

February 2, 2023

Hon. Steve Clark  
Minister of Municipal Affairs and Housing  
777 Bay Street - 17th Floor  
Toronto, Ontario  
M7A 2J3

Dear Minister Clark:

**Re: Toronto Official Plan Amendment 570  
ERO Number 019-5937  
Ministry Reference Number 20-OP-227259**

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**Toronto Official Plan Amendment 570  
Major Transit Station Area - Site and Area Specific Policy 692  
Request for Modification to Delineation of Major Transit Station Area**

**Toronto Official Plan Amendment 570 Should be Modified to Include 220  
Royal York Road in the Major Transit Station Area**

We act for Choice Properties REIT with respect to this matter. We are making this submission to request that the Minister modify Official Plan Amendment 570 to include the Choice property at 220 Royal York Road in the delineation of the Mimico Major Transit Station Area (Site and Area Specific Policy 692). We are also requesting that the site be assigned a minimum density of 2 FSI in the modified mapping.

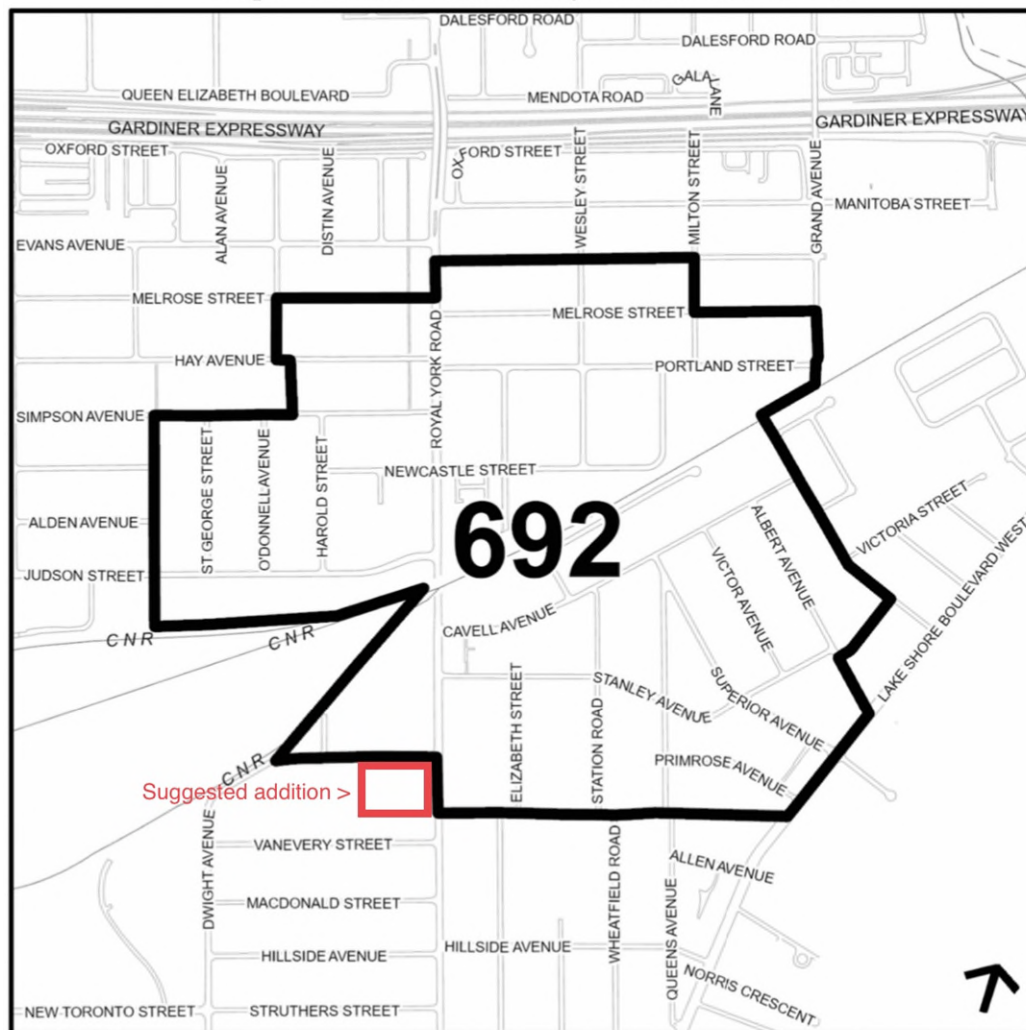
The site is currently occupied by a No Frills supermarket with extensive surface parking. The surface parking lot constitutes the overwhelming majority of the site - making it an ideal location for the type of infill and intensification being encouraged by the province in major transit station areas.



