



PLANNING AND URBAN DESIGN

2 February 2023

Tammy Nguyen
Planner, Community Planning and Development (West)
Municipal Services Office
Central Ontario Ministry of Municipal Affairs and Housing
777 Bay Street, 16th Floor
Toronto, Ontario M7A 2J3

Attention: **Tammy Nguyen**
Planner, Community Planning and Development (West)

Dear Ms. Nguyen,

RE: ERO Item 019-5228
Ministry Reference Number 20-OP-219126
Approval to amend a Municipality's Official Plan
City of Toronto Official Plan Amendment No. 524
(St. George Station Protected Major Transit Station Area)
110-116 Avenue Road Site-Specific Comment Submission
110 Avenue Road LP
Our File: 21.508

WND Associates Limited has been retained by 110 Avenue Road LP as the planning consultant with respect to the submission of complete Zoning By-law Amendment (2021) and Site Plan Control Applications (2022) for the lands municipally known as 110-116 Avenue Road in the City of Toronto ("the Subject Site").

In response to the Environmental Registry of Ontario ("ERO") consultation number 019-5228, this letter has been prepared to provide comments on City of Toronto Official Plan Amendment ("OPA") 524, including recommendations for higher minimum block densities. OPA 524 was adopted by City Council on February 2, 2022 (by By-law 47-2022) and is now before the Minister of Municipal Affairs and Housing for a decision under the *Planning Act*. OPA 524 establishes and delineates Major Transit Station Areas and Protected Major Transit Station Areas ("PMTSAs") in the City of Toronto's Downtown area, including the St. George Station PMTSA.

Background

The Subject Site is located on the west side of Avenue Road within the block bound by Bernard Avenue to the north and Tranby Avenue to the south and is approximately 150 metres south of the intersection of

Avenue Road and Davenport Road (**Figure 1**). The Subject Site is comprised of the following individual properties: 110 Avenue Road and 112 Avenue Road (semi-detached, mixed-use brick building), 114 Avenue Road (vacant lot) and 116 Avenue Road (vacant lot). The Subject Site has an approximate site area of 1,398 square metres with a frontage of 34.64 metres along Avenue Road and depth of 48.77 metres.



Figure 1: Site and Surrounding Area Context

The surrounding area along the Avenue Road corridor contains a range of existing uses and heights with the emerging land use pattern described as being of low-, mid- and high-rise residential and commercial mixed-use buildings. The tallest buildings are located at the intersections of Avenue Road and Bloor Street West, and Avenue Road and Davenport Road which act as nodes. In the immediate vicinity of the Subject Site, building heights range from three to ten storeys in height. The Subject Site enjoys excellent access to transit being located 550 metres from the St. George Subway Station entrance on Bedford Road which represents about a 10-minute walking distance (**Figure 2**).

While St. George is the nearest TTC Subway Station, the Subject Site is also proximate to Museum Station (850 metres), Bay Station (650 metres) and Rosedale Station (700 metres). Additionally, TTC bus service is provided on Avenue Road (Route #13). The Subject Site is well-served by nearby active transportation facilities that include bicycle parking (proposed on-site as part of the development applications), bike share stations (in the surrounding area) and bicycle lanes along Bloor Street West, St. George Street and Davenport Road.

