

May 31, 2022

**Via Email**

Planning and Housing Committee  
City of Toronto  
100 Queen Street West  
Toronto, ON M5H 2N2

Dear Chair Deputy Mayor Bailão, Vice Chair Councillor Fletcher, and Councillors:

**Re: Item PH34.1 – Our Plan Toronto: Final Environmental and Climate Change Official Plan Policy Updates**

We are writing to express support for the proposed final environmental and climate change policy updates to the Official Plan, specifically the updated policy language in Section 3.4 ‘Natural Environment’ and 4.2 ‘Apartment Neighbourhoods’ relating to embodied emissions from building materials.

Tenblock has been a participant in the land use planning process in Toronto for over sixty-five years and currently has six planning applications in progress. Several of these projects propose the demolition of existing apartment buildings and involve significant rental replacement objectives. We agree with the proposed policy wording that buildings subject to demolition should be evaluated to identify opportunities for reuse of demolition waste and assess embodied emissions. It is important that policy continue to evolve to address concerns relating to the topic of embodied carbon from building demolition. In turn, this helps ensure that applicants demonstrate the environmental benefits of new development over existing aging buildings.

Tenblock strives to be a trailblazer for the development industry with regard to the topic of embodied carbon analysis. Our current development applications include two downtown sites at 25 St. Mary Street (21 166606 STE 13 OZ) and 145 St. George Street (21 155923 STE 11 OZ) with apartment buildings dating back to 1965 and 1959, respectively. These projects involve comprehensive redevelopment of these sites including demolition of the existing apartment buildings.

In addition to completing Energy Strategy Reports to demonstrate compliance with the Toronto Green Standard, we retained a local firm (Footprint) specializing in energy modeling and building performance to prepare Carbon Analysis Reports for both projects. These holistic reports included an energy audit of the existing buildings to determine their operational greenhouse gas emissions, and compared this with the proposed construction of the new developments. They also compared the carbon emissions of these proposed downtown developments with a similar-sized suburban development. The striking findings of the reports found that in both projects, the existing buildings emit over 2.6 times the carbon emissions per unit than the proposed developments would. The proposed buildings would be carbon-positive between 9 and 13 years after occupancy. In addition, the reports noted that the annual emissions of a suburban household would be over 4 times higher than a unit in the proposed buildings, including when factoring in transportation-related emissions.

These results confirm that developments based on the now well-established principles of complete communities contribute toward reducing carbon emissions. Infill and transit-oriented developments based



on compact built forms within existing well-served neighbourhoods help reduce dependence on individual motor vehicle trips and shift transportation modal share toward walking and cycling trips.

These reports were formally submitted to the City last year and have been acknowledged by City staff. We thank staff for their enthusiasm to review these reports and we are prepared to engage in further discussions on this topic along with our consultant team.

Please do not hesitate to contact the undersigned with any questions or to discuss further.

Sincerely,

**Tenblock**

A handwritten signature in blue ink that reads "Stephen Job".

Stephen Job, AICP  
Vice President

SJ/EP

cc: J. Welsh, Project Manager, Strategic Initiatives, Policy & Analysis, City Planning, City of Toronto

