

KILMER BROWNFIELD MANAGEMENT LIMITED  
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November 12, 2015

Chair Shiner and Members of the Planning and  
Growth Management Committee  
City of Toronto  
100 Queen Street West  
Toronto, Ontario M5H 2N2

Dear Chair Shiner and Members of the Planning and Growth Management Committee:

**Re: Item 2015.PG8.12, Draft Townhouse and Low-Rise Apartment Guidelines**

This correspondence has been prepared for the purpose of raising our concerns related to the proposed Townhouse and Low-Rise Apartment Guidelines (the 'Guidelines', dated October 2015). We ask that our comments be added to the agenda for the November 16, 2015 Planning and Growth Management Committee Meeting (Item 2015.PG8.12).

Kilmer Brownfield Management Limited (Kilmer) specializes in the redevelopment of environmentally-impacted properties (brownfields) in Canada, allowing underutilized sites to reintegrate into the surrounding community. Aligning with the goals of the Official Plan and other key Council priorities, brownfield redevelopment provides an opportunity to achieve sustainable, transit-oriented development and intensification in existing urban neighborhoods while improving environmental site conditions. Stacked/back-to-back townhomes provide a built-form option that allows for increased density in infill areas while responding to brownfield site conditions that typically prohibit low-rise built-form. In addition, this type of built-form ensures appropriate integration with the existing urban fabric, including stable neighbourhoods, and provides an affordable housing type for families that would like to live in the City.

Overall, the Guidelines are too prescriptive and do not allow for flexibility to permit architectural and planning creativity to address site-specific characteristics that challenge the feasibility of brownfield redevelopment. Many of the specific guidelines act to discourage appropriate low-rise, family-supportive, infill development. As such, we believe the Guidelines, as presented, will hinder the successful implementation of low-rise brownfield redevelopment projects in Toronto. We ask that the City depart from this prescriptive approach and adopt more of a "guidance" approach for townhouse and low-rise apartment development.

We would like to express our support for BILD's comments submitted to this Committee and the industry's position regarding the Guidelines. We respectfully request that further consultation occurs with stakeholders, including BILD, to further refine the Guidelines prior to any additional reports being brought forward to Planning and Growth Management Committee regarding this matter.

Yours truly,



Melissa Walker MCIP, RPP  
Project Manager  
Kilmer Brownfield Management Limited

Cc: Danielle Chin, Senior Manager, Policy & Government Relations (BILD)