



File: P-3610

July 11, 2025

City of Toronto
Planning and Housing Committee
100 Queen Street West
Toronto, ON M5N 2H2

Attention: Planning and Housing Committee

**Re: July 15, 2025 – Planning and Housing Committee Public Meeting
Agenda Item No. PH23.3 – 68 Sheppard Avenue West
File No. 25 150999 NNY 06 OZ**

To the Planning and Housing Committee,

KLM Planning Partners Inc. ("**KLM**") is the land use planner representing the owners of 59-73 Harlandale Avenue, properties located immediately north of 68 Sheppard Avenue West (the "**Site**"). We have had an opportunity to review Agenda Item No. PH23.3 of the Planning and Housing Committee Report, with regard to the proposal of a six-storey mid-rise building, containing a municipal shelter. Our client has requested that we review the proposal in the context of existing and draft policy, to provide you with our comments respecting the proposed built form.

Context & the City's Proposed Development of 68 Sheppard Avenue West

The City of Toronto is advancing applications for Official Plan and Zoning By-law Amendment to facilitate construction of a 6-storey shelter building with frontage on Sheppard Avenue West, which is a major arterial road. The proposed built form would implement massing and setbacks as suggested in the City's Mid Rise Building Design Guidelines, and would deliver shelter beds which the City has identified as sorely needed to support people experiencing homelessness.

The site is located within the Sheppard-Yonge Protected Major Transit Station Area 725 ("**PMTSA 725**") within adopted Official Plan Amendment 570 ("**OPA 570**"), which presently awaits final approval by the Minister of Municipal Affairs and Housing ("**MMAH**"). This is due to the site's proximity to higher order transit having frequent service, namely the Sheppard-Yonge Station being within 150 metres of the site which is on the TTC Lines 1 and 4 subway routes. The site is also served by several bus routes including 84 (Sheppard West), 97 (Yonge), 98 (Willowdale-Senlac), 97 (Yonge), 384 (Sheppard West Night), 385 (Sheppard East Blue Night) and the 320 (Blue Night) route.

Presently, the area immediately west of Yonge Street to Beecroft Road around Sheppard Avenue West is predominantly characterized by high-rise mixed-use development, with low rise detached uses predominating beyond. The broader area includes a variety of commercial, employment, institutional, and public amenities including municipal parks, the North York Civic Centre, a recreation centre, and a public library among other important amenities that are valuable for access by the general population, including and especially those requiring housing support. In response to OPA 570 establishing the area as a PMTSA, which does also have provincial policy implications, expansion of the North York Centre Secondary Plan to establish appropriate land use designations is currently under review via the North York at the Centre Study.

Provincial Planning Statement, 2024

The Provincial Planning Statement 2024 ("**PPS 2024**") establishes a framework of policies that address various aspects of community development, including the efficient use of land and infrastructure. Section 2.3.1. of the PPS indicates that "*Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas*". As the site is located within the Sheppard-Yonge MTSA per adopted OPA 570, it is therefore subject to the MTSA policies (Section 2.4.2) of the PPS 2024. Section 2.4.2 2. requires that a minimum density target of 200 residents and jobs combined per hectare is achieved for lands served by subways, while section 2.4.2.3 b) supports redevelopment of surface parking lots to be transit-supportive and to promote complete communities. Furthermore, Section 2.4.3 1 of the PPS states that "*Planning Authorities shall plan for intensification on lands that are adjacent to existing and planned frequent transit corridors*". As noted, the Subject Lands are located less than 150 metres away from Sheppard-Yonge Station, being quite central to the PMTSA which would generally expand to a radius of 500 to 800 metres from that station. Generally, the PPS 2024 supports intensification of the parking lot to make more efficient use of land and infrastructure.

City of Toronto Official Plan (June 2024 Consolidation)

The City of Toronto Official Plan (the "**OP**") establishes a broad land use vision for the City, and designates the site as "Mixed Use Areas" which are intended to develop for a range residential and non-residential uses, with a range of intensities depending on location. The site is also located on an identified "Avenue", which would typically indicate the mid-rise buildings of up to 14-storeys in height pending planned right-of-way ("**ROW**") width and site characteristics. Sheppard Avenue for example has a planned 36 metre ROW which could support a 10 to 12 storey building on the subject lands.

The OP however does not reflect recently adopted amendments, such as OPA 570 establishing the PMTSA for the area, or OPA 727 which establishes permission for buildings of up to 6-storeys in height on all major streets identified on Map 3 of the OP. The OP also does not reflect ongoing work to establish appropriate land use designations within PMTSA 725 which encompasses the site.

