



PLANNING AND URBAN DESIGN

31 January 2023

Honourable Steve Clark, Minister
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th floor
Toronto, Ontario M7A 2J3

Attention: Honourable Steve Clark
Ministry of Municipal Affairs and Housing – Minister

Dear Minister Clark,

RE: ERO Item 019-5937
Ministry Reference Number 20-OP-227259
Approval to Amend a Municipality's Official Plan
City of Toronto Official Plan Amendment No. 570
(Davisville Protected Major Transit Station Area)
45 and 57-93 Balliol Street Site-Specific Comment Submission
Our File: 21.523

WND Associates Limited has been retained by G.R Feldman Investments Ltd. as the planning consultant with respect to the submission of concurrent Zoning By-law Amendment, Draft Plan of Subdivision and Site Plan Control Applications for the lands municipally known as 45 and 57-93 Balliol Street ("Subject Site"), and further, to assist with commenting on the City of Toronto's Official Plan Amendment No. 570.

Background

The Subject Site is a generally rectangular-shaped lot along the south side of Balliol Street in the Mount Pleasant West neighbourhood of the City of Toronto, and within 200 metres of the Davisville TTC Station (Line 1 – Yonge-University). The Subject Site is currently comprised of 19 two-storey rental townhouses with underground parking and soft-landscaping (57-93 Balliol Street), and an 18-storey residential apartment building which also has underground parking (45 Balliol Street). The Subject Site is 9,808 square metres in area, with 169.55 metres of frontage on Balliol Street, and a lot depth of 58.86 metres.

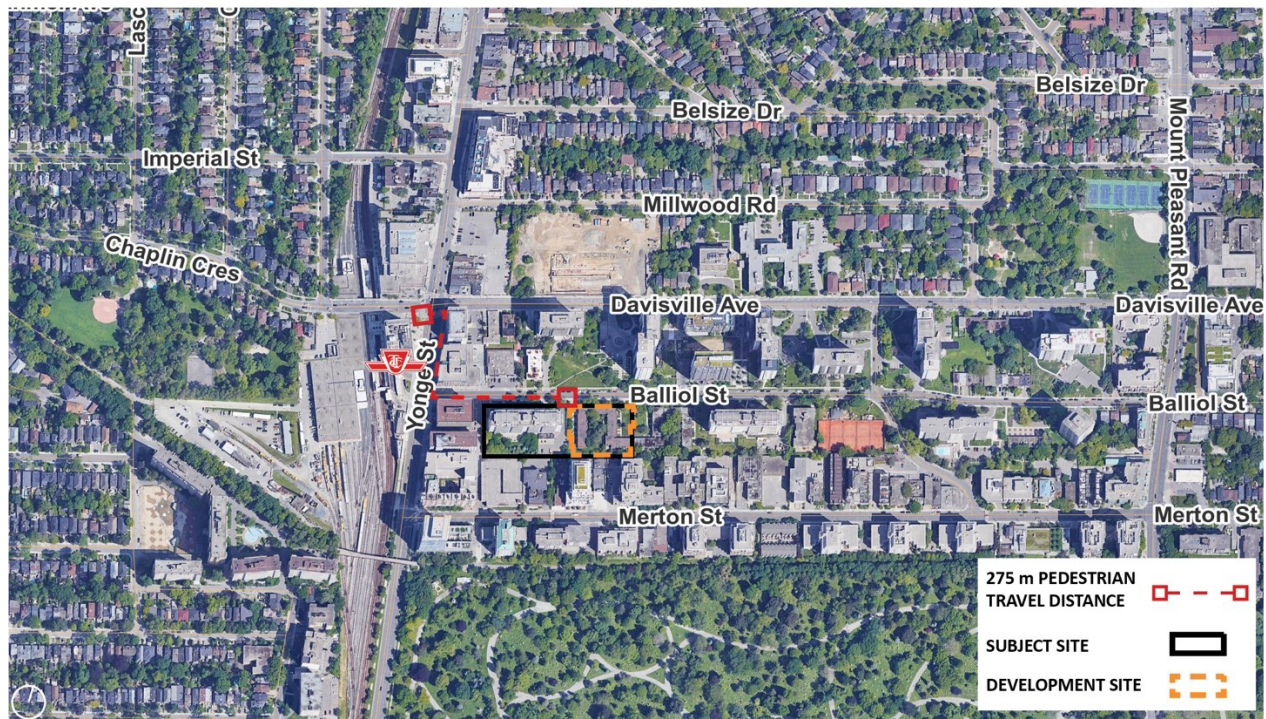


Figure 1: Aerial Context with Travel Distance to Davisville Station

The Subject Site is currently designated *Apartment Neighbourhoods* in the City of Toronto Official Plan and is zoned Residential (R) (d2.0) (x917) under By-law 569-2013. The Subject Site is also within the boundary of the Yonge-Eglinton Secondary Plan, where it is designated *Apartment Neighbourhoods*, and further, within the Davisville Character Area.

