

Summerhill Residents Association

<https://summerhillresidentsassociation.ca/>
summerhillresidentsassociation@gmail.com

23 April 2025

VIA EMAIL: teycc@toronto.ca

Toronto and East York Community Council
Attention: Cathrine Regan

1251-1311 Yonge Street: Amendments to the Official Plan and Zoning By-Law

Dear Chair Moise and Councillors:

The *Summerhill Residents Association* ("SRA") supports reasonable residential intensification projects and, in this specific case, went on record to register its support for the original application, following the community consultation meeting on 13 June 2022 and a review of the Preliminary Staff Report of 06 June 2022 (see **APPENDIX**). Based on the community consultation meeting on 11 December 2024 and a careful review of the latest supporting documents on the AIC-website, the SRA concludes that there appears to be a serious disconnect between the City's performance of its planning and development review functions. Accordingly, the SRA wishes to express its strong opposition to the revised proposal in its present form, for the following reasons:

1. **Revised Proposal:** The revisions call for massive changes to building heights, massing, densities, and number of units which, in our view, represent excessive moves at odds with both the existing and planned physical context and statutory planning framework (see **ATTACHMENTS A & B**), as follows
 - It more than octuples the number of residential units from 102 (2022) to 832 units (2024) and slashes the average unit size in half;
 - it septuples the net residential density from 324 units per hectare (2022) to an astronomical 2,238 units per hectare (2024) that defies global planning norms;
 - it quadruples the building heights from 11 floors (2022) to 43 and 47 floors (2024) that imposes adverse impacts on the public realm and *Neighbourhoods*;
 - it more than triples the gross floor area from 20,055 m² (2022) to 62,498 m² (2024), and,
 - despite claiming that the increase in property size is one of the drivers for these changes, it increases the size of the property by a mere 18% from 3,144.3 m² (2022) to 3,717.9 m² (2024), while the site remains less than one acre in size.
2. **Provincial Policies:** The relevant Provincial Policies have not materially changed between 2022 and 2024, except that *A Place to Grow, the Growth Plan for the Greater Golden Horseshoe, 2020*, ("Growth Plan") and the *Provincial Policy Statement, 2020* ("PPS 2020") have now been combined in the *Provincial Planning Statement, 2024* (PPS 2024"). The *Planning Act* continues to call for the orderly development of safe and healthy communities, the appropriate location of growth and development, and the promotion of built form that is well-designed, encourages a sense of place, and provides public spaces that are of high quality, safe, accessible, attractive and vibrant. This requires, according to the Growth Plan, the optimization, not maximization, of the use of infrastructure and public facilities. The PPS 2024 reaffirms that "Municipal official plans are the most important vehicle for implementation of the Provincial Planning Statement and for achieving comprehensive, integrated and long-term planning." Bill 23 did neither increase growth targets nor modify the criteria regarding PMTSAs beyond Growth Plan policies.

3. **Secondary Plan:** The SRA has been instrumental in the development of the adopted public policies of the *Yonge-St. Clair Secondary Plan*. Accordingly, it prefers at least minimal adherence to the basic area-specific policies while recognizing that some refinements may be warranted considering recent public policy updates, such as the *City-initiated Yonge-St. Clair Planning Framework* of 2019. It does not address, however, policies for *Mixed-Use Area C* where the site is located. And yet, the developer cites as precedents approved developments in *Mixed-Use Area B* with materially different development policies under the Secondary Plan (see **ATTACHMENT C**)

4. **Land Needs Assessment:** The Growth Plan notes: *“The timely implementation of this Plan relies on the strong leadership of upper and single-tier municipalities to provide more specific planning direction for their respective jurisdictions through a municipal comprehensive review.”* Toronto’s 2023 Land Needs Assessment, a component of the *Municipal Comprehensive Review* of the Official Plan regarding Growth Plan conformity, determined that *“the net potential housing could accommodate a population of 2,375,481 or 84% growth in the City’s population after 2016 for a total population of 5,194,880,”* that *“there is more than sufficient potential housing in areas designated in the Official Plan for residential development to accommodate Growth Plan population forecasts at 2051,”* and *“the surplus potential housing stock, after accommodating the population forecasted by the Growth Plan at 2051, is equivalent to over fifty years of potential housing supply.”* Accordingly, there is sufficient land appropriately designated for development in the Official Plan to meet and exceed the growth targets without the need for density acrobatics or major amendments to the Official Plan. (see **ATTACHMENT D**)

5. **Growth Plan:** The Growth Plan acknowledged that already in 2020 *“some larger urban centres, such as Toronto, have already met some of the minimum targets established in this Plan.”* 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. A further massive intensification of the already existing transit-supportive communities along the Yonge corridor between the two designated Growth Centres of Toronto Downtown and North York Centre is a counterproductive intensification strategy for two reasons: 1) it absorbs density urgently needed elsewhere on the transit network to create transit-supportive communities; and 2) it adds further strain to the already overloaded Line 1 subway

