



BOUSFIELDS INC.

Project No. 1978

February 2, 2023

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

Attn: Erika Ivanic

Dear Minister Clark:

**Re: Request to Modify City of Toronto OPA 540 Prior to Ministerial Approval
ERO File No. 019-5936
2455 Danforth Avenue, City of Toronto**

I am the land use planner for First Capital Realty Inc., which through its subsidiary FCHT Holdings (Ontario) Corp, is the owner of lands located on the south side of Danforth Avenue, east of Main Street, and is municipally known as 2455 Danforth Avenue (the “subject site”). The subject site is occupied by a single-storey commercial building leased to a Sobeys grocery store and is flanked by surface parking.

The subject site is situated in the Danforth Village area of Toronto, and forms part of the Main Street Projected Major Transit Station Area, as delineated by Site and Area Specific Policy (“SASP”) 621 of Official Plan Amendment (“OPA”) 540. The subject site also forms of the Danforth GO Projected Major Transit Station Area, as delineated by SASP 623 of OPA 540. Toronto City Council adopted OPA 540 on July 22, 2022. The subject is also located within the boundaries of the Danforth Avenue Planning Study (OPA 420), which Council adopted in 2018 to guide and manage further development. OPA 420 permits incremental development in a mid-rise built form, ranging between 8 and 10-storeys.

From a transit perspective, the subject site has excellent access to existing transit services and is located within an approximate 130-metre radius of Main Street Station, which provides access to the TTC’s Line 1. The subject site is also located within an approximate 350-metre radius of Danforth GO Station, which provides access to GO Transit’s Lakeshore East Line, which has been identified by Metrolinx a mobility hub.

Attachment A sets out the location of the subject site, including its proximity to nearby existing and planned transit infrastructure.

On July 22, 2022, City Council adopted OPA 540, which introduced Site and Area Specific Policies for 23 PMTSA's. As noted above, the subject site falls within two PMTSA's that are currently before the Minister for approval in accordance with Sections 17 and 26 of the Planning Act. SASP 621 and 623 specify a minimum Floor Space Index ("FSI") of 2.0 times for the subject site, as is the balance of the lands on the north and south sides of Danforth Avenue. The exception is the southwest former of Danforth Avenue and Main Street, having a proposed minimum density requirement of 3.0 times. **Attachment B** and **Attachment C** locate the subject site on SASP 621 and 623, Map 2 – Minimum Densities, respectively.

In my opinion, the proposed minimum density of 2.0 FSI for the subject site does not reflect its proximity to both Main Street Station and Danforth GO Station, which provides access to existing higher-order transit. Consequently, the proposed minimum FSI does not constitute a minimum level of intensification that encourages landowners to create transit-supportive developments or construct a meaningful number of new housing units. It also does not reflect the types of densities contemplated by the City of Toronto through the Danforth Avenue Planning Study (OPA 420), which permits mid-rise buildings ranging between 8 and 10-storeys. Therefore, it is my opinion that the Minister should consider increasing the minimum density in order to optimize and make efficient use of and existing infrastructure pursuant to the Growth Plan.

With respect to the minimum density requirements more broadly, as currently drafted, OPA 540 does not include protectionary language which would allow for interim or incremental forms of development that would fall below the minimum density requirements outlined in the various SASPs, nor does it consider improvements, expansions, or additions to existing buildings within the PMTSA delineations. Consequently, as drafted, a modest addition to the existing Sobeys grocery store would not be permitted without an Official Plan or Zoning By-law Amendment.

Accordingly, we recommend the following:

The Ministry of the Environment and Climate Change, and the Ministry of Municipal Affairs and Housing modify OPA 540 as follows:

- 1. Consider increasing the minimum densities proposed by SASP 621 and 623, Map 2 – Minimum Densities, to encourage transit supportive developments resulting in a meaning number of new housing units;**
- 2. Add the following new policies to SASP 621 and 623.**

e) Minimum Density Targets

The minimum intensification and density targets in this Site and Area Specific Policy, including any alternative targets that have been permitted by the Minister, are

minimum standards and municipalities are encouraged to go beyond these minimum targets, where appropriate, except where doing so would conflict with any policy of the Growth Plan, the Provincial Policy Statement or any other provincial plan.

f) Site-Specific Development Application

The final density requirement for individual sites within the SASP shall be determined through a site-specific development application.

g) Expansion and Additions to Existing Buildings

Recognizing that interim uses will continue to exist and expand, the minimum density requirements for section d) do not apply to expansions and/or additions to existing buildings.