On 1 November 2021, concurrent Zoning By-Law Amendment, Site Plan Control, Rental Housing Demolition, and Draft Plan of Subdivision applications for a 39-storey residential building with 507 residential units were submitted for the property at 45 and 57-93 Balliol Street. A separate application for Consent (City File No: 21 152318 STE 12 CO) to sever the property at 57-93 Balliol Street from 45 Balliol Street was approved, with conditions, by the Committee of Adjustment on 27 October 2021. On 6 January 2023, resubmission of the Zoning By-Law Amendment and Site Plan Approval applications were made for a 39-storey building with 490 dwelling units.

Site and Area Specific Policy 722– Davisville PMTSA

The Subject Site is located within Site and Area Specific Policy (“SASP”) No. 722, as part of Official Plan Amendment (“OPA”) 570. Figures 2 and 3 below identify the Subject Site within Map 1 and Map 2 of SASP 722, respectively.

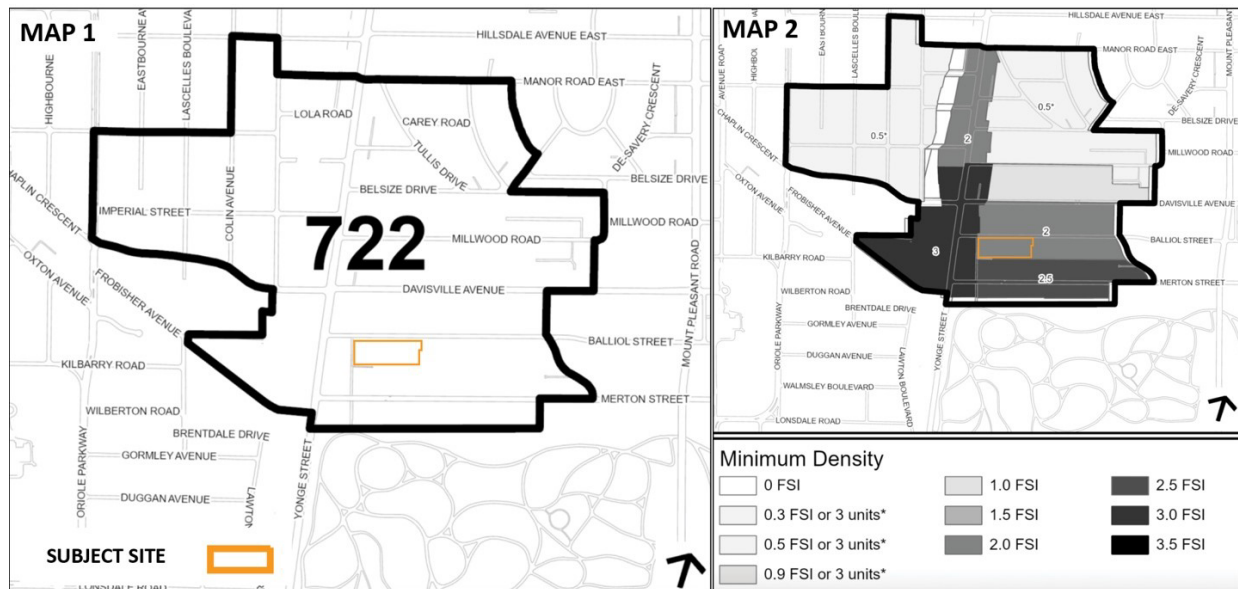


Figure 2: Map 1 of SASP 722 – Davisville Protected Major Transit Station Area Boundary

Figure 3: Map 2 of SASP 722 – Minimum Densities, Davisville Protected Major Transit Station Area

Furthermore, Schedule 4 to OPA 570 provides the following policies for SASP No. 722 – Davisville Station:

a) *Protected Major Transit Station Area Delineation*

The area surrounding and including the existing Davisville Subway Station is a protected major transit station area shown as the Davisville Protected Major Transit Station Area on Map 1.

b) *Residents and Jobs per Hectare*

Existing and permitted development within the Protected Major Transit Station Area – Davisville Station is planned for a minimum population and employment target of 350 residents and jobs combined per hectare.

c) *Authorized Uses of Land*

The authorized uses of land are as identified by the land use designations on Map 17 and associated land use permissions in Chapter 4 of the Official Plan, applicable Secondary Plans and Site and Area Specific policies.

d) *Minimum Densities*

Minimum density requirements are shown on Map 2, represented in Floor Space Index.