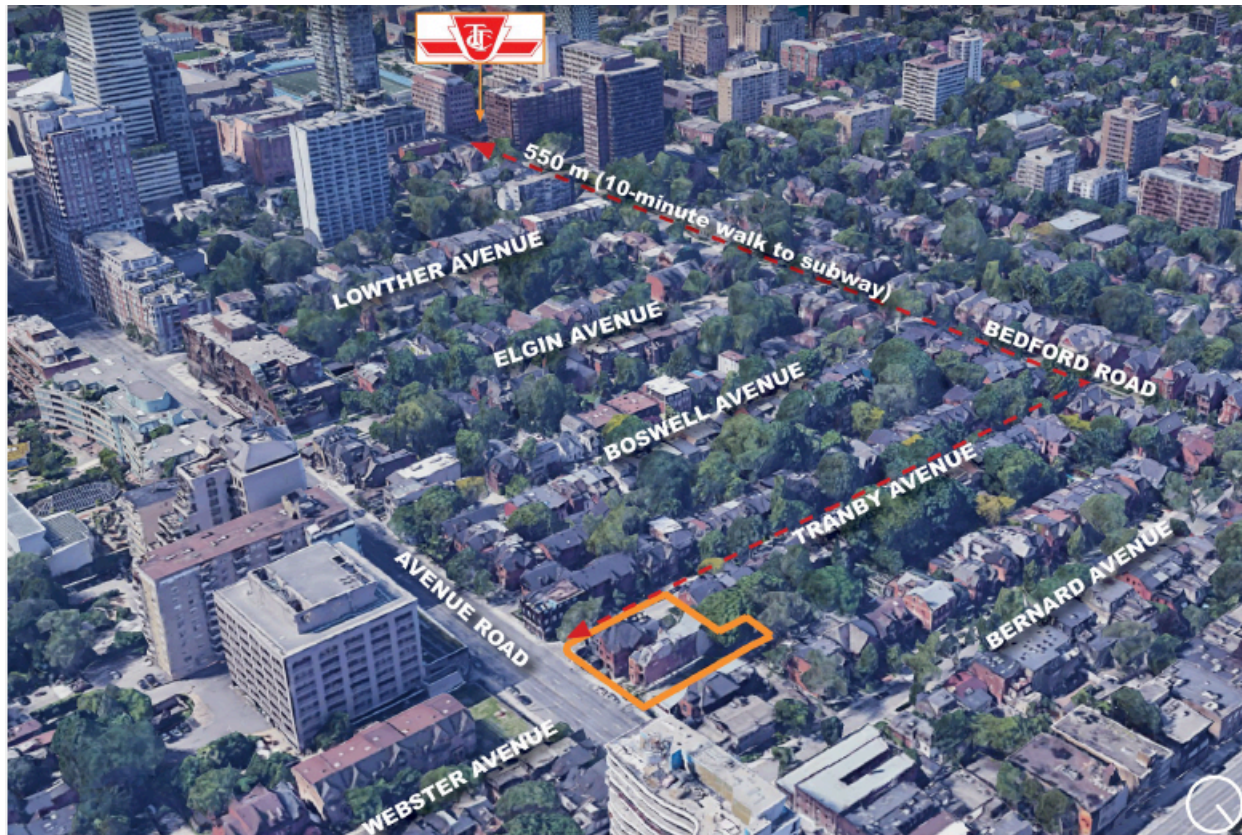


Figure 2: Surrounding Area Transit and Walkability Context (Subject Site shown in orange).

The initial Zoning By-law Amendment application was submitted on August 24, 2021 and deemed complete on November 1, 2021 (City File No. 21 207592 STE 11 OZ). Throughout early 2022, the applicant's team facilitated several meetings with area residents, Planning, Urban Design and Heritage Staff to discuss feedback received and to revise the proposal.

On April 14, 2022, and April 19, 2022, the applicant's team presented a revised development concept to the Annex Residents' Association ("ARA") and residents of Tranby and Bernard Avenues, with the meeting on April 19th, in particular, being held to discuss traffic circulation options for Tranby Avenue.

A resubmission of the Zoning By-law Amendment application was made on May 3, 2022 in response to City, community, and external agency feedback. On June 30, 2022, a Final Report containing a recommendation of approval to Council was adopted by Toronto and East York Community Council (TE34.38) and further considered by Council on July 19, 2022 where the recommendations were adopted without amendments or debate. The Final Report contained conditions to be cleared by the applicant prior to enactment and our client is in the process of facilitating the clearances of these conditions such that a Zoning By-law can be brought forward in the first half of 2023 for a Decision by City Council.

The proposal endorsed by Council at the July 19, 2022 meeting is for a 9-storey (38 metres plus mechanical) mixed-use building with a total of 46 residential dwelling units, ranging from one to three bedrooms in size. Retail uses are primarily located along the ground floor with frontages along Avenue Road and residential units are located in floors two through nine above.

The proposal contains a broad mix of unit typologies ranging from one bedrooms in size, up to three bedrooms, with many units being in excess of 1,000 square feet. The density of the Proposed Development is 3.60 times the area of the site and in total approximately 50 parking spaces are proposed.

Policy Context

The Subject Site is currently designated as *Mixed Use Areas* in the City of Toronto Official Plan and is zoned Commercial Residential (CR) 1.5 (c1.0; r1.0) SS2 (x1923) under By-law 569-2013. The Subject Site is within the boundary of the Downtown Plan and is designated *Mixed Use Areas – 3 Main Street* which is a land use designation that permits mid-rise and mixed-use building typologies, as well as some tall buildings. The Subject Site is also located within the Downtown Urban Growth Centre according to the Growth Plan for the Greater Golden Horseshoe.

