

Ministry of Municipal Affairs and Housing  
Environmental Registry of Ontario  
100 Queen Street West,  
Toronto, Ontario M5H 2N2

**Submitted online to Tammy.Nguyen2@ontario.ca**

Attn: Tammy Nguyen, Municipal Services Office – Central Ontario:

**RE: ERO Number: 019-5228 – City of Toronto Official Plan Amendment 524 to delineate and plan for sixteen (16) Protected Major Transit Station Areas**

**25 St. Mary Street – Bloor-Yonge, Bay, Museum and Wellesley PMTSAs**

Tenblock is a residential development company that has been building housing for over 65 years. Since the 1950s, our mission has been to provide high-quality housing that enriches life for residents while contributing to complete and healthy communities. Our current generation of development projects is adding over 6000 units across the City of Toronto. Our projects focus on delivering high quality housing that fulfills the City of Toronto's long-term city building goals and satisfies the tenets of good planning.

We are writing to submit our comments regarding the proposed Official Plan Amendment (OPA) 524 which seeks to establish sixteen Protected Major Transit Station Areas in downtown Toronto. We own and have active development planning applications for the property located at 25 St. Mary Street which is located within four overlapping PMTSAs including the **Bloor-Yonge, Bay, Museum and Wellesley PMTSAs**. OPA 524 designates the subject site with a minimum floor space index (FSI) density of 1.5. Other adjacent minimum densities are only set as high as 3.0. **In our opinion the proposed FSIs set by the City for all downtown PMTSAs are too low and ought to be increased.**

Our largest project at 25 St. Mary Street is located just south (within 200 metres) of the major intersection of Yonge and Bloor. The project is designed to comprehensively support multi-modal transportation given its location in the heart of downtown.

- The development proposal (as of a November 2022 resubmission) consists of two new towers at 54 and 59 storeys linked by a podium.
- It proposes to add 1,283 homes to the community, of which a minimum of 259 units would be rental replacement homes.
- The current proposed density is a **floor space index (FSI) of 15.39**.

In our opinion, the proposed FSIs set by the City for these PMTSAs are too low and ought to be increased to more realistic values for the following reasons:

- The existing 24-storey apartment building at 25 St. Mary dating back to 1965 (containing 259 dwelling units) has a FSI of 3.64, which is already more than double the proposed minimum FSI in the PMTSAs.
- Establishing higher minimum density values will greatly assist both the City and applicants in justifying new and existing planning applications which seek increased heights and density within the downtown core. Within the realm of planning applications, minimum density values can unfortunately be interpreted as what may be appropriate for a given site and proposals that greatly exceed these minimums (as is now a given for downtown sites), can subjectively be seen as "excessively" dense/tall, which may not objectively be the case.

- The requirements of Inclusionary Zoning are a public benefit but delivered at private cost. There is no doubt that Inclusionary Zoning requirement will have an impact on financial viability of redeveloping certain sites. Establishing higher minimum densities will only help incentivize redevelopments that must also contend with Inclusionary Zoning requirements along with other variables, often including rental replacement obligations.
- Nearby development applications to 25 St. Mary have minimum proposed and approved densities that further reinforce that the minimums currently proposed in these PMTSAs are too low. The adjacent property at 1075 Bay Street has a redevelopment proposal that was approved with a FSI of 20.9. The property at 10 St. Mary Street was approved with a FSI of 14.81. Other recently submitted nearby development proposals include 645 Yonge and 648 Yonge, both with proposed FSIs of 33.0 and 519-637 Yonge with a proposed FSI of 20.26.

We strongly promote that the **proposed FSIs set by the City for all downtown PMTSAs are too low and ought to be increased to better reflect the current reality of development applications in the downtown core**. Redevelopment proposals add significant amounts of new housing, commercial and institutional/community space, increase density, and make better use of existing infrastructure and public investment.

Please do not hesitate to contact me with any questions regarding our submissions.

Sincerely,



Evan Perlman, MCIP, RPP  
Senior Development Manager  
**Tenblock**

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