

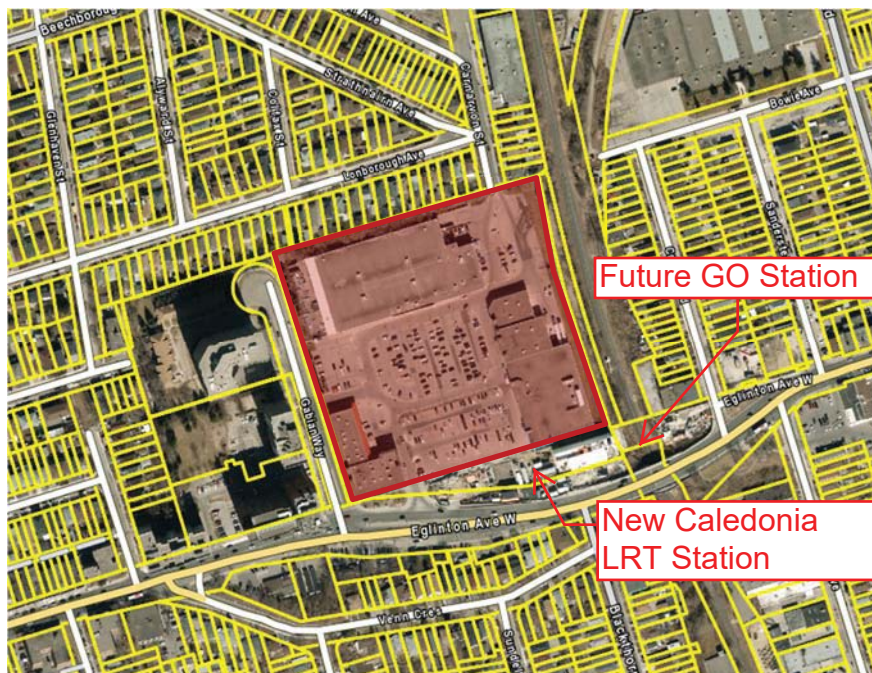
January 13, 2023

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**  
**2400 EGLINTON AVENUE WEST, TORONTO**  
**OUR FILE: 07132AG**

On behalf of our client Smart LP II 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 Westside Shopping Centre, located at 2400 Eglinton Avenue West (hereinafter the "Subject Lands") and shown below on Figure 1. **We are requesting reconsideration of the minimum density applied to the lands from 2.0 FSI to at least 6.5 FSI.**

