

January 21, 2025

The Planning and Housing Committee
City of Toronto
City Hall
100 Queen Street West

Subject: Item 2025. PH18.5 - Housing Action Plan: Avenues Policy Review - Decision Report

Dear Members of the Planning and Housing Committee,

We are writing on behalf of the Beaconsfield Village Residents Association (BVRA) to formally object to the proposed zoning changes under the Avenues Policy Review.

In simple terms the Planning Department is requesting that City Council:

- 1) Approve the addition of 283 kilometers of new Avenues across the city, significantly expanding the current network. In Ward 9, this includes streets such as Ossington, Oakwood, Dufferin, and Lansdowne, alongside existing Avenues like St. Clair, Bloor, College, Dundas, and Queen.
- 2) Permit mid-rise (up to 14 storeys) and high-rise buildings (greater than 14 storeys within 500–800 metres of a subway station) as a matter of right on Avenues, with no further approvals or Avenue studies required.
- 3) Allow the City to, “where appropriate,” rezone or redesignate:
 - a) Neighbourhood lands directly along Avenues to Mixed Use Areas or Apartment Neighbourhoods, enabling mid-rise and high-rise development.
 - b) Neighbourhood lands near Avenues to Mixed Use Areas or Apartment Neighbourhoods, to allow for larger buildings and align with the City’s vision for higher-density development along Avenues.

Lack of Consultation and Clear Communication

We have serious concerns about the lack of meaningful consultation on these proposed changes:

- **The proposal to allow high-rises near transit hubs and redesignate lands for larger developments is a new addition, and residents only learned about it through the staff report. This does not constitute proper consultation.**
- Although the City Planning Department claims to have shared the proposed Avenues in June 2024, the communication was inadequate, leaving many residents unaware of the full scope of the changes. Even major news outlets, like the Toronto Star, only referenced the existing Avenues in their coverage, leading many to overlook the proposed changes. For example, a November 2024 article in the Toronto Star only mentioned existing Avenues, which likely caused confusion and a lack of attention to the new proposals (see Appendix 1).

- City Planning indicated they rely on Councillor newsletters to inform residents, but our Ward 9 Councillor did not notify us about the July or November Planning meetings or the proposed Avenues.
- The Beaconsfield Village Residents Association was unaware of the scope of these changes until reviewing the staff report, and we know many other Residents Associations are in the same position.
- The material provided by Planning is complex, dense, and filled with numerous attachments, making it very difficult to understand. There is no single document that clearly explains the changes and their implications for residents. The information is too technical and filled with jargon, which is not easily understood by the general public.
- Communication has only been available in English, which excludes many in our community.
- The consultations that were held were primarily virtual, excluding those who are not tech-savvy or lack access to technology. This format has not provided an adequate opportunity for all residents to engage in the process and understand the full scope of the proposed changes.
- Lastly, the staff report and supporting documents were not even posted on the Housing Action Plan: Avenues, Mid-rise and Mixed Use Areas Study website. Instead, they were only available on the Committee agenda, making it difficult for residents to access.

Impacts of Rezoning and Increased Density

The proposed changes have the potential to significantly alter our neighbourhood. For example:

- The City could rezone Ossington (north of Dundas) to Mixed Use, allowing mid-rise buildings along the entire stretch of Ossington. Within 800 metres of the subway, high-rise buildings (greater than 14 storeys) would also be permitted, extending close to College to the south and Dupont to the north.
- Streets that back onto Avenues or nearby side streets could also be rezoned to support larger developments. This would allow developers to purchase these properties and expand developments into adjacent lots, including backyards or properties on side streets.
- Recent changes to mid-rise guidelines reduced setbacks, meaning these larger buildings could be closer to backyards and homes, creating shadows, reducing privacy, and negatively impacting quality of life.
- Once a street is rezoned to Mixed Use, businesses like bars, restaurants, and takeout spots could open on the ground floor, increasing noise, traffic, and late-night disturbances in residential areas.

