



November 13, 2015

Ms. Nancy Martins  
 Planning and Growth Management Committee  
 10th floor, West Tower, City Hall  
 100 Queen Street West  
 Toronto Ontario M5H 2N2

### **PG8.12 Townhouse and Low-Rise Apartment Guidelines Project**

Dear Chair Shiner and Members of the Committee:

FoNTRA provides the following comments on the Draft Guidelines dated October 2015. In the Staff Report before the Committee, it is noted that FoNTRA's letter of August 5, 2015 endorsed the Draft Guidelines in principle as an important educational tool with the potential of informing all stakeholders, including developers, resident groups, politicians, and appeal bodies. The October 15 version provides an improved coordinated and comprehensive presentation of the information that will be helpful for residents and applicants, architects and designers and developers in the actual design and review of relevant projects.

However in reviewing the latest draft document, FoNTRA remains concerned that the Guidelines insufficiently refer both to the relevant Official Plan policies, and to the applicable zoning regulations throughout the document. Under Ontario's statutory planning framework, design guidelines have no status beyond assisting in the interpretation of the relevant policy and regulatory provisions. Therefore, more explicit clarity is required.

When the Harmonized Zoning By-law was developed, the City repeatedly acknowledged that there was a need to refine it - in a second phase - with area-specific Zoning By-law amendments. In FoNTRA's view, Design Guidelines, although valuable implementation tools, are no substitute for Secondary Plans with implementing zoning regulations that reflect particular neighbourhood characteristics.

Sincerely,

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Mayor John Tory and Toronto City Council  
 Ms. Jennifer Keesmaat, Chief Planner & Executive Director, City of Toronto

**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of 32 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The 32 residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.