



BOUSFIELDS INC.

February 3, 2023

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Attention: Erika Ivanic

Dear Mr. Clark:

Re: City of Toronto Official Plan Amendment No. 540
2238 to 2290 Dundas Street West, and 104 and 105 Ritchie Avenue
ERO No.: 019-5936
Ministry Reference No.: 20-OP-221476

We are the planning consultants to CP REIT Ontario Properties Limited (“Choice”), the owners of the properties municipally known as 2238 to 2290 Dundas Street West and 104 & 105 Ritchie Avenue, which are immediately south of a property owned by the Toronto Board of Education at 1515 Bloor Street West (collectively referred to herein as the “subject site”). The subject site is located at the southeast corner of the Bloor Street West and Dundas Street West intersection and is currently occupied by a large format shopping centre with surface parking, as well as Bishop Marrocco – Thomas Merton Catholic Secondary School.

On July 22, 2022, Toronto City Council adopted Official Plan Amendment No. 540 (“OPA 540”), which introduced Site and Area Specific Policies (“SASP’s”) for 23 Protected Major Transit Station Areas (“PMTSA’s”), corresponding with existing and planned subway and GO Rail stations along the Bloor-Danforth corridor. The subject site falls within the boundaries of the Bloor GO Station and Dundas West Subway Station PMTSA’s, as set out in SASP’s 654 and 655, respectively. As illustrated on Map 2, SASP’s 654 and 655 specify a minimum density of 2.0 FSI for the subject site.

In 2018, Choice filed an Official Plan for the subject site to permit a mix of residential, retail, office, and parkland, with approximately 2,600 residential units. I understand that the densities being sought with the initial OPA application would not work for the School Board, and that a subsequent application was filed for the Choice property on its own. However, with a higher FSI minimum applying to the subject site, it is anticipated that a comprehensive redevelopment of the subject site could be facilitated.

In our opinion the proposed comprehensive redevelopment of the subject site would contribute to the achievement of numerous policy directions supporting intensification of underutilized sites within the built-up urban area, particularly in locations which are well served by municipal infrastructure, including existing public transit infrastructure.

OPA 540 is now before you for approval in accordance with Sections 17 and 26 of the *Planning Act*. **We are writing to respectfully request that you modify OPA 540 by increasing the minimum density for the subject site in SASP's 654 and 655 from 2.0 FSI to 6.0 times FSI (see Attachments A and B for the modified Map 2 to each SASP).**

A minimum density of 6.0 FSI would better reflect the recent approvals in the area, including the OLT approval for the site to the northwest at over 9.0 FSI (1540-1550 Bloor Street West). It would also be more appropriate given the site's location within immediate walking distance of two existing higher order transit stations, and the broader provincial policy directions which speak to the optimization of land and infrastructure and maximizing the number of potential transit users within walking distance of a station.

In this regard, the subject site is located immediately abutting the Dundas West Station along the Line 2 (Bloor-Danforth) subway, as well as the Bloor GO Station, which provides connections along the Union Pearson ("UP") Express and Kitchener GO Line. The Kitchener GO Line is currently being expanded and upgraded as part of the Regional Express Rail ("RER") project, with planned 15-minute two-way all-day service. As a result of its location at the interchange of major north-south and east-west higher order transit lines, the area is one of the most transit-accessible locations in the City and has previously been identified as a Mobility Hub by Metrolinx.

The existence of higher order transit infrastructure has resulted in a gradual increase in the permitted maximum density limits in the area, culminating in the OLT-approved density of 9.78 FSI at 1540-1550 Bloor Street West to the northwest. However, similar consideration has not been given to increasing the required minimum density limits in accordance with the direction set out by the Growth Plan. Instead, through OPA 540, the subject site has been assigned a minimum density of 2.0 FSI, noticeably lower than the permitted maximum densities approved in the area.

Similarly, the minimum densities set out by OPA 540 do not appear to have regard for the Bloor-Dundas *Avenue* Study (2009) and implementing By-law 1222-2009, which applied to lands along Bloor Street to the immediate north. The implementing *Avenue* By-law 1222-2009 also introduced Exception 12(2) 347(9), which permitted a further increase in the maximum height and density on certain sites in the area. Of note, subsection (b) provides that the applicable density for the 1540 Bloor Street West property would be in accordance with the MCR T5.5 C2.0 R4.5 density limits, reflecting

a maximum density of 5.5 FSI. Additionally, subsection (d) provides that the applicable density for a consolidated site which includes the properties at 1542 to 1552 Bloor Street West would be in accordance with the MCR T7.0 C2.0 R6.0 density limits, reflecting a maximum density of 7.0 FSI. While this density applied to the northwest of the subject site, the subject site has the same, or better, locational advantages that would support an increased FSI and, given the large properties on the north and south sides of Bloor Street West, east of Dundas Street West, an FSI of 6.0 would be an appropriate minimum within this context.

In our opinion, the 2009 *Avenue* study recognized that greater heights and densities could be accommodated on the subject site, compared to other sites located further away from the Bloor-Dundas intersection. Furthermore, since 2009, the importance of the Dundas West-Bloor Mobility Hub has been further enhanced through the introduction of UP Express service, and the planned electrification of the GO RER. However, the density maximums set out in the 2009 *Avenue* Study are now well over a decade old and pre-date the last two iterations of the Provincial Policy Statement and Growth Plan, as well as the Metrolinx 2041 Regional Transportation Plan, all of which place greater emphasis on transit-supportive development than did the policy documents that were in effect in 2009.

