

From: [jeff latto](#)
To: [Planning and Housing](#)
Cc: [Jane Auster, Co-President, SEDRA](#); [John Hiddema](#)
Subject: [External Sender] January 23, 2024 PHC Meeting: PH18.1 - 267-275 Merton Street - Zoning By-law Amendment Application
Date: January 20, 2025 5:15:30 PM
Attachments: [PastedGraphic-2.tiff](#)

Dear Mr. Perks, Chair

SEDRA wishes to take this opportunity to express our concerns with the proposed development at 269-275 Merton Street. We understand that this project is a joint application between the City of Toronto (CreateTO) and Collecdev Markee (the developer). We appreciate this project is an opportunity for the City to provide much needed affordable housing. However, we would expect this application to follow the City's own planning guidelines, given their close involvement in developing the project. Specifically, we are concerned about the following deviations from City policies:

<!--[if !supportLists]-->1) <!--[endif]-->Building Height: We recognize the Province has established a development regime that promotes intensification of areas that are near MTSA's (Major Transit Station Areas). These are areas established by the City of Toronto designed to meet Provincial Policy Statements. The Province's Growth Plan defines MTSA's as *'the area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk'*.

The image below (from Community Planning, City of Toronto) shows the MTSA for Davisville Station. We can see that the site for 269-275 Merton is outside of this area.

The Applicant's Planning Rational indicates that the context for 269-275 Merton includes projects that are located within the Davisville MTSA. We now know this statement is incorrect. The comparable context for this project rather exists outside of the Davisville MTSA and as such that is where we should look for similar development heights. As such recent projects at 265 Balliol (27 stories) and 289-299 Balliol (28 stories) form the appropriate context as these are also outside of the MTSA and are near to the Application's location.

While these contextual heights of 27-28 storey are still above the adjacent

developments on the south side of Merton, this approach would at least reduce the Application's height impact and overlook on Mount Pleasant Cemetery, which we all recognize as an important green space serving this part of the city.

<!--[if !supportLists]-->a. <!--[endif]-->We request the City of Toronto work with the Applicant to modify the application with a building height that is in context with adjacent developments of 27-28 storeys.

- 2) <!--[endif]-->Tall Building Guidelines: The City's Tall Building Guidelines indicates a maximum gross floor area for towers to be 750 m². This allows for reduced shadow impacts on neighbouring properties. During the Community Meeting on December 2nd, we heard the Applicant proudly state that the tower form promotes a less of a shadow impact than other building forms. However, the Application has a tower gross floor area of 850 m² for no apparent reason. This larger floor area will cast a larger shadow impact on adjacent properties versus the maximum floor area of 750m² noted in the Tall Building Guidelines.

<!--[if !supportLists]-->a. <!--[endif]-->We request the City of Toronto work with the Applicant to modify the application with a tower gross floor area of 750 m² per floor and aligns with their own Tall Building Guidelines.

- 3) <!--[endif]-->Community Consultation: The 90-day turn-around time imposed by the province on the City to process development applications does have an impact on community consultation. On December 2nd, the community was presented with a project that was essentially a *fait accompli*. With the current City approval process, community engagement has changed from a two-way process to a single direction. On January 15, 2024 Councillor Matlow hosted a workshop with community representative, City staff from Planning and Create TO, and also representatives from the Applicant (developer). Some of the community representatives were from the neighbouring properties at 319 and 253 Merton. They tabled a number of conditions that they wish the Application would address, as I believe they will be speaking to directly to the PHC on January 23rd.

<!--[if !supportLists]-->a. <!--[endif]-->We request the City of Toronto include

community engagement at the pre-application stage of development applications that are part of this Create TO initiative and we request the City seek to include conditions presented by the neighbouring properties into the approval of this specific Application.

We should all work to make affordable housing happen while not sidestepping our allegiance to following the Official Plan, working in a transparent manner, and incorporating community voices into the design process. We encourage the City to do better.

Regards,

Jeff Latto
SEDRA Board Member
Chair Tall Mid-rise Working Group

