



BOUSFIELDS INC.

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: Tammy Nguyen

Dear Minister Clark:

**Re: Request to Modify City of Toronto OPA 524 Prior to Ministerial Approval
ERO File No. 019-5228
320-332 Bloor Street West, City of Toronto**

I am the land use planner for First Capital Realty Inc., which through its subsidiary First Capital Holdings (Ontario) Corporation, is the owner of lands located at the northeast corner of Bloor Street West and Spadina Road and is municipally known as 320-332 Bloor Street West (the "subject site"). The subject site comprises three properties occupied by 2 and 3-storey mixed-buildings with commercial uses at grade and office uses on the upper floors.

The subject site is situated in the Annex neighborhood of Toronto, and forms part of the Spadina Protected Major Transit Station Area, as delineated by Site and Area Specific Policy ("SASP") 597 of Official Plan Amendment ("OPA") 524. The subject site also forms part of the St George Protected Major Transit Station Area, as delineated by SASP 598 of OPA 524. City Council adopted OPA 524 on February 2, 2022.

From a transit perspective, the subject site has excellent access to existing transit services being located directly above Spadina Station, which is an interchange station and provides access to the TTC's Line 1 and Line 2. **Attachment A** sets out the location of the subject site, including its proximity to existing transit infrastructure.

In November of 2021, the owner submitted a Zoning By-law Amendment application to permit the redevelopment of the subject site with a residential mixed-use building having a height of 37-storeys and a density of approximately 14.09 FSI (City of Toronto application number: 21 234506 STE 11 OZ). Applications for Draft Plan of Subdivision approval and Site Plan approval were subsequently filed in May and July of 2021 respectively (City of Toronto application numbers: 21 234 506 STE 11 SB and 21 245851 STE 11 SA).

On February 2, 2022, City Council adopted Official Plan Amendment 524, which introduced Site and Area Specific Policies for 16 PMTSA's. As noted above, the subject site falls within SASP 597 and 598, which applies to the lands surrounding Spadina and St George Stations,

including the subject site. SASP 597 and 598, which are currently before the Minister for approval in accordance with Sections 17 and 26 of the Planning Act, each specify a minimum Floor Space Index (“FSI”) of 2.0 times for the subject site. Lands to the south of the site, and comparatively further from the entrance to Spadina Station, have proposed minimum density requirements of at least 2.5 times. **Attachment B** locates the subject site on SASP 597 and 598, Map 2 – Minimum Densities.

In my opinion, the proposed minimum density of 2.0 FSI for the subject site does not reflect its location directly above Spadina Station, which provides access to an interchange station with existing high-order transit. As well, the proposed minimum FSI for the site is lower than other lands to the immediate south, on the south side of Bloor Street. 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. 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.

In this regard, on behalf of the owner, I am writing to respectfully request that Map 2 of SASP 597 and 598 (i.e., “Minimum Densities”) be modified by increasing the minimum density from 2.0 FSI to 2.5 FSI (at minimum). **Attachment C** includes the requested modification to Map 2 of SASP 597 and 598.

With respect to the minimum density requirements more broadly, as currently drafted, OPA 570 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.

Accordingly, we recommend the following:

The Ministry of the Environment and Climate Change, and the Ministry of Municipal Affairs and Housing modify OPA 524 as follows:

- 1. Revise SASP 597 and 598, Map 2 – Minimum Densities, and apply a minimum density of at least 2.5 FSI for the subject site, as illustrated in Attachment C; and**
- 2. Add the following new policies to SASP 597 and 598.**

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 524 will assist in facilitating the revitalization of the subject site and optimization of existing infrastructure and transit investment in the area.

