

Townhouse and Low-Rise Apartment Guidelines – Final Report

Attachment 2: Staff Response to Comments Received by Stakeholders – November 2017

	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
City Staff	Toronto Water, Engineering and Construction Services (ECS)	Page 11, Introduction: 4 th paragraph	Suggested alternative wording: "Applicants are also required to adhere to the City of Toronto Wet Weather Flow Management Guidelines, which outline wet weather flow management requirements on development properties." It should be revised to indicate that the WWFM guidelines provides direction on how to manage wet weather flow through source control, conveyance and end-of-pipe solutions, not on a watershed basis.	Not Addressed	Addressed	Revised on Page 10: "Applicants are also required to adhere to the City of Toronto Wet Weather Flow Management Guidelines on how to manage wet weather flow through source control, conveyance and end-of-pipe solutions."
	ECS	Page 15, 1.1 Context Analysis and Planning for Larger Sites	A Master Plan should also include municipal services.	Not Addressed	Addressed	Revised in Section 1.1: c. ii. from "area servicing" to "municipal servicing"
	Transportation Services	Page 15 – Related Standards, Guidelines & Studies	Suggest adding "Bikeway Network" and possibly DIPS to this list	Not Addressed	Addressed	"DIPS" and "Toronto Cycling Network Plan" have been added to the Related Standards, Guidelines & Studies section

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	ECS	Page 16, 1.2.1 Street and Block Patterns: e.	The criteria listed where private streets will be permitted do not comply with the current DIPS standard, i.e. if site is under 1 hectare in size.	Addressed		Included wording to refer to DIPS. Private Streets Section in 3.1 has been deleted.
City Staff	ECS	Page 16, 1.2.1 Street and Block Patterns	Private streets must comply with Solid Waste and Fire Services requirements.	Addressed		Included wording to refer to DIPS. Private Streets section in 3.1 has been deleted.
	ECS	Page 16, 1.2.1 Street and Block Patterns	Redevelopment proposals that consist of large scale townhouse units shall require public roads, not private roads. According to DIPS, up to 10 units can be serviced with a private road.	Addressed		Included wording to refer to DIPS. Private Streets Section in 3.1 has been deleted.
	Transportation Services	Page 15, 1.2.1 Street and Block Patterns: f.	Suggests incorporating traffic calming features, such as on-street parking, bulb-outs, textured materials and crosswalks. Transportation Services supports the principle behind this part of the public realm framework with the caveat that streets must be designed in a way that is easily maintainable.	Addressed		Included in Section 3.1 g. has been revised to "easy to maintain traffic calming features".

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	ECS	Page 28, 3.1. Streets, Mews and Walkways	What is the difference between private street and private vehicular mews? Both must conform to the DIPS standard for private roads and shall also provide for Solid Waste and Fire Services requirements.	Addressed		Reference to private vehicular mews has been deleted.
City Staff	Urban Design	Section 3.2 Street, Lanes, Mews and Walkways	Delete mention of private street and private vehicular mews	Not Addressed	Addressed	References to private street and private vehicular mews have been deleted.
	Transportation Services	Page 29, 3.1. Streets, Mews and Walkways	The cross-section for the public street that is illustrated on this page refers to DIPS. The sidewalk location could vary in the cross-section depending on the DIPS standard that is applied. I.e. It could be monolithic or away from the curb.		Addressed	Included note on diagram to refer to DIPS for details on page 29.
	Transportation Services	Response to Urban Design's email dated Jan 28/16	With respect to winter maintenance of sidewalks , City Council last confirmed the Levels of Service for Roadway and Roadside Winter Maintenance in October 2013. These maintenance standards were originally established in 2009. The criteria to receive service includes the following: <ul style="list-style-type: none"> • Street must be greater than 8.0m in width 		Information Only.	Information provided by Transportation Services regarding winter maintenance has been considered during the development of these Guidelines.

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			<ul style="list-style-type: none"> • Sidewalk must be greater than 1.5m in width • Sidewalk is not immediately adjacent to the street • Parking is not immediately adjacent to the sidewalk • No obstructions such as utility poles, planters, retaining walls immediately adjacent to or within the sidewalk that would create significant potential for damage or an operating safety concern for the equipment operator or public. • Consideration to be given to whether the mechanical clearing could be done in a contiguous area 			
City Staff	1. Sidewalks					
	Transportation Services	Page 29, 3.1. Streets, Mews and Walkways	<p>Sidewalk location away from curb, when crossed by garages at front of unit, leaves insufficient space for adequate soil volume for street trees .</p> <p>TGS requirement for 2.1m sidewalk, not always supported by Transportation staff (would provide sufficient dimension for snow plowing and snow storage next to curb)</p>		Information Only	TGS calls for sufficient soil volume for mature street tree growth. In situations where there are front integral garages and driveways present, locating the sidewalk curbside increases the access to soil for street trees through a soft landscaped front yard

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						setback.
City Staff	Transportation Services	Page 29, 3.1. Streets, Mews and Walkways	When sidewalk is located next to curb, there is a reluctance to plow. This is a reflection of the current DIPS standards in combination with the levels of service for winter maintenance.		Information Only	TGS calls for 2.1m sidewalks on all public streets. Discussion required to determine if a lesser standard could be provided on a short street serving few units.
	Transportation Services	Page 29, 3.1. Streets, Mews and Walkways	While City Planning staff is very supportive of this direction, need guidance for very small streets where 2.1m sidewalk would be excessive.		Information Only	DIPS will be looked at in the operationalizing of Complete Streets.
	2. Mid-Block Public Sidewalk Connections					
	Transportation Services	Page 31, 3.1. Streets, Mews and Walkways	<p>Transportation sometimes requires chain link fencing and curbing (unsightly, impractical)</p> <p>Low-rise Guidelines call for walkways with planting and lighting (some would be public, others not), need agreement on design and maintenance of public ones</p> <p>Standards for different walkway types</p>		Information Only	DIPS will look into the implementation and operational requirements of Complete Streets.

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			would be a good idea. At present, it appears inconsistent. DIPS review may include study of pedestrian-only walkways.			
City Staff	3. Curb and turning radii					
	ECS/ Transportation Services	Page 28, 3.1. Streets, Mews and Walkways: e.	This is a function of the available width at the end of a hammerhead. A more generous radius is required since the width of the 'hammer' portion is less than that of a public street where a truck can swing wide to make a turn.		No change	Not all on-site curb radii are for garbage and fire truck turning. Curb radii should be revisited for development sites just as they have been for City streets
	ECS/ Transportation Services	Page 28, 3.1. Streets, Mews and Walkways: e.	<p>Related to this, cul-de- sacs and hammer head dimensions and requirement to terminate small streets with a cul de sac in some Districts.</p> <p>The only standard that is available and that should be used is the cul de sac design in DIPS so that vehicles can enter and exit the terminus of a roadway in a forward motion.</p>		No change	DIPS also has a hammer head standard. Need to examine this approach on small sites.

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	ECS/ Transportation Services	Page 28, 3.1. Streets, Mews and Walkways	Curb radii consistency across Districts could be revisited if DIPS is reviewed.		No change	The Guidelines are silent on curb radii pending resolution through some other mechanism.
	4. Parking Lay-bys on Arterial Streets					
City Staff	ECS/ Transportation Services	Page 29, 3.1. Streets, Mews and Walkways	Any proposal for parking lay-bys should be reviewed on a case by case basis since there are many factors to consider.		No change	The Guidelines encourage lay-bys. Need to apply a City-wide approach that takes into consideration different conditions.
	ECS/ Transportation Services	Page 29, 3.1. Streets, Mews and Walkways			No change	16.5m ROW may not always be able to support street trees. Need to agree on under what conditions we would use this section and revise Address through DIPS.
	ECS/ Transportation Services	Page 29, 3.1. Streets, Mews and Walkways	Doesn't reflect newer standards (primarily TGS)		No change	Section 3.1 shows an example of a typical street section. Diagram note refers to DIPS for further information.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
	ECS/ Transportation Services	Page 30, 3.1. Streets, Mews and Walkways: Vehicular Mews Street	Need to update vehicular mews street		Addressed	Vehicular mews street section deleted.
	ECS/ Transportation Services	Page 31, 3.1. Streets, Mews and Walkways: Lane	Should address both public and private lanes			Guidelines do not specify whether the lane is public or private. Street section could be used for either.
City Staff	Fire Services	Page 29,31, 3.1 Streets, Mews, and Walkways: Street & Lane	Where a private roadway and/or laneway is designated for fire department access, a minimum width of 6.0 metres shall be provided. Consideration shall be given to snow removal, not snow clearing in the winter months, so as to maintain the minimum 6.0 m clear width	Addressed	No change	The minimum width of a fire access is required by the OBC and therefore not included in the Guidelines.
	Solid Waste	Page 29,31, 3.1 Streets, Mews, and Walkways: Street & Lane	No Curbside collection on private roads or laneways		Addressed	Private streets/lanes have been deleted.
	Solid Waste	Page 29,31, 3.1 Streets, Mews, and Walkways: Street & Lane	Public roads and laneways must be built to DIPS standards to allow collection	No change		The Guidelines refer to DIPS for the design of streets.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
	Fire Services	Page 34, 3.3 Building Placement and Address	Where buildings are setback so that the principal entrance of any unit is greater than 45 metres from a public or private roadway, additional access for firefighting shall be considered		No change	Should have future discussion about what would constitute “additional access”.
	Toronto Water	Page 34, 3.3 Building Placement and Address	Either in this section or elsewhere, there should be text related to not building right to the property line because there needs to be room for wet weather infiltration in accordance with MOECC/OBC requirements.		No change	Section 4.1 Facing Distances and Setbacks, e. and the diagram on page 40 speaks to minimum building setbacks
City Staff	Fire services	Page 46, 4.4.Private outdoor Amenity Space	Where access is required to windows or other openings above the first storey, the planting of trees and other vegetation shall not impede fire fighting operations. Consideration shall be given to the impact of the future growth of trees and vegetation. Siamese connections should also be visible and not impeded by landscaping.		No change	The Guidelines' primary goal is to increase landscape area as much as possible without impeding on fire-fighting operations. The landscape design will be reviewed on a case by case basis to determine if fire access and visibility to Siamese connections will not be effected landscaping.
	Fire Services	Page 52, 5.2.2 Shared Site Elements: b.	Wayfinding signs shall conform to Chapter 598 of the City of Toronto Municipal Code to ensure efficient navigation of services.		Addressed	Section 5.2.2 (b) Shared Site Elements calls for a clear way-finding system.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
City Staff	Solid Waste	Page 36, 3.4 Site Services, Access and Parking	3 m ² for homes that front onto public streets.		No change	Solid Waste Guidelines and zoning will ensure compliance of the garbage collection area requirement.
	ECS	Page 36, 3.4 Site Servicing, Access and Parking	Garbage collection areas must be located in a way that it is not too far for residents to bring their respective bins to the collection area for solid waste pick up.		Addressed	Section 3.4, d. provides a max. 100m distance to a garbage chute.
	ECS	General	The term site servicing used in the document is not referring to an engineering term.		No change	The term site servicing is commonly used in planning and urban design to describe the handling of site loading, garbage collection, vehicular movement, and utilities.
	ECS		How does the current servicing policy fit into these guidelines?			Typically, servicing policies contained in another City document are not listed in the Guidelines. Exceptions occur when the standard would influence the layout of the site or when it might not be known by the design professional.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
City Staff	ECS	Page 34, 3.3 Building Placement and Address & Page 42, 4.2 Facing Distances and Setbacks	Separation distance between buildings (especially stacks) must allow Fire Services the ability to have visual clearance to see if rescue/assistance is required in another building blocked by a building in front that cannot be seen. (e.g. 26 and 30 Fieldway)		Addressed	Section 3.3 b. "Maintain high visibility and direct access to front doors from the public sidewalk, especially when building entrances are not located on a public street."
	ECS		Very small lot frontage widths for townhouses need to be revisited as this creates problems for rain water leaders being discharged to grade and causing flooding problems on private and City right of way (i.e. sidewalk).		Partially Addressed	The guidelines specify a minimum unit width of 6m for townhouses with front integral garages. No number is provided for other types of townhouses, except for stacked and back to back townhouses with all entrances on one side (min. 5.5m in Section 2.1).
	Toronto Water	Page 48, 4.5. (a) and 5.1.3.c. (p. 52)	5.3. b. ("Avoid artificially raised or lowered grades and drainage swales, or low-lying areas where water collects") seems to be in conflict with part of 4.1.3.c ("create bio-retention areas, such as swales and vegetated areas").	Addressed		Section 4.5 (a) has been reworded to eliminate mention of drainage swales and low-lying areas. 5.1.3 c. has been revised to "Wet Weather Flow Management Guidelines".
	ECS	Page 47, 4.4 Private Outdoor Amenity Space	Below-grade terraces must be avoided as this can create a high risk for flooding of property.	No change		The Guidelines prohibit them on public streets but not in pedestrian mews.

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City Staff	Toronto Water	4.0 (p. 49)	"Storm Water" written as two words, whereas it's one word (correctly) everywhere else.	Addressed		Corrected.
	ECS	Page 50, Streetscape	Further consultation with Toronto Water is required with respect to the use of permeable pavers within the right of way.		No change	Toronto Water will review on a case-by-case basis.
	Toronto Water	4.1.3.a. (p. 52)	The Wet Weather Flow Management Guidelines (WWFMG) have requirements related to water balance, water quality, and water quantity (i.e., peak flow control). The wording in this section refers only to water balance.		Addressed	Section 5.1.3 (c) wording on water quality, water quantity added to the guideline.
	Toronto Water		The Ontario Building Code draws a distinction between "rainwater" and "storm sewage"; you may want to point readers to the Code.		Addressed	Section 5.1.3 (b) revised to "rainwater".
	Toronto Water		Consider adding: "Low impact development measures (e.g., bio-swales, bio-retention areas, infiltration trenches, porous/pervious pavements, etc.) should be considered along with traditional stormwater management practices (e.g., storage detention/retention) to meet stormwater management design criteria."	Addressed		5.1.1, 5.1.2 and 5.1.3 address these points.