6. **Protected Major Transit Station Area:** The property is covered by the Summerhill *Protected Major Transit Station Area* (“PMTSA”) with a minimal density of 200 residents and jobs per hectare, as specified in the Growth Plan. *Official Plan Amendment 570*, adopted by City Council on 20 July 2020 prescribes a minimum density of FSI 2.0 – not FSI 16.81 - for this particular site. No *Avenue Segment Review Study* has been submitted required to assess the proposed contribution of this development to the growth target. The Summerhill PMTSA has a size of 60.3 ha and in 2016 an existing population of 4,875 and employment of 2,583. The City has not updated its *Major Transit Station Areas Interactive Engagement Tool* and still uses 2016 census figures to monitor progress. Using the figures from the 2024 *Avenue Segment Review Study* for 1233 Yonge Street shows an additional projected population of 8,100 and employment of 603, would result in a total of 16,161 people and jobs and a density of 268 PPJ/ha – even when using the outdated 2016 census figures. This density exceeds both the prescribed minimum of 200 PPJ/ha and the City’s planned density of 259 PPJ/ha for Summerhill to reach the 2051 growth target in 26 years. The proposed growth of 832 units is at the wrong location but may well be needed elsewhere. (see **ATTACHMENTS E & F**)

7. **Yonge Growth Corridor:** The three PMTSAs in the Yonge corridor segment where this project is located, St. Clair, Summerhill, and Rosedale - with somewhat arbitrary dividing lines between them that do not reflect the actual subway station use (e.g. the second Summerhill subway entrance under construction is in the Rosedale PMTSA) – had already in 2016 a consolidated density of 178 residents and jobs per hectare: 20,617 residents and 19,223 jobs on 224 hectares. No monitoring information on current progress exists and/or has been made public. The large volume of developments – planned, approved and built - since 2016 suggest that the targets have already been far exceeded. Any push for more developments in this overcrowded corridor detracts from a key planning goal: increasing densities elsewhere to optimize the entire transit network – not jampacking the already dysfunctional Line 1 subway between Eglinton and Bloor. (see **ATTACHMENT G**)
8. **Superdensity:** The proposed densities are FSI 16.81 and 2,238 U/ha, which exceed even density ranges found acceptable in Hong Kong. In comparison, for example, the twin tower (39 and 54 floors) Minto Towers at 2195 Yonge Street with 954 residential units on a site of 0.78 hectare – more than twice the size of 1251-1311 Yonge Street - was approved by the OMB at a more reasonable density of FSI 11.9 and 1,223 U/ha. No information has been offered about the global experience with such extraordinary superdensities. (The proposed densities of FSI 25.0 and 4,016 U/ha for 2133 Yonge Street represent even more egregious violations of widely accepted international planning standards.) (see **ATTACHMENT F & H**)
9. **Public Realm:** Of great concern to the SRA are the proposed substandard building setbacks on the north (2.0 m instead of 3.0 m), east (10.1 instead 12.5 m), and south (2.0 m instead of 3.0 m) and, even more so, the major adverse impacts imposed by this development on the public realm of Yonge Street, Woodlawn Avenue East, and Jackes Avenue, as well as on the adjacent residential areas, in terms of shade, wind, and congestion. (see **ATTACHMENTS I, J & K**)

Accordingly, the SRA, respectfully recommends that this Application be refused or, alternatively, be deferred for further consideration and public consultation on the basis of additional updated planning information regarding the Yonge Corridor intensification (including the status of the Summerhill *Neighbourhood* in the City's corridor area – see **ATTACHMENT L**), the current development status of the three PMTSAs in the area, the current densities of all MTSA's covered by OPA 570, the current and projected capacity of the Line 1 subway in this Yonge corridor, and the global experience and precedents of developments at superdensities in excess of 2,000 dwellings per hectare.

