Project No. 20316

February 2, 2023

Hon. Steve Clark

Minister of Municipal Affairs and Housing

777 Bay Street, 17th Floor

Toronto, Ontario

M7A 2J3

Attn: Erika Ivanic

Dear Minister Clark;

***Re: Toronto Official Plan Amendment 570***

***ERO Number 019-5936***

***Ministry Reference Number 20-OP-221476***

**Toronto Official Plan Amendment 570**

**Modification to Site and Area Specific Policy 648**

**683-685 Warden Avenue**

We are the planning consultants for Choice Properties REIT, owners of the lands municipally known as 683-685 Warden Avenue (the **“subject site”**). The subject site is approximately 2.63-hectares in size, and is located on the east side of Warden Avenue, approximately 500 metres south of St. Clair Avenue East. The subject site is currently vacant, and is within an approximate 220 metre radius of the Warden TTC Subway Station on the Bloor-Danforth Line (i.e. Line 2).

On July 22, 2022, Toronto City Council adopted Official Plan Amendment No. 570 (“OPA 570”), which introduced Site and Area Specific Policies (“SASP’s”) for 57 Protected Major Transit Station Areas (“PMTSA’s”), corresponding with existing and planned transit stations across the City of Toronto. The subject site falls within the City’s delineation of the Warden PMTSA as set out in Site and Area Specific Policy (“SASP”) 648. Map 2 of SASP 648 (“Minimum Densities, Warden Protected Major Transit Station Area”) specifies a minimum density of 3.0 for the subject site.

With respect to the subject site, in June 2021, Bousfields Inc. prepared a Planning and Urban Design Rationale report in support of a combined Official Plan and Zoning By-law Amendment application to permit the redevelopment of the subject site six residential buildings, with heights ranging from 13-36 storeys, comprised of ground-related retail space, and approximately 1,519 residential dwelling units, with an overall density of 4.6 FSI. The report concluded that the proposed development would contribute to the achievement of numerous policy directions supporting intensification and infill on underutilized sites within the built-up urban area, particularly in locations which are well served by municipal infrastructure, including existing public transit infrastructure.

With respect to the broader urban structure, the presence of existing higher-order transit infrastructure has resulted in an increase in maximum density limits for large sites along the corridor, particularly to the north of the site at the intersection of Warden Avenue and St. Clair Avenue East. In this respect, as part of the Housing Now Initiative, a Rezoning and Draft Plan of Subdivision application was submitted in July of 2019 to permit a mixed-use community comprised of three residential buildings of 7-, 8- and 18-storeys and approximately 37,500 square metres of gross floor area. A Final Report on the Create TO applications (dated January 28, 2020) was considered by the Planning and Housing Committee ("PHC") at its meeting of February 12, 2020. The PHC adjourned the meeting and requested the Chief Planner and Executive Director, City Planning, in consultation with the Chief Executive Officer, CreateTO and the Executive Director, Housing Secretariat, to review potential revisions to the development concept with the objective of providing additional housing opportunities on the site. In response to comments, an updated concept plan was submitted in May of 2020, which added additional residential density to the site. As approved, the zoning permissions would allow for a building of up to 19-storeys, 600 residential units, and a resulting density of 3.5 FSI (which just reaches the minimum 3.5 FSI of the PMTSA)

In terms of other lands along the corridor and within the PMTSA boundary, a sizeable portion of lands are designated *Neighbourhoods,* wherein significant forms of redevelopment would be precluded. As well, lands to the north of the subject site, which have a specified density of 2.0 FSI on Map 2 of SASP 648, are owned by Ontario Hydro and are occupied by a large hydro facility and hydro lines. These lands are designated *Utility Corridor* in the City of Toronto Official Plan and are primarily used for the movement and transmission of energy. The City of Toronto Official Plan also clarifies that when these corridors are declared surplus, every effort should be made to secure *Utility Corridors* for a variety of public uses (such as public transportation routes, bicycle and pedestrian trails, community and allotment gardens, linear parks and open space or shared parking facilities). Accordingly, it is our opinion that new mixed-use development on these lands would be highly constrained and unlikely.

Accordingly, based on a review of the existing and planned context, the subject site is one of very few properties in the PMTSA boundary that can support the achievement of minimum intensification targets outlined in the Growth Plan. In our opinion, the minimum density of 3.0 FSI for subject site is artificially low and is inconsistent with provincial and municipal policy objectives which encourage an integrated approach to transportation and land use planning, promote the development of complete communities, and support the optimization and efficient use of land and infrastructure within the built-up areas.

In order to facilitate the intensification of sites within the Warden PMTSA, promote the delivery of new housing supply and support the optimization and efficient use of land and infrastructure within the built-up areas, it is our opinion that a minimum density in the range of 4.5 FSI would be appropriate, and would represent a scale of development that would assist in the achievement of minimum intensification targets.

**Accordingly, we are writing to request that the Ministry of Municipal Affairs and Housing modify OPA 570 as follows:**

1. **Revise SASP 648, Map 2 – “Minimum Densities, Warden Protected Major Transit Station”, OPA 570, to increase the minimum density for the subject site to 4.5 FSI, as illustrated in Figure 1.**
2. **As well, we propose the following language be included as new Policy e) to SASP 648, consistent with Policy 5.2.5(1) of the Growth Plan:**

