

February 3, 2023

Ms. Jennifer Le
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sent via email

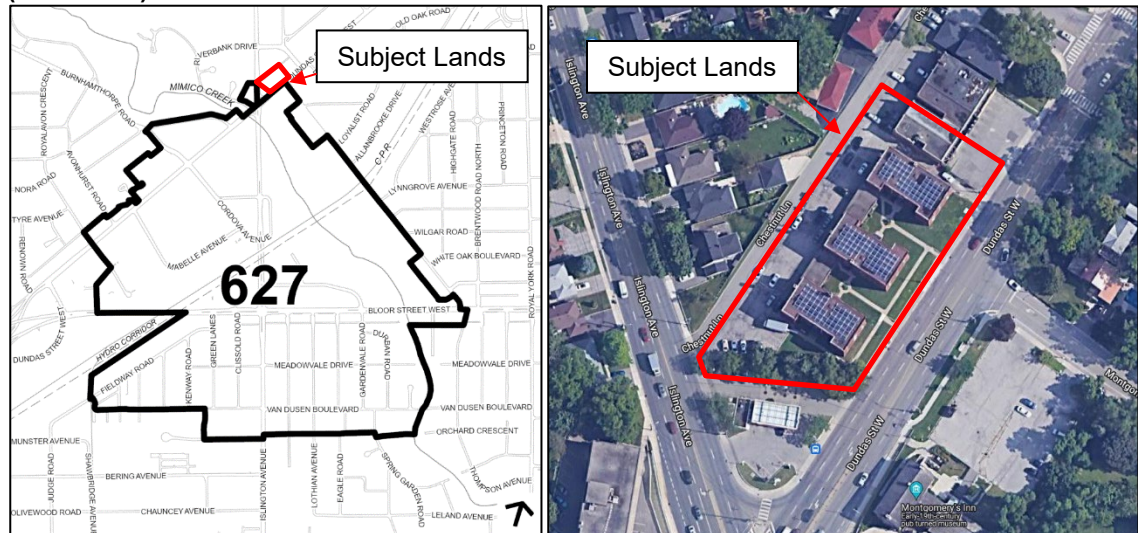
Dear Ms. Le:

ERO 019-5937 (APPROVAL TO AMEND A MUNICIPALITY'S OFFICIAL PLAN, CITY OF TORONTO OFFICIAL PLAN AMENDMENT 570)

Arcadis IBI Group is the planning consultant for 1564534 Ontario Ltd., 2464331 Ontario Inc., and 2464342 Ontario Inc. who are the owners of 4746, 4748, 4750, 4752 and 4754 Dundas Street West in the City of Toronto (the “subject lands”). On behalf of the owners, we are pleased to submit this comment letter in response to the Environmental Registry of Ontario (ERO) posting (019-5937) regarding the approval of Official Plan Amendment (OPA) 570, which involves the delineation and plan for 57 protected major transit station areas in the City of Toronto Official Plan.

The purpose of this letter is to request a Minister’s modification and approval of OPA 570 with the inclusion of the subject lands and adjacent properties within the proposed boundary of the Site and Area Specific Plan (SASP) 627, also referred to as the Islington Protected Major Transit Station Area (PMTSA) boundary (see **Figure 1**).

Figure 1. Location of Subject Lands in Relation to Draft Delineation of the Islington PMTSA (SASP 627)



The subject lands are municipally known as 4746, 4748, 4750, 4752 and 4754 Dundas Street West and are located immediately north of the intersection of Dundas Street West and Islington Avenue, both of which are Major Arterial roads, in the Etobicoke community of Toronto. The subject lands are comprised of several properties that occupy the majority of the block between Chestnut Hills Crescent and Islington Avenue. The subject lands have a total area of approximately 0.45 hectares (1.11 acres). As shown in **Figure 1**, the subject lands are located

directly adjacent to the northern extent of the proposed delineated boundary of the Islington PMTSA.

The subject lands are located within an area that is well serviced by community services and facilities including schools, parks, open space, recreational facilities, museums, and places of worship. The lands are also adjacent to Etobicoke Centre to the west, which provides residents with access to several retail and service uses that are accessible through the extensive active and public transportation network that exists within the area.

