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February 22, 2018

Paul Farish
Senior Planner, Strategic Initiatives
City Planning Division
Metro Hall, 22nd Floor
55 John Street
Toronto, ON
M5B 3C6

Dear Mr. Farish:

**RE: MIDTOWN IN FOCUS PLANNING STUDY
COMMENT SUBMISSION
OUR FILE: Y429E**

On behalf of our client Davpart Inc., the owner of the property located at 1910 Yonge Street (hereinafter the "Subject Lands" as shown on the **Figure 1**), we submit the following comments regarding the Midtown in Focus Planning Study and the associated proposed Yonge-Eglinton Secondary Plan (hereinafter "the proposed Secondary Plan").

PROPOSED YONGE- EGLINTON SECONDARY PLAN

We have reviewed the proposed Yonge-Eglinton Secondary Plan, dated November 2017, as they pertain to the Subject Lands. We request that certain amendments to the proposed Secondary Plan to be made as follows:

1) Rectifying Mapping Inconsistency Issues

The proposed Secondary Plan has identified the Subject Lands to be wholly within the proposed new "Secondary Plan Boundary" and the "Station Area Cores" around the Toronto Transit Commission (TTC) Davisville subway station. The entire Subject Lands are also identified to be within the proposed "Midtown Cores – D.2 Davisville Station" character area. However, Maps 21-6 and 21-9 of the proposed Secondary Plan, which relate to the development potential and maximum tall building heights in the Davisville area, have excluded the northern portions of the Subject Lands from the Davisville character area.

Given the unity of ownership of the Subject Lands, and that the Subject Lands have already been identified to be wholly within the “Midtown Cores – D2. Davisville Station” character area, we believe the entirety of the Subject Lands should be included within the “Davisville Area” character area as identified on Maps 21-6 and 21-9 of the proposed Secondary Plan, and that the “Infill Development Potential” and “Maximum Height Range” provisions be extended across the Subject Lands in its entirety accordingly.

We therefore request that the Davisville Area character area boundary as identified on Map 21-6 and 21-9 of the proposed Secondary Plan be amended so that the entirety of the Subject Lands are included within the character area with associated provisions extended across the Subject Lands, and bring the two aforementioned maps to consistency with the “Midtown Cores – D2. Davisville Station” character area boundary on Map 21-12.

2) Increasing Height and Density Provisions on the Subject Lands

Notwithstanding the above mapping inconsistency issues, the proposed Secondary Plan identified the Subject Lands to have “Infill Development Potential” with a “Maximum Height Range” of “20-23” storeys. We believe that 30 to 40 storeys would be a more appropriate maximum height for the Subject Lands.

The Subject Lands are located immediately adjacent to the TTC Davisville subway station (a Major Transit Station Area as defined by the Growth Plan) with a direct, automated entrance to the station.

Section 2.2 of the Growth Plan, 2017 directs growth to be focused on locations with existing or planned higher-order transit, and that areas surrounding a subway station shall have a minimum gross density of 200 people and jobs per hectare. The City’s Official Plan also directs growth to areas such as those growth-designated areas particularly well served by rapid transit as per Policy 2.2.2.

Furthermore, Policy 4.4.1 of the proposed Secondary Plan states that the “Midtown Cores” will be vibrant and mixed use areas centred around major transit stations, and amongst the Cores, the intensity of development in the “D2. Davisville Station” areas (and others) will be significantly less than what exists and is planned at the “D1. Yonge-Eglinton Crossroads” area. Our proposed maximum height range of 30 to 40 storeys for the Subject Lands will be consistent with aforementioned Policy 4.4.1 of the proposed Secondary Plan, of which the height, scale, and form of intensification for the Davisville Station area will remain significantly less than the maximum height of tall buildings envisioned in the Yonge-Eglinton area (e.g. 70, 56, 48, and 45 storeys).

We therefore request that the maximum height range for the Subject Lands as shown on Map 21-9: Maximum Tall Building Heights (Davisville Area) to be increased to 30 to 40 storeys.

3) Lack of Provisions to Cap Parkland Dedication or Equivalent Cash-In-Lieu

The proposed Secondary Plan’s Policies 3.29 and 3.2.40 would require a parkland dedication or equivalent cash-in-lieu rate of 0.4 hectares per 300 units for development in the Yonge-Eglinton Secondary Plan area. Policies 3.29 and 3.2.40 do not mention a cap for the land contribution or equivalent cash-in-lieu in

accordance with Chapter 415, Article III, Provision 23 of the Toronto Municipal Code, which caps the land contribution or equivalent cash-in-lieu to 10% of the overall land area for residential development on sites less than one hectare in size and 15% for sites greater than one hectare in size.

We request that Policies 3.29 and 3.2.40 of the proposed Secondary Plan specifically reference the alternative rate provisions in the Toronto Municipal Code vis-à-vis the required parkland cap.

