

September 19, 2024

**Via Email**

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

**RE: PH15.1 – OPA 528: Updating Policies for Infrastructure Projects in Parks and Open Space Areas**

Dear Chair Perks, Vice Chair Bradford, and the Planning and Housing Committee,

Tenblock has developed and managed multi-family apartment buildings in Toronto for over sixty-five years. As a company, we are deeply committed to building sustainable, high-density communities.

**We wish to express our strong support for Official Plan Amendment 528.**

It is our recommendation that the Planning and Housing Committee ensure the written policy of OPA 528 reflects the shared understanding that privately owned alternative energy systems, like geo-exchange, are included:

Enabling geo-exchange feasibility

The inclusion of geo-exchange in OPA 528 will help small, high-density urban developments achieve Toronto Green Standard compliance by eliminating the need for a site-specific OPA in order to broaden a geo-exchange field into adjacent *Parks and Open Space Areas*.

Marginal development sites will be able to more easily achieve geo-exchange feasibility by extending angled boreholes deep under adjacent parkland, well below tree and utility depth (Appendix 1). This non-intrusive approach is performed from within a site and does not require future parkland access for maintenance, reflecting the OPA 528 goal of ensuring public access is not impacted.

Clarifying private alternative energy systems qualify

Geo-exchange systems are generally privately operated to serve specific sites, as highlighted on page 13 of the [Staff Report](#), and do not fit policy definitions of “public utility” (Appendix 2) relied upon for interpreting the *Official Plan*.

Amending the written OPA 528 policy to reflect the shared understanding that private alternative energy systems qualify will provide clarity for future interpretation of this new policy and certainty to industry.

Tenblock applauds the efforts of Strategic Initiates, Policy & Analysis for advancing this important policy amendment and we look forward to continuing to collaborate on building a more sustainable Toronto.

