

October 29, 2024

Via Email

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

RE: PH16.1 – Housing Action Plan: As-of-Right Zoning for Mid-rise Buildings on Avenues and Updated Rear Transition Performance Standards - Final Report

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 concern that the proposed updates to As-of-Right Zoning for Mid-rise Buildings on Avenues do not go far enough.

The proposed updates are positioned to help streamline approvals in select areas of the city and simplify mid-rise building construction, however the impact will be tempered due to:

- The new Development Standard Sets not extending Major Streets permissions to the Avenues
- Limiting updates to CR zones on Avenues instead of advancing updates citywide

Development Standard Sets do not extend new Major Streets permissions to the Avenues

The zoning by-law amendments proposed by PH16.1 updates the Commercial Residential zone with new Development Standard Sets 4 and 5 (SS4 & SS5). SS4 and SS5 replicate SS2 and SS3 except for replacing the rear angular plane with a stepback above 20m (6 storeys). This new standard aligns key portions of CR zoning with the Council approved [Major Streets](#) zoning by-law.

However, technical differences between the two standards prevent the easy migration of an as-of-right Major Streets building design from a *Neighbourhoods Residential (R)* zone to a *Mixed Use Areas CR* zone. For example, SS4 and SS5 contain the continued requirement for a 5.5m sideyard setback where a main wall contains windows instead of using the new 2.4m “non-Primary Windows” sideyard setback standard from Major Streets.

Given Avenues policy is envisioned to be even more permissive than Major Streets, we recommend that the committee ensure Major Streets development standards are permitted as-of-right within SS4 and SS5. Ensuring new development standard sets incorporate many of the positive advancements from the Major Streets by-law will help establish consistent housing models across similar development contexts, streamlining approvals and construction.



Limiting updates to CR zones on Avenues instead of advancing updates citywide

PH16.1 is one of multiple separate, ongoing [Housing Action Plan: Avenues, Mid-rise and Mixed Use Areas Studies](#) advancing to Planning and Housing Committee through to the end of 2025 (Appendix 1). The PH16.1 report notes that the proposed as-of-right zoning updates have been limited to CR zones on Avenues so as not to conflict with the other planning studies.

Restricting much needed updates in this manner means that existing and newly proposed Avenues, especially within Major Transit Station Areas, will continue to be held back by outdated zoning standards until such corridors are included in a specific study. There is a real concern that implementing zoning by-law updates in this manner is creating fragmented development standards (even in the CR zone itself) while continuing to restrain growth along key Avenues throughout the city. For example, new avenues should benefit from previous development standard updates (like PH16.1) and not require future implementing zoning by-law updates in order to be developed as-of-right. Such an approach is contrary to the original intent of the Avenues and Mid-rise policies, which was to apply a consistent development standard citywide and avoid the need for area specific studies and piecemeal zoning updates.

As new development standards like those in PH16.1 are approved, it is our recommendation that development standards in the zoning by-law and design guidelines be updated citywide. To streamline the development of new housing it is incumbent that we replace or update existing standards instead of introducing additional rulesets and complexity into the zoning by-law. Rolling out development standards citywide will help more projects achieve feasibility, advancing the goals and vision of Toronto's Official Plan.

In Summary

Planning staff are establishing a strong track record of addressing friction points currently found in development policy throughout the city. It is our hope that the scope of the proposed amendments can be broadened to create a consistent, permissive standard for existing and new Avenues.

Tenblock appreciates the efforts of City Planning and Urban Design for pursuing much needed updates to the Mid-Rise Design Guidelines and Avenues policies. It is our hope that continued improvements to both as-of-right permissions and mid-rise performance standards will be forthcoming.

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

Sincerely,

Tenblock

Graeme Kennedy
Development Manager



Appendix 1: Housing Action Plan: Avenues, Mid-rise and Mixed Use Areas Study Timelines

Projects	Est. Completion Timeline
As-of-Right Zoning for Mid-rise Buildings on Avenues without Avenue Studies	Current Proposal
Avenues Policy Review (New Avenues)	Q1 2025
Expanding Mixed Use Areas Designations	Q3 2025
As-of-Right Zoning for new Avenues and Mixed Use Areas	Q3 2025
As-of-Right Zoning for Completed Avenue Studies without Implementing Zoning	2025

Source: [City of Toronto Website](#)