



IBI GROUP
300–8133 Warden Avenue
Markham ON L6G 1B3 Canada
tel 905 763 2322
ibigroup.com

June 28, 2021

Ana Bailão, Deputy Mayor & Chair, Planning and Housing Committee

[Attention: Nancy Martins, Committee Administrator](#)

City of Toronto
100 Queen Street West
M5H 2N2

Dear Chair & Members of the Planning & Housing Committee:

PH25.8 - OUR PLAN TORONTO: KEELE-ST. CLAIR LOCAL AREA STUDY – DIRECTIONS REPORT

Thank you for this opportunity to provide comments on behalf of our clients, Sequoia Grove Homes, the owners of 1799 St. Clair Avenue West (the subject site), regarding the Keele-St. Clair Local Area Study (KSC LAS), the draft Official Plan Amendment (OPA) for the St. Clair-Old Weston SmartTrack/GO Transit Protected Major Transit Station Area (PMTSA) and the preliminary assessment of the potential employment conversion of the subject site. This site currently houses Delta Bingo and is the closest site to the planned station location on the south side of St. Clair Avenue, fronting onto St. Clair and the future Davenport Road Extension.

Having reviewed the staff report and associated materials that the Planning and Housing Committee is scheduled to receive on June 28, 2021, we would like to offer the following comments:

1. APPRECIATION OF APPROACH TO KEELE-ST. CLAIR AREA

Overall, we wanted to thank staff for a report that reflects the request for flexibility in relation to key planning principles put forth by the Sequoia Grove Homes team and other neighbouring landowners. Further, the approach supports the conversion of the Delta Bingo site to a mixed-use designation, includes draft policies for a Protected MTSA and envisions an overall approach to transit-supportive density and complete communities, while relying on future Site and Area Specific Policies to deal with more granular aspects of development.

2. PROTECTED MAJOR TRANSIT STATION AREA (PMTSA)

We are supportive of the staff recommendation to delineate a Protected Major Transit Station Area around the SmartTrack/GO Transit station in a manner that generally provides flexibility for individual sites and developments. Given the limited right of appeal of a PMTSA, we feel that establishing goals that leave room for site-specific solutions is important to successfully achieving a complete community within the MTSA. An overly prescriptive policy framework, on the other hand, can make it financially impractical to achieve the broad range of policy goals on individual development sites.

3. DENSITY, HEIGHT AND ANGULAR PLANE

A prime example of this flexible approach is ensuring that the overall goal of achieving transit-supportive complete communities within the MTSA is achieved while recognizing that it entails “some individual sites not meeting the minimum population and employment targets while others exceed the minimum targets.”

Similarly, rather than establishing prescriptive height and density limits, we agree with establishing general height ranges and angular plane guidelines within each of the Focus Areas through future Site and Area Specific Policies (SASPs) and hope these will be retained as guidelines, rather than policies within the Official Plan. Establishing minimum FSI targets, as opposed to maximums for individual development blocks, is also a good means of ensuring the MTSA achieves its ultimate targets for affordable housing and employment. That said, we believe that the minimums should be reflective of the realistic development potential of these blocks. For example, the newly constructed townhouse block on northwest side of the station site (Birdstone Crescent) is assigned a minimum FSI of 2.5, but is unlikely to redevelop any time in the near future. Instead of trying to distribute densities broadly, including to areas where short- and medium-term redevelopment is unlikely, they should be concentrated more immediately in the station vicinity, where landowners are already undertaking coordinated redevelopment plans.

In regard to height, flexibility should also be provided recognizing that, even within Focus Areas and development blocks, there are sites closer to St. Clair Avenue as well as the proposed station. Furthermore, new grade variations will be introduced with the implementation of the Davenport Road extension which should be considered when determining compliance with any angular plane provisions. Angular planes are also only one means of ensuring appropriate transitions and mitigating built form impacts. Within the study area, the City has already implemented sixty-degree angular planes in recognition of the need to facilitate appropriate development. In more urban contexts the City has also considered minimum separation distances from neighbourhoods as opposed to angular planes. This could also be considered here, in an area that will urbanize rapidly in proximity to important transit investment. Regardless of the approach, reasonable flexibility within the provision of any angular planes or other measures, such as modest intrusions of balconies or non-livable space, should be considered here. Policies in respect to height and density should also recognize the variability of sites within the area, many of which have irregular shapes and/or require dedications in order to facilitate the implementation of the Transportation Master Plan, or otherwise require flexibility in order to reflect the gradual transition of the corridor. Also, in keeping with long-standing City practice, calculation of FSI on sites conveying land for roads and parkland should be done on a gross site basis.