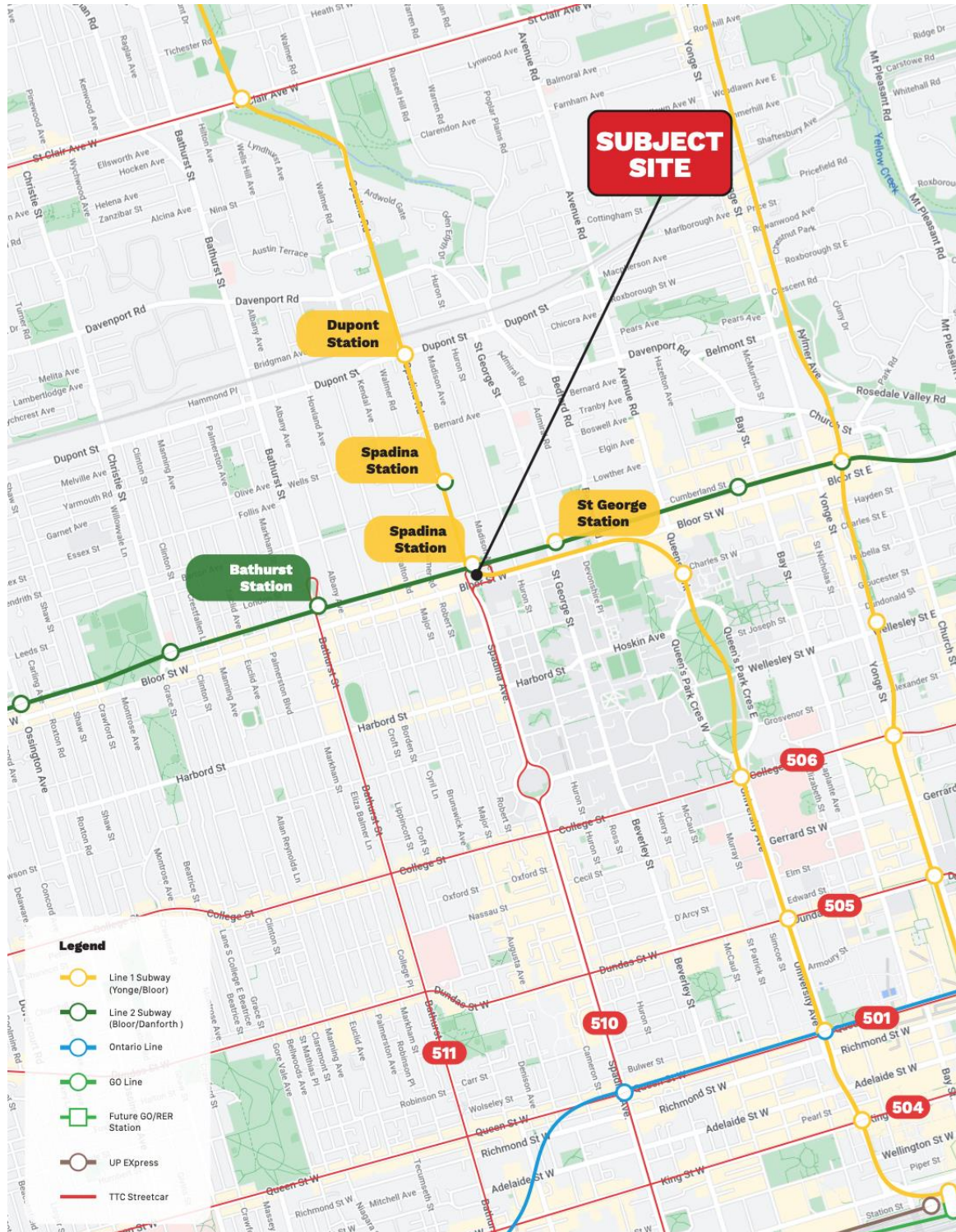
I would be pleased to discuss this request at your convenience. Please do not hesitate to contact me.

Yours very truly,
Bousfields Inc.