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City Staff	Toronto Water		Consider adding: "Discharge of groundwater from building sump pumps (e.g., weeping tile, foundation drains, etc.) should be pumped to grade and safely discharged on property. The site should be designed to properly accommodate these discharges."		No change	Wet Weather Flow Management Guidelines cover the technical aspects of stormwater management. These Guidelines refer to these guidelines.
	Toronto Water		Consider adding: "In general, stormwater should be retained, managed and used on-site in order to help reduce the potential occurrence of basement flooding in the City. Any new storm connections to City storm sewers are prohibited as per the Sewers By-Law (Municipal Code Chapter 681), but may be eligible for an exemption subject to City requirements and review. See toronto.ca/water for more information."		Addressed	Section 5.1.3 (a) calls for rainwater and snowmelt to be managed on-site.
	ECS		For freehold townhouse units fronting public streets, minimize reliance on private catchbasins and private catchbasin leads in the rear or side yards that drain to municipal sewers for drainage purposes.		No change	This issue is best addressed in other City policy.
	Toronto Water	Page 51, 5.1.3 Stormwater Management	The sentence, "Later, part of [the water] is returned to the atmosphere in the form of evapotranspiration" is incorrect. Evapotranspiration occurs throughout the	Addressed		This sentence has been deleted.

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			water cycle, and can be an effective way to meet water balance requirements.			
City Staff	Solid Waste	Page 52, 5.2.2 Shared Site Elements	Chutes to be used for front end collection only (31 or more units) Centralized garbage room if between 9 and 30 units (Multi-Res Curbside). Centralized garbage room if 31 units or more (Front-end collection)		No change	This issue is best addressed through Solid Waste Guidelines.
	ECS	Page 74, 76, 78, 80, 82, 84 Development Scenarios	Include "Ensure the development adheres to all applicable potable water, storm and sanitary sewer servicing requirements in addition to and separate from any other municipal by-laws or legislative requirements, including but not limited to those under the Toronto Municipal Code Chapters 681 and 851 or the Ontario Building Code".		No change	This issue is best addressed through Engineering Standards and Guidelines.
	Solid Waste	Section 5.1.1	Solid waste prefers collection in front of the unit on the public street that the townhouse fronts onto	No change		This issue is best addressed through Solid Waste Guidelines.
	Solid Waste		Garage storage for the garbage bins (3 m ²) is ideal only when the travel path to get the bins to the curb is simple.	No change		This issue will be reviewed with Solid Waste on a case-by-case basis.
	Solid Waste		Front Integral garage is simple	No change		Front integral garages are not desired from an urban design point of view. This approach to accommodating parking should be minimized wherever possible. Solid

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						waste collection should not determine built form and streetscape.
City Staff	Solid Waste		<p>Rear access and separated garage can be simple if there are pathways (internal or external) to get the bins to the front curb.</p> <p>Residents should not have to walk around (for example) 5 other homes to get to the curb in front of their home. This should be reduced to 2 or 3 at most. This only applies when there are rear lanes or shared driveways that are dead ends.</p>		Partially addressed	<p>The Guidelines do not specify pathways from rear of the property to the front, but do mention in Section 3.4 (d) a maximum 100m travel distance to a collection area.</p> <p>Section 3.3 g. calls for breaks between buildings every 36.0 m (6-8 units)</p>
	Solid Waste		Collection will happen in rear public lane if its 6.0m wide and stored at grade and the truck can drive straight through		Addressed	Section 3.1 Lanes are all drawn to have a minimum width of 6.0m with additional space for landscaped/snow storage area on either side
	Solid Waste		<p>Minimum shared storage room size of 12.6 m² for 9 units o Max storage room size of 42 m² for 30 units</p> <p>All bins collected on same day, so enough curbside space is needed to allow all bins to fit. Some areas in the city allow bins behind bins, should assume bins are to be set out in a single file row.</p> <p>Front-End Collection for 31 units or more requires a type G and staging area. Truck must be to enter and exit the site in a forward motion. No reversing onto public</p>		No change	These issues are best addressed in Solid Waste Guidelines and through zoning.

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			<p>streets or lanes.</p> <ul style="list-style-type: none"> o Minimum of 25 m2 of storage, increases based on number of units in development o Can be stored outside or inside, outside required an enclosure o Required a type G and staging area and truck must turn enter and exit the site in a forward motion. This means no reversing onto public roads or lanes. 9 to 30 units, same concerns as 5.1.2 31 + units, same concerns as 5.1.2 Chute for front end only, can be compacted or not compacted. Chutes at ground level that drop garbage to room below Or horizontal "chutes" that drop waste into bins on another side of the wall Either chutes with a sorter, or 3 separate chutes Waste chute system with sorter Type G and staging need to have 6.1 m unencumbered vertical clearance. Can use chute system for all units <ul style="list-style-type: none"> • Internal access to chutes OR • Grade level units can go curbside and higher units can use common waste room with chute Curbside possible with common shared waste room (multi-res) Front end not possible if truck cannot enter + exit in a forward motion Front end truck needs to turn around on site as they cannot reverse onto a public road or laneway. Single Family Curbside. 			

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	Fire Services	5.2.5.(k) (Page 82)	Ensure removal of surface parking does not adversely affect fire department access and/or firefighting activities. Additionally, any changes to the site may result in existing fire access routes to be redesigned to meet current Building Code requirements		No change	Covered in other City guidelines.
City Staff	Urban Design (West District)		Guidance re public vs. private lanes		No Change	The Guidelines speak to the design of lanes and don't distinguish between public and private lanes.
	Urban Design (West District)		Guidance re public vs. private lanes 20 units plus – required children's play area in combination with the common amenity space. Requirement for indoor common amenity area?		No Change Addressed	The Guidelines speak to the design of lanes and don't distinguish between public and private lanes. Zoning By-law should ultimately cover this issue. However, it is addressed in 3.2 " a. For multi-residential developments defined as "Apartment Building" under the City-wide by-law, with 20 units or more, provide a minimum of 4m ² of shared amenity space for each unit, 2m ² of which is provided as indoor shared amenity space."
	Urban Design (West District)		Address the constant debate over the corner units and the entrance facing the flanking street. Clearly articulate in the guidelines front entrances prominent on the street facing		Addressed	See Section 3.3 Building Placement and Address

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City Staff			façade with a walkway directly connecting to the municipal sidewalk			
	Urban Design (West District)		Issues with below grade pits and projecting balconies into the separation distances		Addressed	Section 4.2 Separation Distances and Setbacks and 4.4 Private Outdoor Amenity Spaces include guidelines relating to below-grade amenity spaces and separation requirements when these spaces are located within pedestrian mews.
	Urban Design (West District)		Issues of public walkways in a free hold condition where transportation does not maintain any landscaping just the concrete sidewalk		No change	Private walkways are privately maintained. Freehold ownership can still have common element maintenance programs and/or agreements.
	Urban Design (West District)		It would be great to illustrate sections of the units where a stepped ground floor can accommodate parking garage at the rear and still have habitable active rooms facing the street (various configurations that help to address the issues)		Addressed	Section 2.1.1 Townhouse shows an example where a garage is located in the rear with habitable space in the front of the unit.
	Urban Design (West District)		Rooftop amenity and privacy screening detail so that it does not add to the overall height and mass of the building – minimize the impact of rooftop screens and rooftop pop ups		Addressed	5.3 “g. Ensure that roof elements do not dominate the building particularly on larger buildings: ii. design rooftop amenity and privacy screening so as to not add to the overall

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						height and mass of the building and minimize the visual impact of rooftop screens and rooftop accesses.
	Urban Design (West District)		Suggestion of some better images to illustrate the points		Addressed	Additional photographs and illustrations have been added to clarify the guidelines.
City Staff	Urban Design (North District)	General	Make the format fit the 1 or 2 full page layout - the 3 page sets do not read clearly - sections bleeding over other ones do not make a clear "punchy" structure to the document - try to keep to 2 page spread - guidelines/narrative		Addressed	The format has been changed to 2 pages per section.
	Urban Design (North District)		annotate diagrams - use image captions to replace narrative deletions		Addressed	Additional image captions have been provided.
	Urban Design (North District)		Need to make clear that the Guidelines do not apply to townhouse and low-rise multi-unit development anywhere in the City but where it has been determined by the City to be appropriate.		Addressed	How and Where the Guidelines Apply, page 9, end of 2 nd paragraph revised to "The Guidelines apply to the design, review, and approval of new low-rise, multi-unit building developments that are 4 storeys or less,

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						where townhouse and low-rise multi-unit buildings are appropriate. The Guidelines will be applied through the evaluation of development proposals and design alternatives in Official Plan Amendments, Zoning By-law Amendments, Plans of Subdivision, and Site Plan Control applications.”
City Staff	Urban Design (North District)		cut down narrative as much as possible integrate section 1.2.1 block patterns into 2.1 streets		No change	These sections remain separate. Section 1.2.1 Street and Block Pattern speaks to the design of overall larger scale block patterns. Section 3.1 Streets, Lanes, Mews and Walkways speak to the detailed design of these circulation elements.
	Urban Design (North District)		Integrate 1.2.2 Parks and Open Space into 3.2		No change	Section 1.2.2 Public Parks and Open Spaces addresses the location of parks and open spaces at a city-scale as opposed to section 3.2 Shared Amenity Spaces which refers to on-site private amenity spaces.
	Urban Design (North District)	4.3 Building Elements	Take out section 4.3 Building Elements		Addressed	Section 5.3 Building Elements remain, however it has been revised to be less prescriptive detailed.

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	Urban Design (North District)	Introduction	not a good image of towns - top right don't show below-grade terraces		Addressed	Image removed.
City Staff	Urban Design (North District)		Historic court apartment image provide is good, however provide a modern suburban townhouse type		No change	Historical image is shown to illustrate an early example of low-rise apartments.
	Urban Design (North District)	Introduction	Low-rise apartment definition should include 4 storey - consistency of definitions .Clarify definition of low rise on page 6 to include "4 storeys and less"		Addressed	Definition includes revised wording to "4 storeys or less."
	Urban Design (North District)	Introduction	last paragraph on page 9 - too wordy - reduce size - "guidelines are intended to provide a degree of predictability in design outcome...development may warrant further review, the city's design review panel may assist in the process"		Addressed	Revised to be more concise.
	Urban Design (North District)	Introduction – Guiding Principles	Guiding principles paragraphs, what are the principles? These points seem floating and not connected to quality of life, design excellence, sustainable design and heritage conservation. Like tall building guidelines, present each section heading and description on a double spread, will be circulated...		Addressed	Guiding Principles have been made into separate points.
	Urban Design (North District)	Introduction	Remove duplicate definitions from body of text. Refer readers to definitions on glossary here.		Addressed	Glossary has been updated with all definitions.
	Urban Design (North District)	1.2.1 Street and Block Patterns	Much of what is written in the streets and parks sections is more appropriate in site section. Edit this section to be much more about "needing" the context to create "street, circulation, park & open space networks"		Addressed	Section 1.2.2 Public Parks and Open Spaces have been reworded to include more emphasis on context.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
City Staff	Urban Design (North District)	1.1 Context Analysis and Planning for Larger Sites	Point C - condense master planning is triggered by sites that require: new streets, multiple blocks of townhouses and types, multiple phases, larger than 1ha		Addressed	Revised to 1.1 c. For larger or more complex areas with multiple properties and/or buildings, new streets, parks and open spaces, a Master Plan may be required..."
	Urban Design (North District)	1.1 Context Analysis and Planning for Larger Sites	Find better images that are illustrative of neighbourhood institutions - school sites, libraries, or transit stops		Addressed	New diagram has been developed to describe site context analysis.
	Urban Design (North District)	1.2.1 Street and Block Patterns	Delete "Streets also allow for sunlight and daylight to reach buildings and outdoor amenity spaces. The layout of the new public realm consisting of streets, mews, parks and open spaces is the structure upon which a walkable community is organized and must not be a secondary consideration after laying out building blocks and servicing functions efficiently.		Addressed	Deleted.
	Urban Design (North District)	1.2.1 Street and Block Patterns	Delete "New streets should be laid out to reduce the impact of additional traffic on surrounding neighbourhoods"		Addressed	Sentence has been deleted.
	Urban Design (North District)	1.2.1 Street and Block Patterns	Remove last sentence - covered in DIPS		Addressed	Sentence has been deleted.
Urban Design (North District)	1.2.1 Street and Block Patterns	Parks/open space extend existing parks, open spaces, ravines, school sites <ul style="list-style-type: none"> • provide frontage on streets • locate to promote pedestrian access through site, promote connections • locate to have adequate sunlight and wind conditions 		Addressed	Covered in point a in section 1.2.2	

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City Staff	Urban Design (North District)	1.2.1 Street and Block Patterns	point C - delete - vague point		Addressed	Point c has been deleted.
	Urban Design (North District)	1.2.1 Street and Block Patterns	point f - reword - not much of a guideline		Addressed	Point f has been deleted.
	Urban Design (North District)	1.2.2 Public Parks and Open Spaces	DELETE - Each development application should be reviewed with the goal of enhancing the community's network of parks and open spaces. The review should look at opportunities to increase the visibility and accessibility to parks and open spaces. Where appropriate, opportunities to enlarge or create new parks and open spaces should be pursued. Adding to variety, in terms of the character, function and range of experiences offered by the local network of parks and open spaces, should be another important consideration. Good quality parks and open spaces,		Addressed	The rationale has been reworded to improve clarity.
	Urban Design (North District)	3.1 Streets, Lanes, Mews and Walkways	Reorganize numbering and layout - change titles - show better examples		Addressed	Layout, photos and numbering have been improved and corrected.
	Urban Design (North District)	3.1 Streets, Lanes, Mews and Walkways	1) public street a)with front integral garage b) without garage		Addressed	Section 3.1 reorganized to provide improved clarity. Private Street discussion has been deleted from the guidelines.
			2) private street a)with front integral garage b)without garage 3) lane / private shared driveway 4) pedestrian mews 5) landscaped walkway remove private vehicular mews - same as		Addressed	Discussion on private vehicular mews deleted from the guidelines.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
City Staff			private street/mews			
	Urban Design (North District)	Section 3.1	Group points d) and j) with m) - delete "when required by the zoning bylaw" in point J		Addressed	Guidelines have been reorganized and reworded to improve clarity.
	Urban Design (North District)	Section 3.1	This section needs to be more diagrammatic - open space in the block vs. open space along a street		Addressed	Diagrams have been refined to be more legible.
	Urban Design (North District)	Section 3.2	Combine points a, b , c into shorter guideline		Addressed	Points a, b, and c have been reworded to be more concise.
	Urban Design (North District)	Section 3.3	Add annotations to diagrams pull out points from a, e, k		Addressed	Annotations to the diagram have been included to provide more clarity.
	Urban Design (North District)	Section 3.3	Combine a + c		No change	3.3 a. and c speak to different scenarios and remain unchanged.
	Urban Design (North District)	Section 3.3	Point I illustrate corner lots with street and park or open space frontage		Addressed	A photograph has been included to illustrate corner condition.
	Urban Design (North District)	Section 3.3	Most of this discussion is about building placement start with direct connections between sidewalks, walkways, and front entrances		Addressed	Revised Section 3.3 b. "Maintain high visibility, direct, generous, and universal access from the public sidewalk especially when building entrances are not located on a public street."
Urban Design (North District)	Section 3.4	Not sure why this is two sections group guidelines: general vehicular access, loading, garbage, bicycle parking/storage		Addressed	Site services, access and parking guidelines have been consolidated into one section.	

