



BUILDING A GREATER GTA
Building Industry and Land
Development Association

November 14, 2017

Chair David Shiner and members of the Planning and Growth Management Committee
Toronto City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

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

RE: *Draft Townhouse and Low-Rise Apartment Guidelines – Final Report*

On behalf of the members of the BILD Toronto Chapter, we submit the following comments to you with respect to the City of Toronto's Draft Townhouse and Low-Rise Apartment Guidelines ("guidelines"), which are to be considered at the November 15th Planning and Growth Management Committee meeting. BILD and its members have been heavily engaged in the review of the guidelines and we were surprised to learn that it is being considered by the Committee this month.

We would like to thank Chair Shiner for his leadership in quickly initiating a meeting prior to the Committee meeting with senior staff. Based on this discussion, we understand that a deferral motion will be put forward at the November 15th meeting, to the Committee's February 8th meeting. BILD members are supportive of this deferral to allow for the necessary time to comprehensively review this latest iteration of the guidelines and to allow time for staff to consult with BILD Toronto Chapter's working group. We are hopeful that this time will allow for clarity and resolution to several outstanding concerns and we are committed to this process.

Conceptually, the guidelines are the right approach to providing direction for townhomes and low-rise apartment buildings. But, upon initial review of the latest iteration of the guidelines, BILD members continues to be concerned that many of our comments were not reflected in the latest version. Our members do not see a balance being created between existing land uses and the allowance of appropriate infill development. They have indicated that the current set of guidelines work against the efficient and feasible delivery of a housing type that is typically entry-level housing for families that cannot afford detached homes, but still want to live in the great neighbourhoods of Toronto.

While there are many comments made by BILD's working group over the course of this review, if the Committee kindly grants this deferral we would like to take this time to work collaboratively with staff on the following.

Process and Decision-Making:

- Strengthen the introductory section on "how to read these guidelines" by striking a balance between the interests of the existing community with growth. Allow for the overall intent of the guidelines to be met without the necessity to meet each and every individual guideline, which is likely unachievable.
- Include two guiding principles, being 'housing affordability' and 'transit-supportive development,' to reinforce the City's Official Plan objectives.
- Include a staff training program for the implementation and interpretation of the guidelines. This is an imperative step to the successful implementation of any new guidance.

Content of the Guidelines:

- Allow for a range or a wider range for setbacks, separation distances, and angular planes. This will provide needed flexibility to applications and demote a "one size fits all" approach.

- In the interest of housing affordability, addressing the missing middle and providing for family-sized units, abandon the requirements for public roads, interior and outside amenity areas, internalized garages and below grade unit restrictions for these development types.

As partners in prosperity, BILD and the City of Toronto need to continue our past successes by working cohesively to support development projects that represent good planning in an environmentally-sustainable, socially-responsible and economically-viable fashion. In consideration of these three critical elements, and to encourage the continued development of Toronto as a world-class city, the City should allow some level of flexibility to permit architectural creativity and innovative technology to be explored.

The City of Toronto's existing planning approvals process is extremely complex and multi-dimensional. Every additional set of guidelines adds a new layer of complexity to the development approvals process so it is imperative that each new guideline or policy document be thoughtfully integrated.

We hope that you will take these comments into consideration. If you have any questions or comments, please do not hesitate to contact the undersigned.

Sincerely,



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

CC: Gary Switzer, BILD Toronto Chapter Chair
BILD Toronto Chapter members