Overlap with EHON Major Street Changes and Residential Zoning

Many of the new Avenues proposed in Ward 9 are currently streets zoned residential, with one, two, or two-and-a-half storey homes. These streets, such as Ossington and Lansdowne, are also designated as Major Streets under the City's planning framework.

As part of the EHON initiative, the Zoning By-law Amendment adopted on May 22, 2024, already permits townhouses and small-scale apartment buildings (up to 30 units and 6 storeys) along Major Streets where they were previously prohibited. While these changes significantly increase density, the current proposal goes even further by allowing buildings taller than 14 storeys on streets that are currently zoned residential.

We understand the need for higher density in certain areas, but we believe that 6 storeys is a reasonable approach to meet this need without drastically altering the character of residential streets. Anything taller, especially on streets like Ossington and Lansdowne, would fundamentally change the nature of these communities.

Overdevelopment and Infrastructure Concerns

Our neighbourhood is already experiencing substantial development. For example:

Projects such as 450 Dufferin include studies showing that the area's population density is already 12,859 people per square kilometre, compared to 4,334 for the rest of Toronto. Between 2011 and 2016, the population in the area increased by 29.12%, while Toronto as a whole grew by only 4.5%.

For comparison, major Canadian cities such as Montreal and Vancouver have population densities of 4,000–5,000 people per square kilometre, and New York City is at 10,935.

At 12,859 people per square kilometre, our neighbourhood is already one of the densest in the city. Additional development would strain existing infrastructure, including roads, transit, and community services, which are already overburdened.

Adding to these concerns, our neighbourhood lies in a flood zone, further compounding the risks associated with overdevelopment and inadequate infrastructure.

Lack of Transparency and Accountability

We are concerned that City Planning is moving forward with these significant changes without adequately consulting the public or being transparent about the full implications.

Many residents were only made aware of the proposal through the staff report, and documents were not readily available on the official Housing Action Plan website.

It feels as though the City is pushing this agenda without genuinely seeking input from residents who will be directly affected by these changes.

Recommendations

We strongly urge the Committee to pause these proposals and direct the Planning Department to:

1. Conduct meaningful, transparent consultation with Residents Associations, particularly through an in-person meeting for Ward 9 residents.
2. Provide clear, detailed explanations of vague terms such as “where appropriate” to help residents fully understand the potential implications of the proposed changes.
3. Reassess the need for additional density in our neighbourhood, given the existing strain on infrastructure and the already high population density.
4. Exclude Major streets that are zoned residential, from being proposed as Avenues for further mid- and high-rise development. The existing 6-story allowance under EHON already strikes a balance between adding density and preserving the character of our neighbourhoods.

These changes represent a fundamental shift in how neighbourhoods like ours are planned and deserve thorough and inclusive consultation. We hope that our concerns will be taken into serious consideration.

Thank you for your attention.
Sincerely,

Nicole Tataj (Member) and Randy Kerr (Chair)
Beaconsfield Village Residents Association

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Appendix 1: Toronto Star Article, Nov 11, 2024

https://www.thestar.com/real-estate/a-new-toronto-policy-could-allow-buildings-up-to-11-storeys-tall-on-busier-streets/article_87e7e3ae-9874-11ef-b533-335f0310ac55.html

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REAL ESTATE

A new Toronto policy could allow buildings up to 11 storeys tall on busier streets. Here's where — and what the mayor thinks of the plan

The wider the street, the taller developers could build, with a sliding scale up to 11 storeys on the widest avenues like Kingston Road.

