



June 12 2025

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

RE: PH22.8 Housing Action Plan: Avenues Policy Review - Phase Two Work Plan

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

This report outlines the approach to enabling more mid-rise buildings (typically 6 to 11 storeys) on key transit corridors across the city. This supports the creation of housing near transit, shops and services to form complete communities.

Earlier this year Map 2 in the Official Plan was revised to expand the length of Avenues and remove the previous process of Avenue Reviews previously required for designation.

Phase Two consists of three stages, each approximately nine months in length.

- *Stage One consists of two studies for Toronto and East York (TEY): an initial study in Ward 9 (Davenport) and Ward 11 (University-Rosedale) (target completion Q4 2025), followed by a separate study for all remaining TEY wards with Avenues.*
- *Stage Two will examine wards with significant Major Transit Station Areas (MTSAs) prioritizing subway and LRT stations.*
- *Stage Three will examine remaining wards with fewer MTSAs.*

Comments

#1 - Implementation Strategy

Given that Map 2 has already been revised the major issue concerns implementation strategy for the re-zonings that are enabled. The report recommends a phased approach starting with wards 9 and 11 (Phase 1), followed by Midtown/North Toronto and Etobicoke (Phase 2) and then by North York and Scarborough (Phase 3)

This approach proceeding from the downtown to suburbs does not allow for comparative review of the suitability of the varied neighbourhood contexts, and as a result we are concerned that it is likely to proceed in a “business as usual” way.

It is recommended:

- That avenue segments be selected for consideration of re-zoning equitably from all parts of the city rather than proceeding on a ward-by-ward basis from downtown to suburbs

The criteria to be used to identify lands for redesignation and rezoning are proposed to be primarily based on right-of-way width, lot size, and existing land use. These appear to be similar to the criteria used in previous Avenue Studies

#2 - Consultation Process

Council was clear in its direction: implementation was to include comprehensive consultation. While not as detailed as a full Avenue Study, the intent was to ensure robust engagement. With Avenue Studies no longer part of the process, this is now the only public engagement step. We note that residents were not informed when Avenue designations were made earlier this year and in any case are generally not aware of the implications.

What's being proposed - two public meetings, a survey, and a communications plan still under development – appears too narrow and too rushed for the scale of what's being considered. If this consultation is now the only opportunity for residents to weigh in before city-wide zoning changes take place, we believe it needs to be clear, inclusive, and accessible.

It is recommended

- That City Planning report back to PHC on the public consultation plan for the Avenue designation and re-zonings program

#3 - Missing Council-directed Elements

The June 12 report outlines a draft “guide” for redesignation and rezoning but doesn't include several elements that Council specifically asked City Planning to consider - including infrastructure capacity, traffic impacts, and parking in areas without higher-order transit.

See reference report:

PH18.5 – Housing Action Plan: Avenues Policy Review – Decision Report (February 5, 2025).

It is recommended:

- That City Planning include elements such as infrastructure capacity, traffic impacts, and parking in areas without higher-order transit in the re-zoning guide going forward.

#4 - Rezoning Should Not Be Assumed

Residents were not directly informed when Avenues were expanded on Map 2 earlier this year, and Phase 2 process was expected to serve as the opportunity for public input. That input must include not just how, but *whether*, redesignation is appropriate in a given context.

For some streets - particularly where six-storey buildings are already permitted as-of-right under existing zoning - no further change may be necessary.

If the outcome is that all Avenue lands with deep enough lots will be redesignated to either *Mixed Use Areas* or *Apartment Neighbourhoods*, it raises serious concerns about the purpose and integrity of the consultation process.

It is recommended:

- That the Planning and Housing Committee clearly state that redesignation and rezoning are not automatic, and that consultation outcomes will meaningfully shape whether and where such changes proceed.

Yours truly,

Geoff Kettel
Co-Chair, FoNTRA

Cc: Jason Thorne, Chief Planner and Executive Director City Planning
Romas Juknevičius, MCIP, RPP, Acting Manager, Strategic Initiatives, Policy and Analysis, City Planning,
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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.