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
	Urban Design (North District)	General	Why is 30m ³ soil volume being repeated throughout, say it once - addressed in Section 5.0		No change	Adequate soil volume is dependent on various design conditions being met and which are addressed by different guidelines.
City Staff	Urban Design (North District)	Section 3.4	Driveway width addressed in Section 2, and 3.1		No change	Section 3.4 speaks to parking and therefore includes the front yard parking/driveway scenario.
	Urban Design (North District)	Section 3.4	Point h) add parks, open space and mews - better yet, just state "no free standing outdoor garbage storage" - should be integrated into building		Addressed	Revised Section 3.4 a. "Incorporate parking garage ramps, access stairs, garbage collection/storage areas, and loading areas into the building."
	Urban Design (North District)	Section 4.1	Point c) "Match at least the first building..." is confusing just say, reduce height where adjacent context is lower in scale and not anticipated to change		Addressed	Revised Section 4.1 c. "Provide a transition in the building height down to lower-scale neighbours. Reduce the height of at least the first building, unit or bay where adjacent context is lower and not anticipated to change."
	Urban Design (North District)	Section 5.1	Point c) what does heritage say in regards to this point		Addressed	HPS have been consulted and have provided comments on the Introduction and Section 1.3. Heritage

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
City Staff	Urban Design (North District)	Section 4.1	Rationale: unclear when to actually step down or step back - 3m?		Addressed	A list has been created in the rationale to provide guidance on the various scenarios where transition needs to be considered.
	Urban Design (North District)	Section 4.2	Point a) Remove "for front to front and back to back building blocks"		Addressed	Deleted.
	Urban Design (North District)	Section 4.3	Photo of steps - "8-9 steps down" - creates a deep pit condition should be max 6		Addressed	Photo has been replaced.
	Urban Design (North District)	Section 4.2	Point g) include POPs		Addressed	Point g has been replaced.
	Urban Design (North District)	Section 4.4	Can we reduce depth of lower units? - 1.5m too deep - not a preferred type of entrance		No change	The OBC allows for a unit to be 1.5m below-grade. Guidelines are provided to improve the design of these below-grade amenity spaces.
	Urban Design (North District)	Section 4.3	2nd image caption - "Avoid large excessive protruding..." Change to "avoid large elements such as porches, balconies, canopies, stairs and below-grade terraces into narrow mews and front setbacks to streets"		Addressed	The caption has been reworded.
	Urban Design (North District)	Section 5.3	3rd image caption Carefully composed and detailed façade, entrance and fenestration design combined with high quality materials help create an elegant street edge, entrance and private amenity area.		Addressed	The caption has been reworded.
	Urban Design (North District)	Section 5.3	Railings - we should be addressing type of railings for all these types - transparency, opacity, barred, glass, etc		No change	Section 5.3.1 Building Elements address the architectural design including railings and privacy screens.

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City Staff	Urban Design (North District)	Section 5.1	5.1 title - "The attractiveness and amenity of everyday landscapes are important to the quality of people's lives" move into rationale		Addressed	Sentence has been reworded and included in the rationale.
	Urban Design (North District)	Section 5.1.1	5.1.1 switch the order of point a) and b)		Addressed	The order of a. and b. has been switched.
	Urban Design (North District)	Section 5.1	All the rationale paragraphs on this page do not deal with stormwater management		No change	The rationale on this page covers both sections 5.1.1, 5.1.2, and 5.1.3.
	Urban Design (North District)	Section 5.2	Remove the section drawing		Addressed	Section drawing has been removed.
	Urban Design (North District)	Section 5.2	See Jane Perdue - delete public art from 5.2.2a) - public art is not a site plan matter		Addressed	Public art is discussed in section 5.4.
	Urban Design (North District)	Section 5.2	point g) add gas regulators		Addressed	Gas regulators have been included in point b.
	Urban Design (North District)	Section 5.2.1	Remove point b) - address in previous section		Addressed	Point b has been reworded to be more specific.
	Urban Design (North District)	Section 5.3.1	Point c) reword c) ensure windows and doors reflect floor hierarchy and street pattern		Addressed	Point c has been reworded.
	Urban Design (North District)	Section 5.3	Does this page become too prescriptive? could be condensed to reflect neighbouring patterns - provide variety, but ensure roof elements do not over dominate main building massing and create abrupt changes in scale		Addressed	Section 5.3 revised to reflect comment
	Urban Design (North District)	Section 5.3.1	Point h) unclear - no real explanation why? point g) reword "To retain the harmony of an elevation or street frontage, to:" Point i: remove first sentence Rationale is too long delete 2nd last		Addressed	Point h has been revised and speaks to the proportion and composition of the building. points has been deleted.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
			Paragraph - explain what the guidelines are if they are going to be included in the rationale			This paragraph has been deleted.
City Staff	Urban Design (North District)	Section 5.3	Remove "The application process will provide a greater level of clarity on the external design of buildings"		Addressed	Sentence has been deleted.
	Urban Design (North District)	Section 5.3.2	Revise point a) "A carefully curated selection of materials helps new development integrate with existing fabric point d and e		Addressed	These points have been deleted.
	Urban Design (North District)	Section 6.0	Each of the putting it together should be reorganized to reflect the order of the guidelines start with : 1) public structure, 2) building location, entrances, garbage 3) massing 4) details		Addressed	The Demonstration Plans in Section 6 have been reorganized to reflect the order of the guidelines for the most part.
	Urban Design (North District)	Section 6.0	Remove "public" from "public street"		No change	The development scenarios show sites with public street frontages.
	Urban Design (North District)	General	At-grade access is the determining factor in deciding whether an apartment building or stacked townhouse is preferred. Besides marketing, what is the built form reason for making a choice		Addressed	In Section 2.0 there is discussion which speaks to the preference for apartment buildings in certain conditions.
	Urban Design (North District)	Section 6.5	Starts with comprehensive design for site organized on circulation and open space network of places		Addressed	Paragraph deleted.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
	Heritage (HPS)	Section 1.3 Heritage	<p>The Guidelines should reflect OPA 199 final heritage policies in place in the main OP. Similarly re HCD's there is specific language in the Ontario Heritage Act, use the word "conserve" rather than "respect and complement". Also, it is not just lower scale adjacent heritage properties that have to be conserved by development - the PPS requires adjacent heritage properties period to be conserved by development.</p> <p>The revised OP heritage policies are in force as of May2015. The City also obtained a recent and significant OMB Decision on 412 Church, where the developer's appeal was refused primarily due to the project failing to conserve the adjacent heritage properties.</p>		Addressed	Revised Section 1.3 Heritage, the word "conserve" is used in guideline a. and reference to "lower scale" has been removed in guideline c.
City Staff	Zoning	Introduction	Modify introduction to reflect that "back-to-back" townhouses are townhouses in Bylaw 569-2013 if the units are fully at-grade and stacked and back to back are apartments.		Addressed	The second paragraph in the Introduction clarifies that stacked and back-to-back townhouses are defined as apartment buildings in Bylaw 569-2013.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
	Zoning	Introduction	These Guidelines mainly address the residential building types defined in the city-wide zoning bylaw as Townhouse and Apartment Building, and -- to a lesser degree -- Triplex and Fourplex.		Addressed	Included the wording "to a lesser degree - triplex and fourplex.
City Staff	Zoning	3.1 Streets, Lanes, Mews and Walkways	<p>(Main paragraph definition text) The DIPS setbacks do not necessarily (yet?) equate to the zoning setbacks.</p> <p>In most cases the minimum front yard setback in the zoning bylaw is 6 metres. Nonetheless, I recognize the design guidelines help give direction to developers seeking amendments. This graphic may be better off saying "Min 3.0 m or as required by the applicable zoning bylaw."</p>		Addressed	Diagram note pg. 29: The public/private street, private vehicular and pedestrian mews, lane/driveway, and walkway sections with associated setbacks and permitted encroachments are typical access elements for townhouse and low-rise apartment buildings. The dimensions do not necessarily equate to zoning standards and the design standards for some of the elements (streets, lanes and vehicular mews) are specified in Development Infrastructure Policy and Standards (DIPS).
	Zoning	Section 3.1 Streets, Lanes, Mews and Walkways	(Main paragraph definition text) I'd prefer more careful use of the word "setback", especially front yard setback. As used here, this is not the same as the bylaw's language -- i.e., one relates to property line, the other relates to front of the dwelling unit.		Addressed	Private street discussion has been removed from the guidelines.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
	Zoning	3.2 Shared Indoor and Outdoor Amenity Areas: Pg. 29 Rationale First Paragraph	<i>"are required to provide a shared outdoor amenity area..."</i> this is now correct ... but... The required amenity space, by deliberate definition, is not intended for public use. "POPS" can be part of the required landscaping if it is surplus to the bylaw-required "amenity space".		Addressed	Section 3.2 Pg. 33 Rationale, First Paragraph revised to reflect comment
City Staff	Zoning	3.3 Building Placement and Address: n)	Something that would really help us in order to improve the new bylaw would be your advice on the actual numeric standards for setbacks from side lot lines for (a) multiple tiers of rows of townhouses parallel to the street with end units closest to side lot line, and (b) apartment buildings with at-grade townhouse-style units and their private amenity spaces facing the side lot line.		Addressed	Addressed in Section 4.2 e. "Provide half the distance specified in Table 1, Separation Distance, between the faces of a building containing primary living spaces, such as living and dining rooms, and the side (secondary living spaces) of another building or property line."
	Zoning	3.3 Building Placement and Address: o)	In most cases, the few residential zones that permit small stores in apartment buildings explicitly prohibit individual entrances to the stores, and even signs; so this guideline is currently only useful for mixed-use zones and the new RAC zone.		Addressed	Revised as 4.3.b
	Zoning	Section 4.3 - Rationale - second paragraph last sentence	"Further, in order to fully function as a front entrance, the interior of a residential unit at grade should have a foyer and a coat closet at the entrance."		Addressed	This sentence has been deleted.

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			I suggest you insert "at least" between "should" and "have". This has a direct relation to some provisions in the new zoning bylaw that are under appeal. Identifying a minimum size would be useful, too, but that might go beyond your mandate.			
City Staff	Zoning	3.4 Site Services, Access and Parking: f)	Are you missing the word "or"? Assuming you do mean "or on streets", be aware the zoning bylaw demands that all required parking spaces must be provided on the subject property.		Addressed	The guidelines do not suggest required parking can be located outside of subject site.
	Zoning	3.4 Site Services, Access and Parking: g)	The zoning by-law requires all long-term bicycle parking spaces to be inside a building. The zoning bylaw allows long-term bicycle parking spaces to be as high up as the second storey, and lower in basements such as underground parking levels, subject to specified limits. Even this permissive approach is under appeal for being too onerous.		Addressed	The guidelines refer to the Toronto Green Standard and the other related bicycle infrastructure guidelines.
	Zoning	3.4 Site Services, Access and Parking: i.	I appreciate you changed this to be emphatic in the negative, per earlier comments. However, the tough new approach regarding below-ground setbacks does not apply in some mixed-use zones. And where it does apply, the rule is based on the required minimum setback, meaning that you could in theory have the above ground portion of the building voluntarily pushed back farther while the below-grade part is at the required setback line -- and in that case, a		Addressed	The guideline regarding below-grade structure not projecting beyond the front face of the building has been removed.

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			below-grade parking structure could be beyond the front face of the building. Note also, there are appeals about this.			
City Staff	Zoning	3.4 Site Services, Access and Parking: j.	The revision you did here is good, and might help establish a benchmark for a condition of approval for variances that might be approved to allow below-grade encroachments into the required yard setbacks.		No change	
	Zoning	4.2 Facing Distance and Setbacks: a.	These distances lead to lower than a 45-degree angle (which would be a 1:1 ratio).		Addressed	4.2 a. Facing Distance has been revised.
	Zoning	4.2 Facing Distance and Setbacks	In bylaw terms, the top of the main wall is where the roof is, so there is nothing above it to apply this 45-degree angle to. This is not how (or where) the bylaw determines the height of the main wall(s).		No change	The guideline uses the term “main building face height” which is different from the zoning term “main wall height”.
	Zoning	4.2 Facing Distance and Setbacks: Chart comments	This set of numbers looks like a good start toward a potential amendment to the bylaw. It will be difficult, though, to put these variables into "bylaw language". What if one tier of units is shorter than the other? "Front to front and back to back buildings" is somewhat confusing. And what about other configurations? I.E., what should the separation be if, say, there is a "front" to "end" relationship?		Addressed	Revised in chart to, "Where the height of the main building faces are different, average the two heights" Revised to, 4.2 e."Provide half the distance specified in Table 1, Facing Distance, between the faces of a building containing primary living spaces, such as living and dining rooms, and the side (secondary living spaces)

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						<p>of another building or property line.</p> <p>The “end” will typically be another front or side, with either primary or secondary living spaces and so 4.2 Facing Distances would apply.</p>
City Staff	Zoning	4.2 Facing Distance and Setbacks: c. Pg. 41 Bullet point 1	Setbacks in the context of the zoning bylaw are always measured to / from a property line. Angular planes can be taken from the far side of a lane or even from a point up in the air; but the lateral dimension would be a separation distance, not a setback.		Addressed	Clarified in Rationale Pg. 43 that adequate separation distances, setbacks, and step-backs help to achieve proper building relationships.
	Zoning	4.2 Facing Distance and Setbacks	<p>I assume you mean to be referring to a traditional townhouse. Be aware, however, there is no such thing as a "single unit townhouse". Only a detached house would have a single unit. A townhouse is the building, not the unit, and among other things in the definition, it would have at least 3 units.</p> <p>In most cases, the zoning bylaw sets different side yard setbacks depending on the building type. This "guideline" would undermine those fundamental rules if the neighbouring building is not a townhouse.</p>		Addressed	Guideline removed.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
	Zoning	4.2 Facing Distance and Setbacks: h.	The bylaw allows a variety of building features, including balconies in some circumstances, to encroach into the required setback area to a limited degree.		Addressed	As in the Midrise performance standards, guidance has been developed to promote appropriately scaled and massed buildings and to avoid excessive shadowing and overlook
City Staff	Zoning	4.4 Private Outdoor Amenity Space: e.	Are you recommending a bylaw amendment? Currently -- though under appeal -- Zoning Bylaw 569-2013 regulation 10.5.40.60(1) allows the encroachment into the front setback to be as much as 2.5 metres, subject to the 50% distance limit. Assuming you are talking about a linear distance, delete word "area" from here.		Addressed	This guideline refers to below-grade terraces within pedestrian mews. Not a building setback issue.
	Zoning	4.4 Private Outdoor Amenity Space: Raised Terrace d. ii. 4.3 Primary Entrances: g. iii.	Does this work if the first floor elevation is 1.2 metres above established grade? (Though the bylaw does not impose such a limit for townhouses or apartment buildings, it sets that elevation for the front part of the first floor in detached and semi-detached houses at 1.2m.)		Addressed	Revised to, " to be approximately 3 to 5 steps or 1.2m above the grade of the walkway leading to the front entrance" and similarly with 4.4 Private Outdoor Amenity space – Raised Terrace
	Zoning	4.4 Primary Entrances: Porch g. i.	Are you recommending a bylaw amendment? Currently -- though under appeal -- Zoning Bylaw 569-2013		Addressed	Revised to, 4.3 Primary Entrances g. "Design stoops and porches:

