November 29, 2023

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attention: Nancy Martins.

RE: PH8.4 Housing Action Plan; Midrise buildings rear transition performance Standards Review and update

Dear Chair Gord Perks and Members of the Planning and Development Committee

FoNTRA's members are 35 Residents Associations with the area bounded by Bloor, Bathurst, Sheppard and the Don Valley Parkway. Our area contains a number of streets designated Avenues.

The Planning report recommends:
The Planning and Housing Committee request the Chief Planner and Executive Director, City Planning undertake further stakeholder consultation respecting a.and b. below and report back in Q2 2024 with:

a. the final updated Rear Transition performance standards for the Mid-Rise Building Urban Design Guidelines; and
b. Zoning By-law Amendments implementing the updated Rear Transition performance standards and as-of-right permissions for height and density implementing the Mid-rise Building Urban Design Guidelines.

The rear angular plane guidelines were developed through a comprehensive study in 2010 that resulted in a guideline the he rear transition to abutting low density residential areas be a 45 degree angular plane applied from a height of 3 storeys at 7.5m from the side lot line of the residential property. The width the 7.5 m is to be used for access and greenspace. Modifications of this guideline apply to apartment buildings and corner lots.

The City objectives for rear transition requirements are:

- " Providing flexibility in achieving rear transition by including alternative rear transition approaches, and not solely relying on the application of a 45-degree angular plane from the rear property line,
- Simplifying the Performance Standards to optimize the usable floorplate, particularly at upper storeys,
- Simplifying building massing to promote economies in building construction,

- Encouraging more sustainable and efficient building envelopes,
- Allowing for alternative building technologies and materials that have limitations with respect to dimensions and composition, such as mass timber, modular and prefabricated construction, and
- Prioritizing how mid-rise buildings frame streets, particularly providing for good sunlight conditions on sidewalks and within the public realm."

The guidelines omit any consideration of an objective to ensure an appropriate relationship with the adjacent residential neighbourhood, a key consideration for the angular plane regulation.

The proposed new guideline or regulation is to provide a 7.5 rear yard setback for a 6 storey podium, with 2 additional setbacks for the an additional 6 storeys for an 11 store buildings.

Consultations with development industry participants "reinforced the cost and sustainability implications of multiple building step-backs, as well as the inability to use mass timber and other more sustainable construction methods with this type of envelope. Additionally, from a constructability and cost viewpoint, trade labour that are qualified to do this specialist work are at times, limited and costly."
No residents were consulted.

The result is a big box 11 storeys high extending to 7.5 m from the abutting residential property to the street. The relates shadow changes were deemed to be minor but do appear to extend several houses more at certain times of the day.

No illustrations were provided that show what forms of buildings can be built within the 11 storey box. The Create TO example shows a box like building that is more like an industrial building. What we expect to see is at such a location is residential tower at the Avenue. Double corridor buildings are generally a standard depth that is unlikely to extend to the 7.5m. setback. The Avenue buildings have retail at grade, maybe a couple of storeys high. The rear of the building would accommodate servicing and parking access. Why is big box proposed? Different lot depths will have different options for building forms with deeper lots having the most flexibility.

Why is a height of 6 storeys proposed at the rear? The 2010 angular was measured at a height of 3 storeys. Residential buildings of up to 4 storeys are permitted in residential areas. So that would provide a reasonable transition to the residential neighbourhood. However, it is unclear what would be contained in this portion of a buildings except retail at grade and maybe offices or storage above,

No information is provided about the requirements for wood frame buildings. Setbacks can be established to accommodate a frame structures and can use be used to accommodate setbacks balconies and important common green space.

We recommended that the proposed further consultation process must
- Include residents in the consultations, not just developers,
- accommodate different types of Avenues uses,
- accommodate servicing and parking needs,

- providing examples of how real buildings could be developed on different sized lots with in the proposed guidelines and height and density limits,
- evaluating different options, and
- minimizing visual and shade impacts on adjacent residential areas.

Yours truly,

Geoff Kettel
Co-Chair, FoNTRA

Cathie Macdonald
Co-Chair, FoNTRA

Cc: Gregg Lintern, Chief Planner and Executive Director, City Planning Division
Kyle Knoeck, Director, Zoning and Secretary Treasurer Committee of Adjustment, City Planning Division,
Emilia Floro, Director, Urban Design, City Planning Division
Rong Yu, Project Manager, Urban Design, City Planning Division
John Duncan, Senior Planner, Zoning Section, 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 250,000 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.