



November 13, 2015

Planning and Growth Management Committee  
 City of Toronto  
 Toronto City Hall  
 100 Queen Street West  
 Toronto ON M5H 2N2

Attention: Nancy Martins  
 Administrator, Planning and Growth Management  
 Committee, 10<sup>th</sup> Floor

Dear Mr. Chairman and Members of Committee

Re: **Townhouse and Low-Rise Apartment Guidelines**  
**Planning and Growth Management Committee, Item PG 8.12**

The following is provided on behalf of Minto Communities Inc. and its subsidiaries as comment on the October 2015 Draft of the Townhouse and Low-Rise Apartment Guidelines (the "Guidelines") to be addressed by Planning Growth Management Committee under Item PG 8.12.

Minto Communities has and continues to be a stakeholder in numerous development opportunities throughout the City of Toronto and surrounding municipalities that include housing typologies addressed under the subject Guidelines, including the Southshore development at 120 Twenty Fourth Street provided as case study in Section 6.0 of the document. The townhouse form exemplified in Southshore provides a grade related affordable housing option that caters to the needs of families that otherwise would not be able to participate in the market, achieves transit supportive densities and is appropriate within the context of established neighborhoods.

We are concerned that as drafted the Guidelines impose performance standards that may preclude future developments incorporating various stacked townhouse forms that otherwise have been well executed. Further, the prescriptive nature of the language does not adequately allow for the flexibility necessary to address unique requirements of the housing form and site constraints.

Given the intent of the Guidelines to produce building designs and development that reflect the broader land use planning goals of the Official Plan, the document should be considered with regard for broader goals including affordability and the provision of transit supportive densities.

We ask that Committee consider the comments included herein and those presented by the Building Industry and Land Development Association ("BILD"), and respectfully request that Staff be directed to conduct further consultation with BILD representatives and industry stakeholders prior to a further report on the Guidelines being brought forward to Planning and Growth Management Committee.

Sincerely,

James B. Bujak, P. Eng, M. Fin  
 Director, Land Development

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