We note that our site is the closest site to station on the south side of St. Clair Avenue and presents an opportunity for mirroring the station site to create a gateway of architectural significance. In this context, we respectfully submit that limiting the site to heights in the 20-35 storey range, notwithstanding that higher heights can be achieved on the site with the application of the Council-adopted Tall Building Guidelines (including the application of a 45-degree angular plane), is overly restrictive and inappropriate given that proper transition and separation can be achieved. A key objective for the site is to provide for a transit-supportive amount of employment and affordable housing, but to do so with meaningful intent, a greater flexibility in the proposed built form policies is required.

Planning & Housing Committee – June 28, 2021

4. AFFORDABLE HOUSING AND INCLUSIONARY ZONING

We understand that the City is in the process of finalizing its framework for implementing Inclusionary Zoning and we are supportive of the need to provide affordable housing in all new developments, particularly in proximity to major, new transit infrastructure.

We are in the process of finalizing our own plans for a transit-supportive, mixed use, high-rise development at 1799 St. Clair Avenue West, which will include an appropriate supply of affordable housing. We look forward to working with Council and staff to ensure our development achieves the City's broader goals related to affordable housing and achieving a complete community within the MTSA.

5. EMPLOYMENT CONVERSION AND NON-RESIDENTIAL USES

We have not filed an Employment Conversion Request as part of the Municipal Comprehensive Review of the Official Plan but are supportive of Staff's preliminary assessment for Assessment Area 8, which includes the subject site, that a re-designation to a Mixed Use Area may be appropriate, subject to certain minimum requirements.

We believe that the final Site and Area Specific Policy for Assessment Area 8 should be reflective of the larger approach within the PMTSA, providing flexibility that allows for the ultimate achievement of the broadest range of policy goals for the area. If individual sites or blocks are burdened with a complex combination of minimum requirements for employment and affordable housing and community amenities etc., the cumulative effect could be to render redevelopment financially unfeasible and have the unintended effect of sterilizing prime development lands, and thereby undermine the short- and long-term realization of the MTSA. Establishing balanced, site-specific policies that ensure adequate employment, affordable housing etc. are being provided without being onerous will ensure redevelopment is viable and proceeds at a proper pace as infrastructure improvements are implemented.

We are very cognizant of the need to provide employment, affordable house, community uses, amenity spaces and other elements of a successful complete community in our plans for redeveloping our client's underutilized site, as they proceed towards a formal development application.

6. PARKLAND/PUBLIC REALM POLICIES

Similarly, we agree that this is an area of the City that would benefit substantially from new parkland and that, where feasible, on-site dedication of parkland should be provided. However, recognizing that some sites are constrained (e.g. by the road network, the rail corridor etc.), we believe flexibility is a key consideration in order to ensure the ability to provide parkland is maximized, including by looking at off-site opportunities to expand and enhance existing parks, rather than trying to provide an on-site dedication that provides no value or benefit to the growing community.

7. CONCLUSIONS

Thank you for the opportunity to provide this letter and contribute to the ongoing substantial consultation with stakeholders that has been undertaken in the development of the LAS. We understand that important work is still to be undertaken in turning the draft policy directions into

Planning & Housing Committee – June 28, 2021

the final OPA that will guide the development of the MTSA over the coming years. We look forward to continuing to engage in dialogue with City staff, the area Councillors and neighbouring landowners in order to ensure an OPA is approved in the fall that provides an appropriate policy context for optimizing the development of the study area lands.

Please contact the undersigned should you have any questions regarding our submission.

IBI Group Professional Services (Canada) Inc.

A handwritten signature in black ink, appearing to be 'Amy Emm', written in a cursive style.

Amy Emm MCIP RPP

Associate, Manager - Planning

cc: Client