

PH18.5 - Housing Action Plan: Avenues Policy Review - Decision Report - Lenka Holubec, Addendum Feb5, 2025

February 5, 2025

Attention: Sylwia Przewdziecki, City Clerk

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Email: phc@toronto.ca

RE: PH18.5 - Housing Action Plan: Avenues Policy Review - Decision Report

Dear Mayor Olivia Chow and Members of City Council,

Thank you for this opportunity to comment on **PH18.5 - Housing Action Plan: Avenues Policy Review - Decision Report**

This is to expand on my comments from (January 23, 2025) E-mail from Lenka Holubec (PH.New)
<https://www.toronto.ca/legdocs/mmis/2025/ph/comm/communicationfile-187114.pdf>

This proposal is to bring forward an Official Plan Amendment and Zoning By-law Amendment upon Council's adoption of OPA 778 to implement the intent of the new Avenues vision and policies, that would permit blanket rezoning including:

- Mid Rise Buildings (up to 14 storeys) will be permitted on new Avenues
- Allow development to potentially be larger than a mid-rise building in Mixed Use Areas within a 500 to 800-metre walking distance of subway, light rail transit, and GO rail station
- City Planners to rezone lands along and near Avenues without further public consultation or Council oversight.
- Increased density and height without corresponding infrastructure improvements
- To continue and conclude all Avenue studies that were commenced before December 31, 2024 and that these studies consider the new vision and policy recommendations in OPA 778
- 283 kilometres of new *Avenues*, representing an increase of approximately 165 percent
- Removing requirements for Avenue Segment Reviews and new Avenue Studies
- This report also recommends next steps for staff to redesignate and rezone lands along and nearby *Avenues*

This far reaching proposal in the context of other incremental upzonings along HAPA and EHON do constitute a fundamental changes of Toronto Official Plan and its vision as it was conceived after the city amalgamation without a major public consultation. The vision for this city, as now set in Chapter One of the Official Plan 2024 office consolidation, represents changes now being realized along HAPA, EHON, that most of public may not be aware of and/or were adopted without a wide process of public consultations and consensus.

For example the OP office consolidation 2019 below statement is no longer present in the OP office consolidation 2024:

1-1

"This Plan sets its sights on building a consensus around change by painting a picture of the City's future. Building a future for Toronto does not mean changing everything. The Plan's land use designations covering about 75 per cent of

the City's geographic area will strengthen the existing character of our neighbourhoods, ravines, valleys and our open space system. These areas are not expected to accommodate much growth, but they will mature and evolve. Most of the new growth over the next 30 years will occur in the land use designations covering the remaining 25 per cent of the City's geographic area. These are the areas of real opportunity where change can contribute to a better future and where we can realize the greatest social, environmental and economic benefits."

Protection of natural heritage was a corner stone of City Official Plan after the amalgamation [Toronto Natural Heritage Study, 2001](#). Policies protecting and enhancing the natural heritage system were anchored into the City Official Plan as a key pillar of biodiversity conservation within Toronto. The city OP Chapter 3 Natural Environment still contains **in text** these policies that were mandated by adoption of [OPA 262](#) and [OPA 583](#) but with changes resulting from HAPA, EHON and blanket rezoning introducing new Avenues, more density, height, impervious surfaces, hydrogeological changes to watersheds, increase public use of protected ESAs/ANSIs, introduction of more pets and invasive species, the reality and the prospects of protecting Toronto's natural heritage for future generations is significantly undermined. Nowhere in this Report, as much as along the past proposed housing initiatives, a proper consideration is given to how the changes proposed may impact the city protected natural heritage, tree canopy, backyard biodiversity, green spaces, etc. There is no correlation between HAP and the Parkland Strategy, Ravine Strategy, Biodiversity Strategy, [OPA 262](#) and [OPA 583](#) Environment and Climate Change Official Plan Policy Updates focused legislature and initiatives.

