



Zelinka Priamo Ltd.

LAND USE PLANNERS

VIA ONLINE SUBMISSION

February 2, 2023

Honourable Steve Clark, Minister of Municipal Affairs and Housing
C/O Municipal Services Office – Central Ontario
777 Bay Street, 16th Floor
Toronto, ON
M7A 2J3

Attention: Erika Ivanic

Dear Minister Clark:

Re: City of Toronto OPA 570
ERO # 019-5937 / Ministry Reference # 20-OP-227259
City of Toronto Official Plan Review
Comments on Behalf of Choice Properties REIT
Our File: CHO/TOR/21-01

We are the planning consultants for Choice Properties REIT (“**Choice**”) regarding the **City of Toronto Official Plan Amendment (“OPA”) 570** adopted on July 22, 2022, which introduces delineations for Protected Major Transit Station Areas (“**PMTSAs**”) and associated policies, as directed by the *Planning Act* and *Growth Plan*. The delineations, minimum floor space indexes (“**FSI**”), and target area-wide densities are to be implemented through Site and Area Specific Policies (“**SASP**”) by By-law 889-2022. **As detailed within this letter, we respectfully request that the Province consider modifications to the boundary of the Mimico GO Station PMTSA, being SASP 692, for the reasons outlined herein.**

CHOICE LANDS

Choice owns a number of properties throughout the City of Toronto, including the lands municipally known as 220 Royal York Road (“**Choice Lands**”), with additional frontage along the south side of Drummond Street (**Figure 1**). The Choice Lands are currently developed with a food store (No Frills) and associated surface parking areas.

Figure 1: Aerial view of Choice Lands

The Choice Lands are designated on Map 15 of the Official Plan as Mixed Use Areas, which permits a range of retail, service, recreation, entertainment, institutional, and residential uses in varying scales and forms. Further, the Choice Lands are zoned Commercial Retail (CR 3.0 (c3.0; r2.2) SS2 (x869)) as per Toronto Zoning By-law 569-2013, as amended.

SASP 692 – MIMICO GO STATION PMTSA

The Choice Lands are approximately 550m south of Mimico GO Station, which provides residents with direct access to downtown Toronto and the wider Greater Toronto Area via the Lakeshore West GO Line.

As shown in **Figure 2**, the Choice Lands are immediately adjacent to the adopted PMTSA boundary for Mimico GO Station. The southern extent of the adopted PMTSA boundary ceases at the centre line of Drummond Street and Royal York Road adjacent to the Choice Lands. Directly at the intersection is a small square parcel, 226 Royal York Road (not under Choice ownership), which is currently occupied by automotive-related uses.

Figure 2: Aerial view of Choice Lands and adopted Mimico GO PMTSA boundary (SASP 692)



REQUESTED MODIFICATIONS TO SASP 692

On behalf of Choice, we respectfully submit a request to the Minister to modify the boundary of the adopted Mimico GO Station PMTSA to include the Choice Lands at 220 Royal York Road, which are immediately adjacent to the boundary as currently proposed by SASP 692. In our opinion, the exclusion of the Choice Lands on the south side of Drummond Road is a missed opportunity.

In order to maintain the contiguous nature of the PMTSA, we suggest that the boundary be modified to include both the Choice Lands and the parcel known as 226 Royal York Road (together, the “**Requested Lands**”) directly at the intersection of Drummond Street. The proposed boundary adjustment would provide for approximately 1.1 ha of additional developable land to the PMTSA. **The minimum FSI for the Requested Lands is proposed to be established at 2.0.**

To facilitate this request, modifications to the boundary of SASP 692 will be required. No changes to the Policy’s text are proposed. A proposed boundary map is attached herein as **Appendix A**.

PLANNING RATIONALE

Choice is supportive of the Province’s direction to increase densities within the vicinity of higher-order transit stations in order to decrease car reliance, accommodate population growth, and realize the full potential of transit investments. As such, Choice encourages the consideration of their lands as part of the Mimico GO PMTSA for the reasons outlined below.

Walkshed Analysis

As per the City of Toronto Staff Report dated June 20, 2022 for OPA 570, the PMTSA boundaries were delineated using the following methodology:

“... an analysis of walking distance from the station using existing and planned sidewalks, trails, and city-maintained pathways. Parcels within an estimated 10-

minute walk (approximately 500 – 800 metres) of the station are included within the proposed delineated area. The analysis also included identifying accessible connections and barriers for those with mobility impairments.”