The 220 Royal York Road property is bordered on the north and the east by the City's delineation of the Mimico Major Transit Station Area. It makes sense that this site, with its strong redevelopment and intensification potential, should be added to the major transit station area which it borders on two sides.

Both sides of Royal York Road are found in the Mimico transit station area for almost its full length from five blocks north of the rail line south to one block south of the rail line. At that point, it inexplicably leaves out the west side of Royal York Road, while continuing south for another block.

### Map 1 – Mimico Protected Major Transit Station Area



We request that the delineation of the Mimico Major Transit Station Area be modified slightly to include both sides of Royal York Road, to the southern boundary of Site and Area Specific Policy area 692.

This submission is accompanied by a planning submission from Zelinka Priamo Ltd.

**Royal York Road Shopping Street is the North-South Axis of the Mimico Major Transit Station Area - 220 Royal York Road is the Southern Anchor of the Retail Street Axis and Should Be Included**

The Mimico Major Transit Station Area is structured along two axes. The east-west axis (on a slight diagonal) is the rail corridor. The north-south axis is Royal York Road. The Mimico GO Station is located at the intersection of these two axes.

The north-south spine, or axis, of the delineated Major Transit Station Area is Royal York Road - in a stretch largely corresponding to the Road's commercial strip. A series of retail and service uses are located along Royal York Road (predominantly on the west side), such as a butcher shop, restaurants, an advertising agency, stores, auto service garages, a gas station, and more. The regionally drawing San Remo Bakery is a major draw.

The supermarket at 220 Royal York Road (also on the west side) represents the southern anchor of this retail street, and is the logical conclusion of the north-south spine of the Mimico Major Transit Station Area. In terms of its place in the local neighbourhood context, as a key part of this retail street, the site should be added to the delineation of the transit station area.

**Size, Use, and Orientation of 220 Royal York Road Site Make it Ideally Suited for Infill and Intensification of the Type Encouraged By Provincial Policy in Major Transit Station Areas - With Potential to Replace an Auto-Oriented Site With a Pedestrian-Friendly Development and Streetscape**

The use currently operating at 220 Royal York Road is a No Frills supermarket. The store itself is located at the south-west corner of the site, set back from the street edges, with the vast majority of the site occupied by surface parking. The surface parking lot dominates the two frontages that border the Major Transit Station Area as delineated by the City - along Royal York Road and along Drummond Street.

This dated form of development results in an auto-oriented streetscape that is very different from what the City seeks to achieve in new development today. The opportunity exists to shift this site from an auto-oriented site, to one that is more pedestrian-friendly, and supportive of active transportation and public transit. That opportunity can be realized by formally including the site in the Mimico Major Transit Station Area. Such a redelineation would create the opportunity for appropriate redevelopment and intensification, just a short distance from the Mimico GO Station.

Because the site is somewhat larger than most along Royal York Road, it also offers the flexibility that can be used to develop a well-designed, mixed-use development that delivers additional housing, in a highly appropriate location. For example, the site has the potential to include residential intensification in combination with a new, integrated supermarket use on the site.