In this regard, it is our opinion that the former density maximum of 7.0 FSI set out by the 2009 *Avenue* Study should be considered as benchmark minimum for sites that are located at this intersection. In doing so, the minimum density set out by OPA 540 would more fully reflect the site's location in the immediate proximity to a higher order transit interchange, the provincial policy directions which speak to the integration of land use and transportation planning. In this specific context, given the large size of the parcels on the north and south sides of Bloor Street, east of Dundas, a 6.0 FSI would be appropriate. It is our opinion that a minimum density of 2.0 FSI is not appropriate or desirable for the subject site from a planning perspective.

If you have any questions with respect to this letter and wish to discuss this matter in detail, please do not hesitate to contact the undersigned.

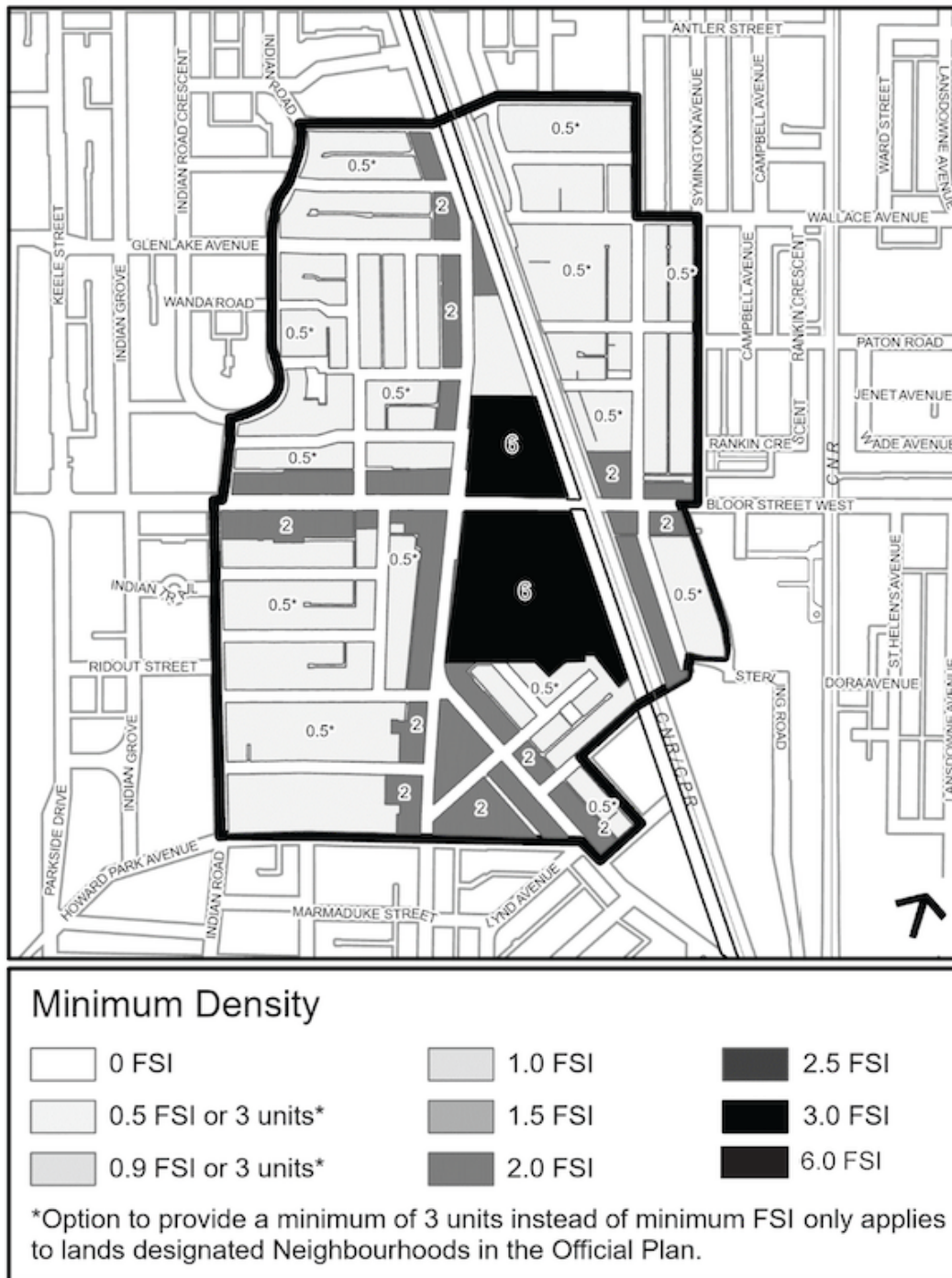
Yours very truly,
Bousfields Inc.



Michael Bissett, MCIP, RPP

Attachment A – Modified Map 2 SASP 654

Map 2 – Minimum Densities, Dundas West Protected Major Transit Station Area



Attachment B – Modified Map 2 SASP 655

Map 2 – Minimum Densities, Bloor GO Protected Major Transit Station Area



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	 6.0 FSI

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