



February 3, 2023

Via Electronic Submission

Ministry of Municipal Affairs & Housing
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Attention: The Honourable Steve Clark
Minister

Dear Mr. Clark:

**Re: Environmental Registry of Ontario No. 019-5937
Ministry Reference No. 20-OP-227259
City of Toronto Official Plan Amendment No. 570**

We are the Solicitors for 244 Queen Street East Ltd., the owners of the lands municipally known as 244 Queen Street East, in the City of Toronto (the “**Property**”). We are writing on behalf of our client in response to the request from the Minister of Municipal Affairs and Housing (the “**Minister**”) for comments on City of Toronto Official Plan Amendment No. 570 (“**OPA 570**”). For the following reasons, our client requests that the Minister consider increases to the minimum densities outlined in the approved Site and Area Specific Policy 763 (“**SASP 763**”), establishing a Protected Major Transit Station Area for the Moss Park transit station (the “**Moss Park PMTSA**”).

The Property is located on the north side of Queen Street East, just east of its intersection with Sherbourne Street. *A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019*, as amended, directs that Major Transit Station Areas will be established generally within a 500-800 metre radius of a transit station. OPA 570 and SASP 763 appropriately includes the Property within the delineated boundary of the Moss Park PMTSA; however, SASP 763 proposes artificially low minimum densities for its subject lands which are inconsistent with the emerging built context for the Moss Park PMTSA. SASP 763 designates that properties with frontages along Queen Street East, including the Property, should obtain a minimum density of 2.0 FSI.

The Moss Park PMTSA has been an area of significant intensification in recent years. Under construction and approved buildings range between 17 and 43 storeys in height. The densities achieved by such buildings range, but are generally far greater than 2.0 FSI.

The emerging built context of the Moss Park PMTSA indicates that the City has set the minimum densities in the area too low. PMTSAs are meant to provide clear direction to municipalities,

residents and landowners as to where intensification will occur and in ensure that intensification supports complete communities with access to transit networks. The City of Toronto is improperly encouraging minimal intensification through the setting of low minimum densities in a manner that is not compliant with the Provincial policy directives, and in a way that could artificially constrain housing supply.

We are writing to request that the Minister increase the minimum densities proposed in SASP 763, as adopted by the City of Toronto through OPA 570, and in particular increase the minimum densities for the Property. In canvassing densities achieved near transit stations across the City, the minimum densities for lands in proximity of the Moss Park Station should be increased to an FSI of **at least 3.0**, with the ultimate FSI that is appropriate for the Property to be determined through the rezoning or minor variance process. This would facilitate more timely approvals for much needed residential development on lands having excellent access to planned and existing infrastructure while assisting the achievement of Provincial policy directions promoting intensification within strategic growth areas

Yours truly,

Cassels Brock & Blackwell LLP

A handwritten signature in blue ink, appearing to read 'RU', with a long horizontal line extending to the right.

Raivo Uukkivi

RU/JE/ves