Yours sincerely

Summerhill Residents Association



Debbie Briggs
President

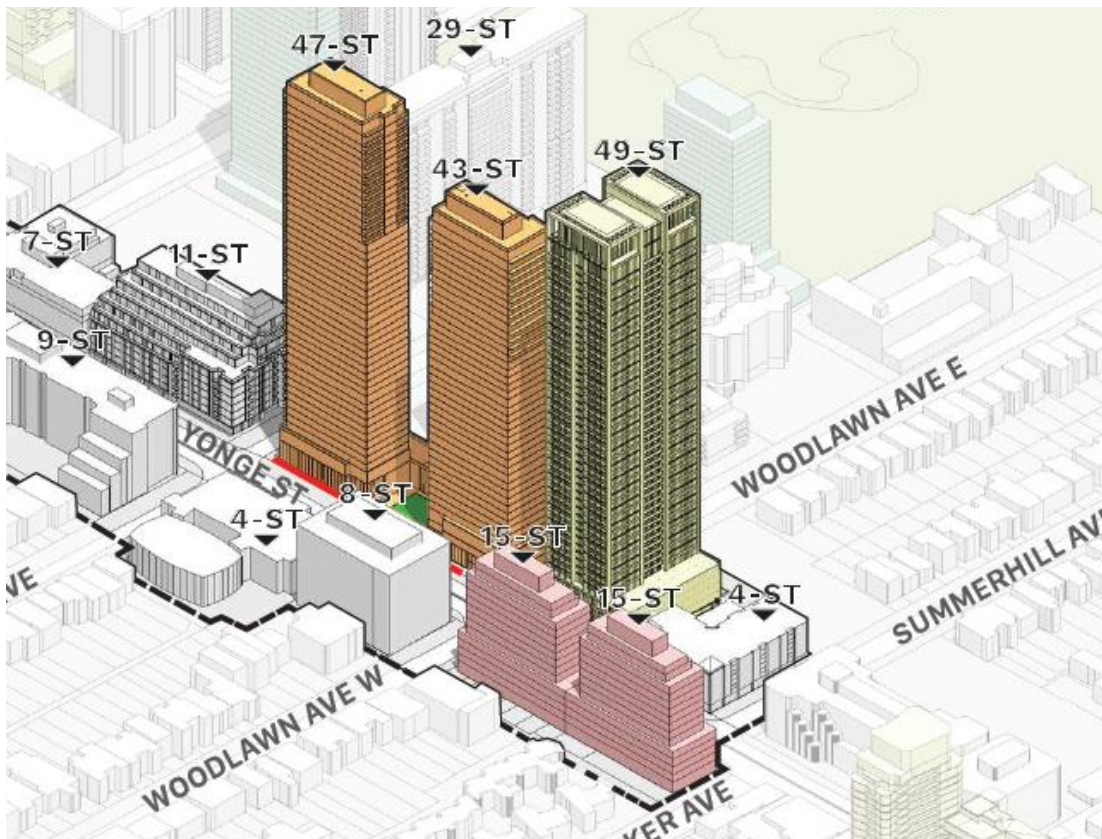
Attachments A-L
Appendix

Copies:

Mayor Olivia Chow, Councillor Dianne Saxe, Councillor Josh Matlow
Paul Johnson, *City Manager*, Jag Sharma, *Deputy City Manager*
Jason Thorne, *Chief Planner and Executive Director, Planning*
Valesa Faria, *Executive Director, Development Review*
Development Review: Omar Tamir, David Driedger, Chris Pereira



