



January 22, 2025
Toronto City Hall
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To: Planning and Housing Committee (phc@toronto.ca)

CC: Councillor Kandavel
Councillor Ainslie
Councillor Perks (PHC Chair)
Mayor Olivia Chow

SUBJECT: Item 2025.PH18.5 - Housing Action Plan: Avenues Policy Review – Decision Report

Dear Members of the Planning and Housing Committee,

We are writing on behalf of the Cliffcrest Scarborough Village Southwest Residents Association (CSVSWRA) to formally object to the proposed zoning changes under the Avenues Policy Review. There is once again a lack of notice and consultation on these changes being provided to our community.

In simple terms the Planning Department is requesting that City Council:

- 1) Approve the addition of 283 kilometers of new Avenues across the city, significantly expanding the current network.
- 2) Permit mid-rise (up to 14 storeys) and high-rise buildings (greater than 14 storeys within 500–800 metres of a subway station) as a matter of right on Avenues, with no further approvals or Avenue studies required.
- 3) Allow the City to, “where appropriate,” rezone or redesignate:
 - a) Neighbourhood lands directly along Avenues to Mixed Use Areas or Apartment Neighbourhoods, enabling mid-rise and high-rise development.
 - b) Neighbourhood lands near Avenues to Mixed Use Areas or Apartment Neighbourhoods, to allow for larger buildings and align with the City’s vision for higher-density development along Avenues.

Lack of Consultation and Clear Communication

We have serious concerns about the lack of meaningful consultation on these proposed changes:

- **The proposal to allow high-rises near transit hubs and redesignate lands for larger developments is a new addition, and residents only learned about it through the staff report. This does not constitute proper consultation.**

Cliffcrest Scarborough Village SW Residents Association

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- Although the City Planning Department claims to have shared the proposed Avenues in June 2024, the communication was inadequate, leaving many residents unaware of the full scope of the changes. Even major news outlets, like the Toronto Star, only referenced the existing Avenues in their coverage, leading many to overlook the proposed changes.
- The CSVSWRA was unaware of the scope of these changes until reviewing the staff report, and we know many other Residents Associations are in the same position.
- The material provided by Planning is complex, dense, and filled with numerous attachments, making it very difficult to understand. There is no single document that clearly explains the changes and their implications for residents. The information is too technical and filled with jargon, which is not easily understood by the general public.
- Communication has only been available in English, which excludes many in our community.
- The consultations that were held were primarily virtual, excluding those who are not tech-savvy or lack access to technology. This format has not provided an adequate opportunity for all residents to engage in the process and understand the full scope of the proposed changes.
- Lastly, the staff report and supporting documents were not even posted on the Housing Action Plan: Avenues, Mid-rise and Mixed-Use Areas Study website. Instead, they were only available on the Committee agenda, making it difficult for residents to access.

Impacts of Rezoning and Increased Density

The proposed changes have the potential to significantly alter our neighbourhood. For example:

- The City could rezone numerous streets in Ward 20 and 24 to Mixed Use.
- Streets that back onto Avenues or nearby side streets could also be rezoned to support larger developments. This would allow developers to purchase these properties and expand developments into adjacent lots, including backyards or properties on side streets.
- Recent changes to mid-rise guidelines reduced setbacks, meaning these larger buildings could be closer to backyards and homes, creating shadows, reducing privacy, and negatively impacting quality of life.
- Once a street is rezoned to Mixed Use, businesses like bars, restaurants, and takeout spots could open on the ground floor, increasing noise, traffic, and late-night disturbances in residential areas.

Overlap with EHON Major Street Changes and Residential Zoning

Many of the new Avenues proposed in Wards 20 and 24 are on currently zoned residential streets, with one and two storey homes. Your proposed plan does not adequately allow for appropriate transitioning, nor respect current neighbourhood character.



As part of the EHON initiative, the Zoning By-law Amendment adopted on May 22, 2024, already permits townhouses and small-scale apartment buildings (up to 30 units and 6 storeys) along Major Streets where they were previously prohibited. While these changes significantly increase density, the current proposal goes even further by allowing buildings taller than 14 storeys on streets that are currently zoned residential.

We understand the need for higher density in certain areas, but we believe that 6 storeys is a reasonable approach to meet this need without drastically altering the character of residential streets. Anything taller would fundamentally change the nature of these communities.

Overdevelopment and Infrastructure Concerns

Our neighbourhood is already experiencing substantial planned development, and our RA keeps pushing for cumulative effect studies through Segment and Avenue studies without progress by the City. The purpose of these studies was to ensure an area could support the level of intensification proposed. This is compliant with Section 2 of the Planning Act.

Additional development would strain existing infrastructure, including roads, transit, and community services, which are already overburdened. Scarborough Southwest does not have a robust transit structure like other areas in the City.

Adding to these concerns, our neighbourhood is located along the Scarborough Bluffs. This fragile natural beauty needs to be preserved and ensure that densification does not impact the Bluffs.

Lack of Transparency and Accountability

We are concerned that City Planning is moving forward with these significant changes without adequately consulting the public or being transparent about the full implications.

Many residents were only made aware of the proposal through the staff report, and documents were not readily available on the official Housing Action Plan website.

It feels as though the City is pushing this agenda without genuinely seeking input from residents who will be directly affected by these changes.

Recommendations

We strongly urge the Committee to pause these proposals and direct the Planning Department to:

1. Conduct meaningful, transparent consultation with Residents Associations, particularly through an in-person meeting for Scarborough Southwest residents.
2. Provide clear, detailed explanations of vague terms such as “where appropriate” to help residents fully understand the potential implications of the proposed changes.
3. Reassess the need for additional density in our neighbourhood, given the existing strain on infrastructure and the already high population density.

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4. Exclude Major streets that are zoned residential, from being proposed as Avenues for further mid- and high-rise development. The existing 6-story allowance under EHON already strikes a balance between adding density and preserving the character of our neighbourhoods.

These changes represent a fundamental shift in how neighbourhoods like ours are planned and deserve thorough and inclusive consultation. We hope that our concerns will be taken into serious consideration.

Sincerely,

Sincerely,

Tanya Baksh, CSVSWRA Director and Co-Chair of Planning and Development