

Hon. Steve Clark, MPP, Minister
Ministry of Municipal Affairs and Housing
Municipal Services Office – Central Ontario
777 Bay Street – 13th Floor
Toronto, ON M7A 2J3

Attn: Jennifer Le

February 3, 2023

Re: Letter of Support for Increased Leslieville PMTSA Minimum Density Requirements
City of Toronto Official Plan Amendment 570
Site and Area Specific Policy 765
ERO No.: 019-5937
Ministry Reference No.: 20-OP-227259
33 & 39 Davies Avenue, Toronto

On behalf of 'Davies Ave Holdings Inc. & 39 Davies Ave Holdings Inc.' & First Gulf (First Gulf), Urban Strategies Inc. is pleased to submit this planning analysis letter in support of updated minimum density requirements for the planned Leslieville Protected Major Transit Station Area (the "PMTSA"). This letter presents a particular focus on *Employment Areas* and how they may be utilized to assist in realizing the population and job targets within PMTSAs through encouraging the highest and best redevelopment potential via increased minimum density provisions. In particular, we looked at how those areas can encourage the highest and best redevelopment potential via increased minimum density provisions through the inclusion of policy language so as to optimize employment areas to allow for economic growth and the appropriate higher density office redevelopment that contributes in a meaningful way to the provision of much needed new jobs to support the development of new residential developments in the same designated area.

Request to Minister

Based on our planning analysis, we recommend that the lands designated as *Core Employment* in the Leslieville PMTSA be required to develop at a minimum density of 1.5 times floor space index (FSI). However, higher densities should be encouraged in order to optimize full redevelopment potential and the highest and best use on these sites. In addition, for *Core Employment* lands, the policies of OPA 570 and SASP 765 should permit densities that enable building massing and higher than mid-rise heights that are appropriate to encourage higher employment density uses, such as office uses.

Requiring an increased minimum density of 1.5 times FSI will enable the appropriate redevelopment of these *Core Employment* lands with office uses on sites well-served by transit and adjacent to the Downtown, while protecting the existing retail areas along Queen Street East and stable residential *Neighbourhoods* from any adverse impacts. Unlike the *Employment Areas*, the *Core Employment*

designation in the Leslieville PMTSA is located between the Don Valley corridor and *Apartment Neighbourhoods*, allowing for transition to lower-rise *Neighbourhood* land uses further east.

Given this context, the *Core Employment* areas within the Leslieville PMTSA represent a unique city-wide opportunity for new office intensification and accordingly an increase in jobs. Furthermore, an increase to the proposed minimum density provisions in SASP 765 is required coupled with policy language that encourages office supportive densities so as to ensure this key city-building opportunity is capitalized on.

We therefore recommend that the Minister consider amendments to SASP 765 to facilitate the provision of office supportive densities. Our recommended policy is as follows:

“Within *Core Employment* areas where higher employment density uses, such as office, are proposed, densities which exceed the minimum densities shall be encouraged.”

The revised policy language and mapping are attached in Appendix A and B.

Description of the Leslieville PMTSA

The planned Leslieville Station of the Ontario Line and surrounding PMTSA represent an important opportunity for intensification in the Leslieville and Riverside communities. The Leslieville PMTSA is bounded by Dundas Street East to the north, the Don Valley Parkway to the west, Eastern Avenue to the south, and Brooklyn and Winnifred Avenues to the east as outlined in Figure 1. The majority of the area is built out, given the following factors specific to the Official Plan land use designations of this PMTSA area:

- Most of the lands within the PMTSA are low-rise residential areas designated as *Neighbourhoods* – these areas are not likely to dramatically change or intensify;
- A stable *Apartment Neighbourhoods* area is located in the west of the PMTSA, closest to the Don Valley Corridor area of *Core Employment* uses and provides an appropriate transition from the *Core Employment* area to *Neighbourhood* areas;
- A *Core Employment Area* designation runs along the western edge of the PMTSA against the Don Valley Parkway, including the 33 & 39 Davies Avenue site, with another *Core Employment Area* located along the rail corridor located south of the planned Ontario Line station – both areas appropriate for intensification.
- Queen Street East is generally designated for *Mixed Use Areas* and likely to, where redeveloped, take the form of lower/midrise redevelopment; and
- A *General Employment Area* is centered along Carlaw Avenue.



Figure 1. Leslieville PMTSA on Maps 18 and 21– Land Use Designations from City of Toronto Official Plan

As per OPA 570 and SASP 765, the proposed minimum density targets range from 0.5 to 2.0 FSI for various sites within the Leslieville PMTSA. This is far below the densities of recent approvals in the area such as the mixed-use development at 77-79 East Don Roadway and 661-667 Queen Street East, which has a total FSI of 6.77. While the proposed minimum densities represent a minimum threshold, City of Toronto policies commonly restrict significantly higher densities. In practice, artificially low minimum density targets have constrained new employment development to levels below market requirements. Moreover, high employment densities and an increase in job opportunities readily accessible by rapid transit should not be discouraged in a planned PMTSA, especially when Official Plan policies state that opportunities for new office buildings should be provided “along the Don Valley corridor and/or within walking distance to higher order transit” (2.2.4.2.d).

33 & 39 Davies Avenue

First Gulf’s development proposal for 33 & 39 Davies Avenue demonstrates how *Core Employment* lands can be optimized to achieve the highest and best use of a site’s redevelopment potential. Currently, the minimum densities and policies adopted by the City in OPA 570 and SASP 765 do not meaningfully encourage this type of much needed office intensification in the Leslieville PMTSA area. Such policies

would not enable office redevelopment, such as the one proposed at 33 & 39 Davies Avenue, to be feasible.