The Subject Site is also within the East Annex Heritage Conservation District (“HCD”) Plan boundary. Though the HCD Plan does not provide specific guidelines for properties on Avenue Road, it does acknowledge the varied character between Avenue Road’s built form and the District’s smaller residential streets.

Site and Area Specific Policy 598 – St. George Station Protected Major Transit Station Area (“PMTSA”)

At its meeting on February 2, 2022, the City of Toronto’s Council adopted OPA 524 with respect to the implementation of 16 PMTSAs within the Downtown Secondary Plan.

The Subject Site is located within SASP #598 of OPA 524 being within 550 metres of St. George Subway Station where a minimum density target of 400 people and jobs per hectare is planned on an overall basis. Map 2 provides minimum densities on a site-specific basis. According to Map 2, as adopted by Council, the Subject Site has a minimum FSI of 2.0 times site area (**Figure 3** and **Figure 4**).

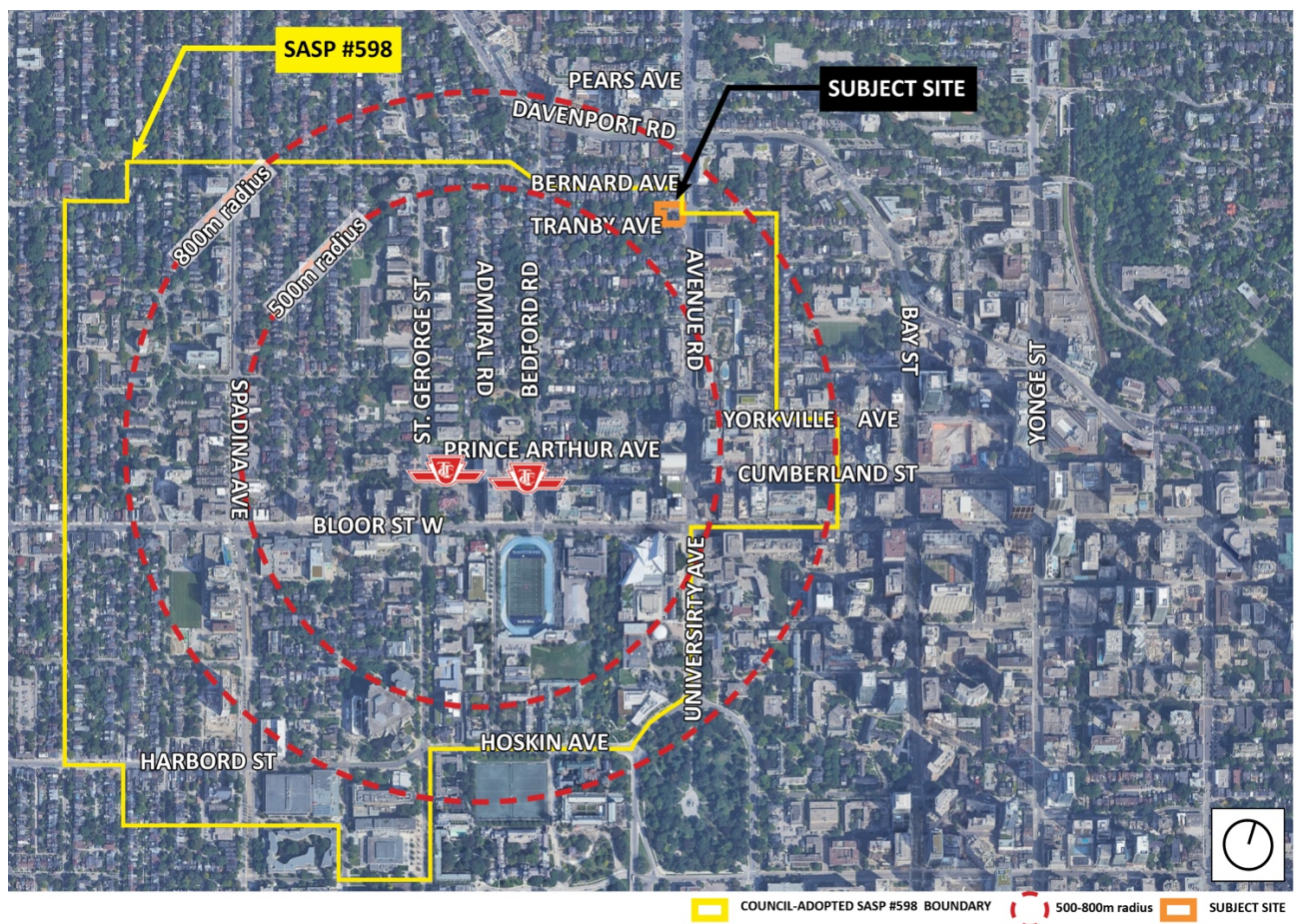


Figure 3: SASP #589 Aerial Context.