2022 Proposal



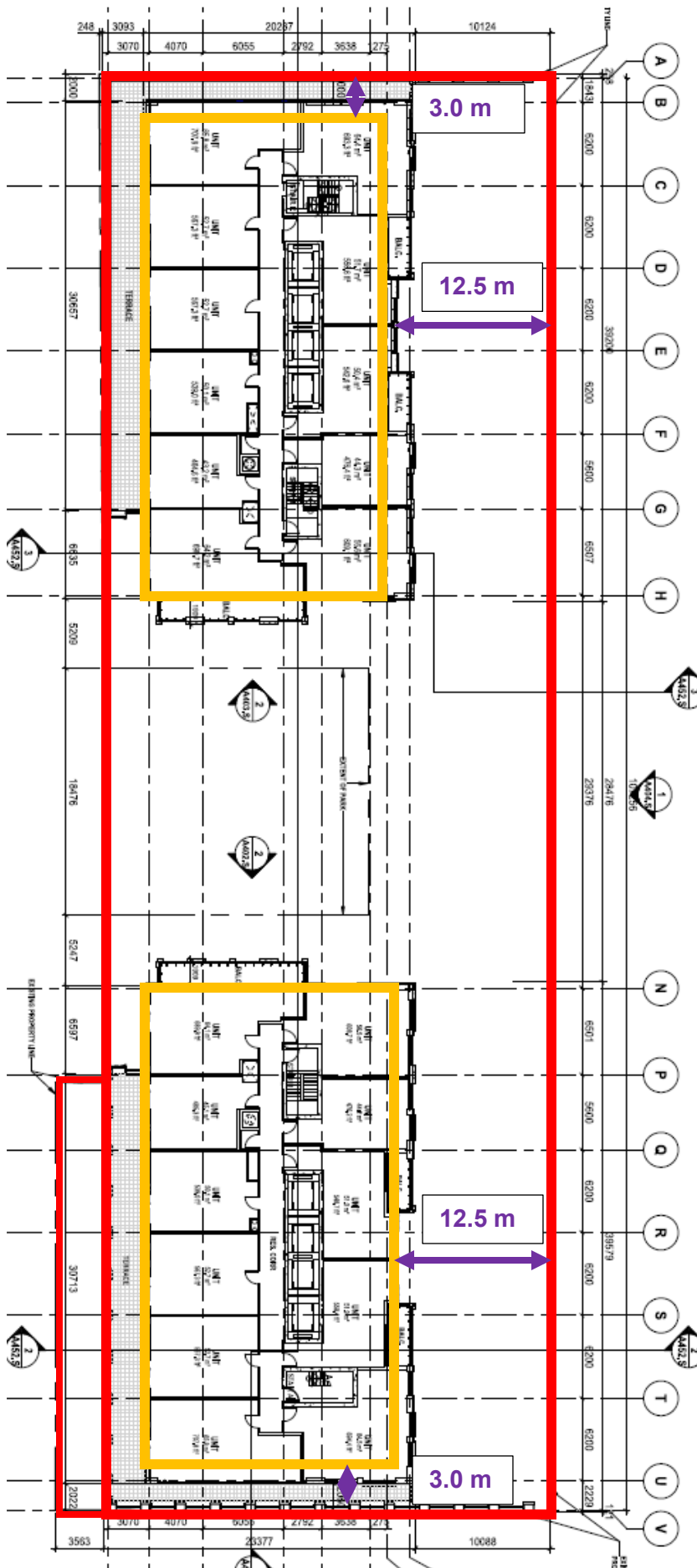
2025 Proposal

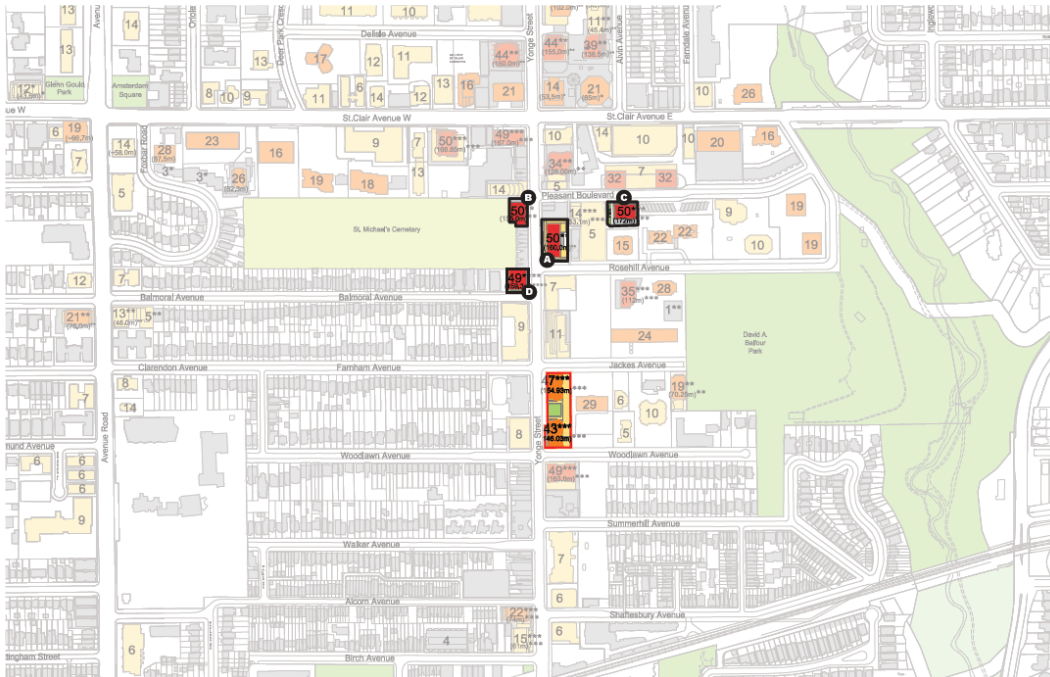
ATTACHMENT B

1251-1311 Yonge Street			2022	2024	Change	%
Site Area	m²		3,144.3	3,717.9	573.6	18%
	Hectares		0.31	0.37	0.06	
	Acres		0.78	0.92	0.14	
Gross Floor Area	Residential		15,949	61,205	45,256	284%
	Non-Residential		4,324	1,283	-3,041	-70%
	Total		20,055	62,489	42,434	212%
Residential Units	Number		102	832	730	716%
	Average Size		156	74	-83	-53%
Densities	FSI		6.38	16.81	10.43	164%
	U/ha		324	2,238	1,913.43	590%
	UPA		131	906	774.34	590%
Building Heights	Floors	North	11	47	36	327%
		m	43.3	154.9	112	258%
	Floors	South	11	43	32	291%
		m	43.3	146.0	103	237%
Resid. Parking	Number		183	294	111	61%
	per Unit		1.8	0.4	-1.4	-80%

