

January 13, 2023

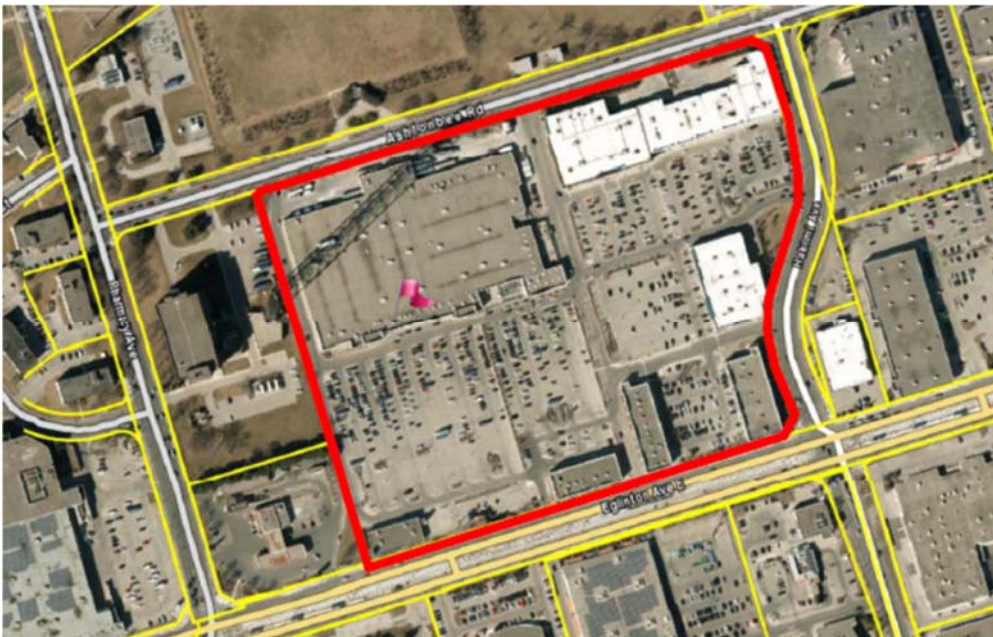
Jennifer Le  
Municipal Services Office - Central Ontario  
Ministry of Municipal Affairs & Housing  
Province of Ontario  
777 Bay Street, 16th floor  
Toronto, Ontario  
M7A 2J3

Dear Ms. Le:

**RE: SUBMISSION ON OPA 570 – ERO #019-5937; MINISTRY #20-OP-227259**  
**1900 EGLINTON AVENUE EAST, TORONTO**  
**OUR FILE: 07132AG**

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On behalf of our client Calloway REIT (1900 Eglinton) Inc. please accept this submission regarding the review by the Province of the City of Toronto's Official Plan Amendment 570 ("OPA 570") respecting the lands located at 1900 Eglinton Avenue East (hereinafter the "Subject Lands") and shown below on Figure 1. **We are requesting reconsideration of the minimum density applied to the lands from 1.0 FSI to at least 3.7 FSI, which reflects the approved density for the property.**



