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CONSULTING**

planning + urban design

TE11.4.11

**City of Toronto
Mayor and Members of Council**

Toronto City Hall,
10th Floor, West Tower
100 Queen Street West
Toronto, Ontario, M5H 2N2

December 12, 2019
File 8997

ATTN: Marilyn Toft, Council Secretariat

**Re: Main Street Planning Study - City-Initiated Official Plan Amendment - Final Report
Proposed Draft Official Plan Amendment 478
Planning Application No. 18 159105 SPS 00 OZ
Item #TE11.4 – City Council**

Weston Consulting is the planning consultant and authorized agent for 2720 Danforth GP Inc. c/o Katalyst Real Estate Corp. (“Katalyst”), the registered owner of the lands municipally addressed as 2720-2734 Danforth Avenue (herein referred to as “subject lands”), which are located within the Main Street Planning Study Area. Katalyst also owns lands located at 15 Chisholm Avenue directly west of the Main Street subway station.

The purpose of this correspondence is to submit comments on City Planning Staff’s Proposed Draft Official Plan Amendment 478 (“Draft OPA 478”) which was prepared as a result of the Main Street Planning Study. Weston Consulting, together with our client, have participated in and been involved in the Main Street Planning Study since its 2018 start. We appreciate the opportunity to provide feedback.

Draft OPA 478 would apply to lands within the Main Street Planning Study Area, inclusive of the subject lands, and be implemented by amending Chapter 7 of the Toronto Official Plan through a new Site and Area Specific Policy No. 577.

Parking

Section 5 of Draft OPA 478, related to Parking and Loading, encourages measures to reduce parking demand including car-share facilities and shared parking among uses. While we support these proposed policies to reduce parking demand, it is our opinion that this section of Draft OPA 478 should be augmented to include additional policies that support reduced parking requirements for developments that are within a short distance from higher order transit facilities such as subway or GO commuter rail stations, in accordance with similar provincial policies guiding growth within *major transit station areas* such as subsection 2.2.4.9 c) of the Growth Plan for the Greater Golden Horseshoe (2019).

Housing

Section 9.2 of Draft OPA 478, related to housing, states the following:

9.2 To achieve a balanced mix of unit types, and to support the creation of housing suitable for families, development containing more than 80 new residential units will include:

- a) a minimum of 10 per cent of the total number of units as three-bedrooms units; and*
- b) a minimum of 25 per cent of the total number of units as units with at least 2 bedrooms.*

Section 9.2, as currently drafted, would apply to new residential developments within the Main Street Planning Study Area containing more than 80 new dwelling units, and would require these new developments to dedicate a minimum of 25% of the total unit supply to 2-bedroom units and a minimum of 10% of the total unit supply to 3-bedroom units. It is our understanding that the proposed requirements under Section 9.2 would be applied to residential developments regardless of the proposed tenure, and therefore would apply with equal force to both purpose-built rental buildings and to residential condominium projects.

Furthermore, based on our review of the Final Report, dated November 15, 2019, we also understand that this policy is intended to achieve the Main Street Planning Study principle of “*Supplying a Range of Housing*”. Furthermore, as stated within the policy itself, the intent of Section 9.2 is to “*achieve a balanced mix of unit types, and to support the creation of housing suitable for families*”.

While we agree that municipalities should continue working with private residential developers to deliver a range and mix of housing types and sizes in accordance with provincial policy, it is unclear about the origins of the 80-unit threshold and how it applies to different types of ownership.

Based on our experience, the unit mix of larger residential developments, and the ability to achieve a specific ratio of unit types and sizes is invariably tied to site-specific factors and evolving contingencies including built form constraints, the operational requirements of new buildings and market demand. This consideration is particularly relevant to the Main Street Planning Study Area which encompasses a large area of the City and contains a range of different lot types and site-specific geographical characteristics.

In addition to the above, it is not clear how City Staff determined the specific ratio requirements under Section 9.2 and why the proposed 25% minimum requirement for the supply of 2-bedroom units is 10% higher than the minimum supply recommended by the City’s Draft Growing Up Guidelines (May 2017), which recommends that “*15% of the units should be two bedroom units.*”

We request that the comments contained above be appropriately reviewed and incorporated, as necessary, into subsequent draft policy documents to be released. Furthermore, Weston Consulting and our client would like to reserve the right to provide further comments on the policies and/or schedules related to OPA 478 and the Main Street Planning Study as it relates to the future

development of the subject lands and adjacent lands and respectfully request to be notified of any future reports, public meetings and decisions in relation to this matter.

Thank-you for reviewing this request. If you have any questions regarding the above comments, please contact the undersigned at extension 225 or Jason De Luca at extension 253.

Yours truly,

Weston Consulting



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Associate

cc. Kunal Adhikari, 2720 Danforth GP Inc. c/o Katalyst Real Estate Corp.
Daniel Woolfson, Senior Planner, City of Toronto