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			regulation 10.5.40.60(1) allows the encroachment into the front setback to be as much as 2.5 metres, subject to the 50% distance limit.			i. to encroach into the required front yard setback a maximum of 2.5 metres or 50%, whichever is less"
City Staff	Zoning	5.1.1 Streetscape: g.	It may be better to say "applicable zoning bylaw" instead of referring only to the new bylaw given that the new bylaw does not (yet) include all lands within the City.		Addressed	Guideline has been deleted and replaced.
	Zoning	5.1.3 Stormwater Management	In most cases the minimum front yard setback in the zoning bylaw is 6 metres. Nonetheless, I recognize the design guidelines help give direction to developers seeking amendments. This graphic may be better off saying "Min 3.0 m or as required by the applicable zoning bylaw."		Addressed	Drawing has been deleted.
	Zoning	5.3.1 Architecture: h.	Clarify that the "elements" you're referring to are building-function features along the lines of stairwells or things like that. Access from a regular floor level (such as a fourth storey) to a roof deck on top of an adjacent but lower part of the building (such as a roof over a third storey) is acceptable -- premised on the the fourth floor in this example is treated like other habitable space and is subject to height limits and inclusion in the FSI calculations if applicable.		Addressed	Guideline has been deleted.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
City Staff	Zoning	2.0 Building Types	I appreciate that you have this comment to distinguish the two documents. I'd suggest saying even more. For example, perhaps the first sentence should say the terms used in this document break-down the building types established in the zoning bylaw by using design-oriented lexicon in order to be more fine-grained. The two definitions that are relevant in the zoning bylaw could even be quoted here or on page 9, in whole or in part, as they are relatively brief. They are found in Bylaw 569-2013 at 800.50(55) for Apartment Building, and 800.50(865) for Townhouse.		Addressed	Language has been revised in the Introduction to reflect this comment.
	Zoning	Introduction	This paragraph still seems adequate, except that "back-to-back" townhouses are townhouses in Bylaw 569-2013 if the units are fully at-grade. (Also see my notes on pages 22 - 23.)		Addressed	Revised to "stacked townhouse" and "stacked and back-to-back townhouse".
	Zoning	Introduction	The last sentence is maybe too brief to be clear. How about "These Guidelines mainly address the residential building types defined in the city-wide zoning bylaw as Townhouse and Apartment Building, and -- to a lesser degree -- Triplex and Fourplex."		Addressed	Sentence has been revised.

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City Staff	Zoning	2.1.3 Back-to-Back Townhouse and 2.1.4 Stacked and Back-to-Back Townhouse	<p>Back to back townhouse with no part above another is considered a townhouse in zoning terms.</p> <p>Back to back townhouse with part of the one unit above another would be considered as an apartment building like the second diagram.</p>		Addressed	A paragraph has been added to the Discussion in 2.13 and 2.14 to describe this
	Zoning	2.1.4 Stacked and Back-to-Back Townhouse	<p>This is a good thing to note to try to bridge the semantic divide. However, this is true of most of the building types you are dealing with, not just this one. A fundamental aspect of the bylaw's definition of Apartment Building is that the building "has five or more dwelling units, with at least one dwelling unit entirely or partially above another".</p> <p>Then again, a back-to-back townhouse type where no units have any part above another is just a Townhouse in the language of the zoning bylaw.</p>		No change	
	Zoning	2.1.4 Stacked and Back-to-Back Townhouse	Not all of the Former Municipalities' bylaws use the quite same terms and/or definitions, so you might want to refer specifically to Bylaw 569-2013, or to be more generic, the "city-wide zoning bylaw".		Addressed	City-wide zoning by-law wording added to this section.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
City Staff	Zoning	2.1.5 Low-Rise Apartment Building	Unlike several of the Former Municipalities' bylaws, Bylaw 569-2013's definition of an Apartment Building is such that the dwelling units may have direct access from the outside or via internal corridors, or both.		Addressed	Added wording in the caption to include exterior entrances to unit.
	Zoning	3.1 Streets, Lanes, Mews and Walkways	I presume your introduction of the words "or context" is a way of covering my prior suggestion of saying "Min 3.0 m or as required by the applicable zoning bylaw." I appreciate that ultimately the dimensions in these guidelines may lead to amending the zoning bylaw, but I am very concerned that the way this is presented implies there are no current zoning standards.		Addressed	Street section revised to 3.0m, context or applicable zoning by-law. Diagram note pg. 29: "The public/private street, private vehicular and pedestrian mews, lane/driveway, and walkway sections with associated setbacks and permitted encroachments are typical access elements for townhouse and low-rise apartment buildings. The dimensions do not necessarily equate to zoning standards and the design standards for some of the elements (streets, lanes and vehicular mews) are specified in Development Infrastructure Policy and Standards (DIPS)."

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City Staff	Zoning	3.1 Streets, Lanes, Mews and Walkways - Lane	I'm not sure what is in DIPS with respect to private lanes, but be aware that in the most dense ground-related residential zone (the "R" zone) in 569-2013, the required minimum setback for a detached garage from a public lane is 1 metre, apparently to make turning movements into and out of the garage easier and to reduce the amount of right-of-way that might be impacted by common types of garage doors swinging open. (Possibly this setback is premised on many of the central-city lanes being only 5 metres wide even though the design standard is 6 metres.)		Addressed	Lane section revised to indicate unspecified setbacks with a note indicating a Planting/Snow Storage Area.
	Zoning	3.4 Site Services, Access and Parking: i.	Carrying on from my comments about this matter in earlier drafts, although not applicable in some types of "CR" zone, the standard setbacks apply both above and below grade in most (maybe all) residential projects; so I would ask you to delete the word "generally" from the start of this sentence.		Addressed	The word "generally" deleted.
	Zoning	3.4 Site Services, Access and Parking: j.	The bylaw treats driveways and walkways as different entities. Per 10.5.50.10(1) of the new bylaw, if a dwelling unit in a townhouse is 6 metres wide (or more) only half the front yard has to be devoted to landscaping. The assumption is that the other half would be a driveway, but if		Addressed	Revised Section 3.4. k. "Avoid front driveways and garages in street-related townhouses generally and consider only when a unit is 6.0m or wider. When providing the minimum:

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			<p>there is no driveway provided the bylaw does not require 100% of the front yard to be landscaping. It does require 100% landscaping for the front yard -- not counting the driveway if one is permitted - - when the townhouse dwelling unit is under 6 metres wide.</p> <p>Did you calculate whether this cubic metric jives with the front yard landscape requirements of the bylaw? (I have not.) Please check regulations in 10.5.50.10.</p>			<p>i. provide a maximum width of 3.0m for a driveway and a walkway leading to the front door”</p> <p>Yes we have.</p>
City Staff	Zoning	4.1 Fit and Transition	In many circumstances, the zoning bylaw requires the front yard setback to be the average of the current setbacks of buildings on the two abutting lots facing the same street. See 10.5.40.70(1).		Addressed	Note on Figure 1 revised to, “Provide a front yard setback that is the average of the existing front yard setbacks of buildings on either side of the subject property.”
	Zoning	4.2 Facing Distance and Setbacks: c.	I appreciate that this guide may be used when analyzing amendments to the zoning bylaw. HOWEVER, the concept of including the width of a public lane at the rear for the angular plane (and the rear setback) has been brought into Bylaw 569-2013 only in mixed use zones, NOT residential. PLEASE modify this to say "in some circumstances" or to refer to a private lane on-site instead of an abutting public lane.		Addressed	Revised to, “4.2 c. Provide a minimum 7.5m rear yard setback from the property line at grade. A private lane or driveway may be included for the purposes of establishing the setback and angular plane.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
City Staff		4.2 Facing Distance and Setbacks: Chart	Should this be "more than 11 metres"? Otherwise, there is a gap between what's in the second and third rows.		Addressed	Facing distance chart has been revised.
	Zoning	4.2 Facing Distance and Setbacks: d.	<p>Do you want to provide a guide as to the appropriate dimensions when there are no windows at all in a given wall and/or when there are only bedroom windows? (Generally, a zoning bylaw is not really enabled to parse out such distinctions on the basis on the "living spaces" inside the wall.)</p> <p>By referring in this way to the "side of another building", do you mean that other building is on the same lot (otherwise, there is a property line between the subject building and the other building); and do you mean that "side" of the other building has no windows?</p> <p>This is valuable for us in seeking modifications to the Side Yard Setback in the event of units facing the side lot line. (Am I correct in assuming this is meant to relate to property lines other than just rear lot line?)</p>		Addressed	Revised to "4.2 d. Provide half the distance specified in Table 1, Facing Distance, between the face of a building containing primary living spaces, such as living and dining rooms, and the side (secondary living spaces) of another building or property line."

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
City Staff	Zoning	4.2 Facing Distance and Setbacks: f.	For much of the zoning bylaw, the required side yard setbacks are based on the building type or the zone or the required lot frontage; so a townhouse or an apartment building abutting, say, a detached house would rarely be required to have the same side yard setback. Refer to similar building types or say it depends on the context. This concept of having the same side yard setback as what is on the abutting lot is NOT a general amendment we would consider because a bylaw really cannot be written that way. Instead, the concept could be contemplated on the basis of a site-specific rezoning for a development proposal if supportable in its own context.		Addressed	Guideline deleted.
	Zoning	4.2 Facing Distance and Setbacks: g.	Do the current set of "permitted encroachments" into required setbacks in Bylaw 569-2013's clauses 10.5.40.60 and 15.5.40.60 satisfy this objective? Or are they too generous? Or too strict? (Keeping in mind they only relate to "setbacks" from property lines, not the distance separation between buildings on the same parcel. There is no permission for building features to be within those distance separations.)		No Change	Revised 4.2 Facing Distances and Setbacks g. "Limit building element projections, such as balconies, into setback areas, streets, mews, and amenity areas to protect access to light and sky view."

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City Staff		4.3 Primary Entrances: b.	<p>Maybe better to say "part of a new development". We don't require this height in the RAC zone (even though there could be new low-rise buildings) because we don't want a barrier to converting ground floor space into retail in the existing buildings.</p> <p>Where this has already been implemented in the zoning bylaw (in "CR" zone etc.) the required 4.5 metre minimum height is "measured between the floor of the first storey and the ceiling of the first storey".</p>		Addressed	Revised to 4.3 Primary Entrances b. Where retail uses are part of a new development and permitted in the applicable Zoning By-law, provide a minimum 4.5m ground floor height with a separate entrance to each ground floor retail unit, identifiable and directly accessible from the public sidewalk.
		4.3 Primary Entrances: g., i.	<p>Good. This reflects the permitted encroachment rules for Chapter 10. Maybe this should be addressed in Chapter 15 as well? (Currently, regulation 15.5.40.60(1) allows a much bigger encroachment into the front yard at the first storey because it's oriented to large apartment buildings; but given that small apartment buildings are also allowed, it might be good to amend the bylaw to also address the small scale front porches at or near grade in the RA and RAC zones.)</p>		No change	
		4.3 Primary Entrances: g., ii.	<p>The bylaw does not address parts of buildings that could be allowed within the separation distance required between buildings, so this may be a good thing to pursue in a general bylaw amendment.</p>		No change	

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City Staff	Zoning	4.3 Primary Entrances: h.	I am not sure we could impose this restriction in a zoning bylaw, but it might be worth pursuing. Is this restriction meant to be only applicable at the front / street yard?		Addressed	4.3 j. and i. Revised to "front yard setback area."
	Zoning	4.3 Primary Entrances: h., ii.	The Planning Act enables zoning bylaws to regulate the vertical elevation of entrances into buildings, but usually this is premised on flood-related concerns. We might be able to pursue this as a bylaw amendment.		No change but requires further discussion	ECS has expressed concerns about the high risk of flooding in below grade terraces and entrance ways.
	Zoning	4.4 Private Outdoor Amenity Space: e., ii.	This is good, but, as noted before, I'm not confident regulations about the below-grade terrace can be in a zoning bylaw.		No change	
	Zoning	4.4 Private Outdoor Amenity Space: f.	The bylaw allows a roof-top terrace on an apartment building (and therefore on a stacked townhouse) but not on top of a townhouse unless the access to it is at the same level (i.e., using an enclosed stairwell or some other building element that has floor space).		No change	Follow up with Zoning required.
	Zoning	5.1.2 Landscape: h.	See page 36, where 1.5 metres is stated as the desired depth. If they are the same issue (which they seem to be) please address the inconsistency. This matter could become very important as we wrestle with the appeal against the		Addressed	Changed to 1.5m.

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			bylaw's requirement that building setbacks apply equally above and below grade (other than in some mixed use zones).			
City Staff		5.3 Building Elements: g.	While not directly a Zoning matter, I feel obliged to weigh in here and suggest you not be so emphatic. Among my personal favourites are the stacked townhouses along Irwin Ave and St. Nicholas Street, and the low-rise apartment building on Inkerman Street, all of which have "house-form" pitched roofs.		No change	The guideline 5.3.1 g. refers to larger footprint buildings "Ensure that roof elements do not dominate the building particularly on larger buildings. House-form roofs such as pitched or mansard roofs are not appropriate for stacked and back to back townhouses or apartment buildings."
		Section 6.1 4e and 6.4 diagram	In many circumstances, the zoning bylaw requires the front yard setback to be the average of the current setbacks of buildings on the two abutting lots facing the same street. See 10.5.40.70(1).		Addressed	Same objective, different wording provided in Section 3.3 Building Placement and Address e. "ii. where existing setbacks are well-established, but vary on either side of a proposed development, setback all or part of the building to resolve the differences."

