

December 4, 2024

Via Email

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

RE: PH17.10 – Housing Action Plan: Mid-Rise Building Design Guidelines

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

Tenblock wishes to express our support for the Mid-Rise Guidelines and recommend the following:

1. Ensure Major Streets massing and setbacks are allowed as-of-right in Mid-Rise contexts
Staff's 2025 work scope includes as-of-right zoning by-law updates for Avenues and Mixed-Use Areas. From speaking with staff, it is our understanding these updates would implement the Mid-Rise Guidelines (if adopted) and also include the objective of migrating the Major Streets zoning by-law development standards to the Avenues and Mixed-Use Areas. Although we have not seen any proposed zoning updates, we agree with this approach.

Allowing Major Streets massing and setbacks as-of-right in Mid-Rise contexts ensures that groups working on this type of small-scale development model can extend their work from the Neighbourhoods to the Avenues without restricting opportunities for higher density development to occur.

2. Exempt small apartment buildings from ground floor retail requirements
Tenblock recommends exempting buildings of 30 dwelling units or less from the 4.5m ground floor height and retail space requirements in the Mid-Rise Guidelines. These are burdensome requirements to place on small buildings as they lack the scale and capacity to effectively manage retail spaces, leading to high vacancy rates and operating costs.

Zoning currently exempts buildings of 30 dwelling units or less from loading and amenity space requirements for similar reasons. Simplifying requirements for buildings of 30 units or less supports feasibility and encourages small-scale development in areas where housing is urgently needed.

Sincerely,
Tenblock



Graeme Kennedy
Development Manager