Several bus stops are located adjacent to and within proximity of the subject lands that provide residents with eastbound, westbound, northbound, and southbound service, and direct connections to the Kipling and Islington subway stations. Access to the public trail network is located immediately south of the subject lands, which provides residents with direct linkages to schools and community recreational facilities through Tom Riley Park. The public trail network provides several points of access to the broader pedestrian network, which connects to areas throughout Etobicoke Centre, including the nearby Islington subway station. As such, it is our opinion that the subject lands offer a great opportunity to facilitate future development that would support provincial and local objectives for transit-oriented development.

As shown in **Figure 1**, properties on the opposite side of Islington Avenue and Dundas Street West have been included within the proposed delineated boundary. It is our opinion that the inclusion of the subject lands within the proposed boundary will help facilitate the intensification desired for the PMTSA, as many properties within the PMTSA as currently delineated are constrained and have limited development potential, for example:

- The lands located on the opposite side of Dundas Street West, municipally known as 4709 Dundas Street West, are currently occupied by the Montgomery Inn, which is a Designed Cultural Heritage Asset under Part IV of the Heritage Act.
- Based on Toronto and Region Conservation Authority (TRCA) mapping, the entirety of 4800 Dundas Street West is located within a TRCA regulated area, for which more than half the lands are located within the conceptual floodplain. In comparison, the subject lands have no known cultural heritage resources and are located outside of the regulated area and conceptual floodplain.
- A large portion of the proposed PMTSA boundary is comprised of parks and open space, for which the minimum density target for a majority of the of the PMTSA has been proposed as zero (0) people and jobs per hectare. This includes Tom Riley Park, which occupies the eastern extent of the PMTSA.
- The southern portion of the proposed PMTSA, south of Bloor Street West, is predominately comprised of stable neighbourhoods. In accordance with Section 4.1 of the City of Toronto Official Plan (the "OP"), neighbourhoods are considered physically stable areas made up of residential uses in lower scale buildings such as detached houses, semi-detached houses, duplexes, triplexes, and townhouses, as well as interspersed walk-up apartments that are no higher than four storeys.

The redevelopment of the City's established neighbourhoods has historically been slow and a sometimes-contentious process, resulting in the delay of growth. In comparison, the subject lands provide an opportunity to expand the PMTSA boundary to include an area that is not part of the City's 'Neighbourhoods' designation and could be redeveloped to accommodate additional growth. As per Schedule 14 of the OP, the subject lands and adjacent properties are designated 'Mixed Use Areas', which are areas meant to achieve a multitude of planning objectives by combining a broad array of residential uses, offices, retail and services, institutions, entertainment, recreation and cultural activities, and parks and open spaces (Section 4.5). It is the intent of our client to redevelop the subject lands with a mixed-use development that would support the

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achievement of greater density and a mix of uses and would support local objectives for resident and job growth within the PMTSA if included.

As the inclusion of only the subject lands could create an oddly configured boundary limit, it is recommended that the boundary be expanded to include the subject lands and adjacent properties that form the block bordered by Dundas Street West, Islington Avenue, Chestnut Lane, and Chestnut Hills Crescent (see **Figure 2**). The inclusion of the block would create a natural rounding out of the limit of the PMTSA boundary that is reflective of the existing streetscape. In addition, the inclusion of the adjacent properties would create an opportunity for the comprehensive development of the lands into a larger mixed-use development that would act as gateway to the PMTSA.

Figure 2. Location of Lands Recommended for Inclusion within Islington PMTSA Boundary



Given the Province's stated goal of building 1.5 million homes over the next decade, the development of lands with direct access to existing or planned transit should be prioritized. By modifying the boundary to include the subject lands and adjacent properties, it would support the City's goals of creating mixed-use, complete communities and support the achievement of greater intensification in transit-supportive areas.

Thank you for this opportunity to provide comments on the approval of OPA 570. Should you require any additional information or have any questions, please do not hesitate to contact the undersigned.

Yours truly

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