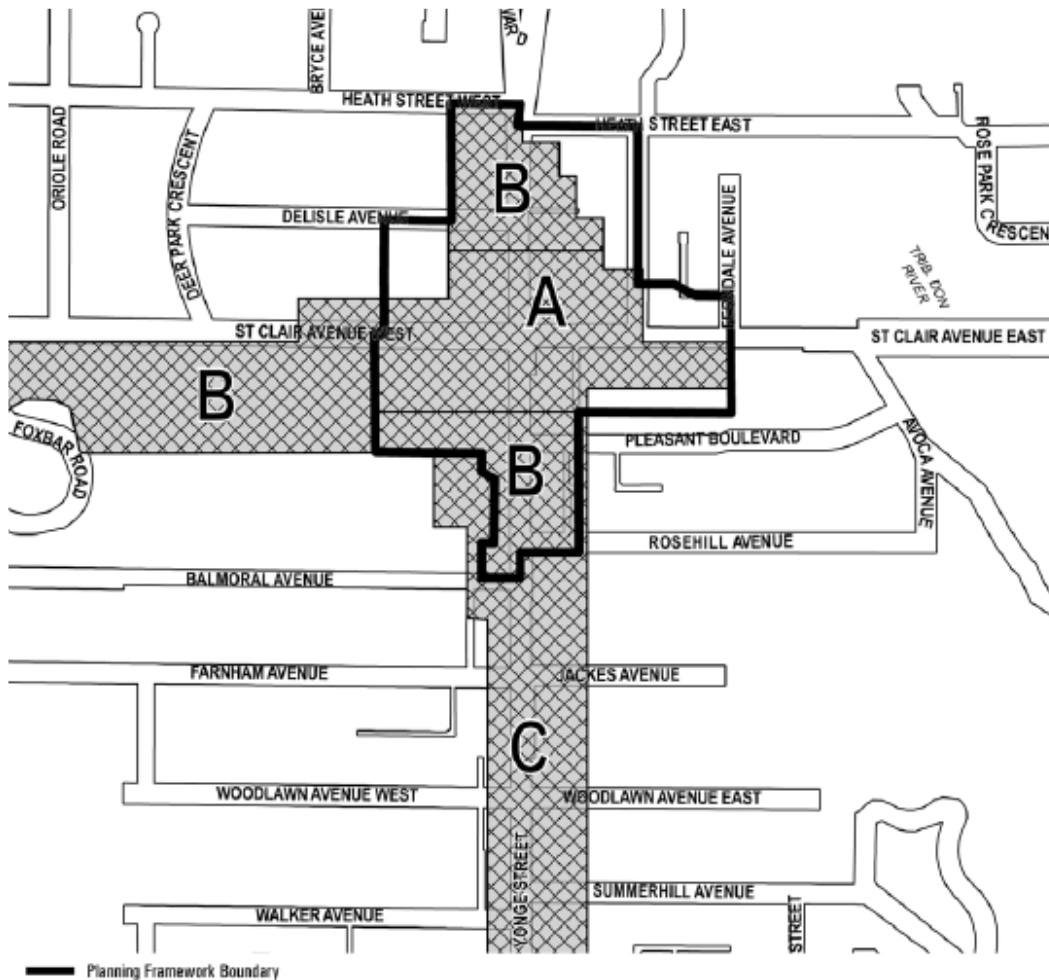
Change in Development Statistics 2022 to 2024

Tower Setbacks





Supposed Major Tower Precedents

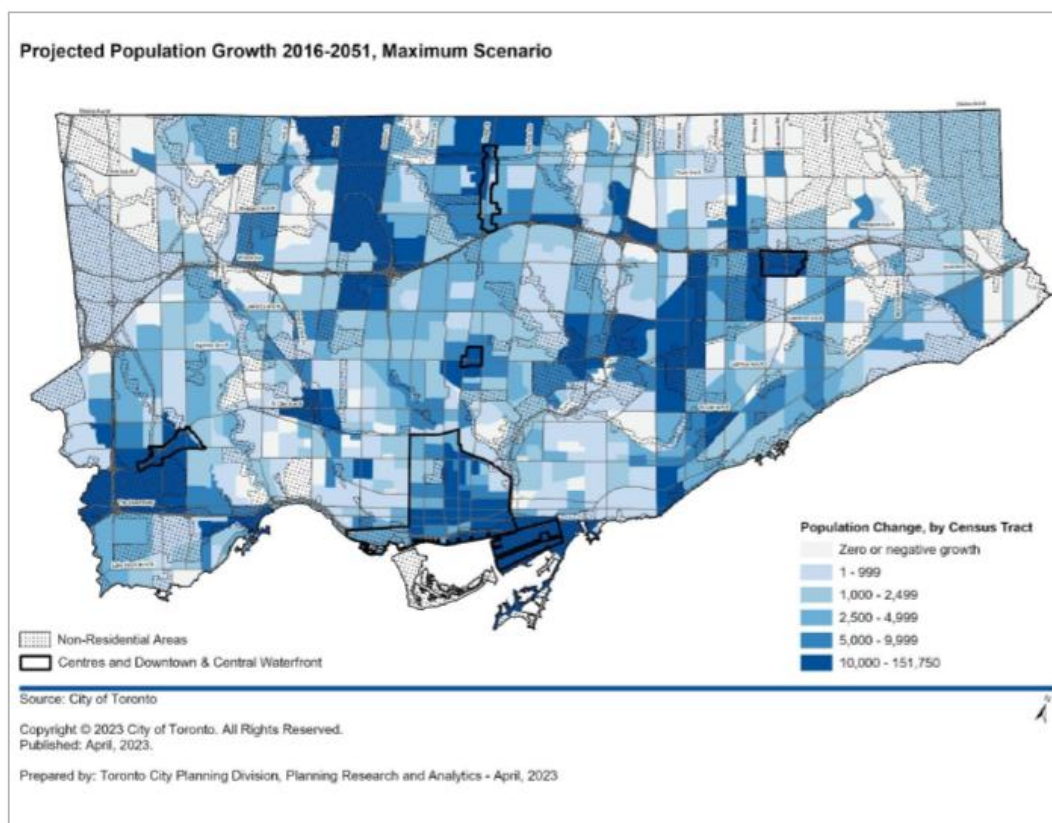


Yonge-St. Clair Secondary Plan and Planning Framework:
Mixed Use Areas A, B, and C

