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November 15, 2015

Mr. Chairman & Members
Planning & Growth Management Committee
City of Toronto, City Hall
Toronto ON
M5H 2N2

Subject: Townhouse & Low-Rise Apartment Guideline Project

PG8.12

Recommendations:

1. The Chief Planner and Executive Director, City Planning be requested to report on the comments and suggestions of BILD members that were not incorporated in the Guidelines; and
2. The City's Design Review Panel [DRP] be invited to present its comments to your Committee during consideration of the next report.

Objective of the Guidelines

The main objective of the guidelines is to achieve superior urban design that fits into the overall planning regime of the City's Official Plan and related documents.

BILD's letter of November 13th details how Guidelines have skewed the objective by the rigorous approach. These requirements will stifle design diversity and impair affordability of low rise housing suitable for families.

In addition, the guidelines fail to recognise the design impediments arising from the 2005 Development Infrastructure Policy & Standards [DIPS], which were initially introduced as a "guideline".

During consultations with City staff, BILD members have been pointed out examples of recently completed low-rise developments, recognised for their superior design, that contravene the draft Guidelines. Building industry participants will review these examples with staff during the next phase of consultations.

Illustrative Key Issues

The following are a few examples of Guidelines that impinge on design flexibility and quality:

2.3 Building Placement

Draft Guideline propose that buildings have breaks every 6 to 8 units.

*This requirement is inappropriate for an urban setting like Toronto as units have smaller frontages e.g. 4.5 m. Our **Bloor West Lofts** and **Corktown Brownstones** projects have longer facades with multiple units that blend nicely with the street scape. Similarly, notable UK and European cities have facades with breaks at intervals much greater than 8 units.*

3.2 Separation Distances

Draft Guideline propose a 15 m separation between buildings. The angular plane is measured 4.5 m away from building face.

This requirement exceeds current zoning by-law requirements of 11 to 12 m separation. The guideline cites stair and other encroachments as rationale for this approach. It would more effective to rely upon promoting good practice regarding encroachments, some of which are included in the Guidelines.

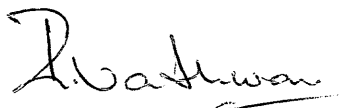
Conclusion

The cumulative effect of the current Guidelines will be a deterrence to design diversity and impair affordability of grade related family housing.

We request that development of the guidelines be reviewed by the Design Review Panel and continued by City staff in consultation with BILD and the OAA.

Sincerely,

PER: NAMARA DEVELOPMENT LTD



Rashmi Nathwani, P. Eng., O.A.A. (Hon)
President