Adopted OPA 570

Adopted OPA 570 establishes policy that would require achievement of the minimum population and employment target of 350 residents and jobs combined per hectare for the area and identifies 68 Sheppard Avenue West as a site which should minimally achieve a 1.5 Floor Space Index ("**FSI**"). These policies set a baseline to guide establishment of designations and land use policy, such as that within a secondary plan, which will guide appropriate outcomes aimed at achieving a complete community, at densities which are transit supportive and efficiently use land and infrastructure in accordance with provincial policy.

Adopted OPA 727

Adopted OPA 727 is the result of the City's Expanding Housing Options in Neighbourhoods ("**EHON**") study, which intends to deliver "missing middle" housing forms such as townhouses, walk up apartments, and mid-rise apartments. These forms would have a maximum height of 6-storeys, and would be permitted within "Neighbourhoods" designated lands along "Major Streets" identified on Map 3 of the OP. Such major streets exist throughout the City, but notably include Yonge Street, Sheppard Avenue, Finch Avenue, Bayview Avenue, and Bathurst Street with many segments in proximity to (but outside of) the MTSA benefitting from permissions facilitating the building form proposed for the site.

North York at the Centre - Planned Neighbourhood Context

The Subject Lands are located within the proposed boundary expansion of the North York Centre Secondary Plan which is currently under review via the North York at the Centre Study. This study aims to better reflect current conditions and trends while providing a guide for growth within the Secondary Plan area over the coming decades. It is important to note that the Secondary Plan updates and recommendations resulting from this study are not yet in effect but offer valuable insight into the City's vision for the area and consideration into the PMTSA designation. As per the Options and Directions Report, June 2025, Sheppard Avenue, west of Yonge Street, including the site, is planned to be designated as "Mixed Use Area 2" and is envisioned to accommodate high-density residential development. As per Figure 4-1 – Emerging Preferred Option Structure Map, the Subject Lands are identified as an area suited for tall buildings. The vision for tall buildings in this area is further illustrated within Figure 4-11: Emerging Preferred Option Building Heights and Types Map, which permits a building height of 25-storeys. The subject site is subsequently located within District 4a – Sheppard Avenue, which has the potential for intensification, as this corridor is home to the Line 4 subway currently extending from Yonge Street to Leslie Street. This District is planned to provide taller buildings concentrated near the subway station, with heights gradually decreasing to mid-rise buildings as you move east and west of Yonge Street. This would create a gradual transition towards areas outside of the Secondary Plan boundary. Section 4.6 of the Options and Directions Report further outlines this step-down approach in building height, indicating that the maximum height of buildings around subway stations should be as tall as 65 storeys. In order to capitalize on transit along the Sheppard Avenue Corridor, those properties just west of Beecroft Road and just east of Doris Avenue should be intended for tall buildings of 25 storeys to create a strong, urban street edge. Further north and south along both Beecroft

Road and Doris Avenue, lower-scale development of 8–12 storeys is contemplated to provide an appropriate transition to the surrounding neighbourhoods. Through the City's study, it is clear that the Site is located within an area that is intended for greater heights and density, predominantly high-rise buildings that are to provide residential units and commercial space.

Conclusion and Recommendations

Considering the above, the lands are within an area of the City which is among the highest priority for intensification considering the encompassing PMTSA, and considering provincial policy which directs land use decisions to be transit supportive and make efficient use of land and infrastructure resources which already exist. The City has recently made great strides through the EHON study work for Major Streets through adoption of OPA 727 in establishing permissions for missing middle forms including 6-storey buildings such as that proposed for the site. The ongoing work to establish appropriate land use designations for the area including the site through the North York Centre Secondary Plan update process indicates that a 6-storey building may not represent the most efficient use of land and infrastructure, and ultimately may not be transit supportive to the extent of much denser building forms which are contemplated for the site and adjacent sites along Sheppard Avenue West. In plain language, the intent of establishing Major Transit Station Areas is to locate as many potential transit riders as possible in proximity to the transit amenity for the purpose of increasing public transit ridership as opposed to reliance on private automobiles. Furthermore, from an urban design standpoint, awkward height/skyline/streetwall results may come about following potential development of neighbouring sites which may be much taller.

Considering all of the above, it is our suggestion that alternate sites along Major Streets outside of the PMTSA would be much more suitable to receive the proposed building form. Alternately, the City may also consider integrating the use within a more intense mixed-use building in a sensitive manner, as this would also allow for efficient and appropriate use of the site.

We respectfully request that Council defer the proposal back to City Staff for further community consultation and investigation into more suitable locations for the proposed development. We would like to be informed of any public meetings, open houses, or updates related to File No. 25 150999 NNY 06 OZ.

