



22 St. Clair Avenue East, Suite 1010
Toronto, ON Canada M4T 2S3
T 416 324 5409
F 416 924 6353
www.diamondcorp.ca

November 13, 2015

Via Email

pgmc@toronto.ca

Chair Shiner and Members of the Planning and Growth Management Committee
City of Toronto
City Hall
100 Queen Street West
Toronto, Ontario

Dear Mr. Chairman and Members of Committee:

***RE: Draft Townhouse and Low-Rise Apartment Guidelines
Planning and Growth Management Committee Item PG8.12***

We appreciate the opportunity to provide commentary on the City's Draft Townhouse and Low-Rise Apartment Guidelines. Diamond Corp. shares with the City a commitment to excellence in design, to making positive contributions to the public realm and to ensuring that our development projects fit with the surrounding context. However, we believe the Guidelines as currently drafted are overreaching and, if implemented, will have a negative impact on the industry's ability to provide affordable market housing.

By way of background, low-rise housing forms, including townhouses and stacked townhouses, provide our city with an important source of relatively affordable ground-related housing. These housing forms create opportunities for families to find entry-level ownership opportunities in Toronto's many great neighbourhoods. As a compact built form, townhouse and stacked townhouse typologies can assist in achieving Growth Plan objectives for 'Smart Growth' and transit-supportive densities. The City's Official Plan recognizes that these are valuable contributions to the housing supply for Torontonians and accordingly are a recognized housing form within the Neighbourhood (and other) designations of the Official Plan.

As demand for low-rise housing in the city continues to grow, and as housing affordability and available residential land continues to diminish, it is vital that the Townhouse and Low-Rise Apartment Guidelines be drafted with a view to facilitating the delivery of these housing options in a practical manner.

However, upon review of the two initial drafts of the Guidelines and more recently, the receipt of the latest Guidelines on November 6th, 2015, Diamond Corp. shares the concerns expressed by the Building and Land Development Association (BILD) with respect to the challenges the Guidelines would present to the delivery of these housing forms.

We strongly encourage the City to revise its approach in the Guidelines to include a more balanced policy perspective. In this respect, we are particularly concerned that the current draft omits any reference to the City's Housing policies found in the Toronto Official Plan, including affordable market low-rise ownership housing for families. In addition, *Growth Plan* policies that encourage compact built form and transit-supportive densities appear to be omitted from the Guidelines' overall guiding principles.

Furthermore, we believe the Guidelines' current approach will serve to stifle innovative design and the land development industry's ability to deliver quality, liveable entry-level units for families with aspirations to live in Toronto's low-rise neighbourhoods.

Prior the Guidelines' return to committee on May 11th, 2016, we look forward to continued opportunities for meaningful consultation between the City and the land development industry in achieving a set of Guidelines that facilitates the successful and appropriate delivery of low-rise grade related housing typologies.

If you have any questions or comments, please do not hesitate to contact the undersigned.

Sincerely,



Stephen Diamond
President and CEO
Diamond Corp.