



**Toronto City Council**

c/o City Clerk's Office  
City Hall, 100 Queen Street West  
Toronto, ON  
M5H 2N2

July 21, 2025

**Subject: Item 2025.CC32.20 Opposition to Settlement - 220, 230, 240 Lake Promenade & 21 & 31 Park Boulevard (Agenda**

**Dear Mayor Chow and Members of City Council,**

On behalf of the ABC Residents Association (ABCRA), I am writing to express our opposition to the proposed settlement between the City of Toronto and the applicant for 220, 230, 240 Lake Promenade and 21 & 31 Park Boulevard, which is scheduled for consideration at the July 23 Council meeting.

We recognize that this site lies outside our own catchment area. However, the scale and character of the proposal raise broader city - wide concerns about planning precedent, tenant displacement, infrastructure adequacy, and environmental protection - concerns relevant to all Toronto communities.

We are also troubled by the process that has brought this settlement forward. The original staff report cited serious inconsistencies with the Provincial Policy Statement and the City's own Official Plan. The proposed settlement increases

both density and unit count beyond what Council previously rejected - yet the rationale for reversing that opposition has not been clearly articulated.

Council previously rejected this application and directed staff to oppose it at the Ontario Land Tribunal (OLT). At that time, the proposed density was 4.64 times the lot area (129,344 m<sup>2</sup>). The revised proposal now seeks 5.42 FSI (154,982 m<sup>2</sup>) - an increase of over 20% from the plan Council originally rejected. This figure is more than five times the maximum density permitted under By-law 569-2013 (1.0 FSI) and would enable high-rise development in a low-rise residential area not identified for growth in the City's Official Plan.

Although 548 rental replacement units are included, there is no net gain in affordable housing. The unit mix has also shifted with 55% of units being one-bedroom 10% and bachelors, further reducing the development's suitability for families in an neighbourhood that is well suited for family living.

We are also concerned about the environmental impact of the proposal particularly as it affects the Waterfront Trail an important City asset. The development would result in the loss of mature, protected trees - many of which cannot be meaningfully replaced with new plantings that would be shaded by towers or situated above underground garages. The site sits adjacent to the Waterfront Trail and lies along migratory bird corridors; long-term construction in this sensitive area risks ecological disruption.

We know you agree that Toronto's neighbourhoods and waterfront deserve development that respects community character, infrastructure capacity, and environmental stewardship. We urge City Council not to feel pressured into accepting a settlement that compromises these values. Instead, we encourage a thorough critique of the proposed settlement conditions in relation to the previous opinions of the City's planning staff and the well-articulated position of the Long Branch Residents Association.

Sincerely,

Mary Helen Spence for  
The ABC Residents Association,  
abcra@abc.ca

