

Isaac Tang
T: 416-367-6143
itang@blg.com

Lee English
T: 416-367-6169
lenglish@blg.com

Borden Ladner Gervais LLP
Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto ON M5H 4E3
Canada
T 416-367-6000
F 416-367-6749
blg.com



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DELIVERED BY EMAIL

Jennifer.Le@ontario.ca

Jennifer Le, Planner
Municipal Services Office - Central Ontario
16th floor, 777 Bay Street
Toronto, ON M7A 2J3

Dear Ms. Le:

Re: City of Toronto – Official Plan Amendment 570
ERO Number: 019-5937
Ministry Reference Number: 20-OP-227259
Comment Letter from Oulahen Team Realty Inc.

We are counsel to Oulahen Team Realty Inc. (“**Oulahen Team**”), a family-owned real estate company with many decades of experience in brokering, constructing and developing properties throughout the City of Toronto (“**City**”).

The Oulahen Team owns, controls or has an interest in the following lands in the North York area:

- 2 and 4 Greenview Avenue, 38 and 40 Finch Avenue West and 7 Eldora Avenue, generally located at the northwest corner of Greenview Avenue and Finch Avenue West (“**Greenview/Finch Lands**”);
- 4679-4685 Yonge Street, generally located at the northeast corner of Yonge Street and Avondale Avenue (“**Yonge/Avondale Lands**”);
- 25 Bonnington Place and 87, 91, 93 and 95 Sheppard Avenue East, generally located at the southeast corner of Sheppard Avenue East and Bonnington Place (“**Sheppard/Bonnington Lands**”);

collectively the “**Subject Lands**”.

The Subject Lands are within walking distance to existing subway stations along Yonge Street. The purpose of this letter is to request the Minister of Municipal Affairs and Housing (“**Minister**”) to increase the minimum densities in each of the Protected Major Transit Station Areas (“**PMTSA**”) applicable to the Subject Lands.

Greenview/Finch Lands

The Greenview/Finch Lands are within the Finch PMTSA, being Site and Area Specific Policy (“SASP”) 727 of OPA 570. Map 2 of SASP 727 establishes a minimum density of 1.5 FSI on the Greenview/Finch Lands. We ask the Minister to increase the minimum density for these lands given their proximity to the Finch Station and frontage along Finch Avenue West.

Yonge/Avondale Lands

The Yonge/Avondale Lands are within the Sheppard-Yonge PMTSA, being SASP 725 of OPA 570. Map 2 of SASP 725 establishes a minimum density of 3.5 FSI on the Yonge/Avondale Lands. We ask the Minister to increase the minimum density for these lands given their proximity to the Sheppard-Yonge Station and frontage along Yonge Street.

Sheppard/Bonnington Lands

The Sheppard / Bonnington Lands are within the Sheppard-Yonge PMTSA, being SASP 725 of OPA 570. Map 2 of SASP 725 establishes a minimum density of 1.0 FSI on the Sheppard / Bonnington Lands. We ask the Minister to increase the minimum density for these lands given their proximity to the Sheppard-Yonge Station and the dense, high-rise nature surrounding the Sheppard-Yonge Station that extends along Yonge Street and Sheppard Avenue East.

Minimum Densities in OPA 570 Do Not Respond to Provincial Policy

The minimum densities established in OPA 570 do not maximize the intensification potential of the lands near existing transit stations, including the Finch and Sheppard subway stations, and more specifically for the Subject Lands.

The Provincial policies contained in the Provincial Policy Statement (2020) and the Growth Plan (2020) promote and encourage compact urban form, intensification, optimization of the existing land base and infrastructure, and development that is transit-supportive. In particular, the Growth Plan encourages higher densities within Major Transit Station Areas and Strategic Growth Areas, within which the Subject Lands are located. Redevelopment of the Subject Lands with higher densities will result in an efficient use of land, cost-effectively utilize existing operational rapid transit infrastructure and community facilities, and contextually optimize the land base and significant public investment in the rapid transit infrastructure in close proximity to the Subject Lands.

Minimum Densities in OPA 570 Should Be Forward-Looking

OPA 570 as adopted does not respond to the Growth Plan direction to achieve complete communities that are compact, transit-supportive, and make effective use of investments in infrastructure and public service facilities. This is because the City’s approach appears to be based on existing and former development frameworks, as opposed to taking the opportunity to seek greater densities around major transit station areas.

As the June 20, 2022 City Staff report filed in support of OPA 570 notes:

The minimum density measures are based on existing Council-approved development frameworks, including: in effect Official Plan land use designations within the identified areas; as-of-right zoning by-law permissions; density permissions included in secondary plans; and approved developments that have not yet been built. (emphasis added)

The City's approach to establishing minimum densities in PMTSAs should be forward-looking and not limited by existing designations, zoning by-law permissions and development approvals. This approach would not meaningfully respond to the Province's goal of building 1.5 million homes by 2031 and serves as a lost opportunity to build more homes near transit.

We encourage the Minister to seize this opportunity to direct higher minimum densities in PMTSAs throughout the City and, specifically, in relation to the Subject Lands.

Regards



Isaac Tang

IT/LE

cc Client