

This complaint/proposal stems from a severance/variance application for 90 Ash in Long Branch.

However it has general applicability.

**In a nutshell there is an unprofessional approach and lack of integrity within the Planning Department, namely with the Community Development Section and there needs to be a limit on density for applications being dealt with by the committee of Adjustment (COA)**

It is acknowledged that the Community Planning Section (Etobicoke York) has done fine work in the past, particularly with initiating the Long Branch Character Guidelines (when development was running amok). It currently recommends refusal for egregious applications.

**At the severance/variance level there is poor practice.** Exchanges of emails are attached to give examples.

- 1) The section is much too cosy with applicants whose main aim is to extract as much money as possible from a development. Meetings behind the scenes and deals are struck, making the process opaque.
- 2) The public is eliminated from consensus building and appear to have little influence. The voice of the people, those most affected, and the Councillor, who represents the larger picture, appear to be given no weight. This is counter to the OP (Official Plan) policy which promotes residents shaping their neighbourhood. There seems to be no understanding that Planning serves the public interest and that demand is not a factor, clearly stated in the OP. Fundamentally need is therefore the criteria and is ignored.
- 3) The section operates in a silo without taking into account urban forestry, urban design, or OP groups who are often in opposition to the position Community Planning take. The OP Section says neighbourhoods are not for intensification unless the character is respected and reinforced eg secondary suites.
- 4) The Community Planning comments on severance/variance applications are meager and seem to revolve around whether the proposal has been improved rather than the planning framework.
- 5) The comments contain information but no analysis. There is no logic or reasoning so again the process is opaque. The Long Branch Character Guidelines, including the 3 lens approach for evaluation, appear to be ignored as well as the flaws in the wholly

inadequate justification reports submitted by applicants. These are needed along with much better drawings eg front facades of the proposal in relation to abutting properties, 3D birds eye views. Without these at the beginning of the process the public is disadvantaged. Clearly an application is not complete unless it includes documents which are readily understood by all and are vital for the application's processing.

6) The comments rarely mention Official Plan policies other than a line from Section 4.1.5. or the general intent of the zoning bylaw, pivotal in the case of Long Branch with its low density to reflect the traditional majority character. Mention is never made about "Minor" which is described in the blue brochure recently published by the Planning Department.

**The "minor" issue seems to be dishonestly dealt with by both public community and private development planners dealing with implementation and consequently the dysfunctional Committee of Adjustment.** It is clear to anyone at the sharp end of the severance/variance process that the system is overloaded with applications that should be dealt with by zoning bylaw (major changes). This would allow appropriate analysis and public participation of the severance/variance proposals. Any creative section would have alerted the powers that be to the situation. This way the Committee could go back to process truly minor variances that would cause hardship and for which there is a need.

It is strongly advocated that a density limit be put on variances. Originally density variances were not permitted and 10% increase was used as a guide until relatively recently. Now the situation is out of hand with the consequence we are getting poor development and TLAB are overburdened. TLAB have generally done a great job in getting planning back on track.

**A limit somewhere in the region of 20% might seem reasonable for applications going for minor variances** but I leave this figure to the City to develop. This would apply to addition of storeys on towers as well, an issue recently raised by the Planning and Housing Committee. This simple notion whether it be Department policy or an official position should resolve many of the problems that have been plaguing the process for at least 5 years amidst huge frustration by the public. It is the citizens who are suffering; they have had their rights severely curtailed both in the process and permanently by negative impacts on them by inappropriate development.

**In summary there is a disconnect between City planning policies and what happens on the ground.** Much of the blame lies with the Community Planning Section.

I look forward to your acknowledgment and reply on this urgent issue.

Yours truly  
David Godley 401 Lake Promenade Toronto M8W 1C3