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June 11, 2024

Chair and Members of the Planning and Housing Committee Toronto City Hall 100 Queen Street West Toronto, Ontario M5H 2N2

E-mail: phc@toronto.ca

Re: PH13.14 - The Future of Visitor Parking

Dear Chair and Members of the Planning and Housing Committee:

On behalf of the members of the Residential Construction Council of Ontario (RESCON), I would like to take this opportunity to provide comments on the agenda item before your committee with respect to the future of visitor parking in residential development projects in the City of Toronto.

RESCON is Ontario's leading association of residential builders. We are committed to providing leadership and fostering innovation in the industry. Our members build 80% of the residential homes constructed across Ontario.

As you will recall, Toronto City Council adopted PH 29.3 – Recommended Parking Requirements for New Developments on December 15, 2021.

Within this agenda item were new regulations relating to vehicle parking in residential developments. The effective date of these new requirements was February 3, 2022.

Subsequent to this, beginning October 12, 2022, minimum parking requirements for a wide range of residential projects were eliminated in the City of Toronto.

With the implementation of these new regulations, the then Mayor John Tory noted that, "City Council took real action for a healthier, more sustainable city. This decision means that developers will no longer be required to build parking spaces that homebuyers don't want, making it easier for residents who live without a car to purchase a home."

At that time, RESCON pointed out data showing that in new condominium developments, an average of 33% of parking stalls were left unsold. By way of example, RESCON referenced a builder who was about to begin construction on one of their projects with 90% of parking spots still available.

Parking stalls in residential buildings are expensive to construct. These costs directly affect the affordability of residential construction projects, costs directly borne by the purchaser. It can cost in the range of \$80,000 to \$120,000 for each parking stall in new residential or mixed-use building projects.

So, there is a direct and significant cost impact for purchasers associated with the inclusion of parking requirements of any kind on new residential projects.

The agenda item before the Planning and Housing Committee notes that development projects are being approved with varying visitor parking requirements. These determinations are made on a site-specific basis and reflect the realities of a given site. Indeed, the motion even references a situation where visitor parking requirements were adjusted based on the location of the site. It is RESCON's position that the current framework should remain in place. Visitor parking requirements should be identified and implemented on a sitespecific basis, indicative of what the developer deems necessary based on market demand. There should not be a return mandatory minimums.

I would note that the motion is also targeted at more suburban areas of the City. In the vast majority of these communities, the City permits on-street parking up to three hours for visitors, ensuring that visitors can park in the neighbourhoods they are visiting while also facilitating turnover of parking spaces so that they are not occupied for unreasonably long periods of time.

We believe that with these considerations in mind, there is no compelling reason to alter visitor parking requirements, particularly any review that would establish new minimums. Site-specific reviews can address any concerns that might be raised during the planning approvals process and ensure that project affordability is not compromised.

As noted, parking minimums add considerable costs to projects. We would also take this opportunity to advocate for a reconsideration of regulations that dissuade above-ground parking incorporated into the base building versus below-grade parking. With modern and updated approaches, above-grade parking provides practical, visually appealing and measured alternatives to constructing underground parking which is as noted exorbitantly expensive and time intensive.

We appreciate this opportunity to share our comments and recommendations on this matter and encourage members of the committee to deliberate and ultimately to make decisions that reflect the need to prioritize affordability in the midst of the most significant housing affordability and supply crisis that the City of Toronto and the province have ever experienced.

Yours truly,

Richard Lyall President RESCON