Map 2 – Minimum Densities, St. George Protected Major Transit Station Area

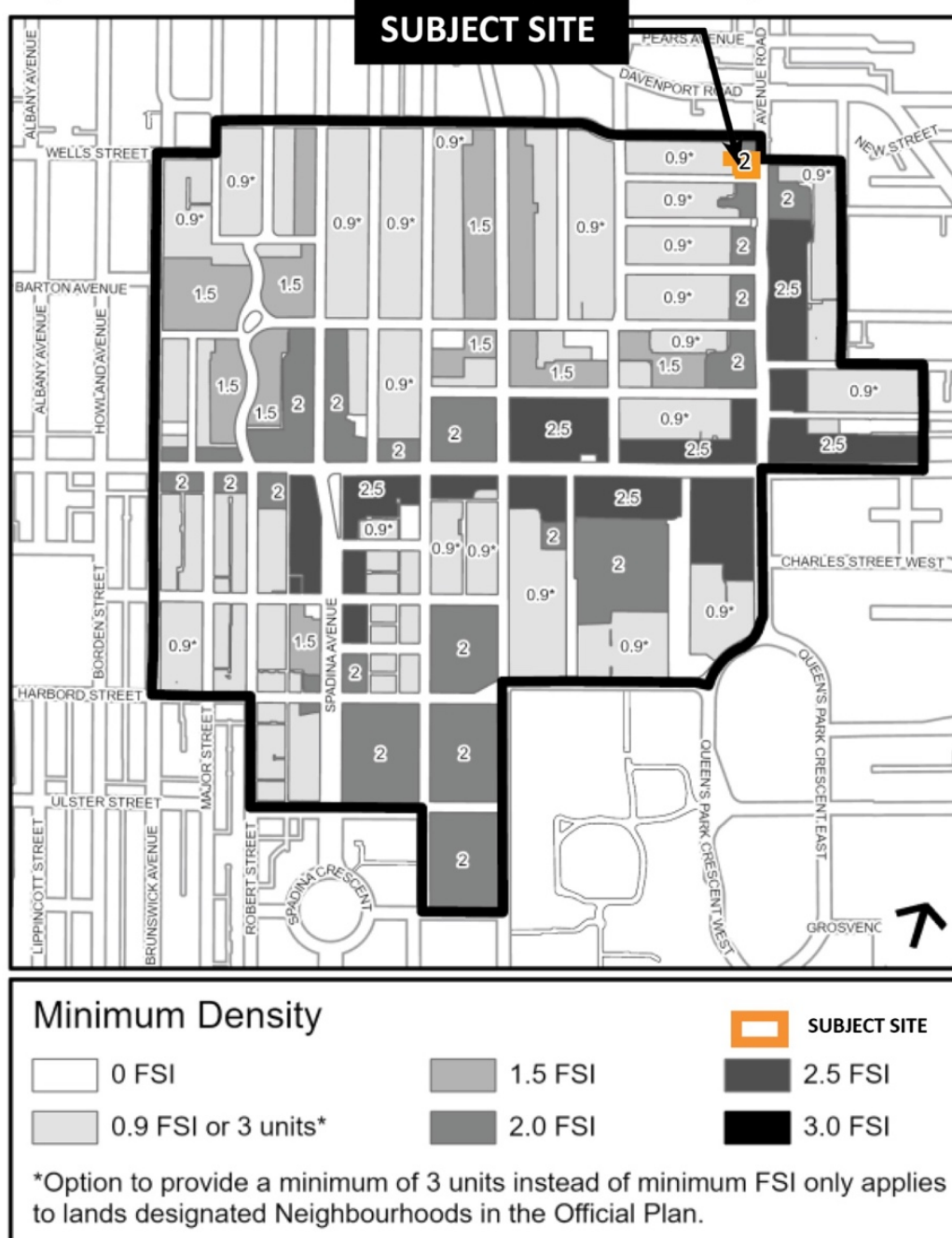


Figure 4: St. George PMTSA Map 2 - Density as adopted by Council

Comment and Discussion

As shown on **Figure 4** above, a significant portion of the St. George PMTSA boundary as a whole is comprised of lands which fall within the *Neighbourhoods* land use designation (shown generally as areas with a minimum FSI of 0.9 on Map 2) or the University of Toronto's campus (minimum FSI ranging from 0.9 to 2.0). Generally speaking, both of these areas have limited development potential in order to achieve the PMTSAs minimum planned density target of 400 people and jobs per hectare, and in particular, the *Neighbourhoods* lands within the East Annex, fall within an HCD and contain primarily low-rise row-house, semi- and detached built forms with severely limited development potential under the HCD guidelines and *Neighbourhoods* land use designation OP policies.

