



BUILDING A GREATER GTA
Building Industry and Land
Development Association

PG21.1.200

March 5, 2013

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: March 6th – Statutory Public Meeting (at the Planning and Growth Management Committee) for the Draft Zoning By-law

The Building Industry and Land Development Association (BILD) is in receipt of the statutory public meeting notice for the City of Toronto Draft Zoning By-Law and we offer you the following comments in advance of the March 6th Planning and Growth Management Committee meeting.

As you may or may not be aware, our industry has been actively reviewing the numerous iterations of the by-law and took part in several consultations meeting with city staff since August 2009. City staff and BILD have worked well together and we greatly appreciate their diligent commitment to our group.

In our consultation meetings and discussions we were able to come to consensus on mutually beneficial changes such as the revisions to the definition of *Gross Floor Area* and transitions provisions for minor variances and site-specific zoning by-law amendments. In turn we will not be challenging the adoption of the proposed harmonized zoning by-law.

We would simply like to take this opportunity to flag a few items to your attention that are posing difficulty in practice, which were raised by one of our active transportation consultant members, with respect to *Vehicular Parking Regulations, Loading Space Regulations* and *Bicycle Parking Regulations*. These items are outlined in greater detail in Table I of this letter. We believe that these are items that do not appear to be aligned with emerging urban design and transportation objectives. However, we believe that this disconnection could be meaningfully discussed during the City's review of its Official Plan (OP). Therefore, we look forward to our opportunity to provide feedback during the OP review.

We maintain that the zoning by-law still needs to be brought into true conformity with the intensification objectives of the City's Official Plan and Provincial Growth Plan. Modernizing the by-law with an as-of right approach would alleviate staff's workload by reducing the number of minor variances and related appeals, thereby promoting efficiencies in the development approvals process.

Thank you for the opportunity to submit comments. Please feel free to contact the undersigned if you have any questions.

Sincerely,

Danielle Chin, MCIP, RPP
Senior Planner, Policy & Government Relations

CC: *Leona Savoie, BILD Toronto Chapter Co-Chair*
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Table 1 – Comments on Primary Issues Relating to Draft City of Toronto Zoning Bylaw (November 8, 2012)

Issue	Recommendation	Application / Priority
<p>1.0 General</p> <ul style="list-style-type: none"> • 1.1 "Policy Areas" 	<ul style="list-style-type: none"> • "Rest of City" Policy Area to broadly defined geographically • Policy Areas PA2, PA3, PA4 are too narrowly defined geographically • These areas should extend beyond the "density" limits associated with their general descriptions to better reflect the travel characteristics associated with the areas. 	<ul style="list-style-type: none"> • General City wide issue • Move towards adoption through amendments

Issues	Recommendation	Application / Priority
<p>2.0 Vehicular Parking Reg's</p>	<ul style="list-style-type: none"> • Applicable to Section 200.5.1.10 (11) and Section 200.5.10 (1) 	<ul style="list-style-type: none"> • Specific Zoning Bylaw standard Issue
<ul style="list-style-type: none"> • 2.1 Multiple Dwelling Unit Buildings Parking Rates 	<ul style="list-style-type: none"> • Leave Resident Parking requirement at a minimum of 1.0 per unit • Revise Visitor Parking requirement to a minimum of 0.2 spaces per unit 	<ul style="list-style-type: none"> • HIGH • Immediate adoption. • This was the subject of an amendment to Zoning Bylaw 1156-2010 (recommended by staff) to adopt the 0.2 spaces / unit for visitors.
<ul style="list-style-type: none"> • 2.2 Shared Parking 	<ul style="list-style-type: none"> • Applicable to section 200.5.10.1 (6) • Apply to entire City, not just Policy Areas PA1 through PA4 	<ul style="list-style-type: none"> • General City wide issue • Move towards adoption through amendments • Shared parking is not dependent on the geographic location of the mixed-use sites.
<ul style="list-style-type: none"> • 2.3 Parking Space Reduction for Bicycle Parking Spaces 	<ul style="list-style-type: none"> • Applicable to section 200.5.10.1 (6) • Apply to PA1, as well as PA2, PA3, and PA4 	<ul style="list-style-type: none"> • General "Policy Area" issue • Move towards adoption through amendments • The travel characteristics of land uses within Policy Areas 2, 3, and 4, are typically consistent with PA1 and warrant application of the bicycle reduction opportunity.
<ul style="list-style-type: none"> • 2.3 Parking Space for Residential Visitor Requirements in PA1, PA2, PA3, PA4 Policy Areas 	<ul style="list-style-type: none"> • Applicable to Section 200.5.10.1 Parking Rates • Maintain at 0.06 space per unit 	<ul style="list-style-type: none"> • General "Policy Area" issue • Move towards adoption through amendments

