



HVVRABoard@gmail.com

Date: January 21, 2025

To: Members of the Planning & Housing Committee

From: The HVVRA Board of Directors

Re: **Agenda Item 2025 PH18.5 HAP Avenues Policy Review (decision pending)**

The HVVRA has **many** concerns about this study. We object to the proposed zoning changes under review and request you Refer this study for further public consultation. Our feedback is below.

Comments:

In our view, the HAP Avenues Policy Review has been rushed and poorly communicated. It is vague, at times misleading, and lacks essential details. Consider:

- Poorly advertised virtual public consultations ignore those not tech-savvy.
- Unreasonably short timeframes between the Notice and the meeting date.
- English-only documents in a multi-cultural city.
- An ever-changing Map 5 was unreadable on the screen at the Public Consultation meeting and Open House and lacked street names. We suspect this applies to other Maps.
- The Map accompanying the report from Planning and Housing Committee for *today's* meeting (Jan. 23) has no names on it.
- Various versions of the Map show Avenues arbitrarily added or removed.
- The report offers no performance standards whatsoever implying details will be determined after it is approved by Council.
- The proposal to permit high-rises near transit hubs and redesignate properties for even larger developments is new.
- The Staff report was not posted on the HAP: Avenues, Mid-rise and Mixed Use Areas study website, only on the Committee agenda.

In our view, these are all unacceptable and deliberately lack transparency.

The HAP consultation is oddly similar to the EHON study which was referred back for further consultation. We request that you Refer this report also. Planning can do far better.

The changes proposed are wide-ranging and impact every resident in the city, yet few residents, aka "taxpayers," have heard about it, let alone studied its implications. Moreover, it proposes to leave the fallout from these recommendations and the financial consequences for other departments to fix later by:

- Eliminating Avenue studies prior to approval.
- Making amendments "as of right".
- Denying third party right to appeal.
- Monitoring, after the fact, when the damage is already done.

What is the rush to ram this poorly written policy through? Surely the new Multiplex Housing by-law amendments offer enormous opportunities to increase housing throughout the city for developers to capitalize immediately.

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Recommendations:

This *spray and pray, one size fits all* approach to permit taller buildings and greater density without restrictions and exceptions, with no consideration for parking and electric vehicles will result in needlessly expensive infrastructure changes and repairs and a host of bandage solutions. Again, Planning can do better.

We offer four recommendations to modify the proposal to add 283km of new Avenues in addition to newly created Avenues:

1/ In every borough:

- **A staged approach:** Identify a limited number of Avenues or stretches of Avenues where higher, greater density development is permitted. Consult local residents where best to start.
- **Measure:** Set timeframes and targets to track new developments, i.e. 2026-2030.
- **Monitor:** Evaluate every new development project, especially impacts on infrastructure (sewers, water mains, parking, traffic).
- **Identify Best Practices:** Learn what's working, what isn't and apply learnings to subsequent projects.

2/ Islington Avenue: We wonder why Islington is not an Avenue close to the Bloor subway and south of Norseman, west side, where existing strip malls (Healthy Planet, Dollarama, and No Frills) are walking distance to the live-work community east to Kipling.

3/ We oppose Royal York Road, a 2-lane street, with large, long-established residential neighbourhoods on both sides, previously an arterial road, now a Major Street, morphing into an Avenue.

4/ Maintain parking requirements for retail/commercial developments where streets nearby have no sidewalks. The current proposal may suit developers, but it is at odds with Vision Zero and puts citizens at risk. Consider Royal York, Kipling and Islington, where most intersecting streets have residential housing and no sidewalks. With cars from retail/commercial establishments parking on side streets, is the assumption that pedestrians, schoolchildren and the elderly walk in the middle of the road?

Clarification Questions

1. Where is the final Avenues Map? When will we see it? Or are you asking Council and residents to support an ever-moving target?
2. What are the overall assumptions for parking given the recommendation for limited parking requirements for mixed-use buildings and at subway stations?
3. What are the plans for EV charging stations near subway stations and along Avenues?
4. What are the specific height restrictions within 800m of subway stations?
5. Do all subway stations share the same restrictions?
6. Can the committee of Adjustment approve greater heights on Avenues? Around Major Transit Station Areas (MTSAs)?



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We do not support the Avenues Study proposal at this point -- we aren't even close. But we look forward to your response to our concerns today.

Sincerely

Anne Legris Anderson, President

On behalf of the Board of Directors