



BUILDING A GREATER GTA
Building Industry and Land
Development Association

September 12, 2012

Councillor Peter Milczyn &
Members of the Planning and Growth Management Committee
City of Toronto, City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

Dear Councillor Peter Milczyn &
Members of the Planning and Growth Management Committee,

**Re: September 13, 2012 Planning and Growth Management Committee Meeting
Agenda Item: PG17.8 Rental Replacement in Mid-Rise Developments on the
Avenues - Official Plan Review (Ward All)**

The Building Industry and Land Development Association is in receipt of the staff report entitled "Rental Replacement in Mid-Rise Developments on the Avenues - Official Plan Review" and we offer you the following comments in advance of the September 13th Planning and Growth Management Committee meeting.

We note that *"the purpose of the study was to examine whether the Official Plan rental replacement policies – which require the replacement of existing rental housing where there are six or more units – may be impeding redevelopment of the Avenues."* The staff report concludes that *"...the rental replacement policies were not a substantive constraint to redevelopment along the Avenues."*

This conclusion is formulated based on the findings of a study prepared by the team of N. Barry Lyon consultants and DTAH architects. Unfortunately, the study was only made available a day prior to the September 13th committee meeting; therefore we were not able to produce a comprehensive review of the information that the staff report is relying on.

BILD Toronto Chapter members have identified barriers to achieving this policy. We have heard that the density needed to achieve projects on the *Avenues* is not enough to justify the cost associated with the rental replacement program. In turn, we suggest that this policy be held by the members of the Planning and Growth Management Committee until the development community has had an opportunity to review the study and provide their implementation experiences with this policy to staff.

BILD appreciates the opportunity to submit comments and we look forward to future opportunities for stakeholder engagement. Please feel free to contact the undersigned if you have any comments or concerns.

20 Upjohn Rd, Suite 100
North York, ON M3B 2V9

Tel: 416.391.3445
Fax: 416.391.2118

www.gthba.ca

Sincerely,

A handwritten signature in blue ink, appearing to read 'Danielle Chin', with a stylized flourish at the end.

Danielle Chin, MCIP, RPP
Municipal Government Advisor

CC: *Kerri A Voumvakis, Acting Director, Policy and Research, City Planning, City of Toronto*
Leona Savoie, BILD Toronto Chapter Co-Chair
Steve Deveau, BILD Toronto Chapter Co-Chair
Paula Tenuta, Vice President, Policy & Government Relations, BILD
BILD Toronto Chapter Members