Issues	Recommendation	Application / Priority
<p>3.0 Loading Space Reg's</p>	<ul style="list-style-type: none"> • Section 220.5.1.10 (7) – should be eliminated 	<ul style="list-style-type: none"> • PA 1 Policy Area Issue • Move towards adoption through amendments • Loading space dimensions specified per loading space type are sufficient to guide implementation.
<ul style="list-style-type: none"> • 3.1 Loading space dimensions / clearances 	<ul style="list-style-type: none"> • Section 220.5.1.10 (8) (B) – Type B loading space minimum vertical clearance should be 4.3 metres • Section 220.5.20 (1) (B) (ii) – minimum vertical clearance for access to a Type B Loading space should be 4.3 metres • Section 220.5.20 (3) (A) – vehicle access to a building with a loading space should be increased to 6.0 metres to be consistent with Section 220.5.20 (1) (A) 	<ul style="list-style-type: none"> • General City wide issue • Move towards adoption through amendments • This better reflects practical single unit vehicle height requirements. • General City wide issue • Move towards adoption through amendments • Consistency in access conditions.
<ul style="list-style-type: none"> • 3.2 Loading space requirements 	<ul style="list-style-type: none"> • Section 220.5.10.1 (8) – Our understanding is that a "loading space", as referred to in this section, means either a Type A, Type B, or a Type C loading space for the purposes of satisfying the requisite number of loading spaces outlined in this section. 	<ul style="list-style-type: none"> • General City wide issue • Move towards adoption through amendments • More clarity is required in the language to convey this understanding.
<ul style="list-style-type: none"> • 3.3 Shared Loading Calculation 	<ul style="list-style-type: none"> • Applicable to Section 220.5.10.1 (9) • Apply Shared Loading to entire City • Sharing should be extended to include Type A loading spaces required for mixed use sites, similar to Type B and Type C loading spaces, described in Clauses (1) and (2), respectively. 	<ul style="list-style-type: none"> • General City wide issue • Move towards adoption through amendments • Concept of shared loading is not dependent on the geographic location of the mixed-use sites.

Issues	Recommendation	Application / Priority
<p>4.0 Bicycle Parking Reg's</p> <ul style="list-style-type: none"> 4.1 Shared Bicycle Parking 	<ul style="list-style-type: none"> Applicable to section 230.5.10.1 (2) Apply concept of Shared Parking to Bicycle parking demand; Adopt similar Parking Occupancy Rate factors for calculating the shared parking requirements; 	<ul style="list-style-type: none"> General City wide issue Move towards adoption through amendments Bicycle parking supply requirements should reflect temporal demand.
<ul style="list-style-type: none"> 4.2 Definition of 'Gross Floor Area' for the purposes of calculating Bicycle Parking 	<ul style="list-style-type: none"> Applicable to section 230.5.10 Adopt GFA as the basis for parking calculation with similar "GFA exclusion" used in vehicle parking and loading calculations Achieve consistency across all parking /loading performance standard calculations. To achieve consistent with Toronto Green Standards (TGS's) 	<ul style="list-style-type: none"> General City wide issue HIGH - Immediate adoption
<ul style="list-style-type: none"> 4.3 Bicycle Parking location 	<ul style="list-style-type: none"> Applicable to Sections 230.5.1.10 (9), 230.10.1.20 (2), 230.20.1.20 (2), 230.30.1.20 (2), 230.40.1.20 (2), 230.50.1.20 (2), 230.80.1.20 (2); Bicycle parking should be permitted in areas of the Site and on floors of the building other than at-grade, the ground floor, and the first floor below grade where parking occurs without restrictions. 	<ul style="list-style-type: none"> General City wide issue Move towards adoption through amendments Impacts virtually all Downtown developments Focus should be on appropriate means of conveying bicycle from building levels other than "grade" to ground level.
<ul style="list-style-type: none"> 4.4 Bicycle Parking Demand 	<ul style="list-style-type: none"> Zoning Bylaw and TGS bicycle parking demand rates should be consistent. 	<ul style="list-style-type: none"> General City wide issue Move towards adoption through amendments

	<ul style="list-style-type: none">• A practical limit, or threshold, on the minimum bicycle parking supply requirement should be developed relative to large commercial (office) uses.• Bicycle parking rates for PA1 should be extended to PA2, PA3, and PA4 areas.	<ul style="list-style-type: none">• The practical distribution of bicycle parking within large commercial (office) uses becomes constrained. A review of the bicycle parking requirement for commercial office land uses should be undertaken.• The travel characteristics of land uses within Policy Areas 2, 3, and 4, are typically consistent with PA1 and warrant application of the bicycle reduction opportunity.
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