Thank you for the attention to this matter. Should you have questions or require further information, please do not hesitate to reach out to the undersigned.
Yours truly,

KLM PLANNING PARTNERS INC.

A blue ink signature of Marshall Smith, consisting of a stylized 'M' followed by a cursive 'S'.

Marshall Smith, BES, PMP, MCIP, RPP
Partner

A black ink signature of Ian Franklin, featuring a stylized 'I' and 'F' followed by a cursive 'Franklin'.

Ian Franklin, BPHIL, BURPI, MCIP, RPP
Senior Planner

File: P-3610

July 14, 2025

City of Toronto
Planning and Housing Committee
100 Queen Street West
Toronto, ON M5N 2H2

Attention: Planning and Housing Committee

**Re: July 15, 2025 – Planning and Housing Committee Public Meeting
Agenda Item No. PH23.3 – 2204-2212 Eglinton Avenue West
File No. 25 150456 NNY 08 OZ**

To the Planning and Housing Committee,

KLM Planning Partners Inc. ("**KLM**") is the land use planner representing the owners of properties located around 2204-2212 Eglinton Avenue West (the "**Site**"). We have had an opportunity to review Agenda Item No. PH23.3 of the Planning and Housing Committee Report, regarding the proposal of a six-storey mid-rise building, containing a municipal shelter. Our clients have requested that we review the proposal in the context of existing and draft policy, to provide you with our comments respecting the proposed built form.

Context & the City's Proposed Development of 2204-2212 Eglinton Avenue West

The City of Toronto is advancing applications for a Zoning By-law Amendment to facilitate construction of a 6-storey shelter building with frontage on Eglinton Avenue West, which is a major arterial road. This Zoning By-law Amendment is required to vary performance standards, including maximum height, maximum density, minimum setbacks and vehicular parking requirements and bicycle parking space size and location, among other standards. The proposed built form would implement massing and setbacks as suggested in the City's Mid Rise Building Design Guidelines and would deliver shelter beds which the City has identified as sorely needed to support people experiencing homelessness.

The site is located within the Caledonia Station Protected Major Transit Station Area 674 ("**SASP 674**") within adopted Official Plan Amendment 570 ("**OPA 570**"), which presently awaits final approval by the Minister of Municipal Affairs and Housing ("**MMAH**"). This is due to the site's proximity to higher order transit having frequent service, namely Caledonia Station being within 200 metres of the Site, which is on the Eglinton Crosstown LRT, which is expected to provide service to the area in late 2025, as well as the new GO station, currently under construction by Metrolinx. The Site is currently served by the 32 Eglinton West bus, part of the TTC's Ten-Minute Network and the 47 Caledonia bus. Night service is provided by the 332 Eglinton West Blue Night route.

Presently, the area surrounding the proposed development is predominantly made up of low rise detached uses, both residential and commercial. The broader area includes a variety of commercial, employment, institutional, and public amenities including municipal park and green space, among other important amenities that are valuable for access by the general population, including and especially those requiring housing support. In response to OPA 570 establishing the area as a PMTSA, which does also have provincial policy implications, and the establishment of the Eglinton Crosstown and the future Caledonia GO Station, OPA 253, the Eglinton Connects Planning Study aims to establish an appropriate vision for Eglinton Avenue.

Provincial Planning Statement, 2024

The Provincial Planning Statement 2024 ("**PPS 2024**") establishes a framework of policies that address various aspects of community development, including the efficient use of land and infrastructure. Section 2.3.1. of the PPS indicates that "*Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas*". As the site is located within the Caledonia Station PMTSA per adopted OPA 570, it is therefore subject to the MTSA policies (Section 2.4.2) of the PPS 2024. Section 2.4.2.2. requires that a minimum density target of 200 residents and jobs combined per hectare is achieved for lands served by subways, while section. Furthermore, Section 2.4.3.1 of the PPS states that "*Planning Authorities shall plan for intensification on lands that are adjacent to existing and planned frequent transit corridors*". As noted, the Subject Lands are located 200 metres away from Caledonia Station, being quite central to the PMTSA which would generally expand to a radius of 500 to 800 metres from that station.

Generally, the PPS 2024 supports intensification of the parking lot to make more efficient use of land and infrastructure.