**Figure 1** – Location of the Subject Lands

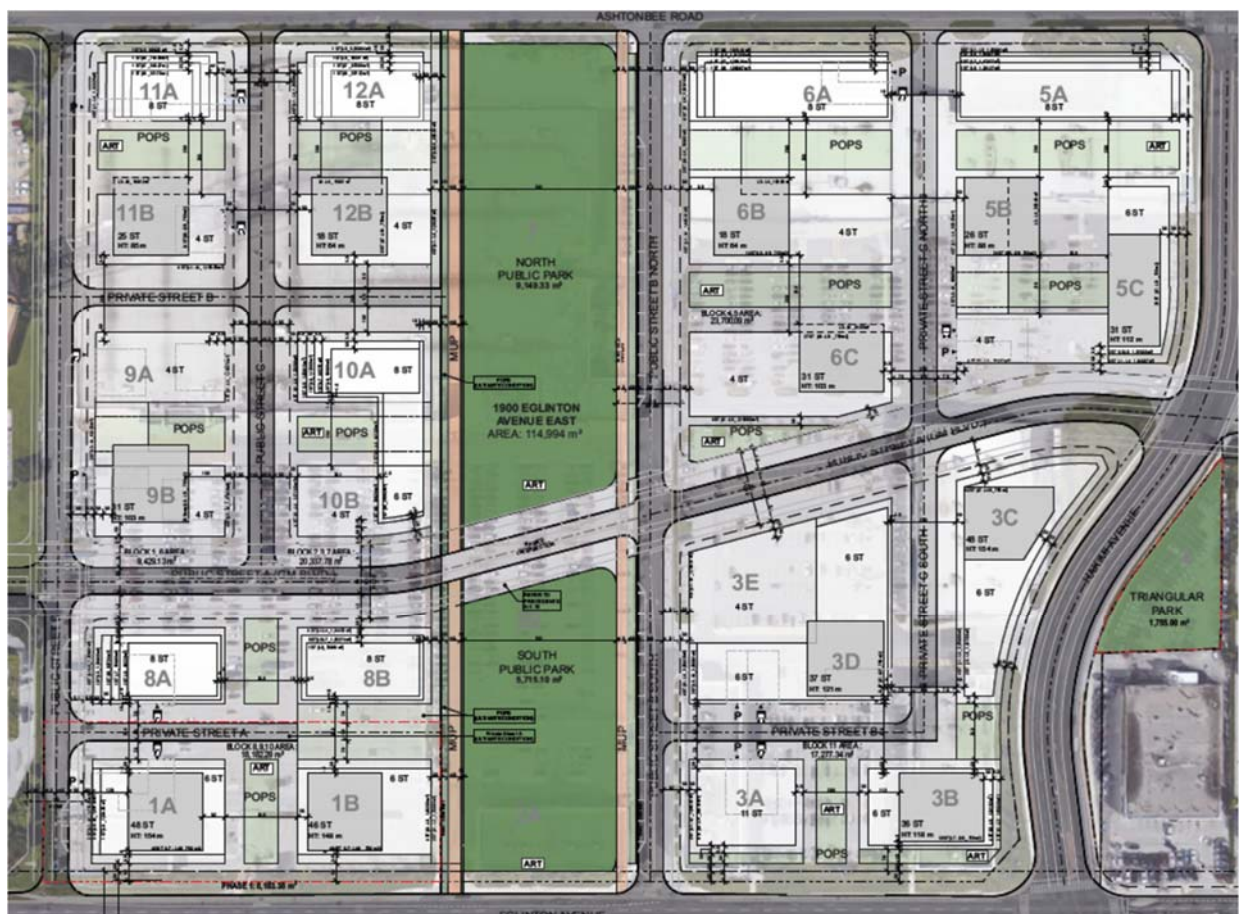
## Background Information & The Proposal

The Subject Lands are located within the Hakimi Lebovic Protected Major Transit Station Area (“PMTSA”) under Site and Area Specific Policy 667. A minimum density of 1.0 was assigned to the Subject Lands.

In August 2019 a proposal to redevelop the Subject Lands was submitted to the City in response to the City’s ongoing Golden Mile Secondary Plan process. The adopted Secondary Plan depicted a density of 3.0 FSI for the Subject Lands. Through detailed negotiations over the following two years, a settlement was reached on the redevelopment of the lands which was endorsed by the Ontario Land Tribunal (“OLT”) in August 2022 (Case No. OLT- 21-001701). The settlement planned for the redevelopment of the existing shopping centre at a density of 3.7 FSI.

The proposed redevelopment would allow for the redevelopment of the Shopping Centre and would include a new 1.6 ha public park, 50,000 sq ft of new community / school space, over 15,000 sq ft of day care space, approximately 460,000 sq ft of non-residential space and nearly 5,000 residential units to be created. The development of the lands would support not only the Hakimi Lebovic LRT station but others in the immediate area to the west and east.

The redevelopment approved by the OLT in support of the proposal are depicted in **Figures 2 and 3** below.