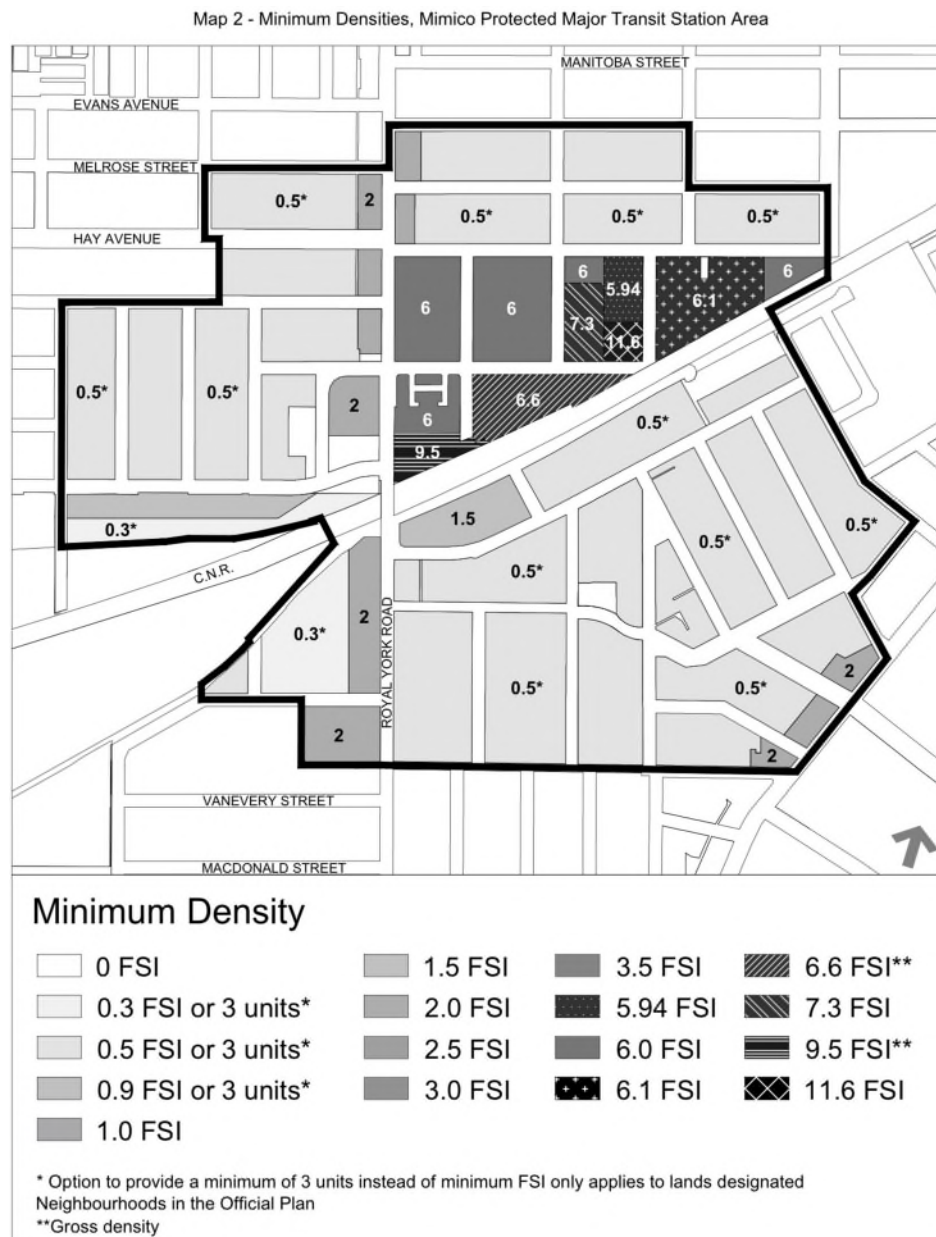
The neighbouring use to the west of the site (Mimico Arena) means that 220 Royal York Road can be developed for residential intensification with little impact on the local long-standing residential community.

