



February 21, 2018

10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2 City Planning Division
Attention: Nancy Martins, Clerk

RE: PG27.5 Townhouse and Low-Rise Apartments Guidelines

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

We provide this correspondence to **express our support for the staff recommendations to City Council regarding the Townhouse and Low-Rise Apartments Guidelines.**

We appreciate several aspects of the Guidelines, especially:

- The “contextual approach” showing the evolution of, and the relationship between, the various typologies of the townhouse and low rise apartment building formats.
- The principled approach to the statements of intent and direction
- The requirement for a “block” context analysis for large sites
- The practicability of the proposed actions, and case studies
- The clear organization of the report and use of graphical presentations

However, the January 2018 edition of the Guidelines has been revised to incorporate several BILD comments. We strongly object to additional language on page 9 of the Introduction-How and where the guidelines apply (page 9) which refer to “balancing” of the need for new development to enhance and fit within the area context, and to accommodate housing in a growing city (see attachment).

The Townhouse and Low-Rise Guidelines are intended as design guidelines, not as land use policies, i.e. they primarily deal with questions of “how” not with “what” and “where”, which are dealt with in the Official Plan, Secondary Plans, and Zoning By-laws. We contend that “balancing” must be done through Official Plan policies, and implemented by zoning by-laws. Guidelines cannot be allowed to circumvent the Official Plan but must be used to guide its implementation in a local context.

We respectfully request the following (original) wording without (BILD) modifications:
“As such, it is important to ensure that new development will enhance and fit within the local area context.” (page 9, pp.1 last sentence)

“The Guidelines are intended to provide a degree of certainty and clarity of common interpretation, however as guidelines they should also be afforded some flexibility in application, particularly when looked cumulatively.” (page 9, pp.3)

We believe that these guidelines, when applied by the City and the building industry working together, will enhance the liveability of the projects for residents, and the quality of the public realm for the community.

We congratulate City Planning staff on accomplishing a well designed product.

Yours truly,

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Attachment: Selected BILD Comments, City Response and FoNTRA recommendations

Cc: Gregg Lintern, Acting Chief Planner and Executive Director, City Planning Division
Lorna Day, Director, Urban Design, City Planning Division

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 170,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.

Attachment - Supplementary Report – Townhouse and Low-Rise Guidelines

Selected BILD Comments, City Response, and FoNTRA Request

Guidelines Reference	BILD comment	City response	FoNTRA comment/recommendation
Page 9, pp.1 , last sentence	As such, it is important to ensure that new development will enhance and fit within the local area context, <i>while balancing the need for an increase in the City’s housing stock to supply affordable housing and family-sized housing.</i>	As such, it is important to ensure that new development will enhance and fit within the local area context, <i>while balancing the need to accommodate housing in a growing city.</i>	The “balancing” of the need to accommodate housing in a growing city must be done through Official Plan policies, implemented by zoning by-laws. Guidelines cannot be allowed to circumvent the Official Plan but must be used to guide its implementation in a local context. FoNTRA recommendation: Stay with the original language - NOT add additional wording.
Page 9, pp. 3	The Guidelines are intended to provide a degree of certainty and clarity of common interpretation, however as guidelines they should also be afforded some flexibility in application, particularly when looked cumulatively and be balanced against broad city building objectives. <i>There may be cases where not all the individual guidelines can be met, but the overall intent is achieved.</i>	The Guidelines are intended to provide a degree of certainty and clarity of common interpretation, however as guidelines they should also be afforded some flexibility in application, particularly when looked cumulatively and be balanced against broad city building objectives. <i>In some case not all guidelines can be met in full; however a development may be acceptable when it respects the official plan.</i>	The reference to the Official Plan confuses the Guidelines’ intended focus on the “how” and not the “ where” . FoNTRA Recommendation: Stay with original language but delete “and be balanced against broad city building objectives”.