



October 28, 2015

Mayor John Tory and Members of Council
 Att. Ms. Marilyn Toft, Council Secretariat Support
 Email: clerk@toronto.ca

Re – City Council meeting November 3, 2015 - PG7.1 Mid-Rise Building Performance Standards

FoNTRA has two major issues with this item.

The guidelines are being used in areas without needed comprehensive area planning policies in place.

The mid-rise guidelines were introduced for Avenues, areas specifically designated for intensification, as additional tools to an existing package of tools - area studies, Secondary Plans, infrastructure and heritage studies etc. - thus providing for a comprehensive review of development projects. However, the use of the guidelines has been expanded to site by site applications in other areas - mixed use areas, employment lands, institutional areas and apartment neighbourhoods - areas where there is no such package of tools to comprehensively review applications. Compliance just with urban design guidelines is not enough. For example, the report's appendix shows how the guidelines have been met or not met for a number of sites but no context is shown. The project may fit the guidelines but not be acceptable in the area in which the site is located. This is not how we should be planning and developing our City.

Extensive public consultation is needed on the guidelines and their use in the broader context of how we plan our City.

The issues raised regarding the guidelines and their use are complex and warrant the public having adequate time to review the matter and to have the opportunity for consultations with City planning staff. We asked for deferral for at the October 8 Planning & Growth Management Committee meeting but were only given a month, which is not enough to have productive discussions needed between City Staff and residents.

Further, FoNTRA agrees with CORRA that there are a number of technical issues with the current guidelines and recommended changes.

FoNTRA agrees with the recommendations made in the submission by CORRA:

1. City Council direct staff from the Strategic Initiatives, Policy & Analysis (SIPA) section of City Planning to report back to Planning and Growth Management Committee at its March 2016 (or any reasonable agreed upon date) with a supplementary report to address the substantive issues raised by CORRA and others and to allow standing committee to receive and consider representations, written and oral submissions, on the proposed and/ or revised recommendations.
2. Alternatively, should Council decide not to refer the item back:
 - i) That the applicability of the mid-rise building performance standards be amended to:

- a) Ensure the standards are applied to and limited to the *Avenues* as originally intended.
- b) Require the standards not be applied on a site by site basis unless the site is evaluated in the context of the area with equivalent area studies as provided in the Official Plan.
- c) Remove recommendations that the mid-rise guidelines override zoning, area zoning, area plans and secondary plans.
- d) Remove recommendations allowing for density ranges and not permit such guidelines to override applicable zoning without following the legislated requirements.

And ii) That the guidelines be amended to:

- a) Amend Amenity Space provisions to remove the requirements of private balconies for all units especially in Character Areas and certain downtown neighbourhoods.
- (b) Amend M-RPS concerning Height such that overall height of midrise buildings include mechanical penthouses.
- © Amend M-RPS concerning Height such that overall height of buildings in Character Areas be reduced to 0.8 : 1 of the road right of way, or perhaps lower as determined by the existing context.
- (d) Amend M-RPS concerning retail uses at grade to permit additional uses based on the local context.

Sincerely,

Cathie Macdonald
Co-Chair FoNTRA

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Toronto Ontario ██████████
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Geoff Kettel
Co-Chair FoNTRA and F.U.N. representative

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Toronto Ontario ██████████
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Copies:

Ms. Jennifer Keesmaat, Chief Planner & Executive Director, City of Toronto
FoNTRA Members and Others

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of 32 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The 32 residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.