

January 31, 2023

Hon. Steve Clark, MPP, Minister Ministry of Municipal Affairs and Housing Municipal Services Office – Central Ontario 777 Bay Street – 13th Floor Toronto, ON M7A 2J3

Attn: Jennifer Le

Dear Minister Clark:

Re: Request to Modify City of Toronto OPA 570 Prior to Ministerial Approval ERO File No. 019-5937 479R, 485 & 487 Duplex Avenue, Toronto

Project No: 1892

We are the planning consultants for Duplex Holdings, the owner (the "owner") of a 3,439 square metre lot located on the east side of Duplex Avenue, mid-block between Montgomery Avenue and Roselawn Avenue, municipally known as 479R, 485 and 487 Duplex Avenue in the City of Toronto (the "subject site").

The subject site is located within the proposed Eglinton Protected Major Transit Station Area (PMTSA) as delineated in Site and Area Specific Policy 723 (SASP 723 of Official Plan Amendment ("OPA") 570, which was adopted by City Council on July 21, 2022.

On Map 2 od SASP 723, the subject site has a minimum density of 1.0 floor space index (FSI). In our opinion, this minimum density is artificially low and is inconsistent with the existing policy framework, which encourages an integrated approach to transportation and land use planning, promotes the development of complete communities, and supports the optimization and efficient use of land and infrastructure within the built-up areas that are well served by municipal infrastructure, including higher-order public transit.

More specifically, we are requesting that the Minister consider increasing the minimum density of the subject site from 1.0 to 2.5 FSI, and create a consistent minimum density of 2.5 FSI across the entirety of the block bounded by Duplex Avenue, Roselawn Avenue, Yonge Street and Montgomery Avenue.

The subject site is currently occupied with two low-rise rental apartment buildings (dating back to the late 1920s-early 1930s) at 485 and 487 Duplex, as well as a surface parking lot located at 479R Duplex Avenue. The subject site is located in Midtown Toronto, north



and west of the Yonge-Eglinton Centre, which is a vibrant, mixed-use area focused on the Yonge and Eglinton Intersection that includes the Eglinton subway station on Line 1 and the future Eglinton-Yonge Light Rail Transit (LRT) station on the Eglinton-Crosstown line.

The subject site is also located in the Montgomery Square Character Area of the Yonge-Eglinton Secondary Plan, which is one of 5 "special places" in the Secondary Plan area, described as the "civic heart" of Midtown. The built form character of Montgomery Square Character Area is intended to accommodate tall buildings that scale down from the Yonge-Eglinton intersection.

The Montgomery Square Character Area has seen significant development activity since the approval of the Yonge-Eglinton Secondary Plan. Within the Montgomery Square Character Area, complete, approved and proposed developments include the approved redevelopment of 2400-2444 Yonge Street (immediately east of the subject site), with two mixed-use towers at 27-storeys and 23-storeys, the proposed redevelopment of 34-70 Montgomery Avenue (immediately south of the subject site), with a 24-storey mixed-use tower and the existing 34-storey rental apartment building at 500 Duplex Avenue (immediately west of the subject site). South of Montgomery Avenue, is the existing 27-storey mixed use tower at 25 Montgomery Avenue and south of Helendale Avenue is the 31-storey mixed use tower at 2368 Yonge Street.

The subject site and block bounded by Duplex Avenue, Roselawn Avenue, Yonge Street and Montgomery Avenue are located within the 500 metres radius of the Yonge-Eglinton Midtown Transit Station Area, identified in the Yonge-Eglinton Secondary Plan. As per policy 2.4.1 of the Secondary Plan, the Midtown Transit Station Areas will be planned to accommodate higher density development to optimize return on investment and increase the efficiency and viability of existing and planned transit service levels.

More specifically, the Yonge-Eglinton Secondary Plan anticipates building heights in the range of 20 to 30 storeys (Policy 5.4.3 (s)) for the Montgomery Square Character Area. Therefore, it is clear that the subject site and block bounded by Duplex Avenue, Roselawn Avenue, Yonge Street and Montgomery Avenue is intended to accommodate tall buildings in a manner that is consistent with the PPS and conforms with the Growth Plan regarding intensification and optimizing the use of land and infrastructure, particularly in close proximity to higher order transit.

In our opinion, the minimum density of 1.0 FSI applied to the subject site would not support the applicable transit-supportive built form and land use policy objectives nor be consistent with the existing and emerging tall building context of the Montgomery Square Character Area. Splitting the minimum densities on the block bounded by Duplex Avenue, Roselawn Avenue, Yonge Street and Montgomery Avenue, as shown on Map 2 of SASP 723 is not an appropriate or desirable approach to accommodate higher density development on the subject site that would help to optimize return on investment and increase the efficiency



and viability of existing and planned transit service levels of the Eglinton PMTSA.

In our opinion, a minimum density of 2.5 FSI across the entire block bounded by Duplex Avenue, Roselawn Avenue, Yonge Street and Montgomery Avenue would be more appropriate and consistent approach in conformity with the Growth Plan objective of achieving a minimum population and employment target of 600 residents and jobs combined per hectare in the Eglinton PMTSA. Attached is a mark-up version of Map 2 – Minimum Densities, Eglinton Protected Major Transit Station Area for the Minister's consideration of our requested amendment to SASP 723.

We trust that you will find the above satisfactory and we ask to be notified of any decision made by the Minister in connection with this matter.

Yours truly,

Bousfields Inc.

David Charezenko, MCIP, RPP

cc: Avi Zucker, Duplex Holding

att. Marked-up Map 2 – Minimum Densities, Eglinton Protected Major Transit Station Area (SASP 723)



3 City of Toronto By-law -2021

Map 2 - Minimum Densities, Eglinton Protected Major Transit Station Area