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
Toronto Planning Review Panel	Toronto Planning Review Panel (April 2017)	General Comment	The need for environmental sustainability in design and for longevity of construction materials.		Addressed	TGS, Sustainable Design in Introduction pg. 10 and Section 5.1.2 Landscape (a., d., e., h.), 5.1.3 Stormwater Management (a., b., and c.), and 5.3.2 Materials (a) all speak to this concern.
	Toronto Planning Review Panel (April 2017)	General Comment	The importance of accommodating the needs of families with children.		Addressed	<p>Growing Up, Planning for "Children in Vertical Communities" addresses accommodation for families with children. The study provides additional guidelines and recommendations for vertical communities including low-rise apartments and stacked townhouses.</p> <p>In Section 3.2 Shared Outdoor Amenity Areas (b.), 4.4 Private Outdoor Amenity Space (c.), and Rationale 2nd paragraph speak to importance of accommodating families with children.</p>

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
Toronto Planning Review Panel	Toronto Planning Review Panel (April 2017)	General Comment	The need to ensure the visual appeal of new developments, including the need to have new developments complement the character of the surrounding areas.		Addressed	There are guidance throughout the document which encourages high-quality design and materials. 5.3 Building Elements section has specified areas where special care should be used.
	Toronto Planning Review Panel (April 2017)	General Comment	The need for sufficient and easily accessible parking for residents and guests.		Addressed	Parking is more of a zoning by-law issue. 3.4 Site Services, Access and Parking (a., b., f., and j.) speak to the design and access to parking.
	Toronto Planning Review Panel (April 2017)	General Comment	Provide sufficient and easily accessible storage that ultimately reduces clutter in public view.		Addressed	Section 3.4 i. “provide secure storage for bulky items outside individual units (i.e. at ground or basement level).”
	Toronto Planning Review Panel (April 2017)	General Comment	Ensure sufficient outdoor lighting in order to maintain and improve safety		Addressed	Guidelines are provide in 5.2.3 Lighting.

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Toronto Planning Review Panel	Toronto Planning Review Panel (April 2017)	General Comment	Address the lack of shared amenity spaces		Addressed	Section 3.2 Shared Indoor and Outdoor Amenity Areas speaks to the Zoning By-law requirement
	Toronto Planning Review Panel (April 2017)	General Comment	Place even greater emphasis on environmental sustainability of design (with regard to both construction materials and the use of these buildings over its lifespan) to be adaptable to various future uses, future circumstances and new technologies.		Addressed	The Toronto Green Standard for New Low-rise Residential Development will be applied through development review
	Toronto Planning Review Panel (April 2017)	General Comment	Minimum accessibility standards should be applied to all new buildings of this type in order to meet the demands of aging individuals and those with physical disabilities (concerning, for example, above-grade first floors). This could be addressed by ensuring a set number of fully accessible units to be constructed in developments of various sizes.		Addressed	Sections 3.2 Shared Indoor and Outdoor Amenity Areas d. meet safety and accessibility standards in amenity spaces, and 4.3 Primary Entrances f. percentage of units directly accessible from grade and various guidelines related to site and building accessibility, pedestrian friendly environments.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
Toronto Planning Review Panel	Toronto Planning Review Panel (April 2017)	General Comment	Consider the demands of pets on both the indoor and outdoor spaces.		Addressed	Zoning by-law and 3.2 Shared Indoor and Outdoor Amenity Areas, e. and Rationale, 2nd paragraph.
	Toronto Planning Review Panel (April 2017)	General Comment	The need for these developments to complement public transit when it is located nearby.		Addressed	Section 1.2.1 Street and Block Patterns a.
	Toronto Planning Review Panel (April 2017)	General Comment	Ensure that design is creating safe spaces at entryways and around the whole building		Addressed	Public Safety paragraph in Intro pg. 10 and Sections 3.1 c. and d., 3.2 Shared Indoor and Outdoor Amenity Areas b., c. and d., and 4.3 Primary Entrances a., c., and Rationale 2nd paragraph
	Toronto Planning Review Panel (April 2017)	General Comment	the need for appropriate soundproofing between units		Addressed	OBC regulates sound transmission rates. The sound transmission rate should be increased for these types of developments due to the primarily wood construction used.

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Toronto Planning Review Panel	Toronto Planning Review Panel (April 2017)	General Comment	ensure that site design includes clear and easy access to public transit for residents and members of the public when it is nearby		Addressed	Section 1.2.1 Context Analysis a.
	Toronto Planning Review Panel (April 2017)	General Comment	City planning staff include or reference relevant aspects of the CPTED (Crime Prevention Through Environmental Design) Guidelines, especially with respect to sight lines		Addressed	Introduction pg. 10. Also embedded throughout the Guidelines.
	Toronto Planning Review Panel (April 2017)	General Comment	Panel members felt it was acceptable for the guidelines to lead to increases in cost for consumers, if a corresponding increase in design quality (for the user or for the surrounding community) was achieved.		No change	
	Toronto Planning Review Panel (April 2017)	General Comment	Required amount of parking could be made to fluctuate depending on the proximity and frequency of public transit		No change	Zoning by-law
	Toronto Planning Review Panel (April 2017)	General Comment	A mandatory greenery-to-built form ratio should be recommended for each development		Addressed	addressed through setbacks and open space guidance. Could also be in zoning by-law

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	Toronto Planning Review Panel (April 2017)	General Comment	Financial incentives could be developed that encourages developers to use environmentally sustainable materials that recoup costs due to savings on utilities over the course of their life span		Addressed	TGS
Toronto Planning Review Panel	Toronto Planning Review Panel (April 2017)	General Comment	The guidelines could recommend that shared amenity spaces respond to the social needs of the broader community		Addressed	1.2.2 a., v. extend parks and open space networks into new development areas to expand the scale and function of these spaces, where appropriate vi.co-locate parks and open spaces with other public amenities, community buildings, schools, shops and restaurants.

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Design Review Panel	Design Review Panel (October 2016)	Chair's Summary	<p>1) The Panel commends the proponent team for their continued progress on this essential Guideline document and further development is encouraged.</p> <p>2) The document is dense with detailed and useful information, but needs simplifying in order to clearly message design intent.</p> <p>3) Establish an over-arching "big picture" context and strategy for these building types; including where the typologies are most appropriate to be used.</p> <p>4) Ensure that all strategies and examples shown lead to an improvement in quality of living; including safety and close connectivity with surrounding text.</p> <p>5) Consider the best communication medium and means to clearly tell the Guidelines story (e.g.: hard copy vs. on line, interactive, simple animation, etc...).</p>	Addressed		The Guidelines have been simplified to improve legibility, ease of use, and clarity of the intent. The guidelines do not establish where these building types are most appropriate because zoning by-laws, secondary plans and the OP are the more appropriate tools to provide direction on land use. Rather the Guideline's role is to provide guidance on the analysis and response to context and site and building design to improve the quality of life. For example, areas such as facing distance, pedestrian mews, private amenity areas, and building transitions have all been studied and guidelines provided to improve the overall quality of life by ensuring adequate sunlight, soil volume, privacy, transitions etc.

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Design Review Panel	Design Review Panel (October 2016)	Related Commentary	<p>Several members commented that the purpose of the guidelines was not clear. The guidelines should address and target the type of audience, from new to experienced developers, that is likely different as compared to mid-rise and tower developments. Specific comments were as follows:</p> <ul style="list-style-type: none"> - 11m separation and face the street: these are the key things I would like to see in the document. - My hunch is that the primary objective [for the guidelines] is built form and site plan. <p>Preferred design solutions were not evident and should be clarified.</p>	Addressed		<p>The Guidelines target a variety of readers from developers, architects, landscape architects, policy makers, planners, consultants, and the general public. The Guidelines provide the history, general direction, and specific guidance to cover a range of topics. For example, specific guidelines with separation distance, amenity space dimensions, design of pedestrian mews have all been included to aid designers and builder. The Guidelines cover generally five areas: context, site, building type, building design, and the public realm. The Demonstration Plan section aims to provide preferred design solutions for various site configurations.</p>
	Design Review Panel (October 2016)	Separation Distances	<p>All members commented that the section on separation distances is important.</p> <p>The diagram on page 45 with angular planes at 125%, 80% etc. is confusing</p>		Addressed	<p>Section 4.2 Facing Distances and Setbacks has been revised. The facing distance is located in Table 1: Facing</p>

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			<p>and questioned the rationale for these numbers. They recommended that a simple number such as 11m or 12m as a minimum dimension, be used instead to govern separation distances and be clearly noted. Another member commented that a 12m high building with a 12m separation could be permitted to go straight up and have no stepbacks for construction efficiency.</p> <p>The minimum separation dimension should be shown clearly and consistently throughout the document. For example, when adding up the dimensions on page 20, a 9.1m separation distance is the unintended result.</p>			Distance, which organizes the facing distance by building height.
	Design Review Panel (October 2016)	Entrances visible from public streets	<p>10) One member who also cautioned against repeating mistakes of the "late 50s and early 60s developments that faced private mews which we are trying to correct" as shown on page 90. However several members were of the opinion that if well done, there is the possibility for successful pocket neighbourhoods sited off of green pedestrian mews. One member noted that examples of this exist at Bain Ave Co-op and Spruce Court co-op, with courtyards and pedestrian walkways, which have become "lovely places that have stood the test of time."</p>	No change		

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Design Review Panel	Design Review Panel (October 2016)	General Interpretation and Graphics	Townhouses on Avenues or main streets: The graphics should be clarified so that townhouses are not shown on main streets such as Avenues, to be aligned with the city's position that mid-rise development should occur instead in these areas. It was noted that a few graphics (images on page 9 and page 15) appear to support the idea of townhouses on Avenues. Due to mid-rise developments being in competition with "quicker and cheaper" townhouses, it was noted that we are starting to see townhouses on deep sites on arterials. It is imperative to be clear about the city's position, and it was suggested it would be helpful to include a section on where they are intended to go.	Addressed		The graphics have been revised to reflect the comment.
	Design Review Panel (October 2016)	Integral Garages	Integral Garages: Another example cited by one member was the implication of integral front garages. As the "least desirable street frontage treatment of a housing unit", it was questioned as to why these appear to be shown in the graphics on page 88, and advised that they should be discouraged.	Addressed		Front integral garages are discouraged in the guidelines, however they are the only option in some cases. The guidelines therefore, address the issues with this type, which include: reduced landscaping opportunities, multiple curb cuts reducing safety and comfort for pedestrians and on-street parking and the poor

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						environment that is created by driveways and garage doors over more active frontages.
Design Review Panel	Design Review Panel (October 2016)	General Comment	In future iterations of the document, it was recommended that all graphics should be drawn carefully to support all city positions, anticipating that they will be interpreted by developers as being the preferred development scenario.	Addressed		Graphics have been updated throughout the document.
	Design Review Panel (October 2016)	Section 3.1 Fit and Transition in Scale	A recommendation from one member was to delete Section 3.1 and tailor the guidelines to the specifics of the low-rise building type where transition in scale is not a major issue.	Addressed		The more intense forms of low-rise multi-unit housing and simple townhouses to a lesser extent, often present transitional issues in residential areas due to lesser setbacks, greater height, building mass and overlook from units of the new development. Sections 3.1 Fit and Transition and 3.2 Separation and Setbacks are intended to address this.
	Design Review Panel (October 2016)	Sections 5.5.2 Windows, Doors and Roofs, and 5.5.3 Materials	A recommendation from one member was that these sections are extraneous and should be deleted.	Addressed		These sections have been consolidated to become 5.3.1 Architecture.

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Design Review Panel	Design Review Panel (October 2016)	Below-grade units	These units are not desirable from a quality of life point of view and it was questioned as to why they are shown in the guidelines.	No change		Below-grade units are permitted in Toronto, the Guidelines as revised, address the relationship of this condition to the public realm.
	Design Review Panel (October 2016)	Street trees and sidewalk	Panel was supportive of the sidewalk recommendations in the guidelines that state that sidewalks are preferred to be located at the curb versus having the street trees at the curb. This condition, where trees are inboard of the sidewalk, will provide greater soil volume and allow for larger trees to grow by having increased shared soil volume with the front yards.	Addressed		
	Design Review Panel (October 2016)	Private Amenity spaces	The guidelines state that these should not be at-grade and should be located away from public/private streets. It was recommended that this be revised: shared amenity spaces like a POPS are acceptable and desirable both at-grade and facing public streets. (Section 1.33, page 28)	No change		Private amenity spaces, in the form of porches or terraces, are permitted on residential streets if they are raised a minimum of 0.6m from grade with appropriate planting and architectural elements to provide privacy. Shared amenity spaces are different and are referred to in Section 3.2.

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Design Review Panel	Design Review Panel (October 2016)	Backyards	The backyard dimension at 7.5m minimum was questioned by one Panel member who observed that a built example with backyards at 5.5m was both attractive and appropriate within a dense urban context.	No change		7.5m is a standard rear yard setback requirement.
	Design Review Panel (October 2016)	Water Management Sustainability	The irrigation statement was raised as being potentially at odds with city strategies of water reduction - drought tolerant species should be encouraged instead as per city guidelines.	Addressed		Deleted, revised to 5.1.2 d. The guidelines also recommended that bio-retention areas can provide visual amenity and possible shared outdoor amenity adjacency.
	Design Review Panel (October 2016)	Garbage	One member pointed to an example at Beverley and Cecil St. of locally produced wood containers for garbage storage when required at the front of townhouses.	Addressed		A preferred screening option has been included.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
BILD	BILD	Introduction Definitions, Low-rise Apartment Buildings “are less than 4 storeys high and share interior corridors...”	<p>Recommendation: That the City be consistent with the Avenues and Mid-rise building guidelines/study, when it states; “In Toronto, on the narrower 20 metre wide streets in the downtown, a mid-rise is 5 or 6 stories high.”</p> <p>This would require a change to the definition to the following: “are less than 5 storeys high and share interior corridors, vertical circulation and entrances, and have multiple units stacked vertically. Typically, units are located on both sides of a corridor (double-loaded) and, sometimes, only on one side of a corridor (single-loaded).”</p>	No change		Revised to, "4 storeys or less".
	BILD	Introduction How and Where the Guidelines Apply	Thank you for being consistent with the Mid-rise and Tall Building Design Guidelines by including interpretation clarity and guidance in scenarios where there may be a conflict of interests or an inability to achieve a particular requirement.	Addressed	Addressed	Revised in 2016 and then changed back at the request of BILD to be consistent with Tall Building Guideline wording.
	BILD	Introduction Guiding Principles, Page 9.	Recommendation: That the City be consistent with the City’s Official Plan and other key Council priorities, by adding two guiding principles, namely “housing affordability” and “transit-supportive development.” This would be a positive start to strengthening the guidelines.	No change		The guidelines are intended to address design excellence for low-rise, primarily residential building types, and the Guiding Principles speak to that. Housing