ATTACHMENT G

	Address	Floors	Residential Units		Density
			Proposed	Approved	
1	645 Yonge Street	76	789	789	33.60
2	699 Yonge Street	64	514		22.93
3	1 Bloor Street West	94	505	505	30.10
4	65 Cumberland (2 Bloor W)	50, 64	1,595	925	23.27
5	820 Yonge St. (2 Bloor W)	75		725	23.27
6	15-19 Bloor Street West	94	1,262		61.60
7	767-773 Yonge Street	25	202	202	14.50
8	2-8 Cumberland Street	51	400	399	20.70
9	11-21 Yorkville (16-18 Cumb.)	66	674	674	15.41
10	1 Yorkville Avenue	56	575	575	18.75
11	874-878 Yonge Street	49	349	349	32.70
12	835 Yonge Street	41, 49	950		8.80
13	906 Yonge/25 McMurich	23, 40	410	410	12.50
14	931 Yonge Street	32	250		13.50
15	1067 Yonge Street	4	0		
16	1080-1088 Yonge Street	12	0	30	7.09
17	1140 Yonge Street	10	66	64	5.48
18	1087-1091 Yonge Street	19	143	136	9.50
19	5 Scrivener Square	23	127	141	5.56
20	1196-1210 Yonge Street	32	130	130	22.4 ?
21	1220 Yonge Street	35	273		14.70
22	1233 Yonge Street	52	763		24.58
23	1303 Yonge Street	43, 47	832		16.46
24	49 Jackes Avenue	19	217	169	12.00
25	33 Rosehill Avenue	35	299	263	5.85
26	1366 Yonge Street	49	458	458	32.49
27	1365-1375 Yonge Street	50	714	714	21.10
28	11 Pleasant Boulevard	14	87		11.07
29	29-39 Pleasant Boulevard	50	375	281	18.71
30	1406-1428 Yonge Street	40	419	419	25.00
31	1417-1431 Yonge Street	34	198	198	
32	1 St. Clair Avenue West	49	340		26.34
33	45 St. Clair Avenue West	51	461	461	15.66
34	1 Deslisle Avenue	44	383	383	12.20
35	1485-1525 Yonge Street	13, 27, 39, 44	1,361	1,361	9.25
TOTAL			14,818	9,972	

