

March 22, 2018

Mayor John Tory and members of Toronto City Council
Toronto City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

Dear Mayor Tory and members of Toronto City Council,

RE: Townhouse and Low-Rise Apartment Guidelines

With significant interest, the Toronto Chapter of the Building Industry and Land Development Association (BILD) has been closely monitoring and periodically meeting with City Staff in consultation for the proposed Townhouse and Low-Rise Apartment Guidelines.

Conceptually, our members believe that the Guidelines are the right approach to providing direction for townhomes and low-rise apartment buildings. However, there's been an on-going concern that a rigid and prescriptive application of the Guidelines would actually reduce the number of townhouse and low-rise development units/projects, because the more requirements placed on this development type – the less viable it would be, especially when compared to a mid or high-rise development on the same site. Ultimately, BILD wants to see this type of gentle density happen, to support the missing middle, and in an effort to deliver housing that is more affordable and that's why we have stayed so close to the review of these Guidelines.

Through a deferral at the November 2017 Planning and Growth Management Committee meeting, two additional and significant consultation meetings happened in December and January between BILD and City Staff. While the majority of BILD's suggested changes were not accepted by City Staff, there were a few areas that BILD and City Staff were able to come to consensus on, through revised language.

The Guidelines returned to Committee on February 22nd but unfortunately, two key revisions were changed at the meeting which deleted language that were resolutions to discussions with the industry, as follows:

- (a) In the introduction to the Townhouse and Low-Rise Guidelines on page 9 paragraph 1, delete the following words: "while balancing the need to accommodate housing in a growing city."*
- (b) On page 9 paragraph 3, delete the following words: "In some cases, not all guidelines can be met in full, however a development may be acceptable when it respects the Official Plan."*

BILD representatives and City Staff committed many hours over the past few months to collaboratively work together and reach consensus on staff's proposed changes. Despite these efforts, it was disheartening to see these changes made.

The purpose of the revised text, noted in points (a) and (b), was to strengthen the introductory section on "how to read these guidelines." These changes struck a balance between the interests of the existing community – with the expected growth to come, a principle clearly established within the City's Official Plan. The Guidelines, being one of the mechanisms staff will use to implement the policies of the Official

Plan, should therefore acknowledge and reinforce this principle. True conformity to the Official Plan can only be achieved if its key themes and objectives are threaded throughout all the City's various planning policy and guidance documents.

BILD recommends that in an effort to truly conform to the City's Official Plan and to positively encourage a 'missing-middle' housing type, we respectfully ask Council to approve the Guidelines that were proposed at the February 22nd Planning and Growth Management Committee meeting.

BILD Toronto Chapter members, your community-building partners, thank you in advance for taking our comments above with thoughtful consideration. If you have any questions or comments, please do not hesitate to contact the undersigned.

Sincerely,



Danielle Chin, RPP MCIP
Senior Manager, Policy & Government Relations

*CC: Gregg Lintern, Acting Chief Planner & Executive Director, City of Toronto
Lorna Day, Director, City of Toronto
Gary Switzer, BILD Toronto Chapter Chair
BILD Toronto Chapter members
Edward Birnbaum, Senior Advisor, Office of the Mayor, City of Toronto*