As identified within Map 2 within Figure 3 above, the Subject Site is prescribed a minimum development density of 2.0 times the area of the site.

Yonge-Eglinton Secondary Plan (OPA 405)

The Subject Site is also identified within the Yonge-Eglinton Secondary Plan (“YESP”) where it is designated Apartment Neighbourhoods, and further, within the Davisville Character Area (refer to Figure 4). Anticipated height ranges for the Davisville Character Area are set out Section 5.4.3 h), specifically providing a height range of 25 to 40 storeys, with heights generally decreasing with increasing distance from the Davisville subway station.

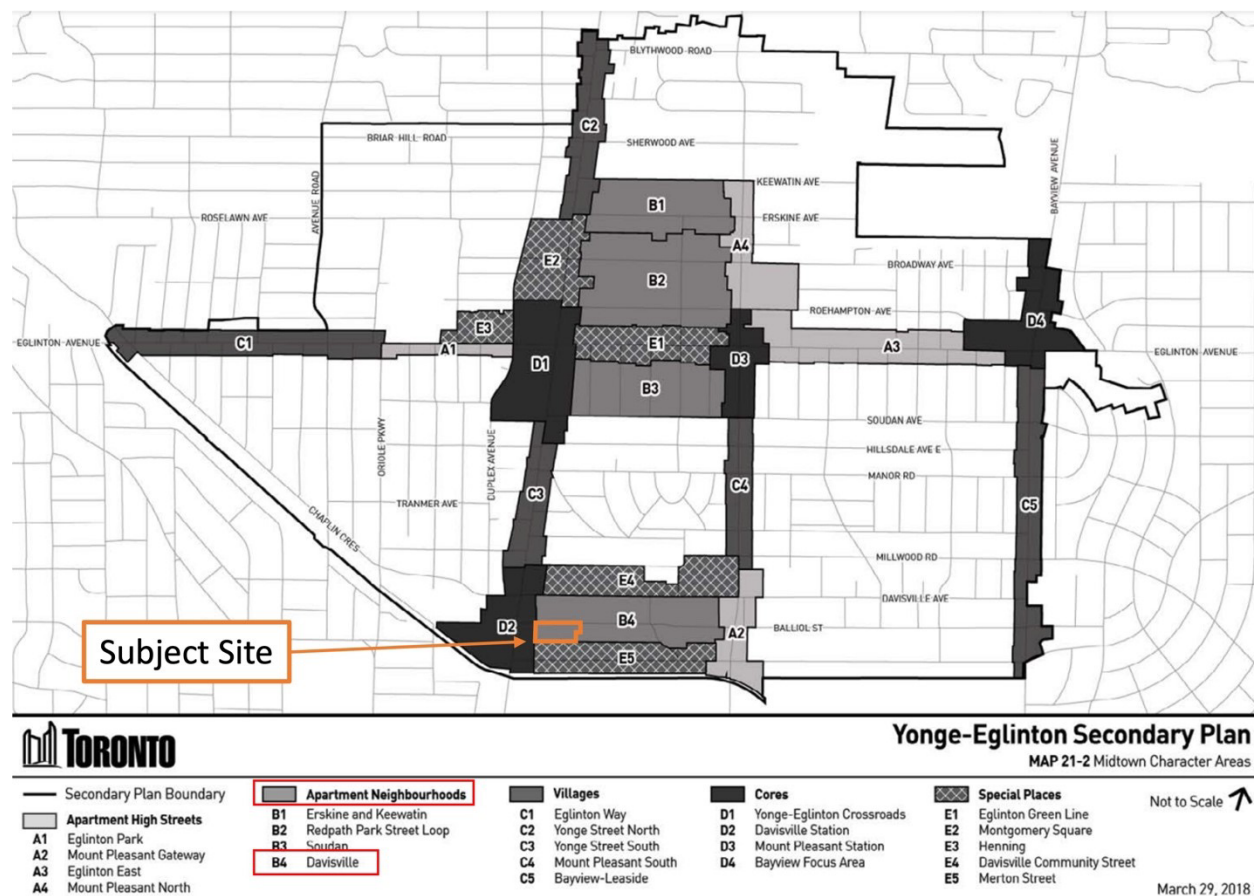


Figure 4: Subject Site identified in the Apartment Neighbourhoods – Davisville Character Area within Map 21-2 of the YESP

