



13 November 2015

VIA EMAIL: pgmc@toronto.ca

**Planning and Growth Management Committee
Toronto City Hall**

100 Queen Street West, 10th Floor West
Toronto, ON M5H 2N2

Attention: **Ms. Nancy Martins**
Administrator

Dear Ms. Martins,

RE: **Draft Townhouse and Low-Rise Apartment Guidelines**
City of Toronto
PG Item 8.12
Our File No. 15.594

Walker Nott Dragicevic Associates Limited has been retained by Mattamy Homes to provide planning consulting services, specifically pertaining to the City of Toronto's Draft Townhouse and Low-Rise Apartment Guidelines ('Guidelines'). We have reviewed that *Guidelines* and understand that the purpose of the *Guidelines* is to provide regulation for the site context, organization, massing and detailed design for a range of building types including standard townhouses, stacked townhouse, back-to-back townhouses, and low-rise apartments. It is also our understanding that the City's objective is to replace the '*Infill Townhouse Guidelines*' (dated 2003) with the proposed *Guidelines*.

The Guidelines are intended to be read together with the City of Toronto Official Plan, the Toronto Green Standard, the Toronto Development Guide, and applicable Zoning By-Laws, Secondary Plans and Heritage Conservation District Plans, as well as all other applicable City policies. If there are any conflicts, the more restrictive of these measures is to prevail. As presented, the Guidelines, which often refer to "*minimum*" and "*maximum*", would prevail over the City's zoning by-law(s), which are the legal regulator of land use standards.

The proposed Guidelines are likely to be applied to all townhouse development proposals throughout the City, much like the City's '*Tall Building Design Guidelines*' and '*Avenues and Mid-Rise Buildings Study*'.

If applied, as presented for endorsement, many residential developments would not be considered consistent with the proposed *Guidelines* including those that have been recently approved by the City and/or the Ontario Municipal Board, including Heron Park (280 Manse Road), Summerside (725 Warden Avenue) and Chesterton Shores (6550 Lawrence Ave), as well as the rear lane townhouse developments

located at Edition Richmond (842-856 Richmond Street West) and Richmond Town Manors (853 Richmond Street West), among others. Both of the Richmond Street developments provided for a 0.0m front yard setback (whereas the *Guidelines* require a minimum front yard setback of 3.0 m where parking and/or garages are at the rear or underground). In 2013, Edition Richmond was awarded 'Project of the Year – Low-Rise' by BILD, and in 2011, Richmond Town Manors was awarded an Urban Design 'Honourable Mention: Private Buildings In Context - Low-Scale' by the City of Toronto.

We have provided commentary below of some of the specific guidelines to illustrate the concerns:

Section	Guideline	Comment
2.1(a) Pg. 24	<i>Extend and connect to the local street network with multiple access points to avoid dead-end routes</i>	Given the configuration and size available of potential infill sites, dead end streets and mews may be unavoidable. It may be more appropriate for the guideline to read as follows: " <u>Where possible</u> , extend and connect to the local street network with multiple access points to avoid dead-end routes."
2.1 Pg. 25	<i>Where front integral garage parking is provided, the minimum front yard setback is 4.5m from the property line (with the garage portion of the building setback 6.0m);</i>	The proposed minimum setback of 4.5m may limit the residential development potential of small infill sites. For Summerside (approved in 2006), the setback to the garage door was at 3.0m, a condition accepted and supported by City staff.
2.2(c) Pg. 28	<i>Preserve and protect existing healthy trees and green space.</i>	The preservation of <u>all</u> healthy trees may be unavoidable due to the location of the trees within a site. The City should also consider the quality of the trees, not only the health of the trees.
2.3(o) Pg. 30	<i>Also on these deeper sites, where back to back units result in one side of the building facing an area that cannot be seen from a street, locate all entrances facing the street or use a through unit type instead.</i>	Depending on the nature of the existing and/or proposed development, back-to-back townhouses visible from public uses (open space, parks, walkways, etc.) should also be permitted. All units do not need to face a public street to be visible. The current Toronto 'Infill Townhouse Guidelines' encourages the design of "townhouses to face parks / open spaces on adjacent sites where new streets adjacent to the park are not possible."
2.5.1(a) Pg. 35	<i>Eliminate front driveways and garages in street-related townhouses generally and consider only when a unit is 6.0m or wider.</i>	The frontage of a residential dwelling has a major impact on the affordability of the dwelling. A review of the floor plans between the narrower Summerside and Heron Park dwellings would show that the livability of the unit would not improve with an increased frontage dimension.

