

October 13, 2021



Michael Hain  
Toronto City Hall  
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Sent via Email to: [Michael.Hain@Toronto.ca](mailto:Michael.Hain@Toronto.ca)

## **RE: Zoning By-Law Parking Requirements Review**

Dear Mr. Hain,

The Residential Construction Council of Ontario (RESCON) and the Residential and Civil Construction Alliance of Ontario (RCCAO) are writing in support of the proposal by the City of Toronto to eliminate minimum parking requirements city-wide and to move to maximum parking limits across the city.

Given changing trends in car ownership, vehicle usage, and more recently, remote work amongst Torontonians, the City's proposal is warranted and a step forward.

The 2019 Residential and Civil Construction Alliance of Ontario (RCCAO) report, [“How Parking Regulations Need to Evolve for High-Rise Buildings”](#), found that:

- The cost of constructing below-grade parking in residential condominiums and apartments has increased rapidly over the last decade, often costing between \$80,000-\$100,000 per parking space in downtown Toronto.
- These costs are passed onto unit owners, negatively affect housing affordability.
- Constructing underground parking adds to the already lengthy and complex construction process for high-rise buildings.
- Deep multi-level underground parking structures necessitated by minimum parking requirements incur groundwater challenges which can burden aging sewer infrastructure or pose problematic to make watertight

RESCON and RCCAO were glad to have been included in the numerous consultations and meetings hosted by Toronto City Planning. In May, we provided sales data from RESCON and BILD members that showed that, on average, new condo projects were left with 33% of the built parking stalls unsold. It is also important to note that this figure includes projects that have negotiated lower parking requirements for their respective project. In the extreme case, one builder member has 90% of their parking available for sale.

We commend the City for undertaking this review as it reflects the need to be innovative in the way that parking standards are considered in urban environments. The consequences of building too much underground are multifold: unnecessarily increasing construction costs, overloading our stormwater and sewer infrastructure systems, and generating vast quantities of soil that must be



transported and disposed of. Although not part of this review, we urge the City, in its future work on this topic, to consider how above-grade parking can be utilized to improve urban design. This concept presents a myriad of opportunities including alleviating pressure from the presence of groundwater and allows for several future repurposing options, including for housing and business needs.

We believe that enlarging parking policy areas reflects growth of developments across the City and reducing the number of parking policy areas would simplify the development application process for developers. We are appreciative of the proposal to establish a process for expanding parking policy area boundaries to align with transit development – this is forward thinking and further highlights trends in higher use of public transportation over car ownership and vehicle usage.

However, RESCON has hesitations with the proposal to establish requirements for electric vehicle infrastructure, specifically that all parking spaces be 'EV Ready.' In our sales data research from members, we found very low market demand for EV parking. We also have concerns regarding the technical requirements of EV parking and the increased burden on electrical infrastructure. Before any policy is implemented, the technical requirements and an associated cost-benefit analysis must be considered before increasing the EV parking requirements beyond those already required in the Toronto Green Standard.

With respect to the policy option regarding payment in lieu of bike parking, we feel this allows flexibility on behalf of the developer to cater bike parking demand to a given project's needs. Market demand for bike parking is largely geographic in nature as it relates to the availability of surrounding bike lane infrastructure and should not be a fixed formula for calculating bike parking. While we believe bike parking is important and necessary to provide in new residential developments, there should be a mechanism to account for anticipated market demand.

Understanding that a Final Report will be presented to the Planning and Housing Committee and eventually City Council, we are eager to see the proposal to move from minimum to maximum parking requirements be approved and operational by early 2022.

Thank you,

Paul De Berardis  
Director of Building Science and Innovation, RESCON

Nadia Todorova  
Executive Director, RCCAO