

PG27.5.2



November 14, 2017

To: Councillor David Shiner, Chair, Planning & Growth Management Committee
Members, Planning & Growth Management Committee

From: Daryl Chong
President & CEO, Greater Toronto Apartment Association

Re: **PG24.11 Townhouse and Low-Rise Guidelines – Final Report**

The Greater Toronto Apartment Association (“GTAA”) represents the interests of the multi-family, purpose-built rental housing industry. Our members own and manage more than 150,000 units of multi-family, purpose-built rental housing in the GTA, with the vast majority in the City of Toronto.

The proposed Townhouse and Low-Rise Guidelines (“Guideline”) should greater flexibility to encourage more development. Instead of an “etched in stone” and “one-size-fits-all” approach, the GTAA strongly recommends fewer rules, and an enhanced focus on a “case-by-case” analysis with the ability to review the merits of each application. Enshrined in this methodology would be the understanding that Toronto is large and has varying needs; and the City is able to accommodate this variety and provide suitable housing accordingly.

Very rigidly designed regulations may result in the ‘self-disqualification’ of many sites. This has been our experience regarding many potential purpose-built rental development sites. The projects stop before they start.

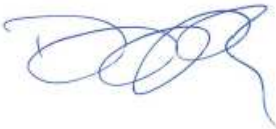
The proposed Guideline includes many ‘nice to have’ requirements that exceed what is needed. Providing these features or fulfilling these requirements often have financial implications. These added costs are then borne by purchasers or embedded in rent – in both cases the added costs impact what the end users pay. Or, in many cases, the project does not proceed, and new housing is not added to the City’s inventory.

GTAA recommends a scaling back of many of the physical element requirements. One example is the requirement of a maximum distance of 100 meters to the waste collection area. This is a “nice-to-have” feature, likely proposed by the solid waste division, citing a

walking distance greater than 100 meters as a reason why some people don't recycle. But without empirical evidence to prove 100 meters as a set 'walkable / not walkable' threshold. Natural light and sightlines are also very "nice-to-have" but designing a single set of rules to be applied city-wide is overkill. Further, in locations where the development site is in close proximity (without etching a specific number of meters) to a public park, it would be reasonable to loosen the outdoor amenity area requirements. People choose to live beside / across from / nearby public parks specifically to use the public park. An onsite playground in a townhouse or low-rise development would pale in comparison and likely be underutilized – even though the end user has paid / is paying for the capital and operating costs of the onsite playground.

Affordability is negatively impacted by the proposed single set of requirements that appear to be designed to individually address a set of worse case scenarios / common denominator.

Townhouses and low-rise apartments often provide more living space, and are often more suitable for some families, than other higher density housing. They add to the housing choices offered to residents in our City. Expansion of this segment of housing needs to be encouraged and this is best done with the flexibility we respectfully recommend.

A handwritten signature in blue ink, appearing to read 'Daryl Chong', with a stylized, cursive script.

Daryl Chong
President & CEO
Greater Toronto Apartment Association