



January 18, 2021

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

Sent electronically

Re.: Motion PH20.4 Proposed Review of Parking Requirements for New Development

The Residential and Civil Construction Alliance of Ontario (RCCAO) is writing in support of the motion to review parking requirements for new developments, which will be brought forward to the Planning and Housing Committee on January 19th. We support the City's focus on reviewing parking requirements, which is welcomed and timely especially given the recent car ownership trends and overall travel patterns of Torontonians. Reviewing and modernizing parking requirements have been a focus of RCCAO for some time and we have worked diligently with City staff and senior City management on this issue.

In 2019, RCCAO commissioned a report, entitled "[How Parking Regulations Need to Evolve for High-Rise Buildings](#)". The report found that there is a clear mobility shift in many urban areas owing to a wider array of mobility options. The pandemic has certainly accelerated certain trends such as telework which will result in decreased demand for office space. Among the report's findings, these are key points:

- While the City of Toronto has lowered parking requirements in parts of the City, often decisions are made on a case-by-case basis;
- The cost of constructing below-grade parking has increased rapidly over the last decade, often between \$80,000-\$100,000 per parking space in downtown Toronto;
- These additional costs negatively impact housing affordability and represent an unnecessary burden for certain demographic groups that are not interested in vehicle ownership; and
- Other jurisdictions are demonstrating greater flexibility with respect to parking standards and, in some cases, are allowing the market to determine whether minimum parking requirements are needed or not (this includes the provision of off-site parking).

Going deep underground for parking adds considerably to the construction time to complete high-rise buildings. As such, the report recommends that innovative above-ground parking options be considered as this would allow structures to be repurposed for other potential uses. This would go a long way to providing options for additional housing in the future.

Further, most municipalities must prepare for severe rainfall, which causes chaos when it lands on areas with a high-water table and limited storm sewer capacity. Currently, Toronto's Tall Buildings Design Guidelines states a preference for below-grade parking, perhaps because of



perceived aesthetic concerns. This focus must change to recognize the environmental consequences of building more underground parking.

Although our report was developed prior to the COVID-19 pandemic and the full impacts of the pandemic remain unknown, we suspect that there will be a long-term trend of decreased vehicle ownership and a concurrent diminished need for parking space in many urban areas.

The committee's motion presents an excellent opportunity for the City to take a serious look at parking standards and how they can address the actual needs of Torontonians. This review would be most welcome and timely. We look forward to continuing our dialogue with City staff on this issue and being involved in the stakeholder consultations as part of this motion.

Regards,

Nadia Todorova
Interim Executive Director

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