

November 24, 2021

Planning and Housing Committee
Nancy Martins
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2



Sent electronically.

RE: PH29.3 Recommended Parking Requirements for New Development

The Residential Construction Council of Ontario (RESCON) is writing in support of the proposal to remove parking minimums city wide for new developments, which will be brought forward to the Planning and Housing Committee on November 25th. Given changing trends in car ownership, vehicle usage, rideshare options, growing transit networks, increased cycling infrastructure and more recently, remote work amongst Torontonians, the City's move to parking maximums from parking minimums is welcomed and supported by declining parking demands in new residential buildings.

The 2019 Residential and Civil Construction Alliance of Ontario (RCCAO) report, [“How Parking Regulations Need to Evolve for High-Rise Buildings”](#), found that:

- The cost of constructing below-grade parking in residential condominiums and apartments has increased rapidly over the last decade, often costing between \$80,000-\$100,000 per parking space in downtown Toronto.
- These costs are passed onto unit owners, negatively affect housing affordability.
- Constructing underground parking adds to the already lengthy and complex construction process for high-rise buildings.
- Deep multi-level underground parking structures necessitated by minimum parking requirements incur groundwater challenges which can burden aging sewer infrastructure or pose problematic to make watertight

City Planning consulted industry and the public numerous times throughout the year, and RESCON was glad to have been included in each consultation and meeting.

In May, we provided sales data from RESCON and BILD members that showed that, on average, new condo projects were left with 33% of their built parking stalls unsold. It is also important to note that this figure includes projects that have already negotiated lower parking requirements than the outdated parking bylaw for their respective project. In the extreme case, one builder member had 90% of their available parking still available for sale as the building neared construction. It should also be noted that market pricing for parking stalls in new residential buildings have significantly increased since the 2019 RCCAO report, with the price of a parking stall reaching up to \$165,000 in certain new building projects, ultimately exacerbating the existing affordability crisis in Toronto.

We commend the City for undertaking this review as it reflects the need to be innovative in the way that parking standards are considered in urban environments. It is also worth noting that other municipal jurisdictions around the world are also overhauling their parking regulations in new developments to ease affordability woes. The consequences of building too much underground are multifold: unnecessarily increasing construction costs, prolonging construction schedules, burdening City sewer infrastructure with groundwater, as well as generating vast quantities of soil that must be excavated, transported and disposed of.

We believe that enlarging parking policy areas reflects growth of developments across the City and reducing the number of parking policy areas would simplify the development application process for developers. We are appreciative of the proposal to establish a process for expanding parking policy area boundaries to align with transit development – this is forward thinking and further highlights trends in higher use of public transportation over personal car ownership.

We look forward to continuing our engagement with the City on this issue and are hopeful that members of the Planning and Housing Committee will vote to adopt the proposal to move forward for City Council review.

Should City Council vote to adopt the policy, RESCON members would be eager to see the policy implemented and operational no later than the end of Q1 2022.

Regards,



Richard Lyall
President

Copy to:

Chris Murray, City Manager
Tracey Cook, Deputy City Manager
Gregg Lintern, Chief Planner & Executive Director
Barbara Gray, General Manager, Transportation Services
James Perttula, Director, Transit and Transportation Planning
Michael Hain, Manager, Transportation Planning Policy and Analysis
Lou Di Gironimo, General Manager, Toronto Water
Councillor Ana Bailão, Chair, Planning and Housing Committee