



PLANNING AND URBAN DESIGN

25 January 2024

Chair Perks and Members of the Planning and Housing Committee  
Toronto City Council  
City Hall, 100 Queen Street West,  
Toronto, ON  
M5H 2N2

**Attention: Members of Planning and Housing Committee**

**RE: Zoning for Midtown Apartment Neighbourhoods  
Draft Zoning By-law Amendment  
250 Roehampton Avenue – Site-Specific Comment Submission**

WND File No.: 23.538

WND Associates has been retained by DD Acquisitions Partnership as the planning consultant for the lands municipally known as 250 Roehampton Avenue in the City of Toronto (“the Subject Site”). The Subject Site is subject to Official Plan Amendment 405 (“OPA 405”) as per the June 2019 approval of the Yonge-Eglinton Secondary Plan (“the Secondary Plan”) by the Ministry of Municipal Affairs and Housing.

On 30 November 2023, City Planning released a Draft Zoning By-law Amendment (“the Draft By-law”) relative to the Apartment Neighborhoods Character Areas of the Yonge-Eglinton Secondary Plan (“the Secondary Plan”). On 8 January 2024 Notice of the Statutory Public Meeting of the 29 January 2024 Planning and Housing Committee was received. This letter provides comments to Planning and Housing Committee in advance of its meeting on January 29 and highlights issues with the proposed zoning standards relative to 250 Roehampton Avenue. Namely, under the Draft By-law, the Subject Site is proposed to be brought into the **Residential Apartment (RA) Exception 807** Zone category with an associated maximum height of 35 storeys (108 metres), a minimum FSI of 2.0 times lot area and a requirement that 40% of the lot be landscaping.

The Subject Site is located on the north side of Roehampton Avenue, approximately 700 metres northeast of the intersection of Yonge Street and Eglinton Avenue East and the Eglinton Subway Station on Line 1. The Subject Site is also located less than 100 metres to Mount Pleasant LRT Station on Line 5 – Eglinton Crosstown. The Subject Site has an area of 3,323.14 square metres and frontage of 58.06 metres on Roehampton Avenue and is currently occupied by an 11-storey rental apartment building. The Subject Site falls within the Yonge-Eglinton Urban Growth Centre delineation of the 2019 Growth Plan for the Greater Golden Horseshoe, which is an area anticipated to absorb a significant amount of population growth in the coming decades through intensification.

The Subject Site is designated *Apartment Neighbourhoods* in the City of Toronto Official Plan and is within the *Redpath Park Street Loop* Character Area of the Yonge-Eglinton Secondary Plan (“OPA 405”). The *Redpath Part Street Loop* Character Area sets out the following anticipated height range policy direction:

*“5.4.3.f. Redpath Park Street Loop: 35 to 50 storeys, with the tallest buildings along the south side of Roehampton Avenue and heights generally decreasing from south to north and from west to east.”*

Under OPA 405, the Subject Site is also within the *Secondary Zone* of the Mount Pleasant Station Area *Core*, which is an area of the Secondary Plan where growth is intended to be focused. The Subject Site is further within the overlap of two Council-adopted Protected Major Transit Station Areas (“PMTSAs”): i) Eglinton Station (Line 1), and ii) Mount Pleasant Station (LRT). While Official Plan Amendment 570 (“OPA 570”) is currently pending approval from the Minister, it remains applicable Council-adopted policy direction which sets out areas surrounding transit as being the focal points of new growth and development. Under both PMTSAs, the Subject Site is assigned a minimum density of 2.0 times the area of the lot. Additionally, the planned minimum people and jobs per hectare target is 600 for Eglinton Subway Station and 350 for Mount Pleasant Road. The policies of the Secondary Plan encourage the exceedance of these minimum targets where it can be achieved and the Subject Site is no exception being within two PMTSAs (Policy 2.4.4). The Subject Site is currently zoned **Residential (R) (d2.0)** under By-law 569-2013.

