

**From:** [Fiona](#)  
**To:** [Planning and Housing](#)  
**Subject:** [External Sender] KPRI Submission-Item PH26.4 – Housing Action Plan – Avenues Policy Review Phase Two: Initial Study of Wards 9 and 11 Pilot  
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December 02, 2025  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

**Item PH26.4 – Housing Action Plan – Avenues Policy Review Phase Two: Initial Study of Wards 9 and 11 Pilot**

**Dear Chair Gordon Perks and Members of Planning and Housing Committee,**  
**FIREHALL SALE ON OUR SCHOOLS- plus a disregard for meaningful neighborhood consultation in a template that is likely to be replicated across the city.**

The Avenues pilot introduces some of the most far-reaching planning changes Toronto has considered in years, including redesignating large areas of residential land — among them active school properties — for mid-rise development. These changes are proposed as the foundation for a future city-wide framework, yet most Torontonians remain unaware that such significant shifts are already underway.

A pilot with this scale of impact requires stronger groundwork and clearer justification before guiding decisions across all wards.

**1. Redesignation of active school properties**

The staff report (p.14) proposes redesignating active school sites for mid-rise development.

Redesignation signals that mid-rise is appropriate on these sites and increases the risk that portions of schoolyards, playfields, or parking areas could be declared surplus and sold. At a time when school land is already scarce, maintaining the current designation provides critical protection for public assets.

**2. Poor consultation**

While the report cites an extensive outreach effort — postcards, posters, surveys, and notices to BIAs and resident groups — the actual participation tells a different story:

- Only 40 residents attended the online meeting.
- Only 8 attended the in-person meeting.
- Of the 1,500 completed survey responses (over 2.5 months), only 24% (360) came from Wards 9 and 11 — the pilot area.

These findings are summarized in [Attachment 11: Summary of Public Consultation](#) (pp. 13–14). Wards 9 and 11 have highly engaged neighbourhoods, so this

exceptionally low turnout suggests the engagement strategy needs improvement.

### **3. . No servicing, infrastructure, or parkland analysis**

This Avenues study proposes significant new density, yet the staff report provides no supporting analysis of servicing capacity, infrastructure needs, or parkland conditions in the study area. Although the report briefly references Water and Wastewater Servicing (p.13), it does not assess the upgrades required to support the anticipated growth, including transit, schools, or public spaces.

While the City has a Parkland Strategy, it has not been applied or integrated into this study to evaluate how existing parkland and potential acquisitions can accommodate the proposed density.

Growth studies like this must include a coordinated infrastructure plan to ensure communities have the services and public spaces needed as population increases. Without this integration, residents cannot be assured that growth will be supported sustainably or equitably.

### **4. Shallow Lots With Frontage on Avenues**

The staff report proposes redesignating parcels behind shallow Avenue (pg. 11) lots to enable mid-rise buildings that otherwise would not fit the Mid-Rise Building Design Guidelines.

This approach effectively extends mid-rise permissions deeper into established neighbourhoods, beyond the frontage of the Avenue which means the potential for taller buildings direct beside properties bringing greater shadowing and privacy issues.

### **5. No affordable or family-sized housing requirements**

Without minimum targets for affordability or family-sized units, this framework is likely to produce primarily small, high-priced suites — missing a critical opportunity to expand housing choice for families across Toronto.

#### **Recommendation**

KPRI respectfully recommends that the Committee defer adoption of OPAs 861 and 862 and direct staff to complete the essential groundwork needed for a city-wide Avenues framework — including school-land protections, clear criteria for where mid-rise belongs, affordability and family-housing requirements, a parkland strategy, and comprehensive servicing analysis.

Strengthening the pilot before city-wide rollout will help ensure that Toronto's Avenues grow in a way that is sustainable, equitable, and aligned with the creation of complete communities.

Sincerely,

F.T.Campbell , President

Kingsway Park Ratepayers Incorporated.