Michael Bissett, MCIP, RPP

Attachment A – Location Map

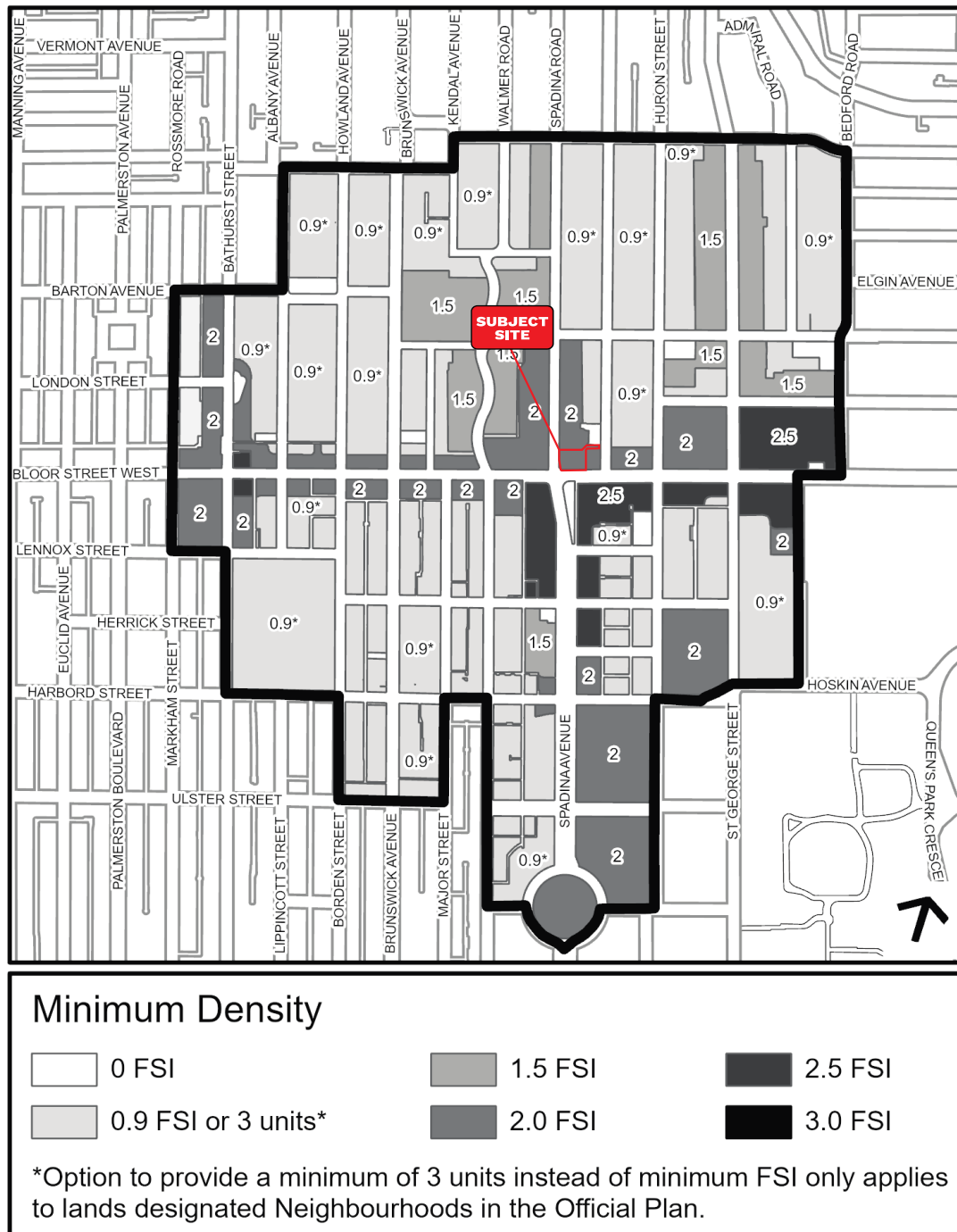


Attachment B – Map 2, SASPs 597 and 598

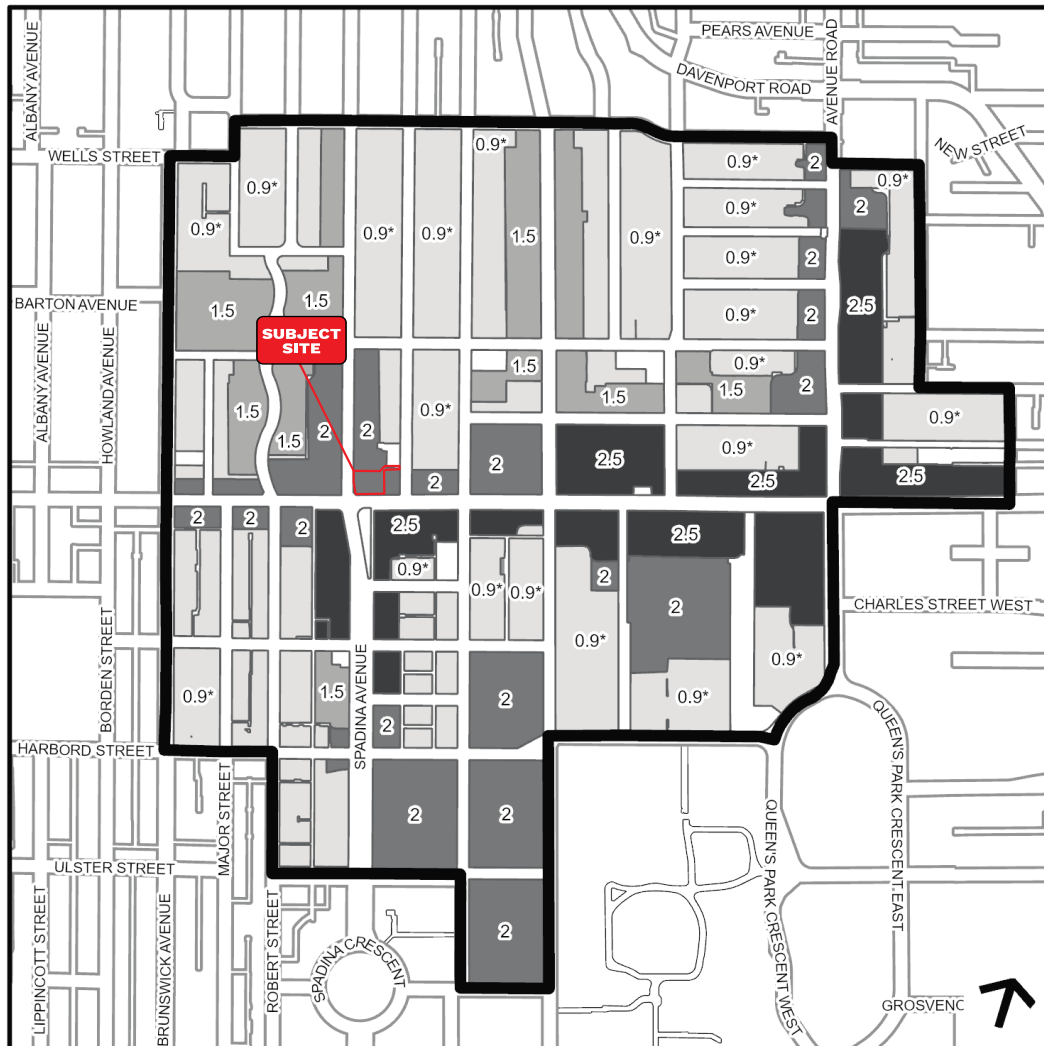
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City of Toronto By-law 47-2022