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						affordability and transit supportive development are addressed through other city policies. No change recommended.
BILD	BILD	1.0 Site Context - 6.0 Demonstration Plans All Subsections.	<p>Recommendation: Generally, these sections of the guidelines need to be reviewed to avoid prescriptive by-law language.</p> <p>Words such as “provide,” “create,” “locate,” and “employ,” should be changed to words such as “encourage,” “discourage,” or “where possible.”</p> <p>BILD reiterated this concern in their October 28, 2016 letter, arguing that the Guidelines had become even more restrictive.</p> <p>BILD is also concerned about what they see as a one-size-fits all approach and that each development needs to be looked at on a site-by-site basis, allowing for innovative solutions.</p>	No change		<p>The language and approach in the <i>Townhouse and Low-Rise Apartment Guidelines</i> is consistent with that used in the <i>Tall Building Guidelines</i>, which contains both directive language and metrics.</p> <p>The City encourages different solutions for different sites, which achieves its objectives.</p> <p>The City also encourages innovation and design excellence and will consider alternatives provided that the proposal is truly innovative and not simply a drive to the lowest common denominator.</p> <p>No change recommended.</p>

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BILD	BILD	1.0 Site Context 1.1 Context Analysis and Planning for Large Sites, Item C, page 14.	Recommendation: That the City be consistent and use the large residential development definition in the City's Official Plan, Chapter 3, page 3-25, where it states; "9. Large residential developments provide an opportunity to achieve a mix of housing in terms of types and affordability. On large sites, generally greater than 5 hectares in size..."	Addressed		The Official Plan contains different metrics to achieve different objectives. The metric in the Guidelines of 1 ha. Was used use to describe a condition beyond which a different approach to site organization and infrastructure is desirable and feasible. The metric was moved to Section 3.1 to describe the conditions under which a private street would be permitted. Private street discussion has been removed from guidelines, as it is more appropriate that this issue be dealt with through the DIPS review and the O.P.
	BILD	1.0 Site Context 1.2.1 Street and Block Patterns, Item D and Rationale - first line of the third paragraph, page 17.	"New streets should be public and conform to the City's Standards of quality" BILD members believe that this determination should be done at the plan of subdivision stage and is not necessary to address in this section. Recommendation: BILD members request removal of this guidance.	Addressed		Guidelines are intended to inform development where a Plan of Subdivision is involved, or wherever new streets and lanes are necessary. Removed the portion of the guideline where it says "New streets should be public..."

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BILD	BILD	1.0 Site Context 1.2.2 Public Parks and Open Spaces, Item C, page 18 "Enhance the experience of 'place', providing experiential and educational opportunities to interact with the natural world"	Comment: BILD members request removal of this guidance. Seek additional clarification as to how this would be achieved and its relevance in a set of Urban Design Guidelines.	Addressed		Guideline has been deleted.
	BILD	2.0 Site Organization 2.1 Streets, Mews and Walkways, Item A, second bullet, page 24. "extend and connect to the local street network with multiple access points to avoid dead-end routes."	Comment: BILD members have advised that given the configuration and size of potential infill site, dead-end routes and mews may be unavoidable. Recommendation: Allow greater flexibility in this regard. Softer language such as "where possible" could lead the sentence accordingly.	Addressed		Revised to, "Provide through streets and lanes to minimize vehicle turnarounds, where possible."

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	BILD	3.0 Site Organization 3.1 Streets, Mews and Walkways, Item A, second bullet. "Minimum 4.5m Front yard setback with front integral garage."	The requirements in this section limit the efficiency of a development site, thereby reducing housing affordability and delivery of family-sized housing, especially for small infill sites. Recommendation: Allow greater flexibility in this regard by reducing min. setback.	No change		In the Infill Townhouse Guidelines "provide a 6m setback from the front property line when parking is at the front of the townhouse" is retained in the low-rise guidelines and adds that the setback to the face of the remainder of the building is a minimum of 4.5m. This dimension provides for sufficient soil volume as per TGS requirements, to support trees in front yards that are bisected by driveways.
BILD	BILD	2.0 Site Organization 2.1 Streets, Mews and Walkways, page 27.	Thank you for adding additional clarity for each type of path, we believe that this section could be strengthened by incorporating the following recommendation. Recommendation: That the City be consistent with the Accessibility for Ontarians with Disabilities Act, 2005, whereby the standard public sidewalk (clear path width) is 1.8m. This would change the building separation for primary access from 6.0m to 5.7m. It would also change for mid-block connections from 4.5m to 4.2m.	No change		TGS requires a minimum clearway width of at least 2.1m.

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
BILD	BILD	2.0 Site Organization 2.3 Building Placement, Item K, page 30. "Generally, provide breaks between buildings every 6-8 units"	BILD members have expressed concerns for this guidance as a suburban standard being applied in an urban context. Recommendation: BILD members believe that we should be dealing with the overall length to meet the Urban Design objective of not having overly long stretches of building without interruption (e.g. a townhouse block with 6.5 metres by 8 units is 52 metres in length and one with 5.0 metres by 10 units is 50m total, one is essentially shorter than the other even though it exceeds the number of units).	Addressed		Revised to, "Generally, provide breaks between buildings every 36m" (Based on units 6.0m in width x 6 units with 4.5m in width times 8)
	BILD	3.0 Site Organization 3.41 Site Services, Access and Parking for Smaller Street-Related Townhouse Sites, Items A, B, C and D, page 35	BILD members are concerned that this direction does not allow for the most efficient use of a small infill site. General Recommendation: Allow greater flexibility in this regard. Recommendation for Item B: be consistent with the City's parking space dimensions which is 5.6m in length and has been applied to existing projects.	No change		Infill Townhouse Guidelines require 6.0m from front property line to garage face. The guideline is being retained in order to accommodate large vehicles without overhanging the public sidewalk or boulevard, while allowing for a small space between the vehicle and garage door. Length of large (SUV) 5.61m

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BILD	BILD	4.0 Building Design 4.2 Separation Distances and Setbacks, Item C and Table on page 40. Requirement for a 7.5m rear yard setback and all separation distances seen in the table.	<p>The guidelines seem to presuppose that townhouses and stacked townhouses are an incompatible built form in Neighbourhoods, when they are in fact a permitted built-form in Neighbourhoods as per the Official Plan. The requirements in this section also limit the efficiency of a development site, thereby reducing housing affordability and delivery of family-sized housing.</p> <p>Recommendation: Allow greater flexibility in this regard. The guidelines should reflect OBC requirements.</p>	No change		The 7.5m setback has been applied before and since the inclusion of the Infill Townhouse Guidelines. Townhouses and stacked townhouses are permitted in some Neighbourhoods designations. Although they may be permitted, they can pose significant intensification relative to their neighbours. The Guidelines are intended to protect light, view and overlook through the 7.5m setback.
	BILD	4.0 Building Design 4.2 Separation Distances and Setbacks, page 41. Requirement for a 45 degree angular plane.	<p>See comments for separation, distances and setbacks, page 40. The requirement for 45 degree angular planes on page 41 is an inappropriate requirement in a low-rise neighbourhood.</p> <p>Recommendation: BILD members request removal of this guidance.</p>	No change		Official Plan Section 4.1 Policy 9b "Infill development on properties that vary from the local pattern in terms of lot size, configuration and/or orientation in established Neighbourhoods will: ...provide adequate privacy, sunlight and sky views for residents of new and existing buildings by ensuring adequate distance and separation between building walls

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						<p>and using landscaping, planting and fencing to enhance privacy where needed..."</p> <p>Infill Townhouse Guidelines which are consistent with Official Plan policy.: "set the buildings back so they do not project into a 45 degree angular plane gradient measured from the rear property line of the adjacent residence" ...</p> <p>" rear setback and angular plane to minimize overlook and shadows on neighbouring properties"</p> <p>The Low-rise Guidelines were revised to clarify intent. Section 4.2 Facing Distances and Setbacks. "c. Provide a minimum 7.5m rear yard setback from the property line at grade. A private laneway or driveway may be included for the purposes of establishing the setback and angular plane, and d. Where there is the potential to shadow an abutting rear yard or open space, apply a 45 degree</p>

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						angular plane measured at the property line of an adjacent property designated Neighbourhoods and/or Parks and Open Space Area.
BILD	BILD	4.0 Building Design 4.3 Building Relationship to Grade and Street, Items B, C and D, page 43.	See comments for separation, distances and setbacks, page 40. Also, the grading conditions of a site may result in the need for a higher elevation. Recommendation: Allow greater flexibility in this regard. The guidelines should reflect OBC requirements.	No change		The City's expectation is that that buildings are stepped to have a generally consistent relationship to grade. In certain guidelines, dimensions are more restrictive than in the OBC. These guidelines are intended to ensure that the site grade and building entrances have a consistent relationship with the site context and/or topography.
	BILD	4.0 Building Design 4.4 Building Entrance and Front Yard, Porch, page 44. "...maximum height above grade of 0.9m" "allow encroachment of stoop or porch into	See comments for separation, distances and setbacks, page 40. BILD members have advised that this requirement does not accommodate some forms and site conditions. Recommendation: Allow greater flexibility in this regard. The guidelines should	Addressed		Revised to, "a maximum of 1.2m above grade."

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		front setback to a maximum of 1.8m from main building face and up to a maximum of 50% of the minimum front yard setback"3.0 Building Design 3.4 Building Entrance and Front Yard, Stoop, page 45. "...be a maximum height above grade of 0.9 m."	<p>reflect OBC requirements. BILD members have advised that this requirement does not accommodate some forms and site conditions.</p> <p>Recommendation: Allow greater flexibility in this regard. The guidelines should reflect OBC requirements.</p>			

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BILD	BILD	<p>3.0 Building Design 3.4 Building Entrance and Front Yard, Below-grade Entrance, page 45. "...maximum horizontal width and depth of 1.2m including the stair access and landing area." "maximum vertical depth of 1.5m from the grade of the adjacent sidewalk."</p>	<p>See comments for separation, distances and setbacks, page 40.</p> <p>BILD members also seek clarification, for this guidance as it appears to not provide for a sufficient depth to accommodate the stairs and landing.</p> <p>Recommendation: Allow greater flexibility in this regard. The guidelines should reflect OBC requirements.</p>	yes	Revised	<p>The guidance on basement stair access has been deleted and replaced with 4.4 Below-Grade Terrace - An outdoor area adjacent to a unit located below-grade.</p> <p>e. Avoid below-grade terraces adjacent to a street, lane/shared driveway, landscaped walkway, or parks/open space. Below-grade terraces may be located in pedestrian mews. Design below-grade terraces to:</p> <p>i. limit the vertical depth of the below-grade terrace to a maximum of 1.5m from grade; with a minimum of 1.5m and a maximum of 2.5m horizontal depth from the main building face to the below-grade terrace wall</p> <p>ii. have generous landscaping at terrace and grade levels to enhance privacy and amenity for the unit dweller and passers by</p>

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BILD	BILD	3.0 Building Design 3.5 Private Outdoor Amenity Space, Above-Grade Terrace, page 47. "raise terrace a minimum of 0.6m and a maximum of 0.9m above-grade."	See comments for separation, distances and setbacks, page 40. Also, the grading conditions of a site may result in the need for a higher elevation. Recommendation: Allow greater flexibility in this regard.	Addressed		"Revised to a min. of 0.6m," and "a maximum of 1.2m above grade."
	BILD	For e.g. on page 8, bullet i. that new development "improve the fit and transition with existing neighbourhoods and at a smaller scale, the transition from the public realm...to the private realm."	Concern regarding the proposed scope of the guidelines.	No change		Revised for clarity to "providing a good "fit" with and transition to existing neighbourhoods and, at a smaller scale, the transition from the public realm (streets, parks and other open spaces) and to the private realm (front yards, private amenity spaces and entrances)." Detailed guidance is then provided in Section 4.1 Fit and Transition.

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	BILD	3.1 Streets, Lanes, Mews and Walkways, Lane page 31	...minimum 0.5 minimum landscape setback on either side of a garage laneway access route. This landscaped space is not sustainable in a laneway setting. We believe that this level of specificity is best kept in the City of Toronto's zoning by-law. Alternatively, we believe that less rigid language should be used, to ensure greater flexibility for development projects that the City of Toronto does want to see happen.		Addressed	Drawing revised to eliminate metric. 3.1 n. added "provide setbacks of, or recesses/gaps to buildings to accommodate planting and snow storage." Existing examples in Toronto of improved laneways are shown on pages 21 and 37. Also refer to the work of www.thelanewayproject.ca for interesting examples of and best practices for laneway greening.
	BILD	Section 3.4 Site services, Access and Parking	Servicing activities have been introduced as a key issue/objective of the guidelines. In this section, the guidelines now state that applicants are to ensure that servicing activities (such as vehicular parking loading, garbage storage and collection) are located underground or internal to the building away from the public realm and public view. We are unclear as to the meaning of "public view" in the context of the guidelines. We find that this guidance is far too specific to be included as an over-arching key objective in a guideline document.		No change	Same wording as primary Guideline 2.3 in the Tall Building Guidelines. 3.4 Site Services, Access and Parking reiterates the objectives and approach of the Infill Guidelines (2003), the Mid-rise Performance Standards and the Tall Building Guidelines.

