



January 22, 2025

Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
Attention: Nancy Martins

**PH18.5 Housing Action Plan: Avenues Policy Review - Decision Report  
(Ward All - Statutory: Planning Act, RSO 1990)**

Dear Chair, Councillor Gord Perks, and Members of Planning and Housing Committee,

First, we note that the proposal is highly complex, given its scope, scale and implementation frame, and as such has presented a significant challenge to properly understand. We appreciate the willingness of staff to spend time going over it, which has resulted in a progressively more favourable view of the proposal.

Basically, the proposal provides a policy framework for Avenues and direction for further studies of specific areas for the intensification of main streets City-wide that are or are not otherwise already designated as Avenues, to confirm if they should be designated as 'Avenues' and if so what OPA and zoning bylaw changes are required. The initial mapping of Avenues is based on several criteria:

- frequent public transit
- avoidance of employment lands
- avoidance of green space
- supportive of housing near post secondary institutions
- connecting existing Avenues where appropriate e.g. O'Connor Drive.

Other criteria may be appropriate for consideration of specific areas.

The report has four main recommendations

**1. Adopt a new Avenues vision and policy**

The report recommends approval of OPA 778 that provides a framework for considering a massive potential expansion of Avenues (165% increase in length). The next step is for Stage 2 studies to confirm suitability for Avenues forms of development and designates them Mixed Use or Apartment Neighbourhoods. This strategy is proposed to help ensure thoughtful planning of the potential new Avenues in the current world of intrusive provincial oversight.

## **2. Re-designate and rezone lands along Avenues as Mixed Use and Apartment Neighbourhoods “where appropriate”**

What is “appropriate”? Detailed segment studies are to be undertaken to develop specific recommendations following the analysis needed for location specific considerations, such as wide or deep enough lots, excessive slopes, protected open space, scale of urban form – height, relationship to abutting neighbourhoods, protection of open space, types of retail space, office space, etc.

The Report’s argument is that a one by one Avenues Study or Segment Review slows down the development process and that having a general OPA with planning policies will shorten an otherwise lengthy planning process.

## **3. Redesignate Neighbourhoods lands near Mixed Use and Apartment Neighbourhoods to facilitate Avenue development**

Why is this needed? No mapping is provided to clarify the relevant adjacencies to Residential and Mixed Use areas. There are enough potential sites to meet the City’s demand for more housing. Housing is not being built due to many factors but not lack of sites. Any consideration of adding such areas should be done via a site specific OPA and ZBA.

## **4. Additional height and density zoning permissions to allow tall buildings for lands in Mixed Use areas 500-800 metres from transit station (i.e. MTSAs)**

This new policy for Avenues clarifies that the properties referenced are only those fronting on to the Avenue. Also that the greatest heights should be buildings closest to the transit station. However, the distance limit should be 500m., not up to 800m.

As well, appropriate criteria should be established for tall buildings to ensure acceptable wind conditions for pedestrians at grade, including revised wind study requirements, and making podiums mandatory.

We note that the MTSAs were introduced by the Province to require minimum amounts of affordable housing but the Province has failed to implement the Inclusive Zoning on which the MTSAs were based. Thus the City’s stated intent for affordable housing, through the Avenues, while desirable, may be beyond the City’s reach.

### **We recommend:**

- 1. Given the complexity of the proposal, that staff consider ways to improve the communication and engagement of the public as the study enters Phase 2;**
- 2. That the following refinements be made to the proposal:**
  - additional height and density zoning permissions to allow tall buildings for lands in Mixed Use areas be limited to 500 metres (instead of 500-800 metres) from transit station**
  - design requirements for high-rise buildings be reviewed regarding managing wind impacts including making podiums mandatory**

Yours truly,

Geoff Kettel  
Co-Chair, FoNTRA

Cathie Macdonald  
Co-Chair, FoNTRA

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,

**The Federation of North Toronto Residents' Associations (FoNTRA)** is a non-profit, volunteer organization comprised of over 30 member organizations. Its members, all residents' associations, include at least 250,000 Toronto residents within their boundaries. The residents' associations that make up FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.