Map 2 – Minimum Densities, Spadina Protected Major Transit Station Area



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



Minimum Density

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

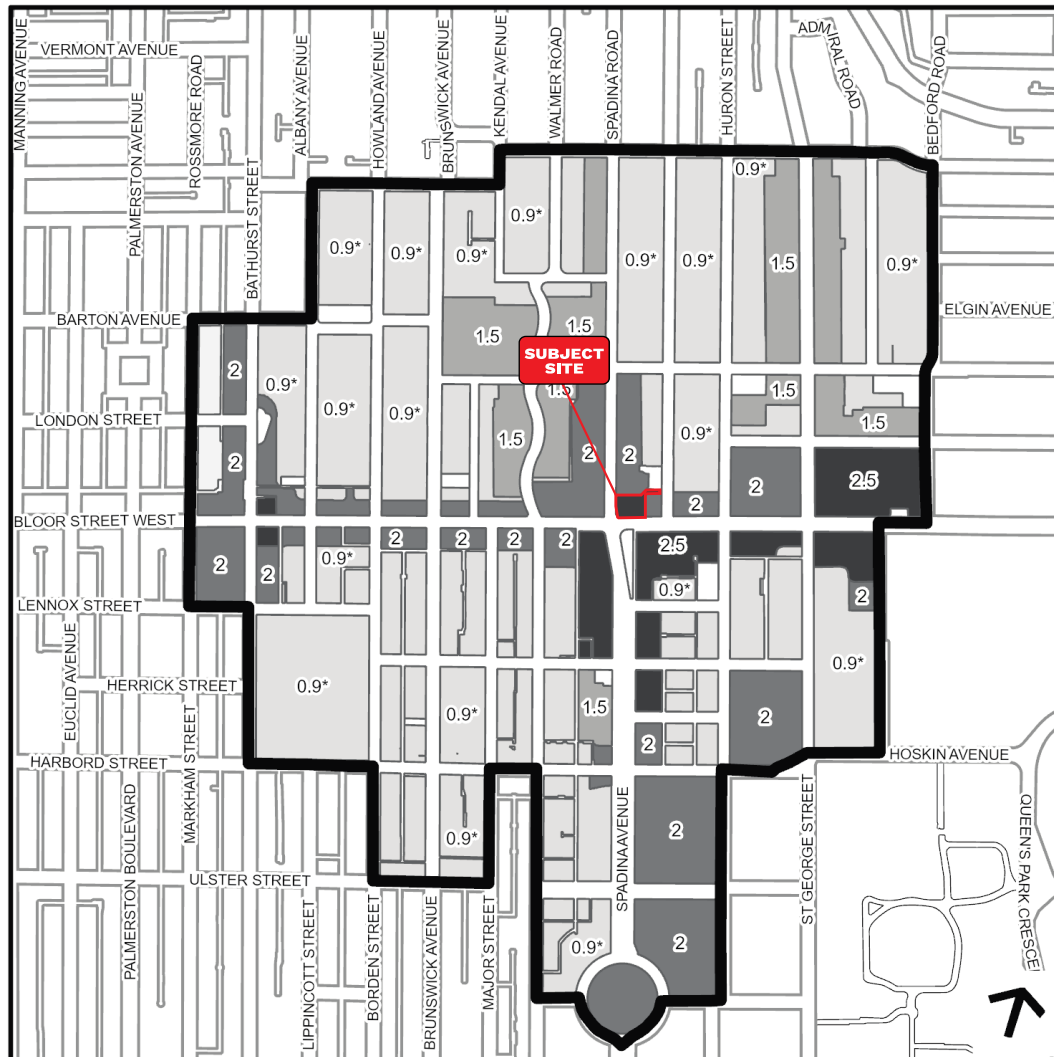
*Option to provide a minimum of 3 units instead of minimum FSI only applies to lands designated Neighbourhoods in the Official Plan.

