



environmental
defence

April 25, 2023

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

PH3.7 - Our Plan Toronto: Land Needs Assessment

Attention Planning and Housing Committee Members,

I am Counsel and Ontario Environment Program Manager for Environmental Defence, a leading national environmental organization that works at the federal, provincial and municipal levels to safeguard our freshwater, create livable communities, tackle climate change and build a clean economy. I lead Environmental Defence's policy development and advocacy regarding land-use planning, smart growth, sustainable housing and the protection of farmland and habitat in Ontario. Of particular note, I've been leading the fight provincially, and at municipal councils all over Ontario, to curb environmentally-destructive, car-dependent suburban sprawl, by maximizing the share and absolute amount of housing we build within existing neighborhoods, and within the City of Toronto in particular.

Environmental Defence urges this Committee, and Toronto City Council as a whole **not to interpret the topline figures in the Land Needs Assessment Study as a vindication of Toronto's status quo approach to land use planning.** While the Study has identified that the current system creates a theoretical net residential *potential* within the City of Toronto for 1,323,040 more units and 2,375,481 more residents - what will matter, from an environmental and environmental justice point of view, is the number of people and homes we actually *do* house. It is vital that the City of Toronto increase, or at the very least maintain, Toronto's share of the GTA region's overall population, rather than continuing to acquiesce to the Ontario government's plan to diminish the City's primacy in southern Ontario. Based on provincial projections for the region, and estimates of provincial that means growing our City's *actual* population by no less than 1,460,077 residents by 2051. Despite the number of *potential* units our current planning regime, accomplishing that in *practice* will require significant reforms.



The Environmental Necessity of Increasing Toronto's Population More Rapidly Than Required by the Province

Rapidly increasing the number and share of GTA residents - and the share of GTA families with children, in particular, who we actually accommodate in our City proper, is the single most powerful move that Toronto City Council must make, within its own jurisdiction, to rescue Ontario's environment.

That is partly because every extra household that Toronto neighbourhoods accommodate (in excess of the mere 700,000 new residents assigned to us by the provincial government) represents a piece of precious habitat and farmland not lost forever to the bulldozers. By maintaining rules that fail to incentivize the creation of enough homes on Toronto's low-car-traffic residential streets than there are people who want to live there, Toronto has been pushing vast numbers of would-be Torontonians into car-dependent, habitat-destroying, often oversized housing in the 905 - and even further afield. Expanding Toronto's population by 1,460,077 residents between 2051 is our estimate the bare *minimum* required to end that. By our estimates, it would save between 80 and 160 square kilometres of habitat and high quality farmland from the bulldozers.

Separately, though, most of Toronto's existing neighborhoods need those 1.46 million more residents to improve the environmental performance (e.g., lower their absolute and per capita greenhouse gas emissions) - and enhance quality of life - for existing residents. Most of Toronto's "single detached" residential areas - and especially those first developed after World War II - have *locked in* environmentally disastrous car dependency and greenhouse gas emissions because they lack the density (90-100+ people per hectare), the mix of incomes and mix of uses that is required to support all of the amenities, such as grocery stores, pharmacies high schools and community centres within easy walking distance. There is no prospect of achieving the GHG emissions reductions we need simply by shifting current car trips to ZEBs, so it is vital that we shift most of those trips to walking and public transit. There is simply no practical way to accomplish this without bringing all Toronto's neighborhoods up to densities (~100/ha) that make it cost effective to provide frequent reliable transit and achieve high modal shares, and allow them to be transformed into walkable complete communities.

Official Plan Amendment 649 and Zoning By-law 569-2013, together with the recent removal of minimum parking requirements, represent an absolutely necessary, meaningful and laudable step in direction of the significant transformation our neighbourhoods need. But these modest moves, which are expressly calibrated to "maintain the lowrise character" of what are presently single detached streets, will not be *sufficient*, by themselves, to fix the inadequate population densities, car-dependency, high greenhouse gas emissions, and intolerable environmental injustice and discrimination created by decades of exclusionary zoning in Toronto's residential neighborhoods.



In the near future, Toronto must do more to divert fa take measures to actually *change* and improve the character of low-rise "neighborhoods" by opening many low car-traffic, currently "single detached" side-streets to forms of conventional mid-rise housing that it currently restricts to "avenues".

Sincerely,

A handwritten signature in black ink, appearing to be 'P. Pothen', with a horizontal line extending to the right.

Philip Pothen, Juris Doctor, Master of Landscape Architecture
Counsel & Ontario Environment Program Manager,
Environmental Defence



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