This site is presently occupied by a converted industrial building with small-scale boutique office uses and surface parking lot. A rezoning application was submitted in 2021 that proposed redevelopment with a significant addition of office space in the form of a 19-storey office building that would accommodate over 1,000 full-time jobs. The site is designated *Core Employment Areas* by the City of Toronto Official Plan and is intended to feature employment uses such as the office use proposed by the application. It's location on a highly-visible site overlooking the Don Valley Parkway, adjacent to the Downtown to the west and *Apartment Neighbourhood* to the east, and the site's close location to higher order transit on Queen Street, Broadview Avenue, and the planned Ontario Line Leslieville Station, present a distinct opportunity for intensification of the site to create Class A office space.

After receiving comments from City staff on the original Zoning By-law Amendment, the proposal was resubmitted in January 2023 with a revised massing of 15 storeys and density of 13.80 FSI – understood by our client to be the minimum density able to support a viable critical mass for the project and market requirements for office development. First Gulf has confirmed that without the increased density requested in the application, the viable uses on the site are limited to a self-storage facility or car dealership, uses that do not yield the same number of jobs. This is exemplified by many sites of similar size and scale in the area. To this point, the City of Toronto has not supported the level of density and building floor plates and height required to meet market needs and support project viability and therefore unlocking the full intensification potential of the site.

We trust that in submitting this letter to the Minister, we have underscored the importance of encouraging higher minimum densities for employment and job-generating uses within *Core Employment* on sites within the Leslieville PMTSA.

Yours very truly,
URBAN STRATEGIES INC.



Melanie Hare, FCIP, RPP
Partner

APPENDIX A

SASP 765. Protected Major Transit Station Area – Leslieville Station

a) Protected Major Transit Station Area Delineation

The area surrounding and including the planned Leslieville Subway Station is a protected major transit station area shown as the Leslieville Protected Major Transit Station Area on Map 1.

b) Residents and Jobs per Hectare

Existing and permitted development within the Protected Major Transit Station Area – Leslieville Station is planned for a minimum population and employment target of 300 residents and jobs combined per hectare.

c) Authorized Uses of Land

The authorized uses of land are as identified by the land use designations on Maps 18 and 21 and associated land use permissions in Chapter 4 of the Official Plan, applicable Secondary Plans and Site and Area Specific policies.

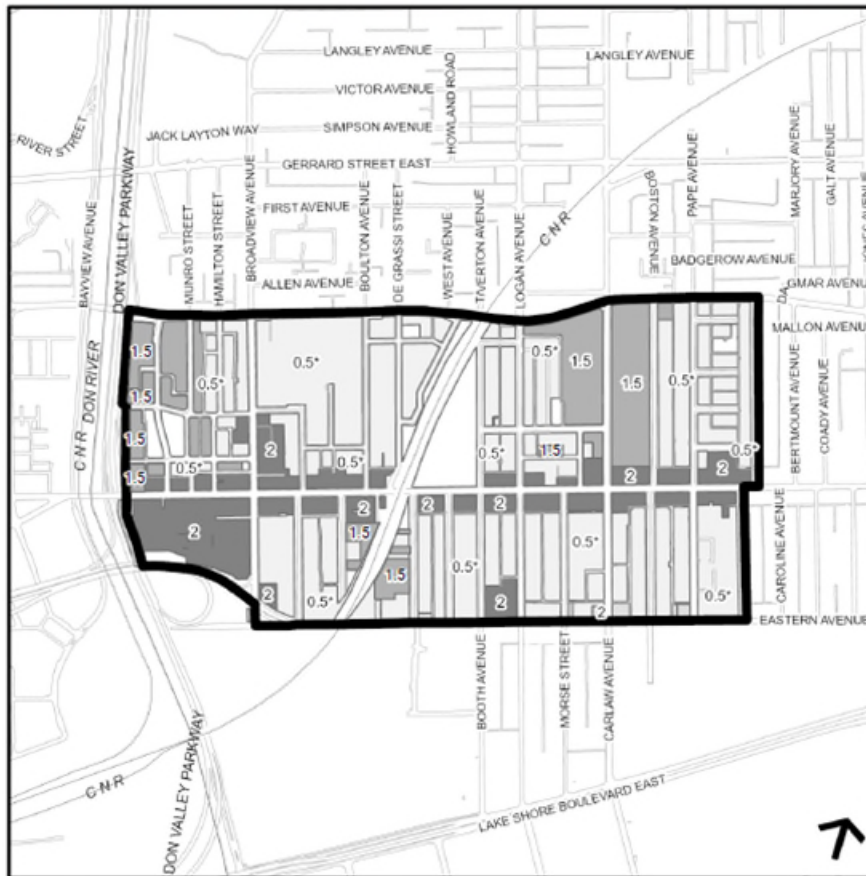
d) Minimum Densities

Minimum density requirements are shown on Map 2, represented in Floor Space Index. Within Core Employment areas where higher employment density uses, such as office, are proposed, densities which exceed the minimum densities shall be encouraged.

APPENDIX B

City of Toronto By-law -2021

Map 2 – Minimum Densities, Leslieville Protected Major Transit Station Area



Minimum Density

0 FSI	1.0 FSI	2.5 FSI
0.3 FSI or 3 units*	1.5 FSI	3.0 FSI
0.5 FSI or 3 units*	2.0 FSI	3.5 FSI
0.9 FSI or 3 units*		

*Option to provide a minimum of 3 units instead of minimum FSI only applies to lands designated Neighbourhoods in the Official Plan.