



January 20, 2026

Planning and Housing Committee
c/o Nancy Martins
Toronto City Hall
100 Queen Street West, 2nd Floor
Toronto, ON M5H 2N2

Subject: Communication regarding Item PH 27.1 (deferred from 26.2 and referencing PH 26.4 - Addressing Tall Building Impacts on the Tree Canopy and Pedestrian Realm)

Dear Chair Perks and the Planning and Housing Committee,

We are writing to provide comments on the Official Plan and Zoning By-law updates (Items PH 27.1 with reference as well as PH 26.4).

Firstly, we support the recommended policy changes to strengthen tree protection to Chapter 4 of the Official Plan as outlined in the staff report dated November 18, 2025.

- Artificial turf and permeable pavers should not be considered "soft landscaping" and permeable pavers should not count as "soft landscaping" requirements.
- Building setbacks need to apply to all parts of a residential building above and below ground.

However, we also need to address the gaps in these policy reviews, which focus significantly on mid-rise implementation. It is imperative that the Committee ensures policy considerations for tall buildings are as rigorous as those for mid-rise, particularly regarding the protection of the tree canopy and the expansion of the pedestrian realm.

The following recommendations, drawn from the current reports and Official Plan Amendments (OPA 857), address the need to adapt our standards for high-density growth that is the majority building type in Toronto's Downtown.

This is particularly important considering the pending rezoning of large sections of the City around transit stations to accommodate increased density.

1. Leveraging Tall Building Scale for "Large Tree" Capacity

Current policies recognize that larger development sites - which typically host tall buildings - offer unique opportunities for substantial green infrastructure. Under Policy 4.2.6, the City can require a framework of public streets and shared open spaces on larger sites specifically designed with the "capacity and conditions to support growth of large trees." On downtown corridors such as Yonge and Avenue Road, tall building approvals must be contingent on providing the soil volumes and setbacks necessary for "large trees," rather than just ornamental plantings.

2. Ensuring Tall Buildings Enhance, Not Diminish, the Public Realm

The vision for Avenues in Mixed Use Areas is to serve a vibrant "**main street**" role. However, tall buildings present greater challenges for pedestrian comfort. The sources emphasize that:

- **Policy 4.2.2** requires new buildings to be massed and designed to "*maximize areas of soft landscaping that support the growth of new tree plantings to maturity*" and maintain comfortable wind conditions for pedestrians.
- **Policy 4.1.9** stipulates that infill development must provide adequate "*sunlight and sky views*" for occupants and the public, using landscaping and planting to enhance the environment. As height increases, the mandatory setbacks required by **Policy 4.2.4** must be proportionally expanded to ensure they are "*at a minimum, sufficient in order to... provide space for pedestrian amenities and soft landscaping*"

3. Addressing the Gap in Tall Building Policy

The Avenues Policy Review (OPA 778) acknowledges that while the mid-rise form is the standard, development may go "beyond the height and scale of a mid-rise building" when located within 500-800 meters of transit stations. However, the sources also indicate that specific policies for tall buildings adjacent to Neighbourhoods and within Major Transit Station Areas (MTSAs) are not yet finalized and are part of a work plan for Q2 2026.

There is a policy risk that tall buildings will be approved without the specific "main street" greenery requirements that define the mid-rise vision. This gap must be addressed.

Recommendations for the Committee

Considering the prevalence of tall building applications, we request that the Committee:

- **Apply OPA 857 Canopy Protections Universally:** Ensure that the "protection of the tree canopy" mandated in Policy 4.1.5 and 4.2.2 is applied as a non-negotiable requirement for tall building approvals, not just mid-rise.
- **Mandate Contiguous Soft Landscaping:** Enforce Policy 4.1.9 (g), which requires maximizing "contiguous soft landscaping" within setbacks to ensure that high-density developments on Yonge and Avenue Road contribute to a continuous urban forest rather than fragmented planter boxes.
- **Synchronize Tall Building Reviews:** Ensure that any tall building approvals granted before the Q2 2026 policy update are held to the high "pedestrian realm" standards

established in the Mid-rise Building Design Guidelines, particularly regarding the relationship between building scale and right-of-way width.

The Bay Street model for some redevelopments (Dundas to Bloor) provide examples for prioritizing the pedestrian experience alongside density. The City must use the tools in OPA 857 and approve new policies to also ensure that "vibrant main growing Downtown population.

Yours truly,

M.H. Spence, on behalf of
The ABC Residents Association,
abcra@abc.ca

The ABC Residents Association is a volunteer organization committed to enhancing the quality of life in our neighbourhood through active participation in municipal issues. We serve the residents living in Toronto's Yorkville / North Midtown community between Yonge Street west to Avenue Road and Bloor Street north to the CPR tracks