



CANADIAN APARTMENT
PROPERTIES • REIT

11 CHURCH STREET, SUITE 401 TORONTO ON CANADA M5E 1W1
TEL: 416-861-9404 FAX: 416-861-9330

February 3, 2023

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

Attn: Jennifer Le

Dear Minister Clark,

Re: ERO Notice 019-5937
Ministry Reference Number 20-OP-22759
Approval of City of Toronto Official Plan Amendment No. 570
1 & 23 Oriole Road, City of Toronto

We are the owners of the Oriole Apartments municipally known as 1 & 23 Oriole Road in the City of Toronto (the “properties”). The properties are located at the north-east corner of the major street St Clair West and Oriole Road, and approximately 4.4 hectares in area. Currently there exists two 127-unit apartments of 4 and 8 storeys in height and a surface parking lot on the properties. The properties are less than 500 metres away from the St Clair subway station.

CAPREIT’s Request

As approved by the City of Toronto’s Council on July 22, 2022, Official Plan Amendment No. 570 (“OPA 570”) introduces various Site and Area Specific Policies (“SASPs”) for 57 Protected Major Transit Station Areas (“PMTSAs”). The properties are located within the delineation of the St Clair PMTSA and will be required to meet the specified minimum intensification targets as per SASP 721; a proposal we wholeheartedly support. However, it is our opinion that the properties’ specified minimum intensification targets of 0.5 FSI and 1.5 FSI are not appropriate and should be increased to meet the need for housing exacerbated by the housing crisis.

Even before the delineation of the St Clair PMTSA, the area surrounding the St Clair subway station has greatly intensified, and will continue to do so, in order to support the existing transit-oriented community and to optimize the use of land and infrastructure. We found that the FSIs of various proposed and existing developments surrounding the properties are magnitudes greater than the minimum densities proposed within the St Clair PMTSA. Within the past three years alone, developments proposing incredibly high densities between **5 and 13 FSI** were approved by City Council. This range does not even consider the densities of other nearby developments currently under review.

We are excited for the approved and proposed development applications within the St Clair PMTSA. Resultantly, we are writing to request an increase in the minimum densities outlined in SASP 721 of OPA 570, so they better align with what is proposed today and what will exist in the future. We propose a **minimum FSI of 7** is appropriate for the properties as shown in Appendix A. It is crucial that we, as a provider of affordable rental housing, are empowered by municipal policies to promote more intense and

transit-oriented developments to ultimately increase housing supply. We must recognize that larger and denser development must occur within the St Clair PMTSA to meet our future housing demand. As such, planning policies should not simply reflect what exists today.

We respectfully request that the minimum density within the St Clair PMTSA, for the reasons above, be increased from 0.5 FSI and 1.5 FSI to a new minimum FSI of 7 for the properties. Thank you for the consideration of CAPREIT's request. Should you have any questions or require any additional information, please contact the undersigned s.lo@capreit.net.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shawni Lo', is positioned above a horizontal line.

**Shawni Lo,
Director of Development
CAPREIT Apartments Inc.**

Appendix A – Modified Map 2

Map 2 – Minimum Densities, St Clair Protected Major Transit Station Area