Request:

that on February 5th this item is referred back to City Planning to complete

- **Studies are done on measures how the goals in this Report, as expressed under "7. e. "be served by adequate parks, community services and facilities, and water and sewer infrastructure" will be achieved**
- **Studies are done on how this "Integrated Approach to Unlocking Toronto's Avenues and Major Streets City Planning taking a comprehensive and integrated approach to advancing related HAP action items" and "streamlining" shift in the Official Plan vision will affect net zero, ecological footprint of Toronto, support and enhance biodiversity and city natural heritage, the ESAs, ravines, waterfront, improve and prevent flooding,**
- **Studies are done on whether proposed changes result in producing affordable housing by comparing to other cities**
- **Studies are done on how and whether proposed changes of "unleashing" more growth will mitigate climate and biodiversity crises or make these worse**
- **Studies are done how growth proposed will contribute to net zero**
- **Allow for in depth review for consistency and conformity of proposed changes with the planning policies guiding natural heritage and biodiversity in the city**

We must ensure the wisdom gained by generations over past decades of the public process is not to be undermined by growth or ideology:

"Since early 90th, there was a growing awareness in the City of Toronto of having to protect remaining valuable natural areas. Too often in the past, we have considered green space as an afterthought, what was left over after development took its course." [Metropolitan Waterfront Plan, Metropolitan Planning Department 1994](#)

Yours sincerely,

Lenka Holubec, member of [ProtectNatureTO](#)

Cc:

Jason Thorne, Chief Planner and Executive Director, City Planning Division
Jeffrey Cantos, Acting Director, Strategic Initiatives, Policy & Analysis, City Planning,
Kyle Fearon, Project Manager, Strategic Initiatives, Policy & Analysis, City Planning,
Kyle Pakeman, Project Coordinator, Strategic Initiatives, Policy & Analysis, City Planning

Mayor Chow and All City Council Councillors

References

[Metropolitan Waterfront Plan, Metropolitan Planning Department 1994](#)

"Since early 90th, there was a growing awareness in the City of Toronto of having to protect remaining valuable natural areas. Too often in the past, we have considered green space as an afterthought, what was left over after development took its course."

"In the urban context, the planning priority is to ensure that we benefit from the natural heritage while not unduly impairing natural processes"

The ecosystem approach requires us to look beyond a particular site to what is happening in the next bay and in the whole watershed, and to have regard for cumulative impacts. A new structure in the lake at one site may destroy the beaches at another."

City Official Plan:

[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, 2015

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

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

[Toronto Official Plan, CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO, December 2023 Consolidation](#)

"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

"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

“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

Studies and articles:

Policy Horizons Canada published in 2024 Report [Disruptions on the Horizon](#):

“The Disruptions on the Horizon 2024 report identifies and assesses 35 disruptions for which Canada may need to prepare and explores some of the interconnections between them. These disruptions are potential events and circumstances that could affect our society and the way it functions, as well as the way people live, work, and connect”

[Federal panel lists 35 'plausible' future threats to Canada and the world](#) lists top 10 disruptions.

“Biodiversity is lost and ecosystems collapse” is ranked as a second highest threat, by highest combination of likelihood and impact:

“The second and third threats on the top ten list are environmental: ecosystem collapse due to loss of biodiversity and extreme weather events overwhelming our ability to respond.

In five to six years, the report says, a collapse in biodiversity “could have cascading impacts on all living things, putting basic human needs such as clean air, water and food in jeopardy.”

Flooding

<https://www.cityfloodmap.com/2024/>

In-depth data and analysis on extreme weather and flood risks on www.cityfloodmap.com share engineering insight on complex topics of infrastructure design and performance, urban hydrology, flood risk assessment, and cost-effective risk management. Our goal is to promote critical, evidence-based "Thinking Slow on Floods and Flow" to improve flood and stormwater management policies and achieve effective environmental outcomes. R.J. Muir, Toronto, ON.