In August of 2023, WND Associates attended a Pre-application Consultation (“PAC”) Meeting with City staff and presented a development concept for a 47-storey residential building which in our opinion conformed with the Secondary Plan. In our view, and based on the PAC Checklist and minutes we received, this conversation with City staff was agreeable in nature. We would be pleased to continue these discussions as our client works towards submission of development applications in accordance with the policies of the Yonge Eglinton Secondary Plan which identify this site for the potential for height up to 50 storeys and with the provision of OPA 580 and the policies of a PMTSA.

While it is positive that the site is being recognized for its tower potential, setting the maximum height for the site at the minimum-end of the height range anticipated for the area is not appropriate, and does not help our clients achieve a viable project or expedited as-of-right entitlements to providing transit supportive density in a newly opening PMTSA and much needed purpose built rental housing. The proposed zoning of 35 storeys also falls short in the context of two recent approvals at 77 Roehampton Avenue and 170 Roehampton Avenue which achieved much greater heights of 50 and 49 storeys respectively<sup>1</sup>. Setting the maximum as-of-right height closer to 50 storeys is in our opinion more appropriate to allow for the compact, complete and mixed use development form of intensification anticipated by the overarching Provincial and Municipal planning policy framework for this area, and is more in keeping with these two recent approvals.

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<sup>1</sup> Council also approved, and Staff supported in Final Reports, nearby developments at 77 Roehampton Avenue and 170 Roehampton Avenue which introduced higher maximum or lower minimum standards relative to many of the regulations proposed in this Draft By-law.

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In our view, the 2.0 FSI is also too low of a standard and should be increased to at least a minimum of 12 to 14 to account for the strong transit context of the Subject Site by nature of its location at the overlap of two MTSAs and both LRT and subway transit modes.

On behalf of our client, we have conducted a review of the Draft By-law. Taken together, the standards proposed in the Draft By-law are, in our opinion, inappropriate and overly onerous for our client's site and do not adequately reflect our PAC discussions with City staff, nor would the standards provide for a development which fits harmoniously within the existing and planned context of the surrounding *Apartment Neighborhoods* areas under an as-of-right scenario.

The proposed standards in particular with respect to tower separation distances, setbacks, stepbacks, tower floorplate, landscape open space, balcony projections, and unit sizes are overly onerous for the Subject Site and frustrate our client's ability to implement the policy direction of the Secondary Plan and PMTSA on an as-of-right basis or through future development applications should this By-law come into force as drafted. Specifically, the landscaping requirements for 40% of the lot area and reflect an antiquated 'tower-in-the-park' development model and the tower separation distances are too limiting for new density and towers which is inconsistent with the more contemporary policy framework of the City-wide Official Plan and Secondary Plan and not realistically buildable.

In our opinion, the development concept presented during the PAC Meeting in 2023 represents a built form program which conforms to the policy intent of the City-wide Official Plan and Yonge-Eglinton Secondary Plan. This development concept is in our view more appropriate for the Subject Site on an as-of-right basis and would fit harmoniously within the surrounding area context.

Prior to adoption of the By-law, we would be pleased to meet with Planning Policy Division staff to discuss the merits of the Draft By-law and the alternative standards which we would propose in keeping with the conceptual plans presented during the PAC process previously undertaken by our client. Should Council proceed with further adoption of this Draft By-law we request the undersigned be circulated on any Notice(s) of Decision.

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Yours very truly,

**WND associates**  
planning + urban design

A handwritten signature in black ink, appearing to read "A Ferancik".

Andrew Ferancik, MCIP, RPP  
Principal and President

cc: Matt Armstrong, Senior Planner, Strategic Initiatives and Policy Analysis  
Nancy Martins, Administrator, Planning and Housing Committee, [phc@toronto.ca](mailto:phc@toronto.ca)  
John Elvidge, City Clerk  
DD Acquisitions Partnership