

April 30, 2025

Toronto City Hall 100 Queen Street West Toronto, ON M5H 2N2 Attention: Cathrine Regan

RE: TE22.5 1251-1311 Yonge Street – Zoning Bylaw Amendment Application – Decision Report - Approval

The north part of the site of this application at the top of the escarpment is within in the Deer Park Residents Group area, with the south part in the Summerhill Residents Association area.

This application is a significant increase from the 2022 application. With a site area increase of only 18%, the residential density is increased 7 times - to Hong Kong level. Instead of one 11 storey building, there are two towers, at 47 and 43 floors and the number of units increases from 102 to 832.

1. Planning policies

The DPRG agrees with the concerns raised in the letter submitted by the Summerhill Residents Association.

Implications of MTSA/PMTSA area designations – Site and Area Specific Policy 720 The PTMSA policies are not yet approved for the City of Toronto, but are approved for other municipalities, such as Mississauga. These policies include minimum requirements for people and jobs but not a maximum density. We think it is important to establish an acceptable maximum. And to confirm their applicability or not to Toronto.

The site is within the Summerhill PTMSA, Greater density should be permitted in the Yonge and St Clair PTMSA than for the Summerhill PTMSA because the Yonge and St. Clair station has both streetcar and bus connections to the subway station. And it is a major commercial hub. This application is for similar density and height as for application in the Yonge St. Clair PTMSA.

Another problem with the current PTMSA policies is that the minimum level of units and jobs included in the City's Major Transit Station Areas Interactive Engagement Tool still uses 2016 census figures to monitor progress. But the area has grown since considerably since then. What should the base be? The proposed high increase of 832 units for this application is at the wrong location, but may well be needed elsewhere.

Implications of the Yonge St Clair Secondary Plan - Mixed-Use Area A includes the Yonge St Clair intersection and Mixed-Use Area B extends along St. Clair to the west and

Yonge south to Balmoral/Rosehill. These have seen 10 buildings for over 40 storeys recently approved. But the subject site is farther south, within the area designated Mixed-Use Area C. The revised proposal between Jackes and Woodlawn has similar height and density to the Mixed-Use Areas A and B but should have lower heights and density.

2. Needed - New planning directions for the growth of the City

We acknowledge and support addressing the need for increased housing development - but we no longer have an Official Plan that effectively directs the growth of the City.

The current City development process, which focusses on evaluating development applications one by one, is not resulting in more development for various reasons. Application approvals continue. In dealing with development applications, City Planning approval focus is on ensuring that the applicant will not appeal to the OLT. The OLT refuses few applications and can approve applications without the conditions the City deems necessary. Due to OLT oversight, the City is approving development applications well in excess of need, in forms that are excessive for their locations. This is not how we should be planning for growth. The City must work with the Province to develop better ways to plan for Toronto's growth.

Growth of the City must not be limited to excessive intensification of the Yonge corridor. The Summerhill letter states that "The Auditor General confirmed in 2021 that of the 25 provincially designated Growth Centres only three had exceeded or almost achieved the mandated minimum growth targets - Downtown Toronto, Yonge Eglinton Centre, and North York Centre – all located in Toronto's Yonge Street corridor where the Line 1 subway has already reached its capacity." The Yonge St Clair area has 10 new tower proposals to that growth. We are pleased to see intensification initiatives in other parts of the City such as in the Downsview and Eglinton east areas and we support these initiatives.

Deferral of this item at the May 1 TEYCC meeting

We understand that this application will be deferred for further consideration. We support this deferral and will be pleased to participate in the upcoming consultations with the applicant and the Summerhill Residents Association to resolve our concerns with this application.

Respectfully submitted,

Cathie Macdonald
President, Deer Park Residents Group

c.c. Councillor Saxe, Councillor Matlow,