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March 9th, 2022

Toronto City Council City of Toronto 100 Queen Street West Toronto, ON M5H 2N2

RE : TE31.12 - Danforth Avenue Planning Study (Segment 2) – FINAL REPORT

Toronto City Council,

Our **HousingNowTO.com** volunteers have participated in all of the public-consultations, at both inperson and webex events over the last 3-years. We all agree that with the existing TTC subway line – and the new Ontario Line interchange station planned for Pape and Danforth, the City of Toronto is in the early stages of an excellent opportunity to encourage new smart, transit-oriented development with <u>dedicated affordable housing capacity</u>, in an existing Toronto near-core neighbourhood along the Danforth.

We would like to thank City Planning staff for listening to the input of affordable housing advocates over the last 3-years, and relaxing some of the highly-restrictive Urban Design Guidelines that existed in earlier drafts – in particular the removal of the 45 degree angular-plane requirement, to allow for more efficient and economical massings.



UDG (Page 37) - https://www.toronto.ca/legdocs/mmis/2022/cc/bgrd/backgroundfile-222591.pdf

However, we are still concerned by the language on page 37 of the DRAFT Urban Design Guidelines which states : *"City staff studied various mid-rise options along Danforth Avenue including a 12-storey option and determined that buildings higher than 8-storey are inappropriate along the street."*

Our volunteers question the planning staff's statement that "*buildings higher than 8-storey are inappropriate*" along the Danforth. Inappropriate for whom? Whose aesthetic-preferences determine the "appropriateness" of building mid-rise heights along our TTC subway lines in 2022? When was the last time they had to look for an affordable-rental apartment in the City of Toronto? Is an arbitrary 8-storey limit on building heights on an avenue along a subway-line "appropriate" during a housing crisis?

Based on our volunteers' assessments of the 8-Storey height limit and the draft Urban Design Guidelines, we cannot assess any simple parcel along Danforth between the Don Valley and Coxwell that with "As of Right" permissions would trigger the 100 units or 8,000 square metres of residential gross floor area (GFA) threshold required to create new Inclusionary Zoning (IZ) requirements inside the Protected Major Transit Station Areas (PMTSA) at Broadview, Chester, Pape, Donlands, Greenwood and Coxwell stations – without a <u>very large assembly</u> of multiple adjacent lots.

We are working in support of a number of mid-rise affordable housing developments around the city that are being supported by the City's Housing Secretariat. Neither of these examples below would be permitted "as of right" along the Danforth under the proposed draft Urban Design Guidelines :



640 Landsdowne Ave (7-storey / No Step-Back | 256 LTC Beds | 57 Affordable Housing units) https://magellancommunitycharities.ca/the-seniors-centre-concept-and-design/



306 Gerrard Street East (10-storey / No Step-Back | 191 units) <u>https://www.ysm.ca/opportunitycentre/</u>

We would formally request that City Council pass a motion to direct planning staff that the draft Urban Design Guidelines included within the Danforth Avenue Planning Study (Segment 2) report <u>do not apply</u>

to not-for-profit affordable housing developments, and that staff should reconsider their proposed 8-Storey height limit along the Danforth - and reassess its impact given the context of our current housing crisis.

We would also request that City Council pass a motion to direct planning staff to improve communication around "Urban Design Guidelines" – so that the public clearly understands these are "guidelines" only – they are not laws. This Guidelines document is <u>not</u> the "Danforth Bible" – and the future development proposals will often need to go beyond the strict-limitations as defined in the Guidelines to deliver better City-building outcomes.

As always, our open data and civic-tech volunteers are happy to answer any questions that councillors or city staff may have on affordable-housing development best practices – and how to make most effective use of Transit-Oriented Lands to help alleviate Toronto's rental-housing crisis.

Yours,

Mark J. Richardson Technical Lead – HousingNowTO.com

Attached

- Appendix 'A' Urban Design Guidelines Danforth Ave Segment 2 (P.39 Mar. 4, 2022)
- Appendix 'B' Danforth PMTSA / Inclusionary Zoning (IZ) stations

Appendix 'A' – Urban Design Guidelines – Danforth Ave – Segment 2 (March 4, 2022)



Appendix 'B' – Danforth PMTSA / Inclusionary Zoning (IZ) stations