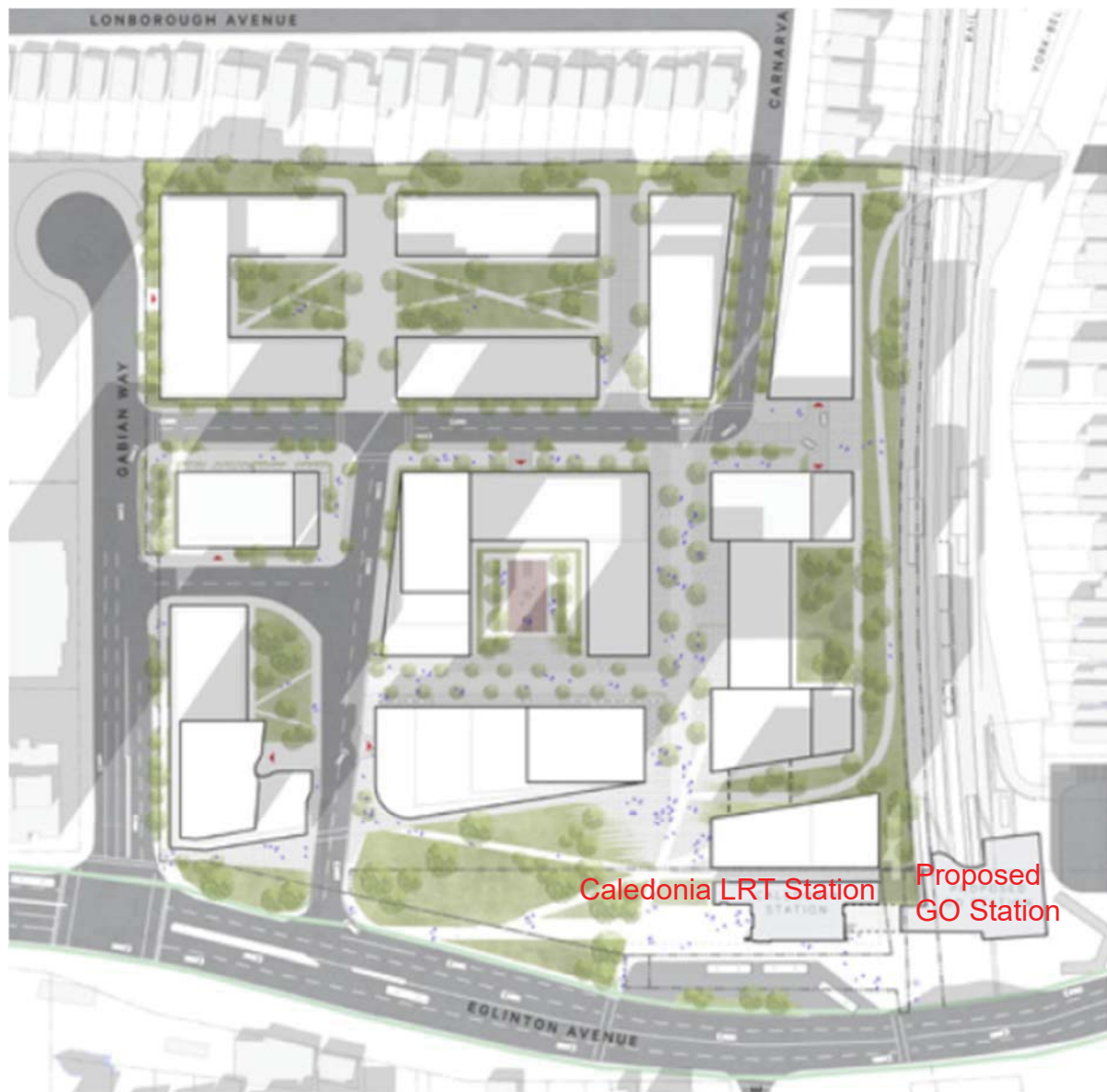


**Figure 1** – Location of the Subject Lands

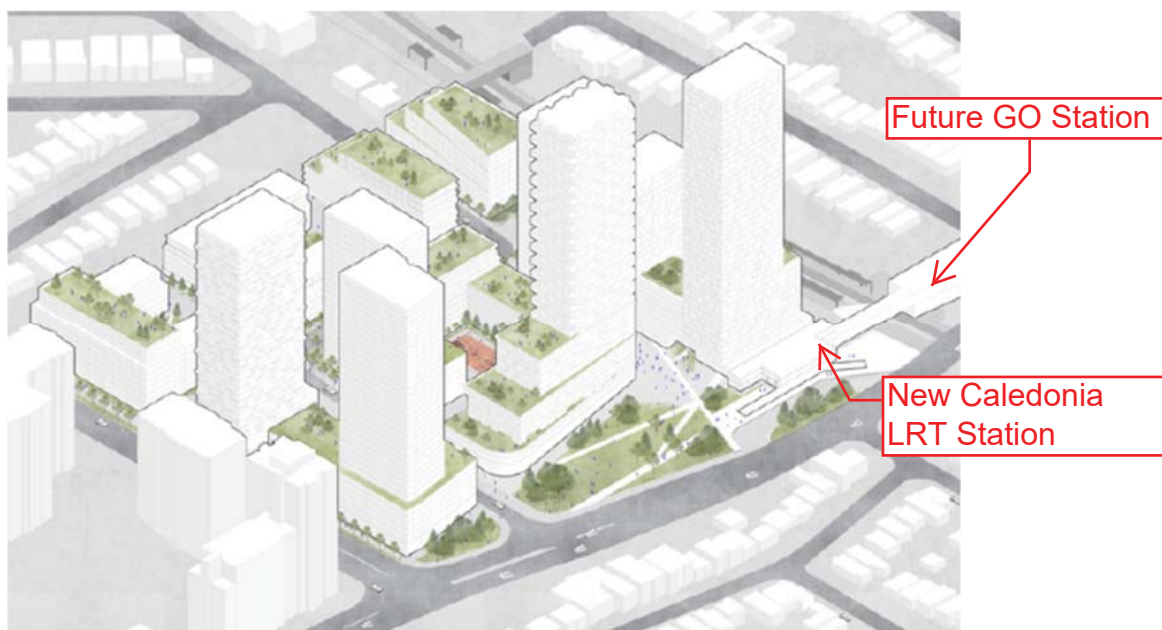
## Background Information & The Proposal

The Subject Lands are located within the Caledonia Protected Major Transit Station Area (“PMTSA”) under Site and Area Specific Policy 674. A minimum density of 2.0 was assigned to the Subject Lands.

