



Federation of  
South Toronto  
**RESIDENTS'**  
**ASSOCIATIONS**

November 22, 2021

To: Planning and Housing Committee

**Re: Proposed Parking Requirements for New Residential Developments (PH29.3)**

The City of Toronto's one-size-fits-all proposal to abruptly eliminate minimum residential parking requirements for all new developments citywide is an idea that simply won't work. If passed, the current minimum parking requirements would immediately become the maximum requirements everywhere. FoSTRA recognizes the need to prepare for a climate-changing future and accepts the City's initiative to encourage the reduction of private vehicle ownership.

However, Torontonians need time to adjust to owning fewer cars – especially when the pandemic has raised fears about relying solely on public transit, heightening the need for car ownership. Vehicle sales dropped by 45% in 2020 and rose 254% by April 2021 (CTV news, 4 May 2021). To introduce such a proposal universally – without thorough study and meaningful consultation – will create hardship for many residents and lead to disruptive workarounds. We are therefore recommending a phased-in implementation of these no-minimum and minimal maximum-parking requirements for residential and mixed-use developments.

**In downtown Toronto – Policy Area 1 – where resident car use has declined below 17% (City Review, September 2021), we agree with the immediate implementation of the Bylaw. The 16 Protected Major Transit Station Areas (PMTSA) should also be fast-tracked, and a review should be conducted three years after implementation. In the 180 Major Transit Station Areas (MTSA) across the city, these standards should be imposed over a three-year period, after further study in each area, to prove that these minimal maximums will not have a negative impact. In other areas of the City, the Bylaw should only be implemented if proof is provided of excess parking in existing buildings and the surrounding areas.**



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We support the approach that the City is currently taking in reducing minimum parking requirements according to local circumstances and making deals for less parking in return for more green or public space, bicycle parking, social improvements to the property or community benefits. Why is the City so willing to abandon this important bargaining tool across the board?

We believe in evidence-based policy making. Last January, the development industry indicated in notes to the Planning and Housing Committee that an oversupply of parking exists because of current minimum parking standards. The city core may have a 35% parking vacancy level, but what about elsewhere in the city? On 11 March 2021, the development lawyers, Davies-Howe, reported that the City was only going to eliminate parking minimums in Transit-Oriented Communities: “All other areas will see a reduction in minimums, but will not be subject to maximums.” What changed? We invite the City and the development industry to provide actual parking space utilization data to support the citywide implementation of the proposed bylaw.

The development industry also raised the issue of affordability. Meeting minimum standards, it claims, makes housing less affordable. Is this actually true? In the fourth quarter of 2019, almost half of all residential developments and 81% of mixed-use projects were approved with parking well below minimums. Indeed, the developers’ costs were reduced substantially – from \$50 – \$160,000 per space. But were these savings passed on to the consumers? For entry-level buyers, it would seem not. According to realtor Andrew Harrild of Condos.ca, “For a smaller unit, a bachelor or one-bedroom, it doesn’t hurt re-sale value if the condo comes without parking.” (*Toronto Star*, 2 February 2021) Do renters get a discount for not having a parking space or does the runaway market set the rent? Proof of lower prices and rents should be provided by the development industry and scrutinized by policymakers before making any far-reaching decisions.



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The database from past projects approved below minimum should be examined. Were too many or too few spaces required? Is parking in the affected area now inadequate? Were additional on-street parking permits subsequently requested in the area? Were the units in those developments with reduced or no parking more affordable?

Toronto would be wise to look to Edmonton, which has eliminated minimum parking requirements. It did so only after carrying out a professional survey to determine where overcapacity actually exists. It also hired an outside specialist firm to conduct proper scientific and online surveys to assess car ownership behaviour and determine public preferences.

The Edmonton approach, with additional public involvement, offers a pathway to a more sensitive, community-focused plan. Rather than shoving us, this approach has the potential to successfully nudge us towards a more walkable, livable and, possibly, a more affordable city. Until an evidence-based plan for the entire city is developed, we believe this gradual and studied approach will be more acceptable and workable.

Finally, it is suggested that whatever approach is taken with regards to parking requirements for new builds, it is reviewed on a regular basis (every three years) to ensure the developing needs of communities are being addressed.

Respectfully yours.

Rick Green  
Chair