



October 28, 2024

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

Via Email: [phc@toronto.ca](mailto:phc@toronto.ca)

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

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Dear Councillor Perks and Members of the Planning and Housing Committee,

I am writing on behalf of The Building Industry and Land Development Association (BILD), which represents the interests of the land development, home building, and professional renovations sectors in the Greater Toronto Area and Simcoe. We have reviewed the City's staff report concerning item PH16.1 - Housing Action Plan: As-of-Right Zoning for Mid-rise Buildings on Avenues and Updated Rear Transition Performance Standards - Final Report and we would like to offer our comments as follows.

We recognize that this report recommends amendments to city-wide Zoning By-law 569-2013 to implement as-of-right zoning permissions for mid-rise buildings along Avenues in the Commercial Residential (CR) zone. The amendments implement the updated urban design performance standards for rear transition and recommend as-of-right height and density permissions. Of note, the report recommends increased as-of-right zoning permissions ranging from 6-11 storeys on specific Avenues of the City (as noted on page 16 of 24 of the staff report).

BILD has received feedback from its members indicating that the proposed increased permissions are insufficient to facilitate mid-rise development projects and enhance housing supply, contrary to the stated intention of the Housing Action Plan. Moreover, certain Avenues, and portions of identified Avenues, remain without any increase in residential permissions, and the rationale for their exclusion is unclear.

Currently, the City of Toronto is facing historic lows in new home pre-sales. Any new policy reforms should focus on reducing complexity and costs for new developments to bolster both the current and future housing pipeline. We encourage you to adopt bold policy reforms that promote greater density, thereby supporting housing affordability and supply.

Thank you for considering our perspective on this matter. Should you have any questions or require further information, please feel free to contact me directly.

Sincerely,

Danielle Binder, RPP MCIP  
Senior Director, Policy and Advocacy