A proposal to redevelop a portion of the Subject Lands for a 35 storey apartment building was submitted in February 2021. The application is still under review by the City. Through the application processing, our client undertook a visioning exercise to depict the development potential for the remainder of the Subject Lands. This resulted in a series of mid-rise and high-rise development opportunities and is depicted in **Figures 2** and **3** below.



**Figure 2–** Site 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 674, the minimum density established for the Subject Lands is 2.0 FSI as shown in the excerpt below in **Figure 4**.



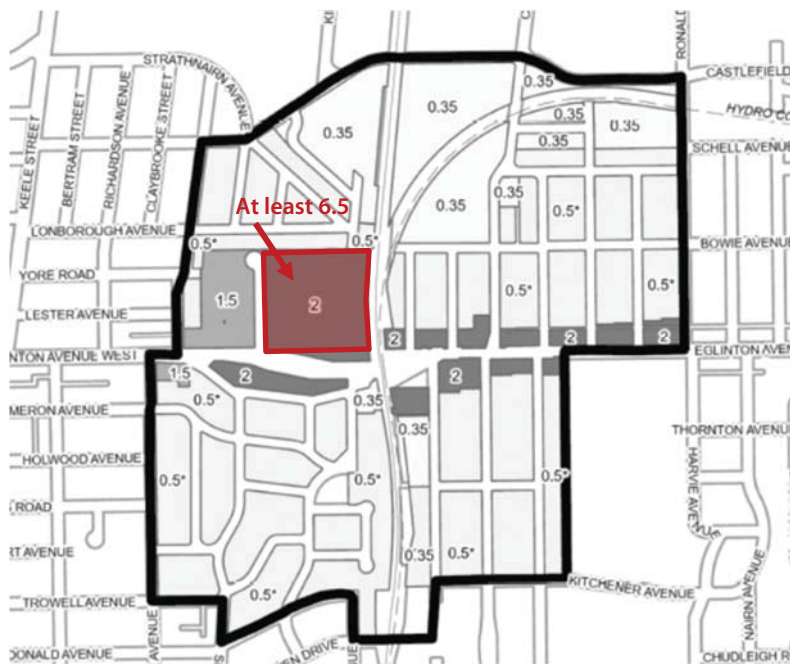
**Figure 4** – OPA 570 Proposed Minimum Densities for SASP 713 (Subject Lands shown in red)

The proposed density of 2.0 FSI is artificially low and does not reflect densities being applied for and obtained in the context along the Crosstown LRT Corridor (approved densities range over 4.0 for mid and high-rise developments in this area, with proposed densities in excess of that for smaller sites). This



artificially low density leads to a failure by OPA 570 to optimize transit infrastructure which exists within the Caledonia PMTSA including the Caledonia LRT station and a proposed GO Station (one of the only multi-modal stations on the Crosstown LRT line).

In our opinion, a more appropriate minimum density would be that which reflects a reasonable, transit oriented redevelopment of the Subject Lands of **at least 6.5 FSI** be applied to the on Map 2 of Site and Area Specific Policy 698 as shown below (**Figure 5**). This density is reflective of the master plan redevelopment depicted above, and would allow for the development of approximately 2,500 residential units as well as at-grade retail and service commercial uses.



**Figure 5** – OPA 570 Proposed Minimum Densities for SASP 713 modified to show the Subject Lands (shown in red) at 6.5 FSI

We believe the requested revision is appropriate, reasonable and makes OPA 570 clear, and unambiguous and understandable to the public. The revision implements a more transit supportive development density in the range of what is being approved in the Crosstown LRT corridor. 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**

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

cc Clients