Generally speaking, even if an assembly of lands in the *Neighbourhoods* were possible, the City of Toronto would require the submission of an OPA for any meaningful redevelopment beyond three to four storeys in height. Furthermore, institutional uses in the area with limited intensification potential include: i) the Royal Ontario Museum Site; ii) the Bata Shoe Museum; and, iii) the Gardiner Museum. This area of the City also contains a wide variety of individually designated heritage properties under Part IV of the Ontario Heritage Act, where although redevelopment is possible, the presence of the Part IV designation, and in some cases long standing heritage easements, continues to further limit the number of available soft sites within the PMTSA.

With that said, the *Mixed Use Areas* lands along Bloor Street and Avenue Road, together with the *Apartment Neighbourhoods* lands along Lowther Avenue and Prince Arthur Avenue, will have exacerbated pressures to accommodate the prescribed minimum 400 people and jobs per hectare density target of the St. George Station PMTSA given the limitations of *Neighbourhoods* sites.

The Subject Site is located within *Mixed Use Areas 3 – Main Street* land use category of the Downtown Secondary Plan (OPA 406) and is within the *Mixed Use Areas* land use designation of the City-wide Official Plan – the policies of both these designations contemplate new mid-rise buildings or tall buildings along the Avenue Road corridor. Typically, in the City of Toronto, a mid-rise built form's FSI can range from 3.0 to approximately 8.0 times the area of the lot, depending on setbacks, step backs, angular planes and other design-based inputs (with potential to exceed these bounds).

With similar design-based inputs, tall buildings might range from 8.0 times lot area to upwards of 20.0 times the area of a lot (with floorplate size and height being driving factors). For reference, the Proposed Development, as adopted by Council in July of 2022, has an FSI of 3.60 times the area of the lot, including the partial retention of the existing heritage building at the corner, and thus already exceeds the minimum 2.0 FSI planned for the Subject Site under Map 2 of the PMTSA.

Given the foregoing limitations with the current PMTSA delineation, we recommend the Minister consider the following modifications to SASP #598:

1. Modification, on a site-specific basis for 110-116 Avenue Road, from the Ministry of Municipal Affairs and Housing to re-classify the Subject Site to a minimum FSI of 4.0 times the area of the lot, or greater, which implements the FSI of the Proposed Development's site-specific by-law as adopted by Council on July 19, 2022, as further supported by City Planning Staff in a Final Report dated June 30, 2022, and provides potential to increase the FSI on the Subject Site through future applications to respond to long-term housing and employment needs;
 2. Modification from the Ministry of Municipal Affairs and Housing to generally re-classify sites along Avenue Road between Davenport Road and Bloor Street West to a higher FSI commensurate with the anticipated mid-rise, and in some cases, tall building built forms both contemplated by Official Plan policies and conceptually possible given the pattern of existing lots along this corridor; and,
 3. An increase in the overall minimum density target to a value well beyond 400 people and jobs per hectare, recognizing that the majority of new people, and in particular jobs, will be accommodated within the *Mixed Use Areas* portions of the PMTSA boundary, given the constraints outlined herein with respect to institutional areas, heritage properties and *Neighbourhoods* captured by the City's delineation of St. George Station.
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Suggested modifications to Map 2 – Minimum Densities are provided in **Figure 5** below.

