

PH16.1-Housing Action Plan - As-of-Right Zoning for Mid-rise Buildings on Avenues and Updated Rear Transition Performance Standards - Final Report - Lenka Holubec submission

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RE: PH16.1-Housing Action Plan_As-of-Right Zoning for Mid-rise Buildings on Avenues and Updated Rear Transition Performance Standards - Final Report

Dear Mayor Olivia Chow and Members of City Council,

Thank you for this opportunity to comment on **PH16.1-Housing Action Plan_As-of-Right Zoning for Mid-rise Buildings on Avenues and Updated Rear Transition Performance Standards - Final Report**:

“This report recommends a zoning by-law amendment to permit as-of-right heights and densities for mid-rise buildings on lands identified as Avenues and designated Mixed Use Areas in the Official Plan. The recommended zoning by-law amendment implements urban design performance standards, including updated standards for rear transition alongside the increases to height and density permissions. ...The recommended changes have the potential to unlock an increase of almost 61,000 dwelling units above the approximately 21,500 dwelling units achievable under existing zoning standards.”

Additionally, there are recommendations, included in the Mayor Chow’s communication from Nov, 29 <https://www.toronto.ca/legdocs/mmis/2024/ph/comm/communicationfile-184100.pdf> to consider opportunities to enable additional residential Intensification through the Housing Action Plan including: Updates to the mid-rise urban design guidelines to provide flexibility and enable opportunities for taller and denser mid-rise built form along the Avenues and Re-examining of older avenues studies and consider opportunities to align height, density and built form permissions with the recommended new as-of-right zoning for midrise permissions.

Request

That consideration of the report be deferred to allow for proper communication, engagement and consultation for its proposals.

Specifically to allow for a review whether this Report - [Housing Action Plan-As-of-Right Zoning for Mid-rise-backgroundfile-249535](#) - is consistent and in conformity with the planning laws guiding natural heritage, green spaces and biodiversity along:

Provincial Planning Statement 2024 - 4.1 Natural Heritage under “4.1 Natural features and areas shall be protected for the long term”

The City Official Plan policies in respect to 3.2.3 PARKS OPEN SPACES and 3.4 THE NATURAL ENVIRONMENT, including in 2016 adopted [OPA 262](#) PG7.2 - Official Plan Five Year Review: Final Recommendation Report - Amendments to the Official Plan Environmental Policies and Designation of Environmentally Significant Areas and

OPA 583 Environment and Climate Change Official Plan Policy Updates [Our Plan Toronto: Final Environment and Climate Change Official Plan Policy Updates](#)

Rationale

Proposed changes in this Report seek to permit as-of-right heights and densities for mid-rise buildings on lands identified as Avenues and designated Mixed Use Areas in the Official Plan within the city area as on the MAP [Housing Action Plan As-of-Right Zoning for Mid-rise Buildings on Avenues and Updated Rear Transition Performance Standards – Final Report – MAP of the area affected](#) and the MAP here [City-planning-hap-avenues-draft-urban-structure-map-proposed-new-avenues-88c7](#).

- **The city area to be affected by this proposed amendment is mandated in the City Official Plan for growth, economy and housing, but also for preserving and enhancing of remaining Toronto’s natural heritage, the Environmentally Significant Areas** [OPA 583 - Our Plan Toronto Final Environment and Climate Change Official Plan Policy Updates – the Environmentally Significant Areas - backgroundfile-225897](#), **Green Spaces, parks and biodiversity:**

“Strong communities and a competitive economy need a healthy natural environment. Clean air, soil and water and abundant trees, parks and open spaces, underlie our health and well-being and attract people to work and invest in the City. Building the City while protecting and enhancing the natural environment is the aim of good stewardship. The natural environment is complex. It does not recognize boundaries and there are limits to the stresses resulting from human activity that it can absorb. To be good stewards of the natural environment we must acknowledge that it has no boundaries and we must respect its limits.” City Official Plan 3.43

- **Urban nature, parks, including open spaces and backyards are critical for rapidly densifying city dwellers health** as we have learnt recently during Covid and recreation, while ensuring “protection of the natural environment, support and enhance biodiversity, and address climate change”. [Our Plan Toronto: Final Environment and Climate Change Official Plan Policy Updates](#)
- **How is this proposed amendment considering already challenged carrying capacity of the parks and green spaces in the very city areas where this housing initiative intends to add thousands more people?**

