

2024.12.04

Re: Agenda Item 2024.PH17.10, Housing Action Plan: Mid-Rise Building Design Guidelines

Attn: Planning and Housing Committee, City of Toronto

My name is Blair Scorgie. I am a Registered Professional Planner, member of the Ontario Professional Planners Institute, and member of the Canadian Institute of Planners. I am the Managing Principal of Scorgie Planning with over fifteen years of relevant consulting experience and expertise on matters associated with mid-rise development. Recently, I directed the preparation of The Mid-Rise Manual in collaboration with LGA and SvN on behalf of Environmental Defence. I am a contributing author of the City of Toronto Avenues and Mid-Rise Buildings Study as well as the City of Toronto Cliffside Village Avenue Study. I have also managed development applications for several mid-rise buildings across the City of Toronto on behalf of various land developers.

I am a prominent advocate for policy and regulatory reform to create housing and employment opportunities in the City of Toronto. My professional opinion is routinely sought by City Staff. I have served on technical advisory committees associated with multiple City-led studies, including the Beaches East-York Missing Middle Pilot Project. I have participated in industry stakeholder meetings and on-on-one interviews at the request of City Staff, including discussions pertaining to the recent Municipal Comprehensive Review, Mid-Rise Building Performance Standards Review, and Expanding Housing Options in Neighbourhoods Initiative.

Leveraging the Opportunity

I am writing to applaud the efforts of Staff to date and outline a series of concerns that I feel need to be addressed to leverage the potential of the draft Mid-Rise Building Design Guidelines, and our Avenues and Major Streets, to the greatest extent. Specifically, my concerns pertain to proposed restrictions on building height and massing, requirements for rear transition, and elements that I feel should be addressed with respect to the ground floor condition.

Restrictions on Building Height

The Guidelines contemplate maximum building heights that are equivalent to the width of the adjacent right-of-way, ranging from 5 to 14 storeys, subject to an assessment of contextual fit, good street proportion, and sun-shadow performance. The Guidelines specify that additional height may be considered on deep lots, provided the objective of applicable Official Plan policies and other guidelines are met. However, the Guidelines indicate that additional height should be located and massed to reduce physical and visual impacts on the public realm and incorporate increased setbacks and/or setbacks equal to or greater than the additional height.

This performance standard is predicated on the desire to maintain a 1:1 ratio of building height to right-of-way width, which is perceived as being an appropriate scale and proportion of development. However, the performance standard is arbitrary, subjective, and misguided. It also stands in contrast to generally accepted urban design standards outside the North American context and needs to be eliminated.

I recommend increasing maximum building heights by a factor of 20 percent for properties that front onto all Avenues, irrespective of their right-of-way width or lot depth, and allowing for such height to be

achieved without the provision of additional setbacks and/or stepbacks. This will allow the Guidelines to address and proactively anticipate the development of “tall mid-rise buildings”, which are becoming increasingly prevalent as a response to changing market conditions. Doing so will deliver more housing while improving the financial viability of mid-rise developments. It will also provide clarity regarding City objectives regarding “tall mid-rise buildings”. At a minimum, exceptions to maximum building heights should be granted for mid-rise developments that incorporate affordable housing or achieve a high standard of environmental sustainability.

Restrictions on Building Massing

The Guidelines contemplate maximum streetwall heights that are equivalent to 80 percent of the width of the adjacent right-of-way, up to a maximum of 8 storeys. Above this point, the Guidelines state that additional building height should be located and massed to incorporate a minimum pedestrian perception stepback of 3 metres. However, in instances where the existing context reflects lesser streetwall heights, the Guidelines state that development should align with the height of adjacent buildings to maintain a consistent streetscape. In many cases, this will result in streetwall heights of less than 6 storeys.

This performance standard is predicated on the false assumption that streetwall conditions will not and should not evolve over time, and that existing streetwall conditions are necessarily desirable and appropriate.

I recommend eliminating the requirement for a pedestrian perception stepback in instances where the existing streetwall condition warrants streetwall heights less than 80% of the adjacent right-of-way width. At a minimum, I recommend granting exceptions to pedestrian perception stepback requirements for mid-rise developments that incorporate affordable housing or achieve a high standard of environmental sustainability. Doing so will deliver more housing while improving the financial viability of mid-rise developments. It will also facilitate the use of innovative construction methodologies, including modular and mass timber building systems, whose feasibility can be negatively impacted by stepback requirements.

Requirements for Rear Transition

The Guidelines contemplate a minimum rear yard setback of 7.5 metres. At this location, the Guidelines specify a maximum building height of 6 storeys is permitted, beyond which a minimum stepback of 2.5 metres is required to establish an appropriate transition to adjacent Neighbourhoods.

I recommend granting exceptions to rear stepback requirements for mid-rise developments that are adjacent to Transition Zones, once associated policies and regulations are established, and boundaries are delineated. In these locations, it is appropriate for the entirety of rear transition to occur within the adjacent Neighbourhood. This will rationalize building envelopes, deliver more housing, and improve the financial viability of mid-rise projects.

Ground Floor Conditions

The Guidelines reference highly animated pedestrian environments, achieved through the provision of architectural elements and expressions including building entrances, windows, canopies, recesses and projections, vertical and horizontal articulation, and other design interventions to reinforce a variety of scales and textures. The Guidelines go on to provide additional detail and direction.

I recommend strengthening this language, by making explicit reference to the need to bring solid building materials from upper storeys down to grade and referencing the desire to simplify and streamline material pallets. This will limit the potential for large and unmitigated expanses of glazing at street level and will ensure a more cohesive approach to the design of mid-rise projects. We are notorious for our failure to appropriately design ground floor conditions, particularly where retail and service commercial uses are provided. This is part of the problem and needs to be addressed.

Conclusion

While I applaud the efforts of Staff to date, I feel that the above-noted concerns should be addressed to leverage the potential of the Mid-Rise Building Design Guidelines, and our Avenues and Major Streets, to the greatest extent. As such, I respectfully request that City Staff be directed to consider and report back on these issues before this item is brought to City Council for final approval.

Sincerely,

A handwritten signature in black ink, appearing to read 'BRJ', is centered below the text 'Sincerely,'.

Blair Scorgie

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Managing Principal

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