Map 2 – Minimum Densities, St. George Protected Major Transit Station Area

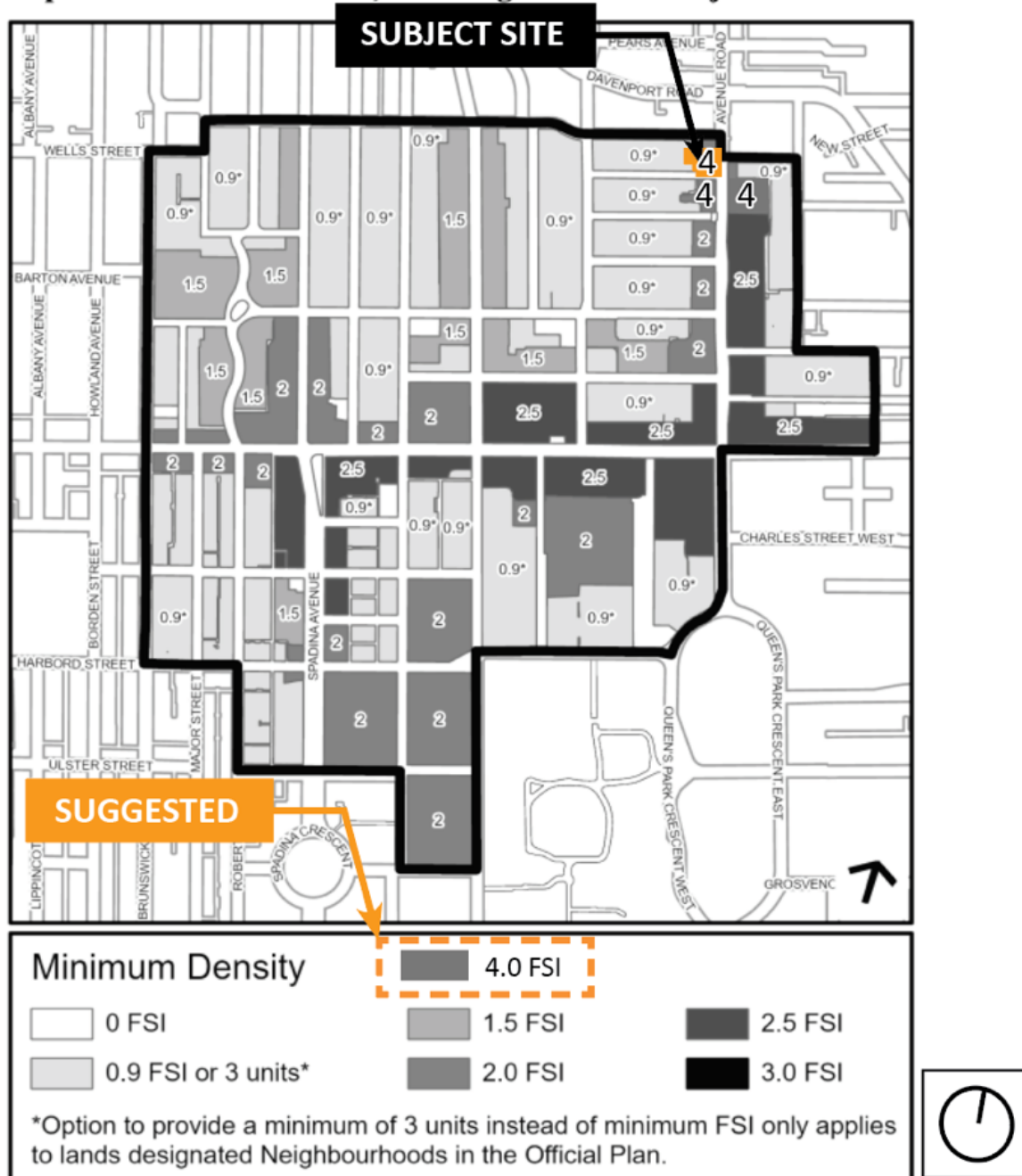
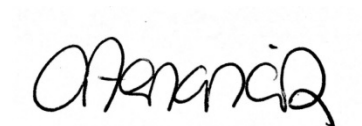


Figure 5: Suggested Modification to OPA 524 - SASP #598 proposing a minimum density of 4.0 FSI consistent with the general ranges of densities under the current Site-specific By-law adopted by Council in July 2022. An FSI of 4.0 times lot area provides potential to increase the FSI on the Subject Site through future applications to respond to long-term housing and employment needs.

Thank you for reviewing our recommendations to for modify the Council-adopted version of OPA No. 524. We would be pleased to address further comments or questions should they arise upon review of this submission and prior to a Decision on the City's MTSA/ PMTSA policies. We request that the undersigned be notified of any Decision(s) by the Minister.

Respectfully submitted,

WND associates
planning + urban design

A handwritten signature in black ink, appearing to read 'A Ferancik', is centered on the page. The signature is written in a cursive, flowing style.

Andrew Ferancik, MCIP, RPP
Principal