As shown in **Figure 2**, at a distance of approximately 550m, the Requested Lands are well within 800m of the Mimico GO Station. Barrier-free pedestrian access to Mimico GO Station is achieved to and from the Requested Lands via Windsor Street, which results in an approximately 750m travel distance. The walking distance between the Requested Lands and Mimico GO Station is further reduced by use of the pedestrian staircase from Royal York Road just north of the rail line, which results in a travel distance of approximately 600m. We note that the PMTSA delineation, as adopted, encompasses lands at a greater distance than the Requested Lands. For example, the lands fronting onto Willowbrook Road between Simpson Avenue and Judson Street have an approximate travel distance of 900m.

The route to Mimico GO Station from the Requested Lands is direct, and entirely along a Major Street (Royal York Road). In our submission, the context of the Requested Lands' location in proximity to Mimico GO Station and existing infrastructure render the Requested Lands to be appropriate and desirable to consider inclusion within the PMTSA boundary under SASP 692. These considerations are consistent with the *Growth Plan*, and with the methodology utilized by the City of Toronto in delineating their PMTSA boundaries.

Redevelopment Feasibility

The Requested Lands exhibit characteristics that would be favourable for redevelopment in the near- to- medium-term. As per Policy 4.5 of the Toronto Official Plan, Mixed Use Areas are directed to achieve a broad mix of uses and, *“absorb most of the anticipated increase in retail, office and service employment ... as well as much of the new housing.”* The Toronto Official Plan has therefore identified the Requested Lands as a location planned to accommodate growth through redevelopment.

The approximately 1 ha Choice Lands are developed with a single-storey food store, and the majority of the site is occupied by surface parking. With frontage along Royal York Road, in our opinion the Requested Lands are appropriate lands to consider redevelopment at a transit-supportive density to encourage transit ridership.

Additional Considerations

Provincial legislation established specific instances where Inclusionary Zoning (“IZ”) may be implemented, including for lands located within a delineated PMTSA. By modifying the boundary of SASP 692 to include the Requested Lands, there will be an increase of land on which IZ can be applied, thereby increasing opportunities for secured affordable housing units within walking distance to Mimico GO Station.

Opportunities to apply IZ are important to consider in the context of SASP 692, which includes a significant component of low-density residential neighbourhoods. These neighbourhoods are considered stable and not expected to be significantly redeveloped over the horizon of the *Growth Plan*. The Requested Lands represent an opportunity for redevelopment in the near- to- medium-term on an area suitably sized for any number of uses contemplated by the Mixed Use Areas designation.

Proposed Minimum FSI

As per the aforementioned Staff Report, the adopted minimum density provisions were applied so as to not exceed the maximums that are already established on individual properties by way of Official Plan and/or secondary plan policies, zoning permissions,

and approved development applications. The minimum FSIs adopted as part of SASP 692 range from 0.3 to 2.0, which are applied on a site-specific basis in accordance with their existing regulatory and development context.

In recognition of applicable policies and as-of-right zoning permissions, as well as what is contemplated for the surrounding lands, **a minimum FSI of 2.0 is appropriate to consider for the Requested Lands.** A minimum density of 2.0 FSI on the Requested Lands does not conflict with applicable policies and is consistent with the adopted minimum FSI of neighbouring lands included in the adopted PMTSA that share the same site-specific CR zoning as the Requested Lands, and would be an appropriate minimum to encourage growth in an area appropriate to accommodate growth.

We encourage the minister to consider Choice Properties' request to modify the Mimico GO PMTSA boundary to include their lands at 220 Royal York Road. In recognition of the Requested Lands' proximity to Mimico GO Station, their near- to-medium-term development potential and the existing pedestrian network, the proposed adjustment to the PMTSA is consistent with the *Provincial Policy Statement*, conforms with the applicable policies of the *Growth Plan*, represents good planning and is in the public interest.

Please kindly ensure that the undersigned is notified of any further modifications, approvals, and/or notices with respect to this posting. We reserve the opportunity to provide further comments in the event that additional information becomes available.

Should you have any questions, or require further information, please do not hesitate to contact us.

Yours very truly,

ZELINKA PRIAMO LTD.



Jonathan Rodger, MScPI, MCIP, RPP
Principal Planner

cc. Choice Properties REIT (via email)

Appendix A

Proposed Modification to Map 1 – Mimico Protected Major Transit Station Area (SASP 692)



