiple PAC meetings that are very helpful and productive, but I sometimes find that once we make our official submission, we get a series of new comments, many of which can conflict with one another, or don't apply. The lack of internal coordination results in a significant amount of lost time and added cost. We must coordinate the comments with our consultants, ask for meetings with various commenting departments for clarity, determine which comments are more of a priority for City staff all before we can begin to address the comments and make revisions. The missed opportunity for internal coordination creates a high level of frustration and confusion, in addition to the aforementioned lost time and added cost. I know this level of coordination would take more staff time and resources, which are already stretched.

Again I want to reiterate that we have had some very positive working relationships with City staff and appreciate the workload and constraints under which they work.

Additionally, I want to highlight that over the last 6 months I have had the benefit of working with Valesa Faria in her new role as Executive Director, Development Review. I have found this relationship to be very beneficial in advancing our priority projects.

While we continue to feel good about the work that is coming out of the Development Review Department, we are also aware that there is limited staffing capacity. I would like to recommend that the Executive Committee consider delegating authority to the Executive Director of the Development Review Department to engage third party consulting firms/services, approved and qualified by the City and paid for entirely by the applicant, on affordable housing and other priority projects in order to ease the internal pressure and speed up review timelines.

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This would allow the City to deliver on its various mandates more quickly and easily and allow the delivery of desperately needed affordable housing.

As Committee members may know, there is already precedent as it relates to 3rd party engagement by the City for legal services or environmental engineering consultants (e.g. to peer review ESA's and reliance letters for land conveyance to the city). I want to be clear that I am not suggesting that 3rd party consultants could or should ever replace the role of planning staff, but offer this recommendation as a means to relieve some pressure and to help support City staff and future applicants efforts to fast-track vital affordable housing applications at no cost to the City.

In closing, I would like to thank ALL City staff for their continue work to keep our City running. I know it isn't easy work.

Sincerely,
Joshua Bénard

EVP Real Estate Development and Construction &
Board Member of non-profit housing organizations.