

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

January 23, 2025

Attention: Nancy Martins

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Email: phc@toronto.ca

Cc: councillor_perks@toronto.ca; councillor_bradford@toronto.ca; councillor_matlow@toronto.ca;
Councillor_Myers@toronto.ca; councillor_nunziata@toronto.ca; Councillor_Crisanti@toronto.ca

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

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

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

Changes proposed in this Report are far reaching affecting potentially every aspect of people's life and this city built and natural environment in the area of [MAP 2](#) as a consequence of "unlocking" growth via more streamlined policy framework. These changes will undoubtedly affect the neighbourhoods, infrastructure, level of density, daily stress levels and mental health, availability of schools, programming, green spaces per person availability, air quality, preservation of natural and historical heritage, backyards biodiversity and the overall capacity of city to maintain and enhance biodiversity, it may contribute to heat islands, liveability, result in more CO2 emissions due to much more construction and population growth.

Report notes that *"With evolving growth pressures, there is an opportunity to update the policy framework to align with the vision set out in Chapter One and address the housing challenges set out in the Housing Action Plan."*

We cannot defy gravity as much as we cannot entirely defy how "unlocking" of growth and density affect the cities.

Smart growth facilitates more growth into the cities but so far there is not enough proof of whether this *"growth pays for growth"* formula really produces net zero, enhances people's quality of life, preserves green spaces, biodiversity, stops sprawl and enables sustainability.

Request:

Refer this item until

- 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 living standards, net zero, ecological footprint of Toronto, biodiversity, natural heritage
- Studies are done on, whether proposed changes really result in producing affordable housing

- Studies are done on how and whether proposed changes of “unleashing” more growth will mitigate climate and biodiversity crises

Allow for a review for consistency and conformity of proposed changes with the planning policies guiding natural heritage and biodiversity in the city.

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. Missing is any mention to the policies relevant to the city protected natural heritage, adopted into City Official Plan.

There is no interrelation between housing initiatives with the Parkland Strategy, Ravine Strategy, Biodiversity Strategy and the OPA 583 Environment and Climate Change Official Plan Policy Updates focused legislature and initiatives.

This Report lists supportive policies under LEGISLATIVE AND POLICY FRAMEWORK that while fails to give a proper consideration to other equally important relevant policies and goals.

How to Read the Provincial Planning Statement <https://www.ontario.ca/files/2024-10/mmah-provincial-planning-statement-en-2024-10-23.pdf>

“The provincial policy-led planning system recognizes and addresses the complex inter-relationships among environmental, economic, health and social factors in land use planning. The Provincial Planning Statement supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas.

The Provincial Planning Statement is more than a set of individual policies. It is to be read in its entirety and the relevant policies are to be applied to each situation. When more than one policy is relevant, a decision-maker should consider all of the relevant policies to understand how they work together.”

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

Background:

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 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:

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.

<https://macleans.ca/economy/why-canadas-housing-crisis-is-not-just-a-supply-and-demand-problem/>

Why Is Vancouver So Insanely Expensive? January 16, 2025

“The city has built homes faster than any other in North America, but it’s still the priciest place to live on the continent.

Politicians and pundits often blame Canada’s housing crisis on a simple problem of supply and demand: housing prices are high because not enough new housing is being built for the people who want to live there.

Some argue that increasing the number of homes in a city block can make land cheaper by spreading land costs across more units. But the evidence suggests otherwise. In practice, granting developers the right to build higher only inflates land values further. Why? Because land isn’t valued by how much dirt is for sale but for how many square feet of housing it can hold. A parcel of land that can accommodate a 40-storey tower is worth exponentially more than an equally sized lot restricted to single-family homes. The more density a city allows, the more lucrative its land becomes for those in the business of buying and selling urban property. And those speculative gains do not trickle down to renters or homebuyers. They fatten the pockets of landowners and developers.”

<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”*

[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

Introduction

“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.”