



BUILDING A GREATER GTA
Building Industry and Land
Development Association



September 6, 2016

Chair Mike Layton & Members of the Toronto and East York Community Council
City of Toronto
100 Queen Street West
Toronto, Ontario
M5H 2N2

Dear Chair Layton and Members of the Toronto East York Community Council,

**RE: TE 18.7 TOcore: Updating Tall Building Setbacks in the Downtown – City-initiated
Official Plan Amendment and Zoning By-law Amendments – Supplementary Report**

On behalf of the members of the BILD Toronto Chapter, NAIOP and the industry's TOcore working group participants, we would like to take this opportunity to thank you and the members of Community Council for allowing additional consultation time by deferring this item from the June 14th Toronto and East York Community Council meeting, to its meeting on September 7th. Meetings did occur with various development industry representatives and the public, as detailed in the supplementary staff report. We would also like to thank City staff for being active and attentive during this deferral period.

While we appreciate the additional consultation time granted by this committee and the efforts of staff to continue to consult, we remain concerned by this proposal and are disappointed with the results of the process. Our members still feel that the fundamentals of this initiative are flawed given that by the City's own admittance, two-thirds of all recent approvals would not comply with these regulations.

From our industry's perspective, we acknowledge that staff have made a few revisions to improve the clarity surrounding potential zoning by-law amendments and the treatment of prevailing by-laws. However, complete applications are not exempted from this new proposal and the policy is still widely applied without consideration of the block context. During our July 22nd working group meeting, our members also raised the issue that while these setbacks may be used in the current Tall Building Guidelines, and have been for some time, our members understand that the mechanism of implementing these setbacks through a zoning by-law has not been studied in this context, and remains the case today.

Therefore, would like to take this opportunity to reiterate 3 key recommendations, as expressed in our August 15th letter to staff:

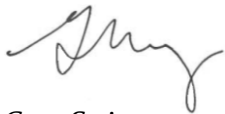
1. We request that the City provide the planning analysis undertaken by staff that helped to inform the decision of transforming these requirements from guidelines to zoning by-law regulations.
2. Our members recommend that the tall building requirements be applied at a more refined planning scale than what is being proposed. Specifically, BILD and NAIOP members

recommend that the proposed policies be evaluated during the block planning phase. This approach will allow for the site-specific context to be taken into consideration in a more meaningful way than applying these policies across the entire Downtown area. It will introduce the flexibility needed to enhance site performance and creativity in order to help achieve additional City objectives.

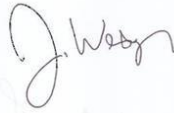
3. While BILD and NAIOP appreciate the City's efforts to provide transition, it does not go nearly far enough. We believe that complete applications should be exempt from this new proposal in order to avoid delays in the approvals process.

Thank you for the opportunity to submit these comments. If you have any questions or concerns, please do not hesitate to contact the undersigned.

Sincerely,



Gary Switzer
BILD Toronto Chapter Chair



Jeremy Wedgbury
President, NAIOP Greater Toronto Chapter

Cc: *Gregg Lintern, Director of Community Planning, Toronto and East York District, City of Toronto*
Danielle Chin, BILD
BILD Toronto Chapter