In our view the proposed modification to OPA 540 will assist in facilitating the revitalization of the subject site and optimization of existing infrastructure and transit investment in the area.

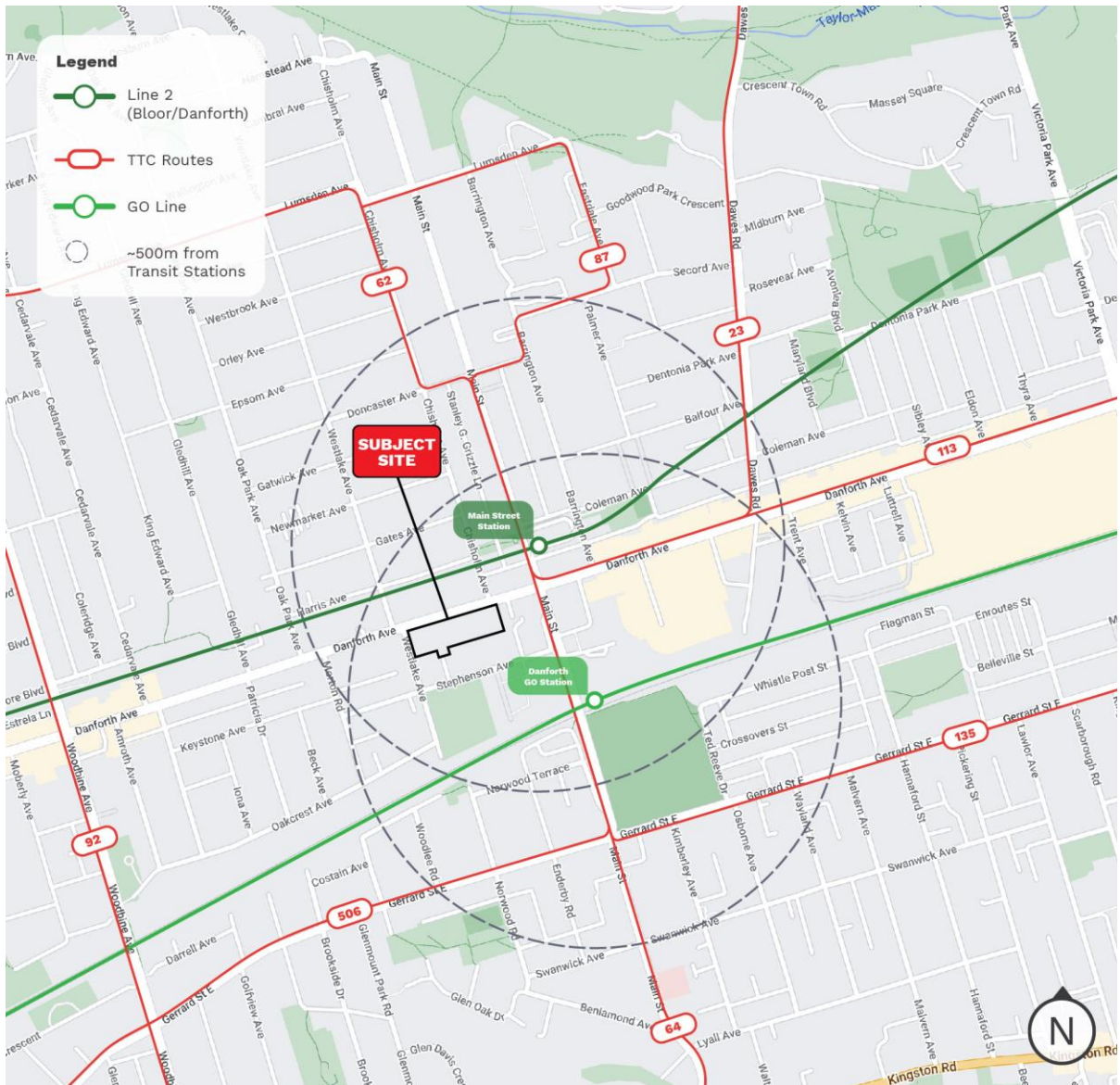
I would be pleased to discuss this request at your convenience. Please do not hesitate to contact me.