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			<p>This guidance also has significant cost impacts and construction challenges. We believe that the guidance for servicing should be left in the body of the document and it should allow for these functions to occur outside of the building, if they are appropriately planned for and screened from the public street and are concerned with how it may be applied.</p>			<p>Internalizing building services is particularly important on low-rise development sites. When not internalized, these elements typically occupy the spaces left over from the placement of buildings. The residual area rarely promotes a safer, more comfortable, attractive and amenable pedestrian environment.</p>
BILD	BILD	Section 3.4 Site services, Access and Parking	<p>Within the body of the guidelines (page 36) applicants must now provide a maximum 100m distance to a common waste collection area and garbage chutes. We view this as a strong deviation from a functional and feasibility perspective. We do not feel that development projects should be planned by prioritizing irregularly occurring activities (e.g. garbage pick-up) over the daily functionality and livability of the homes. This numerical distance (of 100m) in the guidelines should be removed, as it appears unwarranted.</p>		No change	<p>This guideline, provided at the request of Solid Waste Management Services, was included as it could affect the layout of a development.</p>

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	BILD	Section 3.2 Shared Indoor and Outdoor Amenity Areas	There may be instances where residents may prefer that liveable interior space be prioritized over ancillary outdoor amenity space. Interior space is also a key consideration of the planning and growth management committee, as noted during their November 2015 meeting. We believe that the guideline language in this section needs to be revised for a more flexible approach.	No	No change	The Guidelines promote both indoor and outdoor shared amenity space as well as private outdoor amenity spaces. See the 3.2 Shared Indoor and Outdoor Amenity Areas and 4.4 Private Outdoor Amenity Space,

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BILD	BILD	3.1 and 3.2 Public Roads, Private Amenity Space and Shared Outdoor Amenity Area (various Sections)	<p>Public roads, private amenity space and shared outdoor amenity area continue to be challenging attributes in the guidelines, especially under the lens of housing affordability. We believe that the guidance for public road could be more permissive by revising the section to read “<u>encourage</u> streets and lanes to be public.”</p> <p>Our members believe that the guidance for private amenity space is counter-intuitive to the objectives of creating an active streetscape and maintaining the “eyes on the street” safety approach to land-use planning. The guidelines should provide an opportunity to strike an appropriate balance between public realm conditions while providing residents with options for usable outdoor amenity space.</p> <p>Finally, there may be instances where residents may prefer that liveable interior space be prioritized over ancillary outdoor amenity space. Interior space is also a key consideration of the planning and growth management committee, as noted during their November 2015 meeting. We believe that the guideline language in this section needs to be revised for a more flexible approach</p>	No change	No change	<p>In addition to operational design, equity and connectivity concerns, developments on private streets are contrary to the Official Plan which directs that new streets should be public streets. The Official Plan also directs that private streets, where they are appropriate, should be designed to be integrated into the public realm and meet the objectives for new streets.</p> <p>The City needs to determine when private streets may be considered and how they should be designed through an inter-divisional review of DIPS standards.</p>

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BILD	BILD		<p>The perpetuation and entrenchment of DIPS, which our members view as prohibitive to these development types in its current form is problematic from a functional and implementation standpoint. In November 2015, Planning and Growth Management also appeared to acknowledge this discrepancy when they directed the Chief Planner and Executive Director, City Planning to report back on the unintended consequences that the current Development Infrastructure Policy and Standards has on low rise infill development sites in the City of Toronto. We believe that references to DIPS should be removed from the guidelines or that DIPS be reviewed prior to the approval of the guidelines because they are so entangled in this latest version.</p>	Yes	No change	<p>Staff will undertake a technical review of DIPS through the operationalizing of Complete Streets, in order to better align with the Townhouse and Low-rise Apartment Guidelines and other relevant City standards (e.g. Toronto Green standard)</p>

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	Commenting Group	Section and Subsection, or Topic	Comments	Comments Addressed 2015	Comments Addressed 2016/2017	Response
Walker Nott Dragicevic	Walker Nott Dragicevic	2.1(a) Pg. 24 Extend and connect to the local street network with multiple access points to avoid dead-end routes	Given the configuration and size available of potential infill sites, dead end streets and mews may be unavoidable. It may be more appropriate for the guideline to read as follows: "Where possible, extend and connect to the local street network with multiple access points to avoid dead-end routes."	Addressed		
	Walker Nott Dragicevic	2.1 Pg. 25 Where front integral garage parking is provided, the minimum front yard setback is 4.5. from the property line (with the garage portion of the building setback 6.0m)	The proposed minimum setback of 4.5m may limit the residential development of small infill sites. For Summerside (approved in 2006), the setback to the garage door was at 3.0m, a condition that was supported by City staff.		No change	<p>Revised to, "Extend and connect new streets, lanes, pedestrian mews and walkways to the local street/pedestrian network and provide links to schools, transit, community facilities, and retail areas, <i>where possible.</i>"</p> <p>Infill Townhouse Guidelines "provide a 6.0m setback from the front property line when parking is at the front of the townhouse"</p> <p>Staff have determined a minimum 4.5m setback to the front of the building other than the garage, is necessary in order to satisfy the TGS requirements and provide sufficient soil volume for trees.</p>

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Walker Nott Dragicevic	Walker Nott Dragicevic	2.2(c) Pg. 28 Preserve and protect existing healthy trees and green space	The preservation of all healthy trees may be unavoidable due to the location of the trees within a site. The City should also consider the quality of the trees, not only the health of the trees	No change		Infill Guidelines: "preserve and protect existing healthy trees and green space" Official Plan: Section 3.1.2 Built Form Policy 1d) preserving existing mature trees wherever possible and incorporating them into landscaping designs Revised to 3.2.b. iv. "preserve existing trees and topography wherever possible and incorporate into the landscape design."
	Walker Nott Dragicevic	2.3(o) Pg. 30 Also on these deeper sites, where back to back units result in one side of the building facing an area that cannot be seen from a street, locate all entrances facing the street or use a through unit type instead.	Depending on the nature of the existing and/or proposed development, back-to-back townhouses visible from public uses (open space, parks, walkways, etc.) should also be permitted. All units do not need to face onto a public street to be visible. The current Toronto 'Infill Townhouse Guidelines' encourages the design of "townhouses to face parks / open spaces on adjacent sites where new streets adjacent to the park are not possible"		Previously revised	Revised to 3.3 k. "On mid-block sites, where back to back units result in one side of the building facing an area that cannot be seen from a street, park or publicly accessible open space, locate all entrances facing the street/open space, or preferably use a hybrid, low-rise apartment or through unit type instead."

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Walker Nott Dragicevic	Walker Nott Dragicevic	2.5.1(a) Pg. 35 Eliminate front driveways and garages in street-related townhouses generally and consider only when a unit is 6.0m or wider	The frontage of a residential dwelling has a major impact on the affordability of the dwelling. A review of the floor plans between the narrower Summerside and Heron Park dwellings would show that the livability of the unit would not improve with an increased frontage dimension.		Previously revised	Buildings with front integral garages, which occupy the majority of the ground floor, create an undesirable condition on the street and should be avoided. Revised to 3.4 k. Avoid front driveways and garages in street-related townhouses generally and consider only when a unit is 6.0m or wider. When providing the minimum: i. provide a maximum width of 3.0m for a driveway and a walkway leading to the front door ii. ensure a minimum soil volume of 30m ³ to support mature tree growth within the 50% soft landscaped portion of the front yard, iii. provide for garbage and recycling bin storage in the garage iv. provide a minimum of 6.0m between individual driveways to accommodate on-street parking v. construct driveways with permeable paving and/or high albedo surface material

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Walker Nott Dragicevic	Walker Nott Dragicevic	2.5.1(b) Pg. 35 Locate the garage door face a minimum of 6.0m from the inside edge of the sidewalk on a vehicular mews and from the property line on a public street	The distance between the garage door and sidewalk should be consistent with the City's parking space dimension, which is 5.6m in length. The distance between the face of the garage door and the sidewalk for Heron Park was 5.6m	No change		<p>Infill Townhouse Guidelines - "provide a 6m setback from the front property line when parking is at the front of the townhouse"</p> <p>Staff have determined a minimum 4.5m setback is necessary in order to provide sufficient soil volume for trees to satisfy the TGS requirements.</p> <p>The 6.0m requirement also takes into consideration space required for a person to move around the vehicle on private property Revised as 3.4 k. (see above)</p>
	Walker Nott Dragicevic	2.5.1(c) Pg. 35 Provide a minimum of 6.0m between individual driveways to accommodate on-street parking	Providing a 6m separation distance will be difficult for proposals with lots less than 6m in width. This will not address situations where less than 6m wide units are appropriate. Depending on the layout of each development, sufficient on street parking may be available in other locations (for example on single loaded roads or in front of other dwellings)	No change		<p>Infill Townhouse Guidelines - a minimum of 6 metres (20 feet) space between individual driveways to not preclude on-street parking. Revised as 3.4 k. (see above)</p>

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Walker Nott Dragicevic	Walker Nott Dragicevic	2.5.1(d) Pg. 35 Ensure that 50% of the lot frontage along the street comprises landscaping	Based on the size of a potential infill site and proposed residential building types, it may be difficult to provide for 50% open space. For example, Heron Park provides a minimum of 37% of the front yard for landscaping. The landscape requirements should be dependent on the width of the lot, and consistent with the City of Toronto Zoning By-law 569-2013 which states that for "lots with a lot frontage less than 6.0 metres, or a townhouse dwelling unit less than 6.0 metres wide, the front yard, excluding a permitted driveway, must be landscaping."	Addressed		Revised as 3.4 k. (see above)
	Walker Nott Dragicevic	4.2(c) Pg. 40 Provide a minimum 7.5 minimum rear yard setback from the property line	A proposed minimum rear yard setback of 7.5m is counterproductive to intensification.	No change		Infill Townhouse Guidelines - "allow for a minimum of 7.5m back yard setback to the rear property line The 7.5m setback has been applied before and since the inclusion of the Infill Townhouse Guidelines. Townhouses and stacked townhouses are permitted in some Neighbourhoods designations. Although they may be permitted, they can represent significant intensification relative to their neighbours. The Guidelines are intended to

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						protect light, view and overlook through the 7.5m setback.
Walker Nott Dragicevic		4.2 Table Pg. 40 A minimum separation distance of 11.0m to 15.0m (depending on main wall height) within a 45 degree angular plane is required)	From a design perspective, rather than providing a specific separation distance of 15m, it may be more appropriate for the facing distance between blocks to be determined by a 45 degree angular plane measured at the main wall		Addressed	Infill Townhouse Guidelines: 15 metres (50 feet) facing distance between townhouse blocks Revised in Section 4.2 a. and b. to provide a 9-15.0m separation distance depending on the height of the building and whether below grade amenity spaces are being provided
		4.2 Table Pg. 40 A minimum separation distance of 11.0m to 15.0m (depending on main wall height) within a 45 degree angular plane is required)	The grading conditions of a site may create the need for a higher number of risers/steps. For Heron Park, although the majority of the back-to-back townhouses had 5 risers, a few units required a maximum of 9 risers. It would be more appropriate to identify that the majority of the risers be no higher than 1.2m above grade (3-5 risers).	Addressed		Revised in Section 4.3 g. iii. "have approximately a maximum 3 to 5 steps or be a maximum of 1.2m above the grade of the walkway leading to the front entrance. Internalize any additional steps required to gain access to the unit"

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Walker Nott Dragjcevic		<p>4.4 Porch (a) Pg. 44 Design porches to be a maximum height above grade of 0.9m</p> <p>4.5 Above Grade Terrace (b) Pg. 47 Raise terrace a minimum of 0.6m and a maximum of 0.9m above grade</p>	<p>The grading conditions of a site may result in the amenity area being provided at a higher elevation. For example, for Heron Park to respond to the grading conditions of the site, the front porch/ground floor of a few of the back to back condominium townhouses were at 1.5m above the finished grade</p> <p>The grading conditions of a site may create a front porch at a higher elevation. To respond to the grading conditions of Heron Park. The front porch/ground floor of a few of the back to back condominium townhouses were designed at 1.5m above the finished grade.</p>	Partially Addressed		The guidelines have been revised to a maximum 1.2m above grade, and there is an expectation that buildings will be stepped to address grade changes across a site.
		<p>Streetscape Illustrations - Illustrates a minimum 6.0m wide street boulevard and a minimum 2.1m public sidewalk</p>	<p>The guidelines should be consistent with the City's current policies, including the Development Infrastructure Policy & Standards (DIPS) (the width of the sidewalk for DIPS is 2.0m)</p>	No change		The guidelines reflect TGS standards at 2.1m sidewalk width. DIPS needs to be updated to reflect this.

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Diamondcorp	Diamondcorp	Public Street - Intent is to provide public street on sites greater than 1 hectare	<p>Public roads would be required over approximately 17% to 25% of the site, depending on the product type.</p> <ul style="list-style-type: none"> - Unit count would be reduced by approximately 30% with a stacked back to back product - Overall, with the introduction of new roads, the layout of the blocks would result in an awkward configuration given the size and shape of the block. Of more concern, new roads would not provide any meaningful connectivity in the neighbourhood and the result would be an irregular pattern of streets and blocks compared to the grid that prevails in the neighbourhood. The guideline at section 2.3 e) also seems to suggest that all units should be accessible from a public sidewalk, and it is unclear if the suggestion is that all units must directly face the public sidewalk, thereby reinforcing the issue described above. 	Addressed		Guideline has been deleted
	Diamondcorp	Metrics for Setbacks and Stepbacks - Intent is to retain sunlight and privacy	To comply with the current requirements, 17m separation distances would be required, which would reduce unit yield significantly, by over 20%. The separation distances as built range from 13.3m-14.2m	Addressed		The Southshore development in Etobicoke being referred to in this comment, would comply with the Separation Distances as outlined in Section 4.2

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Diamondcorp	Diamondcorp	Building relationship to street - Intent is to create appropriate relationships to streets	<p>Significant implications on the Southshore lower level, as the guidelines do not permit either grade related or below grade amenity space fronting public/private streets. Application of these guidelines would impact 11 of the more affordable, one storey product offerings that face 24th and 26th Streets.</p> <p>- The outdoor amenity would be compromised for the upper units, which the guidelines indicate can only be 0.75m in depth if they are located above the lower level amenity.</p> <p>- The guideline for a maximum 0.9m porch (OBC maximum is 1.5m) combined with the maximum 1.5m depth for entrances to lower units, results in 2.4m floor to floor (7.87 feet) condition) or a ceiling height of less than 7 feet. This compromises the internal living environment for two levels of units.</p> <p>- The guidelines outline that a maximum depth at the base of a lower level staircase should be 1.2m. OBC has different requirements for stair depth based on stair width which could be a conflict with these guidelines.</p>		Previously revised	<p>Revised Section 4.4</p> <p>e. Avoid below-grade terraces adjacent to a street, lane/shared driveway, landscaped walkway, or parks/open space. Below-grade terraces may be located in pedestrian mews. Design below-grade terraces to:</p> <p>i. limit the vertical depth of the below-grade terrace to a maximum of 1.5m from grade; with a minimum of 1.5m and a maximum of 2.5m horizontal depth from the main building face to the below-grade terrace wall</p> <p>ii. have generous landscaping at terrace and grade levels to enhance privacy and amenity for the unit dweller/passers by</p>

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PMG Planning Consultants	PMG Planning Consultants	Introduction & 56, 5.4 Public Art	Pg 12 & 56, 5.4 Public Art – As I understand, it's the City's policy only to ask for public art where there is at least 10,000 m ² of new development. Clarification should be made that public art is only being considered with large developments. The guidelines refer to "large building sites", but don't relate it to development size. It also refers to public art being placed on adjacent public lands. Is this meant to indicate that the City is prepared to take ownership and maintenance responsibility for public art that is placed on public lands?		Addressed	5.4 Public Art, main guideline revised to "Pursue public art opportunities and funding strategies for <i>larger</i> developments to enhance the quality of the development, the public realm and the City."
	PMG Planning Consultants	1.1 Context Analysis and Planning for Larger Sites, Illustration	I am glad to see the illustration on page 15, which shows the City taking a more relaxed position on a number of features which previously were discouraged. These include: - public park dedication within the 30 m rail setback - building orientation with their narrow ends fronting the new public street		Addressed	The illustration on page 15 has been revised to read "open space" rather than "park" in order to not imply that park dedication is acceptable within the rail setback. Narrow ends of buildings fronting streets are acceptable provided that they are treated as fronts see: 3.3 c. and k.