**Addition of 220 Royal York Road to Mimico Major Transit Station Area Should Be Mapped With A Minimum Density of 2 FSI, Consistent With the Rest of the Royal York Road Spine**

In the City's Official Plan Amendment 570, almost all of the lands along the Royal York Road axis of the Major Transit Station Area have been designated in the minimum density mapping at 2 FSI. This density is found on the lands directly north of the site, on the west side of Royal York Road.

It makes sense to extend the Major Transit Station Area delineation to include the 220 Royal York Road site. Similarly, it makes sense that the minimum density mapping of 2 FSI should also be extended south to include the 220 Royal York Road Site.

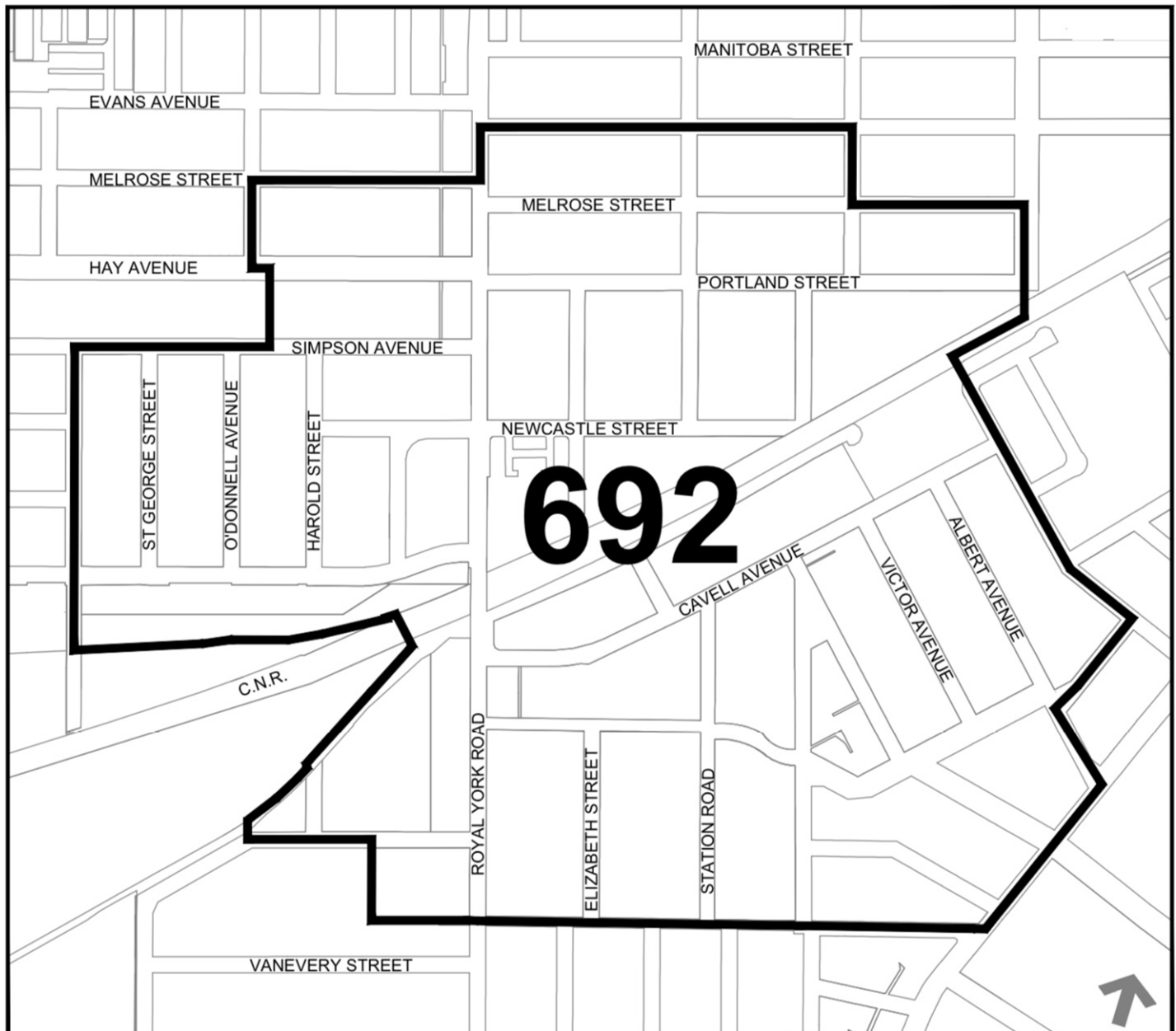
Below is a suggested replacement map showing the proposed minimum density mapping for the Mimico Major Transit Station Area (Site and Area Specific Policy 692) showing 220 Royal York Road at 2 FSI.