Thank you for consideration of our comments.

We look forward to continuing working with Staff through the Midtown in Focus Planning Study process and the associated Yonge-Eglinton Secondary Plan and Midtown Parks and Open Space Network Plan and Citywide Parkland Strategy.

Yours truly,

MHBC

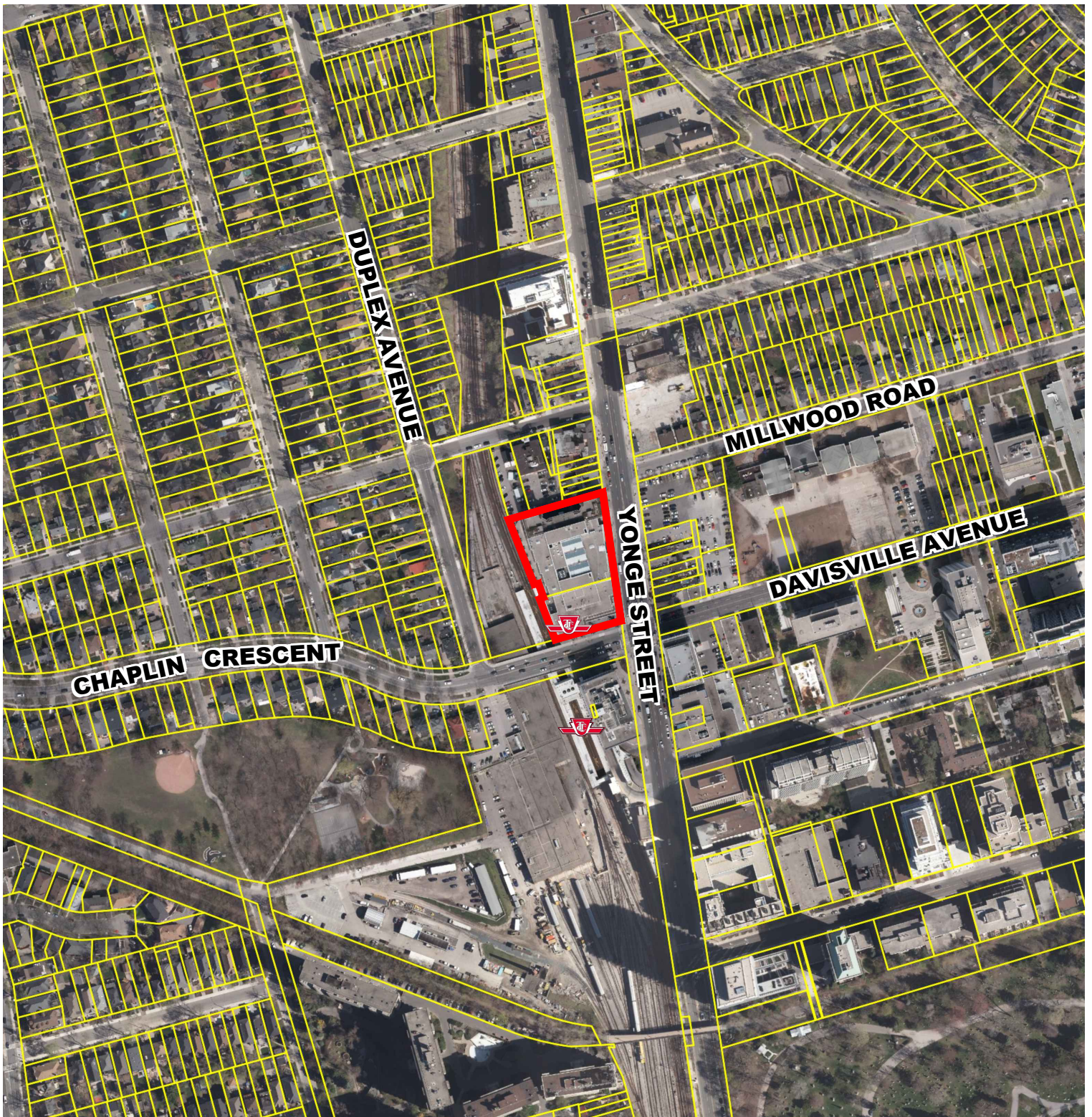


David A. McKay, MScPl, MCIP, RPP
Vice President & Partner



Edwin Li, MScPl
Planner



cc. City Clerk
Manager, Strategic Initiatives
Client



Data Source: First base Solutions Aerial Flown 2017

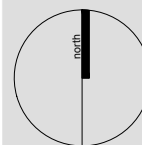
Figure 1
Location Map

LEGEND

-  Subject Lands
-  Davisville Subway Station Entrances

DATE: February 5, 2018

SCALE 1:4000



1910 Yonge Street,
Toronto, Ontario

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