City of Toronto Official Plan (June 2024 Consolidation)

The City of Toronto Official Plan (the "**OP**") establishes a broad land use vision for the City, and designates the site as "Mixed Use Areas" which are intended to develop for a range residential and non-residential uses, with a range of intensities depending on location. The site is also located on an identified "Avenue", which would typically indicate the mid-rise buildings of up to 14-storeys in height pending planned right-of-way ("**ROW**") width and site characteristics. Eglinton Avenue West for example has a planned 27 metre ROW envisioned in the EglinTOday Complete Street Project, which could support an 8-storey building on the subject lands based on Table 1 of the City of Toronto's Mid-Rise Building Design Guidelines.

The OP however does not reflect recently adopted amendments, such as OPA 570 establishing the PMTSA for the area, or OPA 727 which establishes permission for buildings of up to 6-storeys in height on all major streets identified on Map 3 of the OP. The OP also does not reflect ongoing work to establish appropriate land use designations within PMTSA 674 which encompasses the site.

Adopted OPA 570

Adopted OPA 570 establishes policy that would require achievement of the minimum population and employment target of 160 residents and jobs combined per hectare for the area and identifies 2204-2212 Eglinton Avenue West as a site which should minimally achieve a 2 Floor Space Index (“**FSI**”). These policies set a baseline to guide establishment of designations and land use policy, which will guide appropriate outcomes aimed at achieving a complete community, at densities which are transit supportive and efficiently use land and infrastructure in accordance with provincial policy.

In Force OPA 253

The Site is part of the Eglinton Connects Study, a comprehensive planning review of Eglinton Avenue that was conducted in 2014 to respond to the opportunities presented by the Eglinton Crosstown Light Rail Transit project. The Westside Mall lands and surrounding properties adjacent to the subject site were identified as the West Side Focus Area, one of six focus areas identified to accommodate growth. Key planning directions for the West Side Focus Area include: the introduction of east-west and north-south streets toward Caledonia Station, creation of green open spaces within the Westside Mall lands, and incorporation of a variety of building types that provide appropriate transition to the existing neighbouring building fabric. The Eglinton Connects Study indicates that these focus areas have significant capacity to accommodate future residential, mixed-use or employment growth, and may be appropriate for taller buildings. The directions of the Eglinton Connects Study were implemented into policy as OPA 253.

Adopted OPA 727

Adopted OPA 727 is the result of the City’s Expanding Housing Options in Neighbourhoods (“**EHON**”) study, which intends to deliver “missing middle” housing forms such as townhouses, walk up apartments, and mid-rise apartments. These forms would have a maximum height of 6-storeys, and would be permitted within “Neighbourhoods” designated lands along “Major Streets” identified on Map 3 of the OP. Such major streets exist throughout the City, but notably include Yonge Street, Eglinton Avenue, Sheppard Avenue, Finch Avenue, Bayview Avenue, and Bathurst Street with many segments in proximity to (but outside of) the MTSA benefitting from permissions facilitating the building form proposed for the site.

Conclusion and Recommendations

Considering the above, the lands are within an area of the City which is among the highest priority for intensification considering the encompassing PMTSA and considering provincial policy which directs land use decisions to be transit supportive and make efficient use of land and infrastructure resources which already exist. The City has recently made great strides through the EHON study work for Major Streets through adoption of OPA 727 in establishing permissions for missing middle forms including 6-storey buildings such as that proposed for the site. The ongoing work to establish appropriate land use designations for the area including the site through the Eglinton Connects Planning Study must continue and incorporate policies

within OPA 570, which indicates that a 6-storey building may not represent the most efficient use of land and infrastructure, and ultimately may not be transit supportive to the extent of much denser building forms which are contemplated for adjacent sites within the West Side Focus Area. In plain language, the intent of establishing Major Transit Station Areas is to locate as many potential transit riders as possible in proximity to the transit amenity for the purpose of increasing public transit ridership as opposed to reliance on private automobiles. Furthermore, from an urban design standpoint, awkward height/skyline/streetwall results may come about following potential development of neighbouring sites which may be much taller.

Considering all of the above, it is our suggestion that alternate sites along Major Streets outside of the PMTSA would be much more suitable to receive the proposed building form. Alternately, the City may also consider integrating the use within a more intense mixed-use building in a sensitive manner, as this would also allow for efficient and appropriate use of the site.

We respectfully request that Council defer the proposal back to City Staff for further community consultation and investigation into more suitable locations for the proposed development. We would like to be informed of any public meetings, open houses, or updates related to File No. 25 150456 NNY 08 OZ.

Thank you for the attention to this matter. Should you have questions or require further information, please do not hesitate to reach out to the undersigned.

Yours truly,

KLM PLANNING PARTNERS INC.



Marshall Smith, BES, PMP, MCIP, RPP
Partner



Ian Franklin, BPHIL, BURPI, MCIP, RPP
Senior Planner