Updated Nov. 11, 2024 at 11:15 p.m. | Nov. 11, 2024



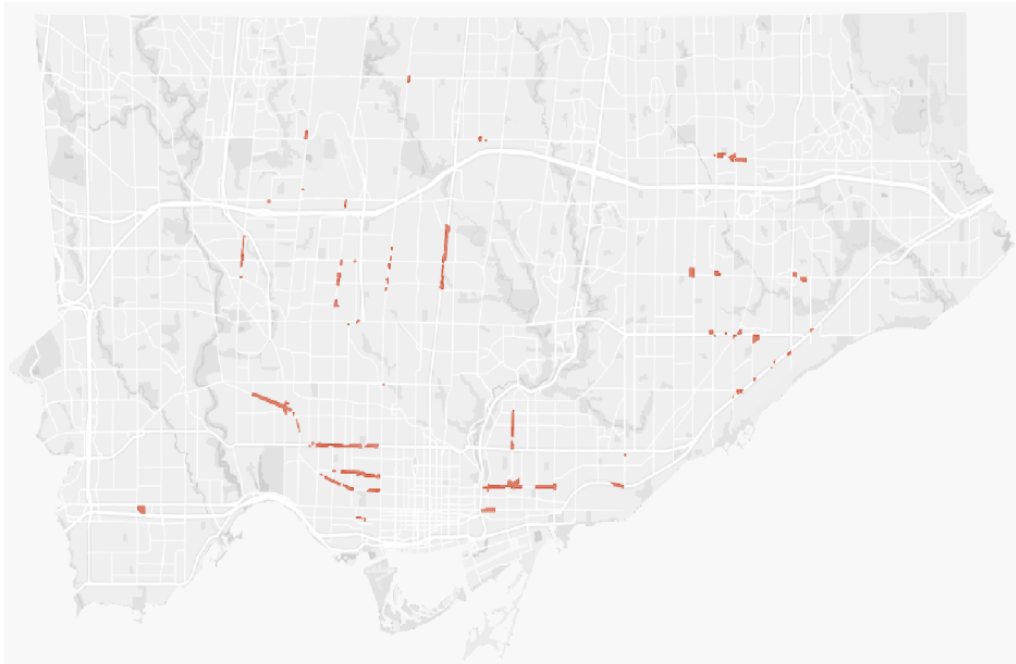
Carlaw and Gerrard is among locations in Toronto where city staff are recommending automatic permission to build at greater heights and densities.

Steve Russell Toronto Star

By Victoria Gibson Affordable Housing Reporter

Which Toronto avenues could see more density?

Areas that could see allowances for six- to 11-storey buildings under the proposal.



Areas are approximate.

SOURCE: CITY OF TORONTO

TORONTO STAR GRAPHIC

The proposal is the latest push in a years-long effort by Toronto planners to crack apart an old rule system that cordoned off large swaths of land for single-family homes. Those rules, over the years, resulted in uneven growth, with some areas increasingly crammed with towers while other, lowrise neighbourhoods stagnated despite the city's continually rising population.

Council has already greenlit changes such as allowing multiplexes with up to four units in any city neighbourhood, as well as townhouses and lowrise apartments along designated "major streets." The new proposal for avenues would allow the

greater density so long as the new buildings meet other specific conditions, such as minimum distances from rear properties.

Property owners could still apply for special permission to build taller or denser buildings — above 11 storeys — on a site-by-site basis.

In consultation meetings this summer, planning staff say participants were largely supportive of the proposed change, though there was debate over the finer details of building design and impacts of density on parking.

But Chow, alongside Coun. Brad Bradford (Ward 19, Beaches—East York), is already questioning why the proposal doesn't suggest greater height limits, telling reporters last month that the pitch was "not as ambitious" as she had hoped to see. "The city has a wall of much higher than 12-storey buildings in some of those avenues," Chow said.

Chow will be seeking councillors' support in asking staff to reconsider allowing "taller and denser midrise buildings," while continuing to look at the stretches of avenues with area-specific rules that would exempt them from the recommendations.

Coun. Bradford, who has made the same requests of staff put forward by Chow in her letter, has also made a separate request for staff to review sites where residential uses are not allowed or allowed in smaller amounts and report back on increasing that residential permission "where appropriate."

"It's another report in front of us that incrementally moves us down the road — down the avenue, if you will — of providing more as-of-right permissions. But frankly, and I've shared these comments with staff and others, we need to do more," Bradford said at last week's planning and housing committee meeting.

City council is set to meet this week from Wednesday to Friday.



Victoria Gibson is a Toronto-based reporter for the Star covering affordable housing. Reach her via email: victoriagibson@thestar.ca.

REPORT AN ERROR

JOURNALISTIC STANDARDS

ABOUT THE STAR