“My ward is full, there’s no vacant unused land or almost none, so to get new parks we have to buy and tear down buildings, that’s where we are now,” downtown Ward 11 Coun. Dianne Saxe told Global News. [Downtown has not kept up at all’: Pressure on Toronto parks grows as population climbs](#)

“Toronto must continue to grow the parks system, and also design parks to specifically maximize their capacities for climate adaption and mitigation. Although parkland expansion, green infrastructure, and purposeful design has a cost, data indicates that the cost of doing nothing is much greater.” [September 9, 2024 The City of Toronto Parkland Strategy – O2 Planning and Design](#)

“Advocates say it’s a trend that can have negative effects for Torontonians’ mental and physical health, especially for renters, who often don’t have the luxury of backyards. And they say the trend will likely worsen, given new provincial

housing legislation that strips parks of some of their traditional funding, and the fact that, on the cusp of a mayoral election, disappearing green space is not at the top of politicians' to-do lists." [Toronto the grey: the city's green space is disappearing, and it's likely to get worse](#)

- **The objective of city Housing Plan and this Report [Housing Action Plan-As-of-Right Zoning for Mid-rise-backgroundfile-249535](#) is to help create a better supply of affordable housing:**

Report's EQUITY IMPACT STATEMENT, Pg. 2 *"Adequate and affordable housing is also a cornerstone of inclusive neighbourhoods, supports the environment, and improves the socio-economic status of individuals, families and communities as a whole"*.

- **Nevertheless, this objective cannot be carried out at the expense of already challenged by thousands cuts Toronto natural heritage, shrinking green spaces, parks, while undermining the environmental policies of the city Official Plan:**

"Protecting Toronto's natural environment and urban forest should not be compromised by growth, insensitivity to the needs of the environment, or neglect. To this end, proposals for new development may need to be accompanied by a study assessing their impact on the natural environment." CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-44

- **We have to keep in mind that impacts of the changes related to growth, including current housing initiatives, are cumulative over time and space and it is imperative to avoid these impacts to mitigate climate and biodiversity crises.**

Bigger footprints of buildings undermine water infiltration, more heights may be in conflict with *"minimizing hazards to local and migratory birds"*, or requirement that *"development adjacent to the Natural Heritage System to provide natural landscaped surfaces that increase the ecological function and/or biodiversity (2.3.1 Healthy Neighbourhoods), or "to enhance the urban forest and ensure adequate soil for new trees, protect mature and native trees, and support the health of street trees"*. Updated policies promote the integration of green infrastructure as a component of stormwater management. Non-policy text includes connecting the concepts of Green Infrastructure and Low Impact Development. Also, *"refined policy to promote ecological and hydrological connectivity (3.4 The Natural Environment)"* and *"New policy encouraging development to demonstrate a net increase in ecological function on development sites within contributing areas identified on Map 9A (3.4 The Natural Environment)"*, etc. [Our Plan Toronto: Final Environment and Climate Change Official Plan Policy Updates](#)

Yours sincerely,

Lenka Holubec, member [ProtectNatureTO](#)

[Background:](#)

[OPA 583 Official Plan Amendment 583, Our Plan Toronto: Final Environment and Climate Change Official Plan Policy Updates Date: May 11, 2022](#)

The City of Toronto has a strong legacy of introducing leading-edge policies that protect the natural environment, support and enhance biodiversity, and address climate change.

Addressing the dual crisis of climate change and biodiversity decline, along with other environmental concerns extend beyond this Official Plan update

“The natural heritage system is important to the City, both within and beyond our boundaries, and needs to be protected for the long term.” CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-43

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“Biodiversity refers to the rich variety of life forms and the critical roles they play within varied ecosystems. Ecological health is related to healthy biodiversity. The greater the biodiversity of a defined geographic area, the greater the ecological health and resiliency of that area. **Policies protecting and enhancing the natural heritage system are a key pillar of biodiversity conservation within Toronto. The biodiversity found in small green spaces, street trees, green roofs, community gardens, hydro corridors, cemeteries, and backyards also play an important role in our urban ecosystem.”** CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-45