

December 16, 2019

City of Toronto  
His Worship John Tory and Members of Council  
Toronto City Hall  
100 Queen St. W.  
Toronto, ON. M5H 2N2

**Re: Main Street Planning Study - Amendment No. 478 to the Official Plan: Site and Area Specific Policy No. 577. Main Street between Danforth Avenue and Gerrard Street East, and Danforth Avenue between Main Street and Dawes Road  
Planning Application No. 17 278384 STE 31 OZ  
Item #TE11.4 – City Council**

Your Worship and Members of Council,

We are writing on behalf of Tawse Realco Inc. ("Tawse" or "our client"), owner of 2494 Danforth Avenue (the "Site"), with regards to the Main Street Planning Study ("Staff Report") and the proposed Official Plan Amendment ("OPA 478"), dated November 15, 2019. The purpose of this letter is to express our client's concern with policies proposed in OPA 478 that would affect their Site.

By way of background, in December 2017, our client applied for a Zoning By-law and Official Plan Amendment (File No. 17 278384 STE 31 OZ) for the Subject Property to transform an existing 2-storey commercial building into a continuing care retirement home and rental apartment building (the "Proposed Development"). The 2017 Proposed Development includes a 7/10-storey (11,441 m<sup>2</sup>) retirement home that incorporates retail uses on the first and second floors and a 4-storey (1571 m<sup>2</sup>) rental apartment building, providing an increase in valuable and much needed seniors housing types and employment in the City.

Site and Area Specific Policy No. 552. Danforth Avenue between Coxwell Avenue and Victoria Park Avenue, also known as Amendment No. 420 to the Official Plan ("OPA 420"), was adopted by City Council on July 23, 2018. Our Client along with CP REIT Ontario Properties Limited and Choice Properties Limited Partnership (collectively "Choice Properties"), brought forward separate appeals of OPA 420 to the Local Planning Appeal Tribunal (the "Tribunal") on April 02, 2019. Our client participated in Mediation with the Tribunal on December 4, 2019.

Our client is concerned that by including reference to policies from OPA 420 which are not yet approved by the Tribunal, adoption of OPA 478 will enforce policies which are not in effect,

creating complications for interpreting the policies that apply to the subject site. We recommend that OPA 478 be postponed until OPA 420 is settled, or that Section 7.1 not be included in SASP 552.

### **OPA 478**

While we support the general intention of OPA 478, our client has concerns with Section 7.0 Built Form. The Site lies within “Character Area A” in Section 7.1 as identified on Map 5 (Character Areas Map). Section 7.1.1 of OPA 478 states that development in Character Area A will conform to those policies set out in Site and Area Specific Policy 552, which as mentioned above are still under appeal.

Our client would also like to ensure that the unique use of their proposed development at 2494 Danforth Avenue, as a Continuum of Care Retirement Home, including Assisted Living and Memory Care, is not subject to policies set out in Section 9.2 regarding the balanced mix of unit types, which are directed at typical residential developments.

In our opinion OPA 478 (SASP 552) is premature until such time as the LPAT has made its decision regarding OPA 420.

### **Consultant’s Report**

In addition to the above concerns with the SASP as drafted, we wish to point out some inaccuracies related to the subject site in the Consultant’s September 2019 report. The site is identified on pg. 14 Built Form Plan as Site A with an existing development application. The heights noted on the built form plan are incorrect: the image suggests a 7-storey element on the north segment of the development site, whereas the original proposal contemplated 4-storeys in this location. Moreover, the accompanying statistics table has incorrect information about the proposed development. The GFA shown is twice as much as proposed as residential GFA for the retirement home, office GFA is indicated where none was proposed, and the number of residents resulting for the site is about 3.5 times as many as proposed (599 in the table vs. 169 retirement home residents). The table shows no jobs associated with the development, but the proposed retirement home would provide upwards of 81 FTE jobs on the site.

The staff report makes clear that this work is not considered an MTSA review under s.26 of the *Planning Act*, however it nevertheless remains a concern the Study did not encompass the entire 800m area around Main Subway Station and Main/Danforth GO Station to calculate the total existing and potential density to ensure that the level of development being planned for meets the Growth Plan targets. By only including the potential new density in the more limited Study Area, the total number of Gross People and Jobs per hectare shown at the bottom of the table on pg.17 (578 r + j per hectare) is misleading. Without a thorough MTSA study, it remains unclear if the

density shown meets the Provincial growth targets for these two highly important MTSA's. Finally, it should be noted that this Built Form analysis assumes that the entire stretch of Danforth Avenue within the Study Area, including lands immediately adjacent to Main TTC Station is developed with 7-8 storey mid-rise buildings. Not only does this seem like an underutilization of lands at key transit stops, but also assumes that there will be significant lot consolidation and demolition of the existing built form. Both point to a potential scenario of under-planning for the lands around station areas within the timeframe established in the Growth Plan.

Thank you for your consideration.

Please provide the undersigned with notice of any further consideration or decision respecting this matter.

Yours truly,

URBAN STRATEGIES INC.



Emily Reisman, MCIP, RPP  
Partner



Inger Squires, MCIP, RPP  
Associate

cc. Lynda MacDonald, Community Planning  
David Neligan, Aird and Berlis  
Joseph Gesualdi, Tawse Realco Inc.