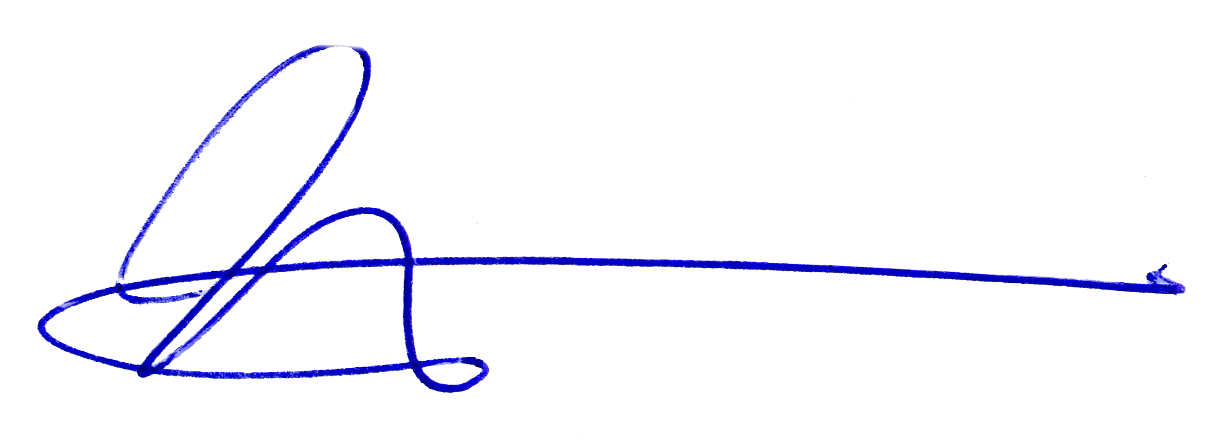
**e) Minimum Density Targets**

The minimum intensification and density targets in this Site and Area Specific Policy, 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.

In this regard, it is our opinion that a proposed density of 4.5 FSI would be appropriate for the subject site, and would better reflect its adjacency to Warden Station, its location along a major street, and provincial policy directions which speak to the integration of land use and transportation planning, the prioritization of intensification and higher densities in strategic growth areas, and the achievement of transit-supportive complete communities. Should you have any questions, I would be pleased to discuss this request at your convenience.

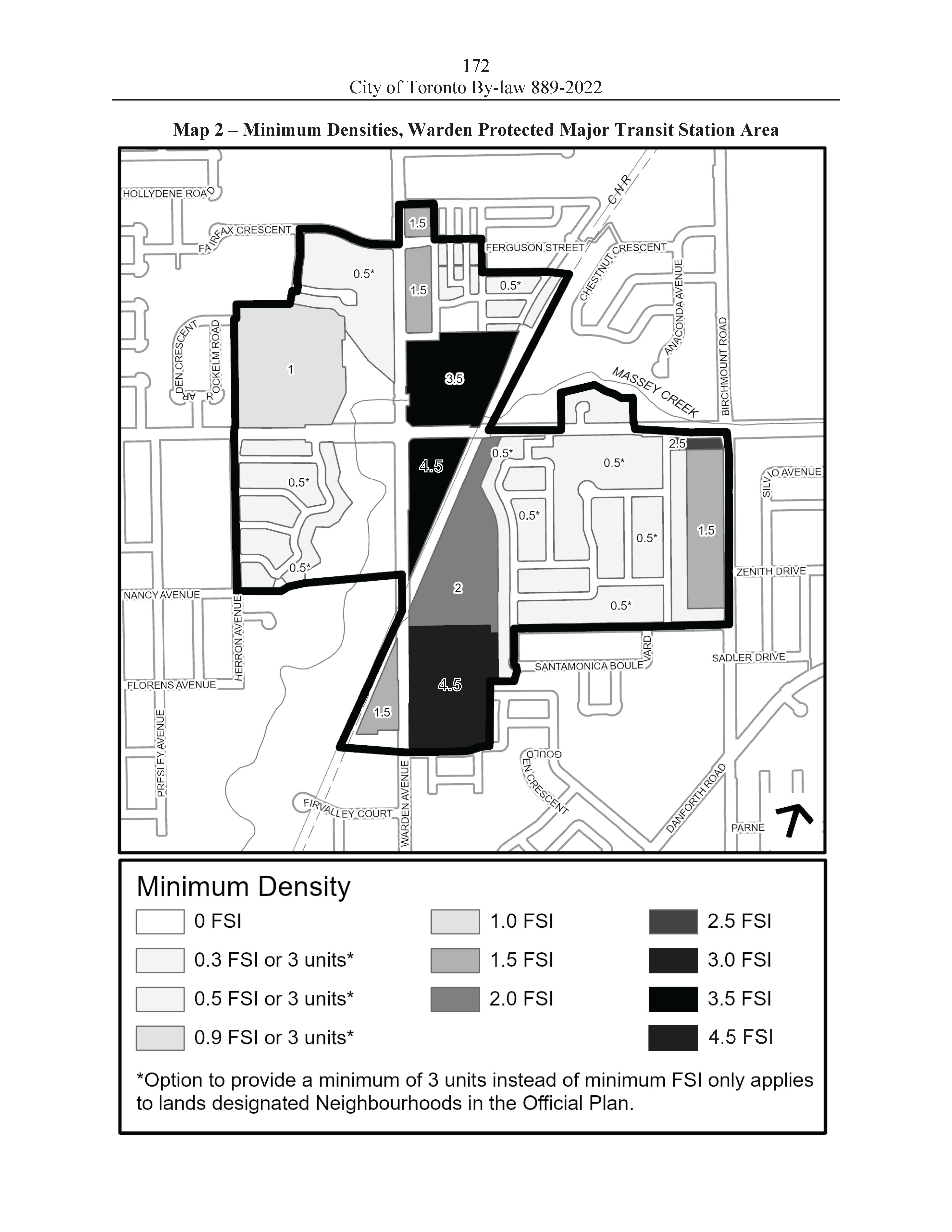
Yours very truly,

**Bousfields Inc.**

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Michael Bissett, MCIP, RP

**Figure 1 – Modified Map 2 SASP 648**

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