**Figure 2–** Master Plan showing potential redevelopment of the Subject Lands

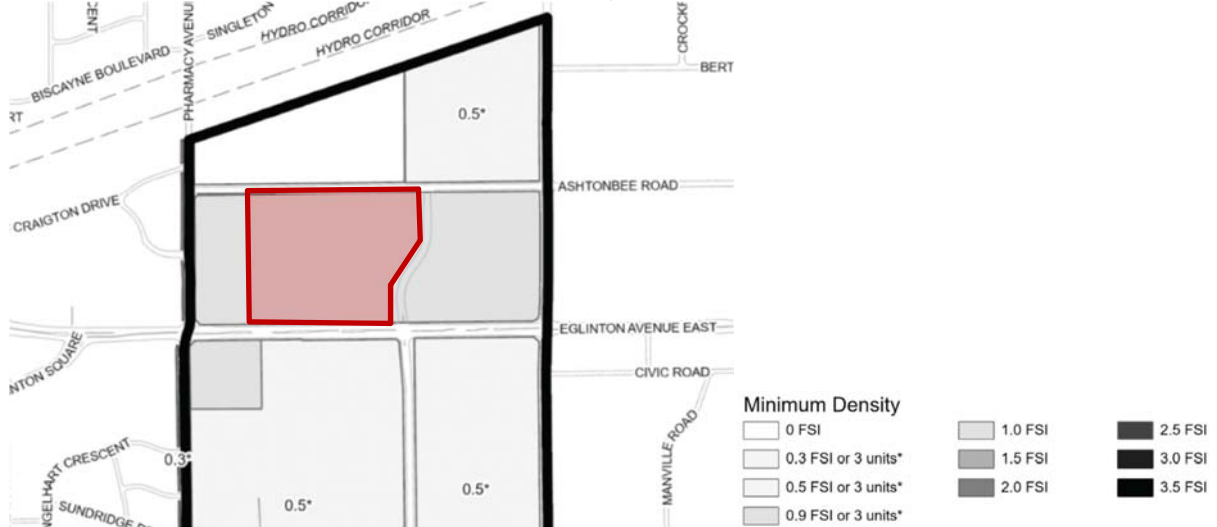




**Figure 3** – Massing of potential redevelopment of the Subject Lands

## Request of the Province

As shown on Map 2 of Site and Area Specific Policy 667, the minimum density established for the Subject Lands is 1.0 FSI as shown in the excerpt below in **Figure 4**.



**Figure 4** – OPA 570 Proposed Minimum Densities for SASP 667 (Subject Lands shown in red)

The proposed density of 1.0 FSI is artificially low and does not reflect the recent density approved for the Subject Lands nor other approvals within the Golden Mile Secondary Plan Area. As part of the OPA 570 process, City staff issued a report dated June 2022, entitled “City-wide 115 Proposed Major Transit Station Area/Protected Major Transit Station Area Delineations: Final Report” identified that the density measures recommended for the various SASPs, including the densities for the Hakimi-Lebovic Protected Major Transit Station Area (“PMTSA”):

*“are based on existing Council-approved development frameworks, including: in effect Official Plan land use designations within the identified areas; as-of-right zoning by-law permissions, density permissions included in secondary plans; and approved developments that have not yet been built.”*

On this basis, the densities set out in the Hakimi-Lebovic PMTSA should have reflected, at a minimum, those of the adopted Secondary Plan (at 3.0 FSI). It did not. In our opinion, the approval granted to the Subject Lands as set out in the 2022 OLT decision should be used as the minimum density of **at least 3.7 FSI** as shown below on **Figure 5**. It is noted that given that the Subject Lands contribute to two Crosstown LRT stations, additional minimum density should be considered by the Province (i.e. in the 5 to 8 FSI range).



**Figure 5** – OPA 570 Proposed Minimum Densities for SASP 667 modified to show the Subject Lands (shown in red) at 3.7 FSI

The artificially low density currently set in OPA 570 leads to a failure to optimize transit infrastructure which exists within the Hakimi-Lebovic PMTSA. The use of 3.7 FSI as a minimum reflects the intent of the OPA as set out by staff above and reflects the reasonable, transit oriented redevelopment of the Subject Lands as approved by the OLT. This density is reflective of the master plan redevelopment depicted above, and would allow for the development of approximately 5,000 residential units as well as retail, service commercial and community uses within walking distance to the Crosstown LRT.

We believe the requested revision is appropriate, reasonable and makes OPA 570 clear, and unambiguous and understandable to the public. The modification will ensure that the transit supportive density approved for the Subject Lands is clearly identified to optimize the transit investments made by the Province for this area, especially given that the majority of lands within the PMTSA are at 0.5 FSI or lower as shown above.

Should you have any questions or require further clarification, please feel free to contact the undersigned.

Thank you.

Yours truly,

**MHBC**

A handwritten signature in dark ink, appearing to read 'David A. McKay', is written over a light orange rectangular background.

David A. McKay, MSc, MLAI, MCIP, RPP  
Vice President & Partner

cc      *Clients*