Yonge Corridor Development Pipeline: Isabella to Heath, January 2025

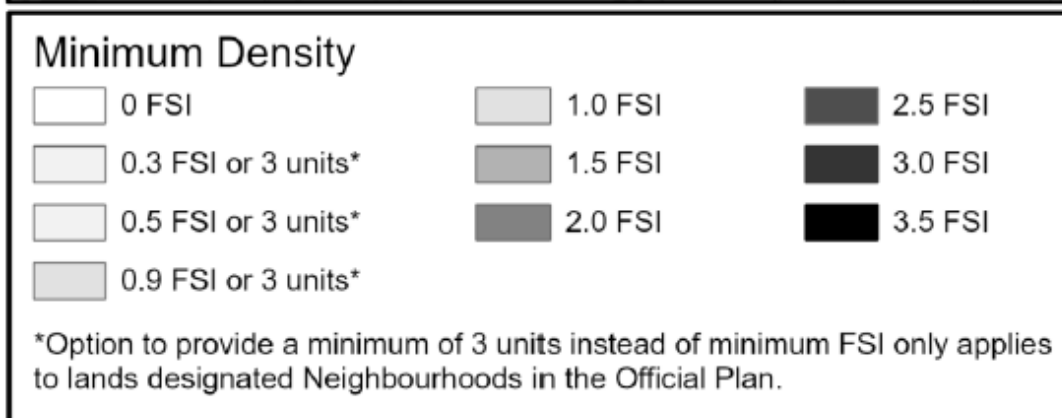
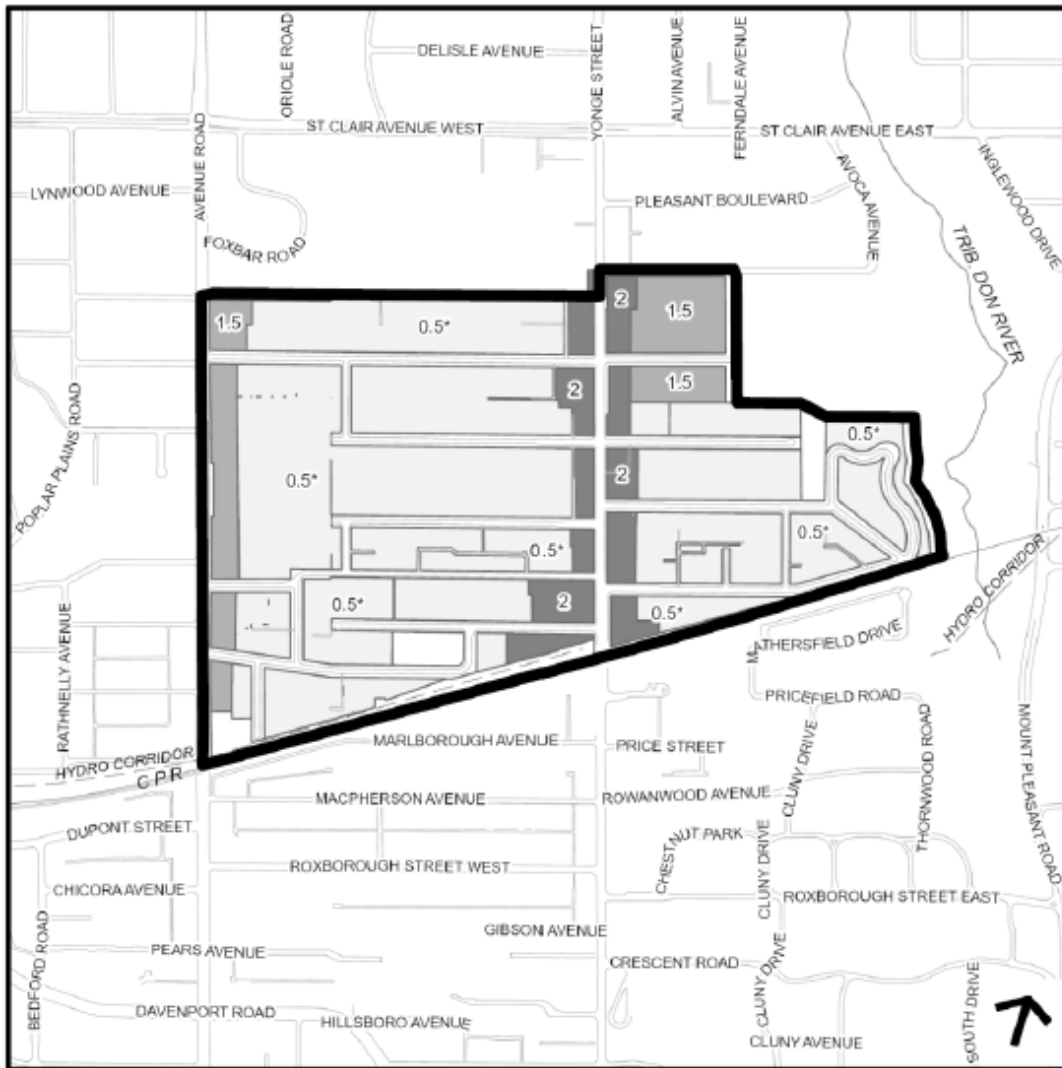


City of Toronto Land Needs Assessment, April 2023

Source of Supply	Ground-Related units	Apartments in a Building of 5 or more storeys	Total Units	Share
MCR Pipeline - Built Projects ^{1,2}	5,766	93,259	99,025	7.5%
MCR Pipeline - Active Projects ^{1,3}	8,636	194,009	202,645	15.4%
MCR Pipeline - Under Review Projects ^{1,4}	63,222	328,491	391,713	29.9%
Opportunities Potential ⁵	13,665	314,386	328,051	25.0%
Downtown Residential Potential ⁶	1,133	109,566	110,699	8.4%
Centres Residential Potential ⁷	1,269	69,522	70,791	5.4%
Avenues Residential Potential ⁸	2,963	26,376	29,339	2.2%
Conversion Sites Potential ⁹	8,022	33,856	41,878	3.2%
Neighbourhood Intensification ¹⁰	99,041	0	99,041	7.5%
Estimated Demolitions ¹¹	- 57,076	- 4,066	- 61,142	-4.7%
Net Potential Supply ¹²	146,641	1,165,399	1,312,040	100.0%

Potential Housing Supply

ATTACHMENT E



OPA 570: Summerhill Protected Major Transit Station Area

ATTACHMENT H

BUILDINGS
(FLOOR AREA RATIO)



6:1 -
15:1

DWELLING UNITS
(DWELLING PER HECTARE)



800 -
2000

POPULATION
(PEOPLE PER HECTARE)



REGION 70
CITY 250+

Floor Area Ratio is the ratio of a building's total floor area to its lot area, the measure most often used by planners and developers to describe the density of a site. FAR is a good approximation of built form, although does not always determine the height or coverage of a building.

DPH is a measure of the number of dwellings within a particular site or neighbourhood, often expressed as dwellings per hectare. As household sizes tend to be within a limited range, DPH may also provide an indication of the number of people that may be living within an area.

However, this is more accurately expressed by the third measurement of density, population or people per hectare.

To have a complete picture of the density of a city, we need to understand all three of these dimensions. It is possible, for example, for a site to have a high FAR but relatively low DPH due to each dwelling having a particularly large floor area.