Local studies that observed no increases in design rainfall when updating IDF values:

Many studies: <https://www.cityfloodmap.com/2018/03/extreme-rainfall-and-climate-change-in.html>

While media and the insurance industry has repeated that climate change has been responsible for increased flood damages and insurance claims over past decades, the lack of increases in extreme rainfall means that other factors are at play. These include fundamental changes in hydrology in urbanized communities, e.g., increased watershed development and intensification. See previous posts for some examples of expanding urbanization in Ontario

communities over previous decades: <https://www.cityfloodmap.com/2016/08/land-use-change-drives-urban-flood-risk.html>

Upzoning and gentrification: Heterogeneous impacts of neighbourhood-level upzoning in New York City

<https://journals.sagepub.com/doi/full/10.1177/00420980241298199>

Abstract

In light of the calls to relax restrictive density regulations, this paper examines how increasing residential development capacity, i.e. upzoning, may change the demographic, socio-economic and housing characteristics of the affected neighbourhoods. We examine the neighbourhood-level upzonings of New York City to answer this question.

We find that upzoning is positively associated with signs of gentrification – upzoned neighbourhoods became whiter, more educated and more affluent in the long run.

Upzoning is also associated with increases in housing production, but housing prices also increased.

Most importantly, we find that these effects varied significantly by the intensity of upzoning and the pre-upzoning local contexts. Neighbourhoods affected by intense upzonings experienced gentrification more intensely, along with greater housing production, rent growth and housing price appreciation. Black-majority and low-income neighbourhoods experienced gentrification to the greatest extent, while neighbourhoods with high demand for housing saw the greatest increases in housing supply. We discuss different mechanisms of gentrification likely at play for the different types of neighbourhoods.

[Ontario's Ecological Footprint and Biocapacity: Measures and trends from 2005 to 2015](#) Eric Miller, etc.

By Eric Miller, Jason Robinson, Maria-Louise McMaster, Elizabeth Holloway, Anuja Kapoor.

Report submitted to the Ontario Ministry of Natural Resources and Forestry. Authors are affiliated with the York University Ecological Footprint Initiative. The York University Ecological Footprint Initiative can be reached at footprint@yorku.ca

Ontario's Ecological Footprint of consumption in 2015 was almost equal to Ontario biocapacity of 96.8 million gha.

“Ontario’s lands and waters sustain a great diversity of ecosystems and species. Through a complex web of inter-relationships, these ecosystems and species transform materials from the landscape, and energy from the sun, into products and processes that sustain life. Humans depend upon ecosystems, and the life that they sustain, as sources of food and materials and energy, and as a means of metabolizing wastes, and as places for settlements and infrastructure. This dependence has a greater chance of being sustained if humans use renewable natural resources at rates that can be regenerated, and if humans emit pollution at rates that can be metabolized. These conditions necessitate the measurement of humanity’s use of the regenerative capacity of ecosystems around the world. This can be accomplished by accounting for Ecological Footprint and biocapacity. For the Ontario Ministry of Natural Resources and Forestry.”

<https://journals.library.ualberta.ca/csp/index.php/csp/article/view/29379/21402>

Minimum ecology in Maximum Canada: A review from an ecological economics perspective

Review by Eric Miller, Consulting Economist, Hamilton, Ontario

“Doug Saunders, an international affairs columnist for the Globe and Mail newspaper, is convinced that an extra 65 Million people living in Canada’s cities by 2100 would be “the best eco-logical asset Canada could have.

In his book **“Maximum Canada: Why 35 Million Canadians are not Enough”**, the author boldly asserts that:

- *underpopulation harms Canada’s climate and ecological prospects”*
- *underpopulation forces us to use energy-inefficient and polluting transportation systems and heating technologies and denies us the people and tax revenue needed to replace inefficient systems and technologies with green energy that would “protect us against the effects of climate change”*
- *the sprawled auto-dependent mode of past planning is the result of too few people, such that Toronto and Vancouver*
- *we need a lot more population in order to overcome the practical and ecological problems of population*
- *larger, denser cities are vastly less ecologically damaging than smaller, looser ones”*