

May 8, 2024

Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of Committee:

Re: PH12.3 – Expanding Housing Options in Neighbourhoods: Major Streets Study – Final Report

We are the planning consultants to the Times Group Corporation, who are the owners of the lands municipally known as 2425-2427 Bayview Avenue and 1 The Bridle Path (“the subject site”).

The subject site is designated *Neighbourhoods*. It is approximately 0.67 hectares in size and has approximately 89.3 metres of frontage along Bayview Avenue, which is identified as a major street on Map 3 of the Official Plan. The subject site is occupied by a single-detached house, with the balance graded for the development of 20 three-storey townhouse units, based on a site-specific zoning by-law approved in 2009. The construction of this project stopped in 2012, and the property changed hands three times prior to our client acquiring it in 2023. Our client is exploring opportunities to redevelop the site at a greater intensity than what is currently permitted.

On behalf of our client, we would like to express our support for the general directions set out in draft Official Plan Amendment 727 and the associated draft Zoning By-law Amendment being presented to the Planning and Housing Committee. Specifically, we are in support of permission for apartment buildings of up to six storeys on sites designated *Neighbourhoods* along major streets, such as the subject site, at a level of intensification beyond the prevailing building type. In our opinion, establishing as-of-right permission for greater heights in these locations is an important step to creating more housing opportunities for existing and future residents of Toronto.

While we are generally in support of the proposed draft Official Plan Amendment and draft Zoning By-law Amendment, we respectfully request two modifications to the draft instruments, as follows:

- Introduce alternative language for proposed Policy 4.1(12)(c) of the draft Official Plan Amendment, with respect to setbacks; and
- Remove the maximum unit count included in the draft Zoning By-law Amendment.

Policy 4.1(12)(c) of the draft Official Plan Amendment directs that setbacks generally meet the setbacks permitted by the zoning of adjacent parcels. The lots adjacent to the subject site currently have large setback requirements, including a 12-metre front yard setback. These setbacks are reflective of the existing character of the area with low-rise, detached dwelling units on large lots, and are not reflective of current built form and urban design direction for a mid-rise form. Accordingly, we recommend the following alternative language (our modifications are in bold):

For properties in Neighbourhoods that are located along major streets shown on Map 3, development proposing intensification beyond the prevailing building type and lot patterns of the geographic neighbourhood will:

*(c) Have **regard for** setbacks that generally meet those permitted by zoning for adjacent properties, unless the established development pattern along the major street is **characterized by deep lots or predominantly** reversed lot frontages, in which case the front yard setback along the major street will be determined in accordance with Policy 13.*

We respectfully disagree with the inclusion of a maximum dwelling unit count in the draft Zoning By-law Amendment. In our opinion, the number of units permitted on a parcel should be dictated by what can fit within an appropriate built form, rather than by a cap. With respect to the subject site, given its size and context, an apartment building with more than 30 units can be accommodated without unacceptable built form impact. Evaluating the number of units on a site-specific basis will facilitate more housing, which aligns with the City's intent of the Expanding Housing Options in Neighbourhoods initiative.

We would like to reiterate our support for greater as-of-right opportunities for intensification and height on properties designated *Neighbourhoods* on major streets and thank City Staff for their efforts in bringing these amendments forward. We appreciate the Planning and Housing Committee considering our requested modifications outlined above. If you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,

Bousfields Inc.



Peter F. Smith B.E.S., MCIP, RPP

CC. Hashem Ghadaki, Times Group Corporation