Site and Area Specific Policy 692, in Official Plan Amendment 570 should also be modified by inserting the below map showing a modified delineation of the area.

Map 1 - Mimico Protected Major Transit Station Area



## **Modification of OPA 570, Site and Area Specific Policy 692 to Include 220 Royal York Road at 2 FSI Would Better Achieve Growth Plan and Provincial Policy Goals for Major Transit Station Areas**

The Growth Plan for the Greater Golden Horseshoe directs that Major Transit Station Areas should include the establishment of minimum densities. This is done to ensure that growth, and intensification, especially of residential uses, is encouraged where public investment in public transit can serve those residents. That potential is maximized if 220 Royal York Road is included in the Major Transit Station Area focused on the Mimico GO Station.

It is significant that Growth Plan policy 2.2.4.2 directs that 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.”

The Growth Plan defines “*transit-supportive*” as “Relating to development that makes transit viable and improves the quality of the experience of using transit. It often refers to compact, mixed-use development that has a high level of employment and residential densities...”

The 220 Royal York Road site is clearly within walking distance of the GO station. The inclusion of the 220 Royal York Road site would help to better “maximize the size of the area and the number of potential transit users” in walking distance of the Mimico GO Station. It will also facilitate the kind of development described by the Growth Plan as transit-supportive.

It is clear that the inclusion of 220 Royal York Road in the Mimico GO Major Transit Station Area will ensure that the Official Plan Amendment better conforms with the Growth Plan policy requirements for such areas - especially as provided in 2.2.4.2.



The Provincial Policy Statement under the Planning Act includes policy 1.6.7.4, which reads as follows:

*“A land use pattern, density and mix of uses should be promoted that minimizes the length and number of vehicle trips and support current and future use of transit and active transportation.”*

By setting the stage to replace an auto-oriented use, with a transit-supportive, pedestrian-friendly development, the modification of Site and Area Specific Policy 692 to include 220 Royal York Road in the delineation of the Mimico Major Transit Station Area would be consistent with the Provincial Policy Statement.

**Conclusion: Minister Should Modify OPA 570 to Include 220 Royal York Road in the Mimico MTSA at 2 FSI**

Under section 3 of the Planning Act, the Minister - in making decisions - is required to act in conformity with the Growth Plan, and to make decisions that are consistent with the Provincial Policy Statement. By including 220 Royal York Road in the Mimico GO Major Transit Station Area at 2 FSI, the Minister would be acting in accordance with his section 3 obligations.

For the reasons noted in this submission, and in the accompanying planning submission from Zelinka Priamo Ltd., the Minister is asked to modify Toronto Official Plan Amendment 570.

The modification should be to substitute new maps in Site And Area Specific Policy 692 for the Mimico Major Transit Station Area including 220 Royal York Road in the delineated area at a minimum density of 2 FSI.

The Minister is asked to use the alternative mapping provided in this submission.

Yours sincerely,



AIRD & BERLIS LLP

Hon. Peter Van Loan  
Partner

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