Attachment C – Proposed Modifications to Map 2, SASPs 597 and 598

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City of Toronto By-law 47-2022

Map 2 – Minimum Densities, Spadina Protected Major Transit Station Area

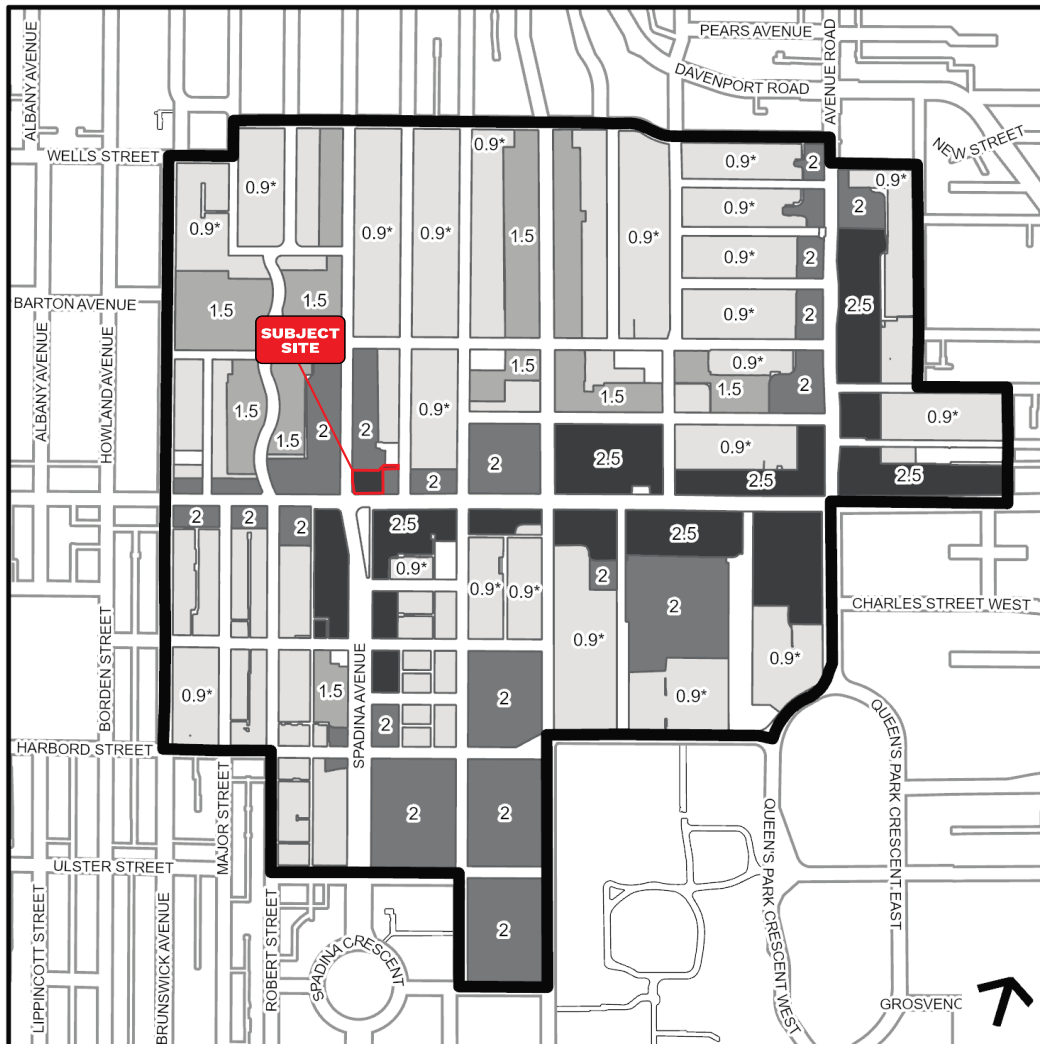


Minimum Density






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

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

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



Minimum Density

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

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