Yours very truly,
Bousfields Inc.

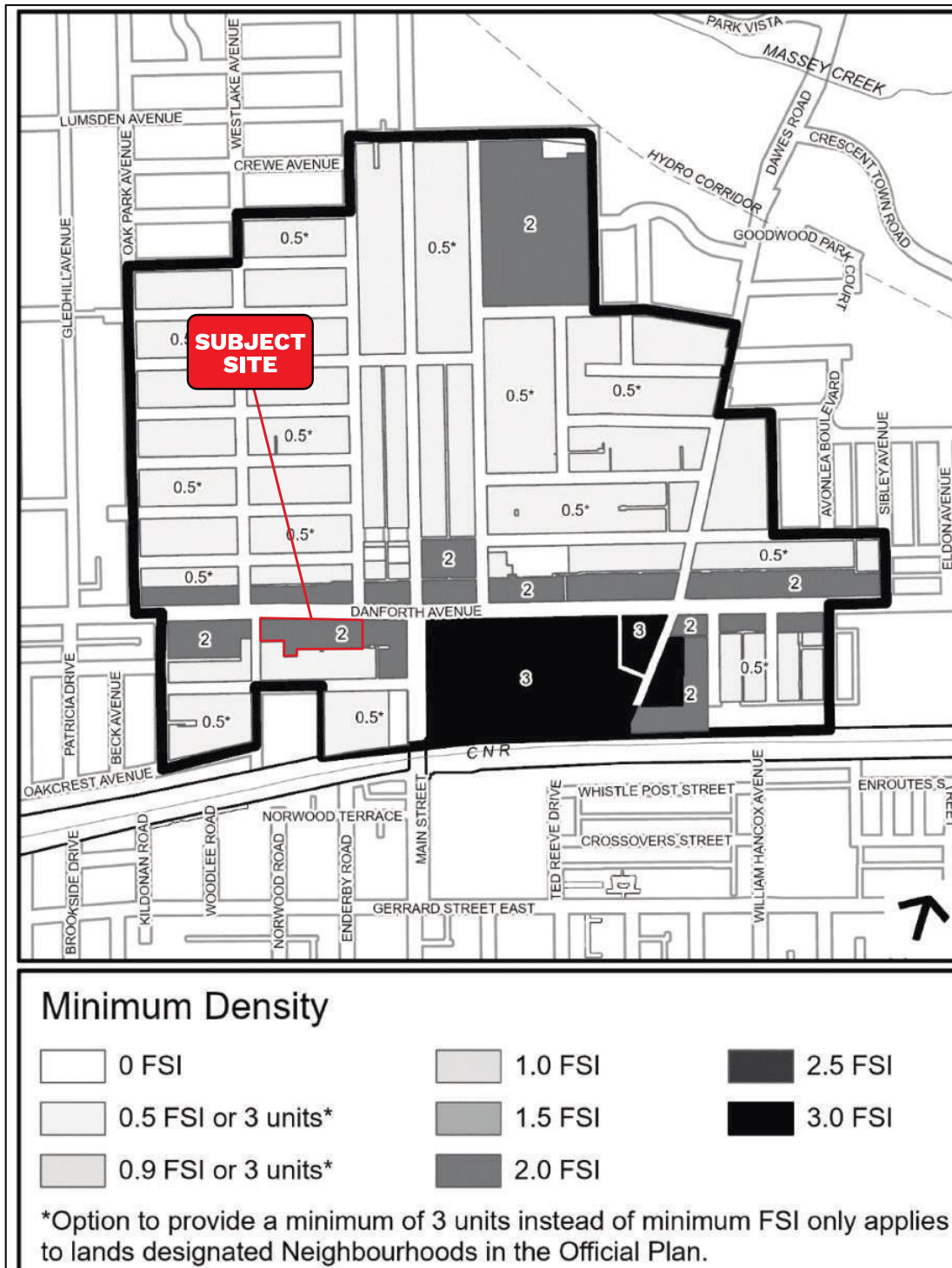


Michael Bissett, MCIP, RPP

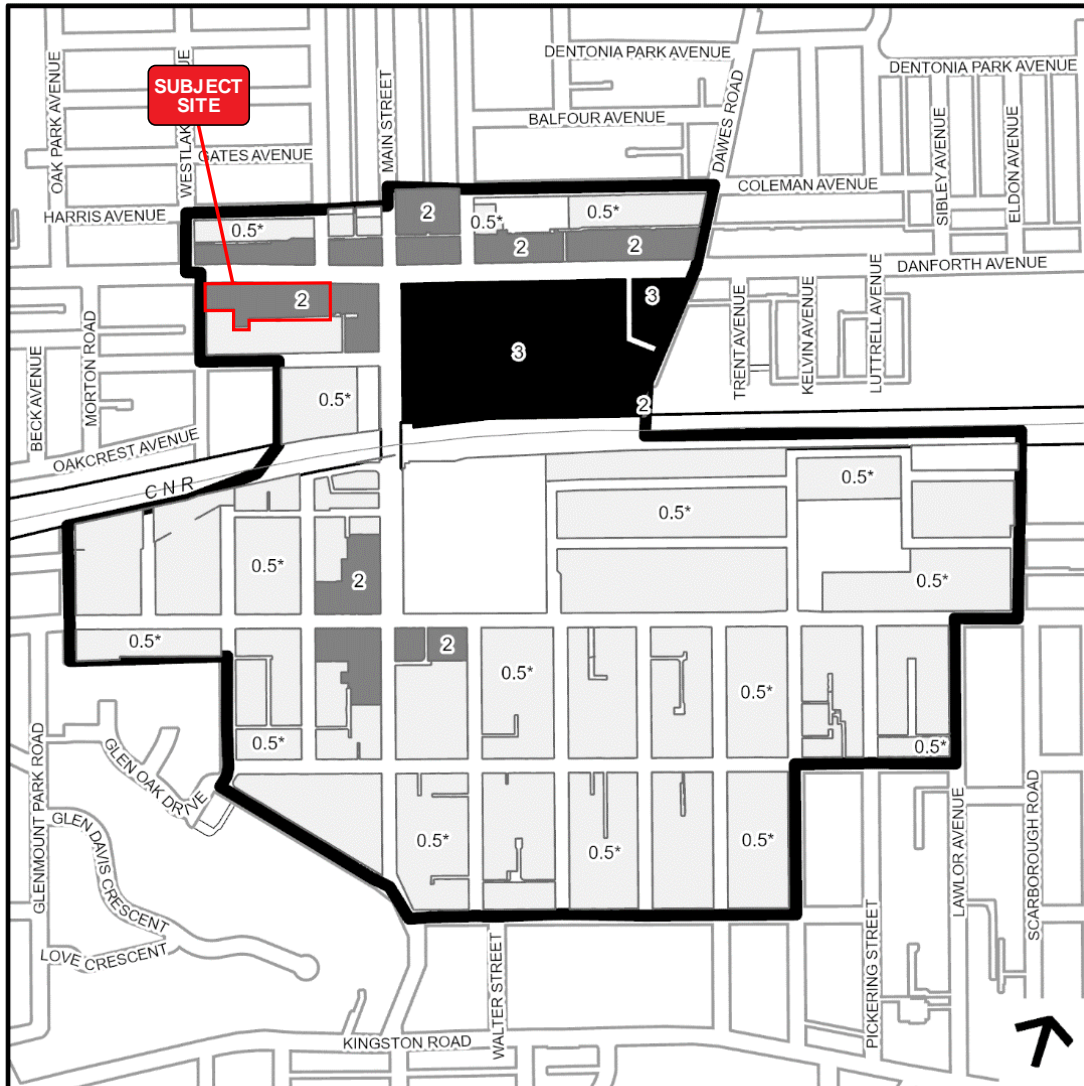
Attachment A – Location Map




Attachment B – SASP 621, Map 2



Attachment C – SASP 623, Map 2



Minimum Density

 0 FSI	 1.0 FSI	 2.5 FSI
 0.5 FSI or 3 units*	 1.5 FSI	 3.0 FSI
 0.9 FSI or 3 units*	 2.0 FSI	

*Option to provide a minimum of 3 units instead of minimum FSI only applies to lands designated Neighbourhoods in the Official Plan.