Comment and Discussion

Our comment relates to subsection d) of Schedule 4 above. As the neighbourhoods adjacent to the Yonge Street corridor evolve in response to the proximity to Davisville Station, which is augmented by their proximity to the soon-to-be-operating Eglinton Crosstown Line 5, it is important that the policies for the Protected Major Transit Station Areas surrounding stations along TTC's Line 1 (Yonge-University) provide an opportunity for transit-oriented development to be optimized.

Yonge-Eglinton Secondary Plan

The current minimum densities found with Map 2 of SASP 722 are too low relative to Section 5.4.3 h) of the Yonge-Eglinton Secondary Plan (OPA 405), which specifically provides direction for new buildings to follow a height range of 25 to 40 storeys, with heights generally decreasing with increasing distance from the Davisville subway station. Buildings conforming to such heights will inherently have a density much greater than 2.0 FSI.

Existing and Emerging Site Density Context

In addition to the misalignment with the in-force Secondary Plan policies on height, the densities of approved and proposed developments in the area surrounding Davisville Station further confirm that the current minimum densities within SASP 722 are too low and do not provide an opportunity for transit-oriented development to be maximized. Table 1 below provides a list of approved and proposed applications surrounding Davisville Station, all of which far exceed the minimum densities found within SASP 722. In addition, Figure 5 provides an illustration of the proposed and approved densities that are listed in Table 1.

Table 1: Proposed and Approved Development Densities Surrounding Davisville Station

Address	Planning Application & Status	Proposed/Approved Density (FSI)
22 Balliol St.	Zoning By-law Amendment (OLT Approved, approved in principle November 2021, awaiting final Tribunal Order)	15.3
97-131 & 155 Balliol St.	Zoning By-law Amendment (OLT Approved)	9.38
60 Balliol St.	Zoning By-law Amendment (Under Review, submitted June 2022)	10.69
30 Merton St.	Zoning By-law Amendment (OLT Approved)	9.46
50-64 Merton St.	Zoning By-law Amendment (Under Review, submitted November 2021)	11.72
185 Balliol St & 8 Pailton Cres.	Zoning By-law Amendment (Council Approved)	6.87
1951 Yonge St.	Zoning By-law Amendment (Under Review, submitted September 2020)	11.15
1910-1944 Yonge St.	Zoning By-law Amendment (Under Review, submitted November 2021)	14.84
25 Imperial St.	Zoning By-law Amendment (Under Review, submitted February 2021)	9.25
1982-1984 Yonge St.	Zoning By-law Amendment, (Council Approved)	8.4
45 and 57-93 Balliol St.	Zoning By-Law Amendment, (Under Review, submitted November 2021)	9.38

