

October 24, 2024

Housing & Planning Committee
City Hall
100 Queen St. W
Toronto, ON M5H 2N2

City of Toronto – TRREB Avenues Review Submission

Dear Committee Members,

The Toronto Regional Real Estate Board (TRREB) believes that the City of Toronto's comprehensive Avenues Review has significant potential to revitalize key corridors in the city, with the potential to add 160,000 new units. "Avenues" are major streets that are typically lined with a mix of residential, commercial, and institutional uses. The review's focus must ensure that Toronto's Avenues policy reflects where growth and development are expected and guides these areas to accommodate increased density and improved urban design.

Avenues Should Sustainably Accommodate Future Growth

The city's goal must be to ensure that the Avenues can sustainably accommodate future growth, support local businesses, and enhance the quality of life for both new and existing residents. It is encouraging that staff have explicitly acknowledged the role of Avenues as appropriate for higher levels of intensification and "transit supported growth". It is also positive that the rationale from city staff states that the Avenues policy should not presuppose which Avenues experience the most growth or intensification, but rather focus on supporting the roles and functions that growth will serve in the local community.

The key recommended changes from city staff would represent a significant improvement over the current Avenues Policies. Lengthy studies and costly spot re-zonings would be replaced by as-of-right zoning along the Avenues. This would allow for lot consolidation on shallow lots, increasing the likelihood of development along key Avenues that are supported by rapid-transit services. Consequently, the number of re-zoning applications needed for midrise buildings would decrease, streamlining the development process and providing greater certainty, while reducing the costs involved in building homes along these streets.

TRREB's Three Areas of Concern

The specifics of housing policies remain crucial. TRREB has identified several aspects of city staff's Avenues Review Proposals Report that must not be allowed to create new barriers to housing development.

1. **The introduction of discretionary Local Area Reviews:** The city has yet to outline exactly how these reviews would be initiated—whether through re-zoning applications, which should be minimized, or building permits. The proposed mechanism also does not specify whether City Planning or developers would conduct these reviews, nor does it clarify if building would be permitted before completion of the study. If discretionary

reviews were to become the default approach for every project before a building permit is issued, this could hinder the ability of Avenues to attract sustainable growth.

2. **Details on staff's proposed Avenues typologies:** These typologies would assign different land use policies for apartment neighbourhoods or mixed use to different parts of Avenues. Changing from one designation to another would require an Official Plan amendment and likely a re-zoning application, adding complexity to the Avenues Policy. Staff should ensure these typologies do not unduly limit the inclusion or growth of a variety of mixed-use and residential developments throughout the city's Avenues.
3. **Unlike the Major Streets policy, city staff have not proposed a financial feasibility study** (including a scenario stress testing) **for the mid-rise building standards on Avenues:** The omission of such a financial feasibility study could undermine the success and uptake of this initiative, particularly for small developers. Without such a study, it would not be an efficient use of planning staff time and budget to go through the lengthy complex process of creating 'as-of-right' rules for 5-11 storey buildings if such rules are not financially viable for developers. If the city's goal is to create 160,000 new units along existing Avenues, then a fundamental requirement of the Avenues policy should be that it is viable and practical to implement – which a feasibility study would address. To scope the study, staff should focus on the mid-rise building standards applying to buildings 5-11 storeys. This study would also help Council to understand the all-in construction cost of various forms of mid- and low-rise housing in the city today.

Ensuring Success of the Avenues Review

City staff should review the building performance standards on Avenues to ensure we are encouraging the growth and expansion of larger units that are in high demand among families, as well as a large variety of more affordable unit types for a wider range of income levels. This could be achieved by relaxing rear-building setbacks, height limits, and angular plane requirements. The Avenues policy needs to transition from an ad-hoc, slow, cumbersome process to one that enables the growth and intensification desired in our communities.

TRREB believes the City should focus on promoting flexibility within the Avenues policy. Mixed Use Areas offer more adaptability than Apartment Neighbourhoods. Designating all avenues as Mixed-Use Areas would enable these main streets to evolve in response to community needs. Requiring an expensive review process before such changes can occur is likely to stifle this evolution altogether.

Sincerely,
Jennifer Pearce
President
Toronto Regional Real Estate Board

CC: Mayor Olivia Chow
Paul Johnson, City Manager
Jag Sharma, Deputy City Manager, Development & Growth Services
Kyle Knoeck, Interim Chief City Planner