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PMG Planning Consultants	PMG Planning Consultants	1.1 Context Analysis and Planning for Larger Sites, Illustration	I think this shows that the City needs to consider removing the building behind a building restrictions from By-law 569-2013 as they can be very arbitrary and could restrict otherwise good projects		No change	All buildings are to be located on a street or a pedestrian mews, the totality of which would constitute the circulation network.
	PMG Planning Consultants	1.2.2 Public Parks and Open Spaces: b.	I am glad to see that building/units are encouraged to front directly onto parks and open space. I have been to a couple OMB hearings where the City's position was that an intermediary street was required, or where the open space was to be replaced by a street		No Change	The 2003 Infill Guidelines: "Design townhouses to face parks /open spaces on adjacent sites where new streets adjacent to the park are not possible." Revised as Section 3.3 Building Placement and Address
	PMG Planning Consultants	1.3 Heritage: c.	Why would the guidelines be encouraging the preservation of the balance of a building if only the façade has historical value? There are many instances where interior historical value has been lost through successive renovations. Why should the developability of a site be compromised by a stated desire to preserve elements that have little or no heritage value?		No Change	The guidelines are consistent with the City's heritage development policies.

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PMG Planning Consultants	PMG Planning Consultants	4.1 Fit and Transition: d.	What if the non-historical context consists of large buildings and only the historical elements are of a lower scale? Scale of new development should respect all context, not just select elements just because they have been deemed historic.		Addressed	Revised to 4.1 e. “For sites including or adjacent to heritage properties, design the scale and height of the building to respect and reinforce the height established by the historic context.”
	PMG Planning Consultants	2.1 Building Types: d., ii.	I don’t understand the issue of too many entrances on a façade. I thought the desire was to break up a larger façade with smaller elements, including entrances. I also thought that you would want to see each unit at grade with its own front door.		No Change	The most successful streetscapes are ones with a balance between entrances and living spaces. When excessive amounts of entrances are located on a street with the associated stairs and railings, these elements often clutter or overwhelm the building and streetscape, reducing the attractiveness of the public realm. The stacked and back to back type with all entrances on one side of the building (not a desired type) typically have so many entrances, stairs etc. that it overwhelms the public realm.

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PMG Planning Consultants	PMG Planning Consultants	1.1 Context Analysis and Planning for Larger Sites, Illustration	The illustration on page 15 shows a site design in which most of the units would not be directly visible or with direct access from a street, but would have access from the walkways you want to see running through the site. This principle should be relaxed.		No Change	All units shown on the illustration on page 15 have buildings with entrances that are visible from a street.
	PMG Planning Consultants	Page 21, 2.1.1, Illustration and discussion	By-law 569-2013 permits parking on a driveway leading to a required parking space. This would be parking between a building and a street. Perhaps this guideline should read “avoid parking lots between ...		Addressed	2.1 d. revised to “Use the appropriate building type and unit configuration in order to avoid: iv. parking /ots located between a building and a street”
	PMG Planning Consultants	2.1 Building Types, 2.1.1 to 2.1.6	By-law 569-2013 requires 1 parking space per townhouse unit, and that space must be located behind the front wall of the building. It is not possible to avoid a front integral garage in the situation shown (public street and no lane) and still be in compliance with the by-law. Shouldn't the guideline be better focusing onto how to best integrate a front garage when it is required? Also, infill street townhouses will most likely be freehold. It is not realistic to expect underground parking with any street-related townhouses, except those which may be infilling on an apartment site where an underutilized		No Change	Front integral garages are only appropriate when no other parking arrangement options are possible on a site, such as via a laneway, driveway, and/or underground garage. 3.4 k. addresses how to integrate a front garage if unavoidable.

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			garage already exists or as part of a new development that has larger scale apartment buildings as well as a street-related townhouse component. I would suggest that expectation for underground parking be more limited. It appears that undergrounds are expected on almost every project.			
PMG Planning Consultants	PMG Planning Consultants	3.1 Streets, Lanes, Mews and Walkways	All of these types of units could be located anywhere in the City. This includes larger sites in less central areas. Affordability is a prime reason that these types of units are constructed, and is also an OP objective. Underground parking is expensive, and could impact this affordability. Surface parking needs to be allowed on sites that have the room. In some cases, it may just be needed to meet the visitor parking requirements as allowing the public into an underground garage may provide safety and security concerns on small developments that don't have a concierge or other staff on site full time. None of these types will be pure freehold, so there will be a condominium associate to deal with the maintenance of surface lots. Section 3.4 also does not deal with surface parking, where it should be and how it should be treated.		No Change	Section 3.4 f. iv. references the Toronto Green Standard and the Design Guidelines for 'Greening Surface Parking Lots for the design of surface parking. Having said that, the City has not received an application for surface parking lots associated with Low-rise development types in some time, even in the more suburban areas. The implication of this is that using land that might be used for parking for development creates more value, even factoring the cost of alternatives for parking (typically underground).

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PMG Planning Consultants	PMG Planning Consultants	3.1 Streets, Lanes, Mews and Walkways: e.	Through streets and lanes minimizing turnarounds), and 3.1 f (consolidating drives and minimizing curb cuts), can be seen to be in direct conflict. Which takes priority? How does the City plan to resolve conflicting comments, say from Works asking less curb cuts and Urban Design asking for through streets and lanes as opposed to turnarounds. It would be helpful if the Guidelines could clarify how the City will deal with these kinds of conflicts.		Addressed	3.1 f. (consolidating drives and minimizing curb cuts) speaks to the need to consider, when site planning, how to achieve the greatest efficiency with site access infrastructure, where access should be located and how to minimize the impact of these elements on the pedestrian realm. 3.1 e (through streets and lanes minimizing turnarounds) will often result in a through block connection, with one access on each secondary street which can be an acceptable impact, while often substantially reducing the amount turn-around area on the site.
	PMG Planning Consultants	3.1 Streets, Lanes, Mews and Walkways	It's good to see that the City is now open to units/blocks fronting walkways		No change	
	PMG Planning Consultants	3.1 Streets, Lanes, Mews and Walkways	The text in i, ii & iii aren't coordinated with the sketch. Lanes are service areas. It is not realistic to expect landscaping to survive in that environment, especially if the setback between the garage and drive		No Change	It is noted on the sketch that dimensions vary according to the particular condition. Existing examples of improved

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			aisle is also being used for snow storage. Recesses along the lane just provide unsafe hidden areas that don't meet CPTED principles.			laneways are shown in Section 3.4 Site Services, Access and Parking. Also refer to the work of www.thelanewayproject.ca for interesting examples of and best practices for laneway greening.
PMG Planning Consultants	PMG Planning Consultants	3.2 Shared Indoor and Outdoor Amenity Areas	What determined the triggers in "a" for the need for shared amenity space? I would not limit it to just rear yards. Roof-top, garage roof and stepback terraces should also be considered when evaluating the need for shared amenity space. Asking to avoid the use of residual space is also not realistic. Given the current prices and lack of availability of sites in higher demand areas, maximizing the number of units is important to control sale prices and maintain project viability. It is not realistic to expect valuable space for units to be turned over to amenity area when other locations such as corners of sites etc can be used instead.		No change	The "trigger" comes from By-law 569-2013: Amenity space requirements for "Apartment Building and "Building" in Zones which permit Apartment Buildings as a Permitted Building Type. Staff found through their research and consultation that there was a noted lack of good grade related indoor and outdoor shared amenity space in low-rise multi-unit developments, for activities such as children's recreation, dining or meeting. One of the main objectives of the Guidelines is to ensure that future developments provide safe, attractive and accessible amenity space as a focal point.

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PMG Planning Consultants	PMG Planning Consultants	3.4 Site Services, Access and Parking	It is not realistic to expect underground garages to not be under outdoor amenity areas if the site is developed with an underground garage. This would create an inefficient garage layout and would most likely require going down an extra level. Garage costs increase by level, and unnecessary additional levels would only decrease the affordability of the units.		Addressed	Revised to, 3.4 i. "Avoid below-grade parking structures encroaching into setback areas on the site." 5.1.2 c. "Ensure that underground structures do not occupy the full extent of the property in order to provide unimpeded areas for tree growth and water infiltration."
	PMG Planning Consultants	3.4 Site Services, Access and Parking	Other guidelines seek to consolidate driveways. Integrating vehicular entrances into the façade of a building could require a separate driveway or an extra large garage opening for service vehicles. Ramps require higher head room for significant lengths, making it difficult to coordinate with the building interiors. Often, setbacks or other exterior areas are the most efficient location for ramps. The guidelines should not simply reject exterior ramps, but also consider how they could be treated when using them makes the most overall sense. Ramps are already very wide and therefore hard to fit into tight sites. Requiring a separate walkway beside the ramp can be onerous. The guidelines should instead ask that bicycle access		Addressed	Locating ramps and loading areas outside of the building massing results in the reduction of available landscape open space. Revised to 3.4. h.: "Provide for safe and appropriate pedestrian/bicycle access to the underground parking garage." Surface parking spaces are not appropriate due their impact on the public realm and the possibility of better uses at grade such

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			and egress to underground bicycle parking be planned for, and not just specify one way of doing it. Introducing visitor parking into underground garages should not be encouraged when surface visitor parking can be provided. By inviting the public in, it makes garages harder to secure and protect from a CPTED perspective.			as amenity spaces and/or landscaped open space. Underground garages can be secured by specified user access which improves security.
PMG Planning Consultants	PMG Planning Consultants	4.1 Fit and Transition	Matching the first building/bay/unit is not required to provide transition and can be onerous on the development.		No Change	This sort of transition is particularly important when the neighbouring properties or community are of a lower scale and intensity. Matching the first building/bay/unit to provide transition has been achieved in other city developments.
	PMG Planning Consultants	4.2 Facing Distance and Setbacks	<p>The table of setbacks make sense, except for the need for 1 m additional setback with a sunken entrance. This could cause the removal of usable outdoor space for lower units in an effort to make buildings fit on the site.</p> <p>It is also not clear why a 7.5 m separation between an active building face and a passive one is required. It shouldn't be a fixed number and instead relate to height and be half the separation distances. The</p>		Addressed	The Guidelines establish minimum separation distances between facing buildings to ensure that three critical aspects of design are adequately addressed - sunlight inside a dwelling and to open spaces, reasonable view from a unit, and privacy. Therefore the higher the main building

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			<p>same argument applies to rear yards. There are a large number of reduced rear yard setbacks approved throughout the City, which should be acknowledged in the Guidelines.</p>			<p>face the greater the facing distance. A sunken patio increases the main building face height and an additional 1m of separation is called for to allow some sunlight into the lower unit and on to the sunken terrace.</p> <p>Revised to 4.2 e. "Provide half the distance specified in Table 1, Facing Distance, between the face of a building containing primary living spaces, such as living and dining rooms, and the side (secondary living spaces) of another building or property line."</p>
	PMG Planning Consultants	4.3 Primary Entrances	<p>What is the legislative background for the requirement of 5% of units on sites larger than 1 ha to be barrier free? Making an entire unit barrier free as per building code can be very onerous. It affects doorways washroom sizes and a number of elements inside the unit which have no impact on Urban Design. It is difficult for the types of units being discussed in these Guidelines. Below-grade entrances may be common in these types of developments and the limitations being</p>		Addressed	<p>Through staff's consultation, a number of stakeholders asked that this aspect be addressed. The thinking was that on sites larger than 1 ha. where multiple blocks of units are being created, that a small percentage of units could and should be made barrier free. Given</p>

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			<p>placed on where they are located can put an undue restriction on how the site is developed. Considering these units tend to be the more affordable ones, they should be encouraged, not discouraged. Asking that they not encroach into the minimum distance separation is onerous.</p> <p>It is also not clear why you would want to restrict the size of the landing making it tighter and darker. Depth is in direct relation to the Building Code and meeting the requirements for a building to be deemed 3 ½ storeys. I would suggest that you check to ensure that you are not bringing forward a guideline that may be in conflict with the Code.</p>			<p>that there are no City provisions that would require this, the language has been softened to, “f. For developments on sites of 1 hectare or more in size, at least 5% of the units are <i>encouraged</i> to be barrier-free and directly accessible from grade.”</p> <p>As a result of typically minimal setbacks and narrow unit widths, entrances to below grade units in combination with multiple stairs up and down provides an inadequate frontage to the street.</p>
	PMG Planning Consultants	4.4 Private Outdoor Amenity Space	<p>The comments for below grade entrances above also apply to below grade terraces. The size restrictions for landings don't make sense given that most entrances would be combined with terraces. The 0.6 to 1.2 m rise of above grade terraces is also restrictive. This would only apply if there was no planting buffer between the terrace and the public realm. If there is a planting buffer, the grade change could be less and the same objective would be achieved. The 1 m</p>		No Change	<p>Staff was unable to find one good example of an at-grade or sunken terrace on a street even with a planting buffer that provided an acceptable transition from public to private given the typically narrow units and minimized building setbacks.</p>

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			roof edge setback requirement limits the potential for casual overlook of common spaces and is not in keeping with CPTED principles. The balcony guidelines are also far too prescriptive and could limit architectural creativity.			The 1m roof terrace setback is to avoid excessive overlook in the typically tight facing conditions.
PMG Planning Consultants	PMG Planning Consultants	5.2.1 Utilities & Other Equipment	Major utilities are generally located where the utility company requires them, where they are accessible for maintenance, and where they best coordinate with off-site connections. These criteria need to be recognised and accommodated. The current wording does not recognise that a balance of needs to be struck between practical engineering and Urban Design objectives.		No change	There are usually options for the placement of utility infrastructure on a site. Section 5.2. Site Element, brings these issues to attention of the designer and developer.
	PMG Planning Consultants	5.3.1 Architecture	What's the problem with sloped roofs on stacked units? These are stacked units. This is getting into dictating styles.		No change	The guideline 5.3.1 g. refers to larger footprint buildings "Ensure that roof elements do not dominate the building particularly on larger buildings. House-form roofs such as pitched or mansard roofs are not appropriate for stacked and back to back townhouses or apartment buildings." When a pitched roof on a larger footprint building is

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						<p>attempted, it is typically flattened resulting in a low-pitched roof that appears as flat from the street and then often elements like faux dormers are added. This guideline speaks to being “true to type” rather than dictating style.</p>