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



Sincerely,

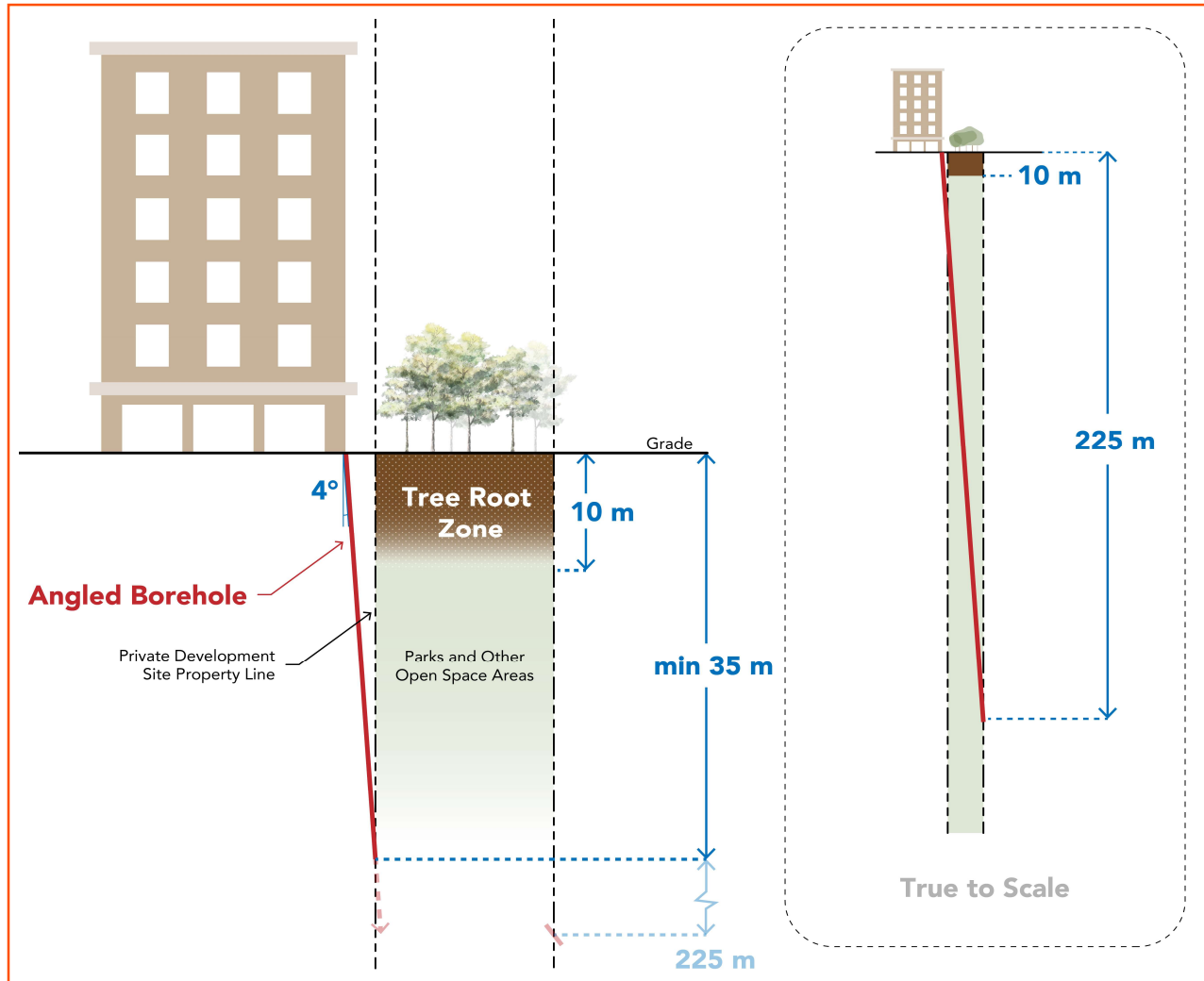
**Tenblock**

Graeme Kennedy  
Development Manager

cc: Councillor Gord Perks, Ward 4 – Parkdale-High Park  
Councillor Brad Bradford, Ward 19 – Beaches-East York  
Councillor Josh Matlow, Ward 12 – Toronto-St. Paul's  
Councillor Dianne Saxe, Ward 11 – University-Rosedale



## Appendix 1 – Angled Borehole Details



Angled borehole cross-section by Geosource Energy



## Appendix 2 – Policy Definitions

| Policy                              | Term                      | Definition   |
|-------------------------------------|---------------------------|--|
| Provincial Planning Statement, 2024 | Alternative Energy System | means a system that uses sources of energy or energy conversion processes to produce power, heat and/or cooling that significantly reduces the amount of harmful emissions to the environment (air, earth and water) when compared to conventional energy systems.   |
|                                     | Renewable Energy Source   | means an energy source that is renewed by natural processes and includes wind, water, biomass, biogas, biofuel, solar energy, geothermal energy and tidal forces.  |
|                                     | Renewable Energy System   | means a system that generates electricity, heat and/or cooling from a <i>renewable energy source</i> .   |
| Municipal Affairs Act               | Public Utility            | means a waterworks, gasworks, including works for the transmission, distribution, and supply of natural gas, electrical power or energy works, or system for the generation, transmission or distribution of electric light, heat or power, a telephone system, a street or other railway system, a bus or other public transportation system, a site for the disposal, transfer, reduction, reuse or recycling of waste or any other works or system for supplying the inhabitants generally with necessities or conveniences that are vested in or owned, controlled or operated by a municipality or municipalities or by a local board; (“services publics”) |
| City of Toronto Act                 | Public Utility            | “public utility” means,<br>(a) a system that is used to provide any of the following services or things for the public:<br>(i) water,<br>(ii) sewage,<br>(iii) fuel, including natural and artificial gas,<br>(iv) energy, excluding electricity,<br>(v) heating and cooling, and<br>(vi) telephone, and<br>(b) the service or thing that is provided; (“service public”)  |
| By-law 569-2013                     | Public Utility            | means premises or facilities used for telecommunications, the transmission and distribution of electricity, the distribution of gas, steam or other forms of energy, or the collection, distribution, storage or treatment of water or sewage.   |