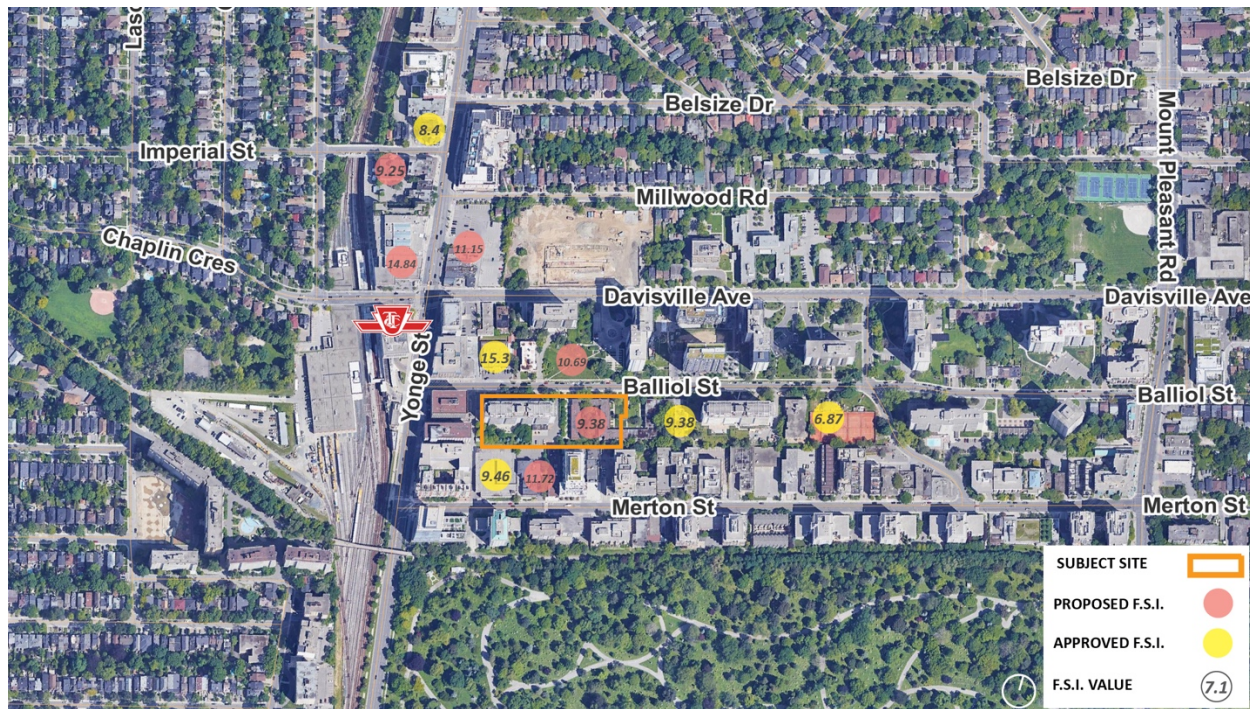


Figure 5: Development Density Context Map

As per Section 7 (Definitions) of *A Place to Grow: Growth plan for the Greater Golden Horseshoe (Office Consolidation 2020)* ("Growth Plan"), a Major Transit Station Area is defined as: "the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk." Policy 2.2.4.2 of the Growth Plan directs that "[f]or major transit station areas on priority transit corridors or subway lines, upper- and single-tier municipalities, in consultation with lower tier municipalities, will delineate the boundaries of major transit station areas in a transit-supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station." As shown in Figure 6 below, the 800 metre radius surrounding Davisville Station illustrates that there is a reserve of land within an 800 metre radius around the Davisville Station that has not been included within the Davisville PMTSA boundary, or a separate PMTSA/MTSA delineated by the City of Toronto. This is due to the presence of the Mount Pleasant Cemetery and its inability to accommodate growth, but in addition, large areas zoned and designated for residential use were not included within the boundary.

As the current PMTSA boundary does not maximize the delineated area surrounding Davisville Station, which has the effect of artificially reducing the amount of people and jobs per hectare that the area can accommodate, it is imperative that the minimum densities be increased within the Davisville PMTSA boundary in order to fully optimize the existing transit infrastructure.

