OPTIONS FOR HOMES

It is possible.

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March 27, 2017

Via Email and Courier

Members of Toronto Council, Mayor John Tory
Toronto City Hall 2nd Floor
100 Queen Street West
Toronto, ON, M5H2N2

Dear Members of Council and Mayor Tory

RE: PG Item 18.5, Proposed Changes to the Accessible Parking Regulations

Options for Homes is one of Toronto's largest non-profit developers, and we are actively seeking approvals for and constructing over 750 units of affordable ownership housing in the City today, with approximately 350 more in our development pipeline. We are writing to express concern with the recommendations contained in the *Technical Amendments to By-law No. 569-2013* report (dated January 23rd 2017), that went to Planning and Growth Management committee on February 23rd. Specifically, we are concerned regarding Recommendation 1, which includes in Attachment 1, a proposal to enact a zoning by-law amendment to Section 200.15 – Regulations Applying to Accessible Parking Spaces. Our primary concerns are as follows:

1. **Proposed Accessible Parking Space Types and Dimensions**
   Similar to the concerns outlined in the letter dated February 23rd 2017 from BA Consulting Group to the Planning and Growth Management Committee (included as a communication item within PG 18.5), we have concerns regarding the change to all Type A spaces (from a current mix of Type A and narrower Type B spaces) and an increased parking stall length of 5.9m (from 5.6). We agree with BA's conclusions that there does not appear to be adequate rationale for these changes, which will result in severely inefficient underground structural designs. Such inefficiencies will impact the economics of all developments, which for our projects in particular restricts our ability to deliver units at affordable levels.

2. **Need for a Transition Clause**

   As stated in the statutory Notice of Public Meeting dated February 2nd 2017, these changes will affect the approval of 'building permits, zoning certificates or other applications for a minor variance, a consent to sever, an amendment to a zoning by-law, an Official Plan amendment or a Minister's zoning order and any appeals of these matters, as well as outstanding appeals of Zoning By-law 569-2013. All land owners and applicants should review the proposed amendments to the Zoning By-law 569-2013 carefully and consult with your professional advisors about the proposed changes and how they may impact your lands or development applications'.

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We object to the absence of a transition or grandfathering clause. Without this many development applications currently under consideration by the City, regardless of how advanced such applications and designs are, would be adversely affected. For Options for Homes, this would impact projects such as our 234 unit affordable ownership project at 10 Wilby Crescent, for which we submitted a rezoning application in 2016.

We would request that transition wording – similar to what was done for the parent By-law 569-2013, be drafted and included in the ZBLA in order to avoid adverse implications for these pipeline projects.

Options for Homes respectfully objects to the proposed amendment as it is currently drafted. We would request that Council direct staff to gather further pubic input and engineering information, and to report back to Planning and Growth Management Committee respecting the above issues.

Please provide us with notice of decisions by Council or any other Committee of Council related to this matter.

Sincerely,

Heather Tremain
CEO, Options for Homes GTA