Dear Chair David Shiner and members of the Planning and Growth Management Committee,

RE: PG8.9 Mid-Rise Building Performance Standards Monitoring

The Building Industry and Land Development Association is in receipt of the Committee agenda for its January 20th meeting and submits the following comments with respect to item PG8.9 Mid-Rise Building and Performance Standards Monitoring. We understand that Council referred this item back to this Committee for further consideration and we would like to reiterate our sentiments that were first expressed to Council in our November 2nd letter.

It is imperative to note that during the preparation and review process for the Mid-rise Building Performance Standards, BILD Toronto Chapter members and City staff worked collaboratively, and while we did not agree on all aspects of the standards, we reached resolutions that were workable to both parties.

Therefore, we are generally supportive of the overall intent of the report to monitor the effectiveness of the performance standards for mid-rise buildings, but we are concerned with the motion that amended the original committee recommendations. Namely; to include a “0.8:1 ratio (or 16 metre height limit) in Character Areas as defined in the Avenues and Character Area Map, as revised, which have 20m right-of-ways, as shown on Map (3) of the Official Plan.”

Adding additional restrictions for the development of mid-rise buildings, such as this, will only serve to diminish the viability of delivering mid-rise built form. This motion arbitrarily reduces the potential height of all development sites by 4 metres within the designated Character Areas. While this may appear like a minor modification, BILD Toronto Chapter members assert that the goal of every site is to attain maximum efficiency in an effort to achieve the most affordable housing type, which is also a key prior of the City of Toronto.

BILD Toronto Chapter members are also concerned with this motion that amended the original recommendations to Council for the following reasons:

- This change was not informed by the necessary and expert advice of City Planning, through a planning report, rationale or justification. New recommendations to Character Areas should be a result of detailed study prior to Council’s consideration.
- No consultation with the development community has occurred for this technical change.
- This change is counter-intuitive to the intensification goals and objectives of the City’s Official Plan and the Provincial Growth Plan. Finally, it does not serve to encourage transit supportive development to meet the goals and objectives of SmartTrack and other related major capital projects.

Recommendation:

BILD Toronto Chapter recommends that the 0.8: 1 ratio be removed for the reasons listed above, thereby maintaining the performance standard ratio of 1:1.
Again, we thank you for the opportunity to submit comments. We trust that you will take these comments into consideration. If you have any questions or concerns, please feel free to contact the undersigned.

Sincerely,

Danielle Chin  MCIP RPP  
Senior Manager, Policy & Government Relations

CC: Harold Madi, Director, Urban Design, City Planning Division, City of Toronto  
Allison Reid, Urban Designer, City Planning Division, City of Toronto  
BILD Chapter members