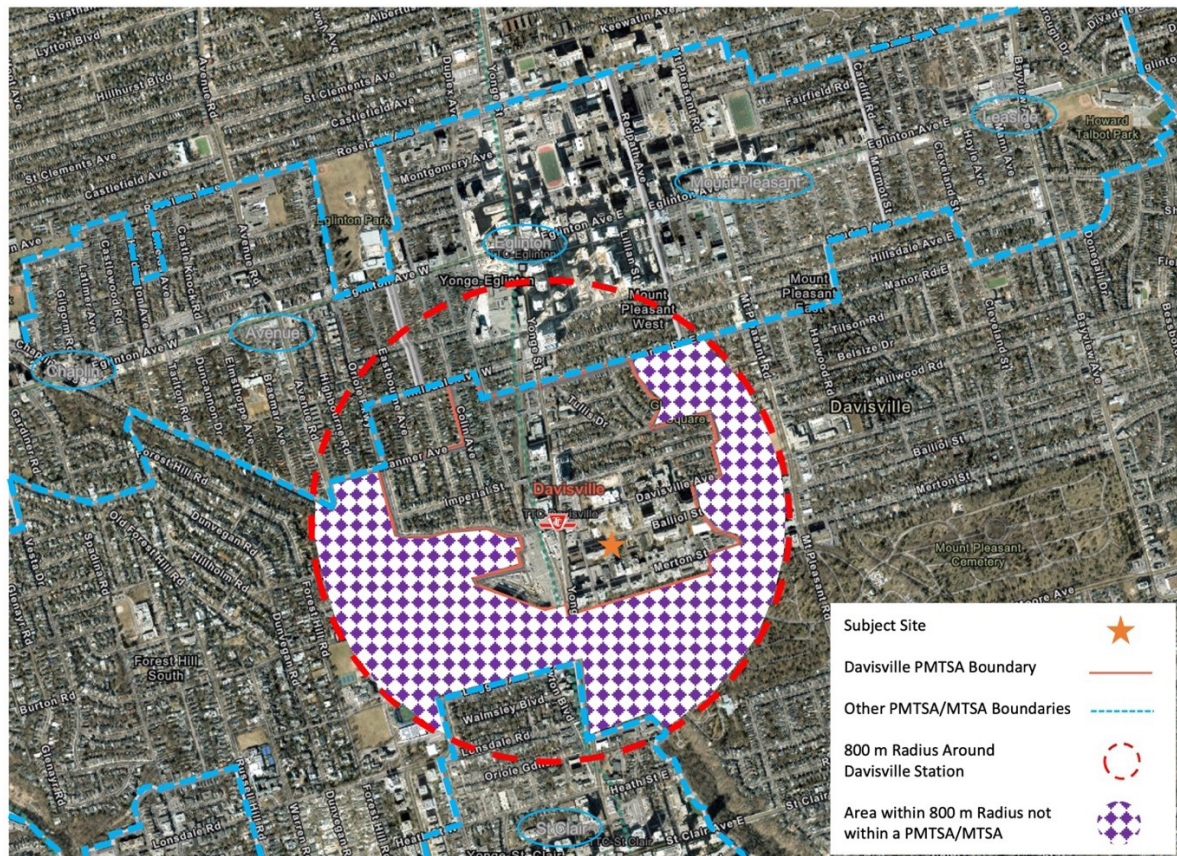


Figure 6: 800 metres surrounding Davisville Station and other PMTSAs/MTSAs

Given the Subject Site's proximity to Davisville Station, the misalignment of the Davisville Character Area YESP policies for height, the densities of approved and proposed developments, and the failure to maximize the delineation of the PMTSA, we formally recommend that OPA 570 be revised by replacing SASP 722 with the proposed SASP found within Appendix A of this report.

In our opinion, the minimum densities currently shown in SASP 722 are inappropriately low to allow support and encourage the type of pedestrian-oriented and transit supportive development, as is envisioned by Provincial Policy, the City's Official Plan and Yonge-Eglinton Secondary Plan, and would not capitalize on the public investment in existing and planned infrastructure such as municipal services, community facilities, roads, and transit, especially when considering the area's current access to multiple higher-order transit stations.

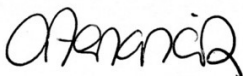
More specifically, we recommend that the development blocks that are adjacent to Davisville station and that front Yonge Street that are currently provided a 3.0 FSI be increased to 14.0 FSI to support an appropriately scaled built-form, specifically one that locates the highest heights and densities in the areas closest to the transit station. Appendix A also identifies that the development block to the north will be revised from 2.0 FSI to 6.0 FSI, further supporting the transition in heights and densities as distance

increases from Davisville station, but also due to its proximity to *Neighbourhoods*-designated lands to its north. An FSI value of 9.0 FSI for the development block that includes the Subject Site offers a transition between the development blocks adjacent to Davisville station and the development block to the north that are adjacent to *Neighbourhoods*. The recommended FSI values within Appendix A are further supported by the approved and proposed densities found within Figure 5 and Table 1 of this report.

We trust that the information included in this consultation letter is complete and comprehensive, and sufficient to allow for your review of the Davisville PMTSA and Official Plan Amendment 570 (SASP No. 722). Should you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,

WND associates
planning + urban design

A handwritten signature in black ink, appearing to read 'A Ferancik', written over a faint grey circular stamp.

Andrew Ferancik, MCIP, RPP
Principal

Appendix A: Proposed Revised Site and Area Specific Policy 722

Schedule "4" to Amendment 570 SASP 722.

Protected Major Transit Station Area – Davisville Station

a) Protected Major Transit Station Area Delineation

The area surrounding and including the existing Davisville Subway Station is a protected major transit station area shown as the Davisville Protected Major Transit Station Area on Map 1.

b) Residents and Jobs per Hectare

Existing and permitted development within the Protected Major Transit Station Area – Davisville Station is planned for a minimum population and employment target of 350 residents and jobs combined per hectare.

c) Authorized Uses of Land

The authorized uses of land are as identified by the land use designations on Map 17 and associated land use permissions in Chapter 4 of the Official Plan, applicable Secondary Plans and Site and Area Specific policies.

d) Minimum Densities

Minimum density requirements are shown on Map 2, represented in Floor Space Index.

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