Section	Guideline	Comment
2.5.1(b) Pg. 35	<i>Locate the garage door face a minimum of 6.0m from the inside edge of the sidewalk on a vehicular mews and from the property line on a public street</i>	The distance between the garage door and sidewalk should be consistent with the City's parking space dimension, which is 5.6m in length. The distance between the face of the garage door and the sidewalk for Heron Park was 5.6m.
2.5.1(c) Pg. 35	<i>Provide a minimum of 6.0m between individual driveways to accommodate on-street parking.</i>	Providing a 6m separation distance will be difficult for proposals with lots less than 6m in width. This will not address situations where less than 6m wide units are appropriate. Depending on the layout of each development, sufficient on street parking may be available in other locations (for example on single loaded roads or in front of other dwellings).
2.5.1(d) Pg. 35	<i>Ensure that 50% of the lot frontage along the street comprises landscaping.</i>	Based on the size of a potential infill site and proposed residential building types, it may be difficult to provide for 50% open space. For example, Heron Park provides a minimum of 37% of the front yard for landscaping. The landscape requirements should be dependent on the width of the lot, and consistent with City of Toronto Zoning By-law 569-2013 which states that for " <i>lots with a lot frontage less than 6.0 metres, or a townhouse dwelling unit less than 6.0 metres wide, the front yard, excluding a permitted driveway, must be landscaping.</i> "
3.2(c) Pg. 40	<i>Provide a minimum 7.5 metre rear yard setback from the property line.</i>	A proposed minimum rear yard setback of 7.5m is counterproductive to intensification.
3.2 Table Pg. 40	<i>A minimum separation distance of 11.0m to 15.0m (depending on main wall height) within a 45 degree angular plan is required.</i>	From a design perspective, rather than providing a specific separation distance of 15m, it may be more appropriate for the facing distance between blocks to be determined by a 45 degree angular plane measured at the main wall.
3.3(c) Pg. 43	<i>To avoid a long barrier-like flight of stairs up to the porch or stoop, raise the front entrance to the first floor no more than approximately 3 to 5 steps above the grade of the sidewalk directly at the front of the entrance.</i>	The grading conditions of a site may create the need for a higher number of risers/steps. For Heron Park, although the majority of the back-to-back townhouses had 5 risers, a few units required a maximum of 9 risers. It would be more appropriate to identify that the majority of the risers be no higher than 1.2m above grade (3-5 risers).
3.4 Porch (a) Pg. 44	<i>Design porches to be a maximum height above grade of 0.9m</i>	The grading conditions of a site may result in the amenity area being provided at a higher elevation. For example, for Heron Park to respond to the grading conditions of the site, the front porch/ground floor of a few of the back to back condominium townhouses were at 1.5m above the finished grade.
3.5 Above-Grade	<i>Raise terrace a minimum of 0.6m and a maximum of 0.9m above grade.</i>	The grading conditions of a site may create a front porch at a higher elevation. To respond to the grading conditions of

Section	Guideline	Comment
<i>Terrace (b)</i> <i>Pg. 47</i>		Heron Park, the front porch/ground floor of a few of the back to back condominium townhouses were designed at 1.5m above the finished grade.
Streetscape Illustrations	Illustrates a minimum 6.0m wide street boulevard and a minimum 2.1m public sidewalk	The guidelines should be consistent with City's current policies, including the Development Infrastructure Policy & Standards (DIPS) (the width of the sidewalk for DIPS is 2.0m).

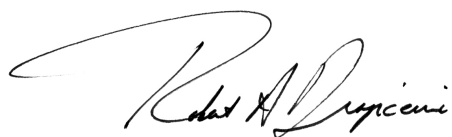
In our view, the guidelines need to be reassessed in the context of the more contemporary approvals in place since the *'Infill Townhouse Guidelines'* were adopted. The resultant is built form and intensification of properties, for residential uses in particular, that are affordable and market responsive grade-related housing suitable for households with children.

We understand that City staff are recommending the continuation of public consultation with stakeholders, resident associates or other identified parties, however, in our opinion, it would be premature for the City to endorse the Guidelines, as presented by City staff, given the concerns raised by the interested parties including the Building Industry and Land Development Association (BILD).

Should there be any questions or additional information required, please do not hesitate to contact the undersigned.

Yours very truly,

WND associates
planning + urban design



Robert A. Dragicevic, MCIP, RPP
Senior Principal

cc. Tim Warner, Mattamy Homes
Mike LaPlante, Mattamy Homes