Similarly, in contexts where dwellings are very small in area, a moderate DPH can yield a relatively high PPH. By any of these measures though, Hong Kong is a high density city.

FARs of 15:1 and over are common, the city has small dwellings, occupied by often large family groups. The people density of the city is well above comparable world cities, 5, 6, 10 times. This is particularly the case when the unbuilt areas of the city are excluded.

Source: Hassell, **Super Density: A New Model for Vertical Urbanism, Hong Kong**

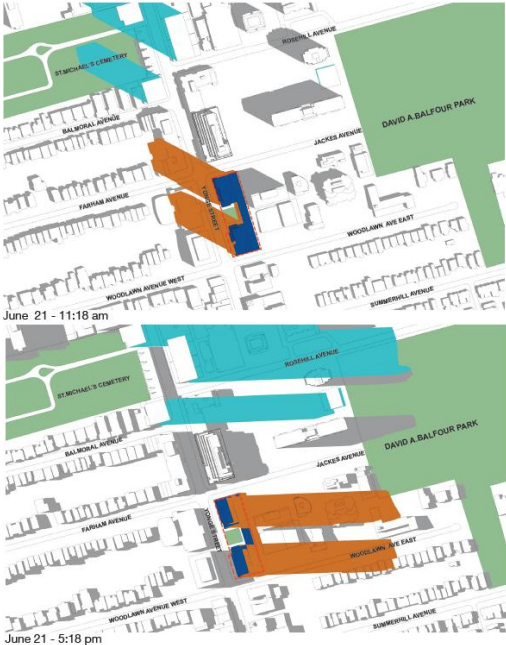


DENSITY: 500 - 2,000 DPH IN CENTRAL AREAS - HONG KONG

Source: New London Architecture, **Super Density: The Sequel**, London, 2015



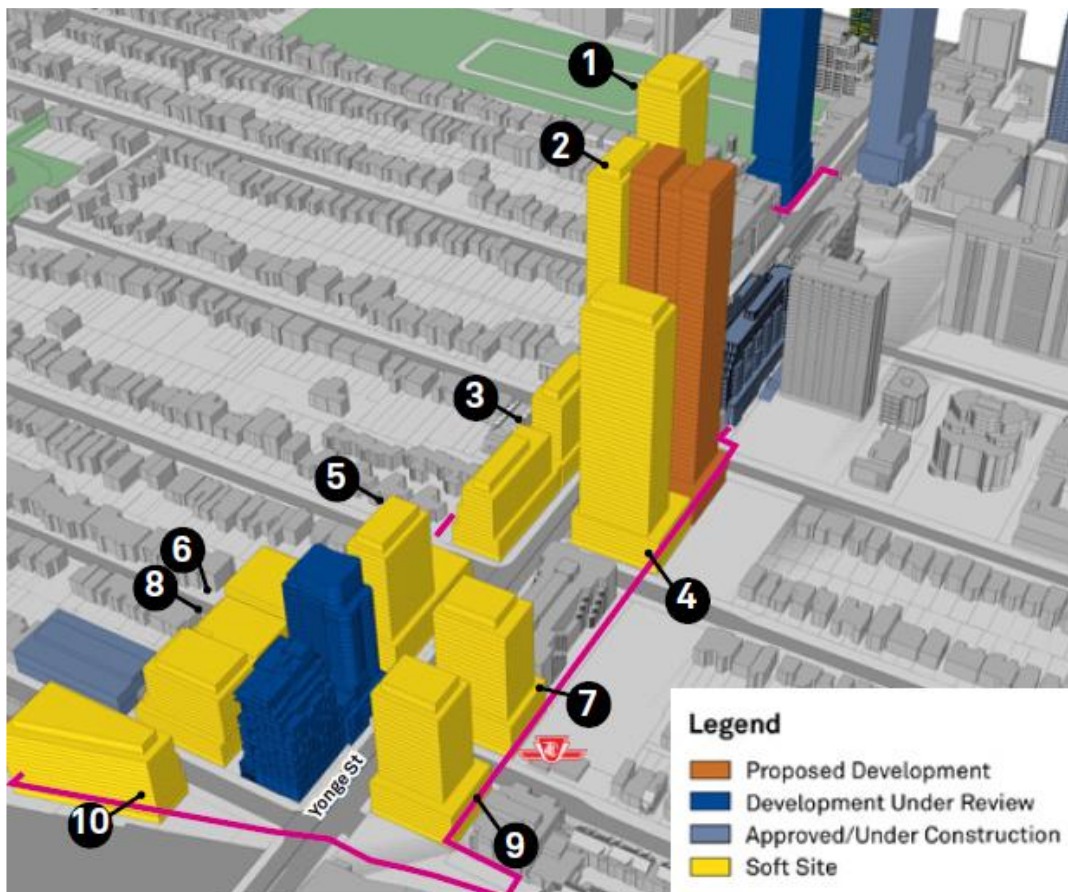
Shadow Study March 21 and September 21



Shade Study June 21



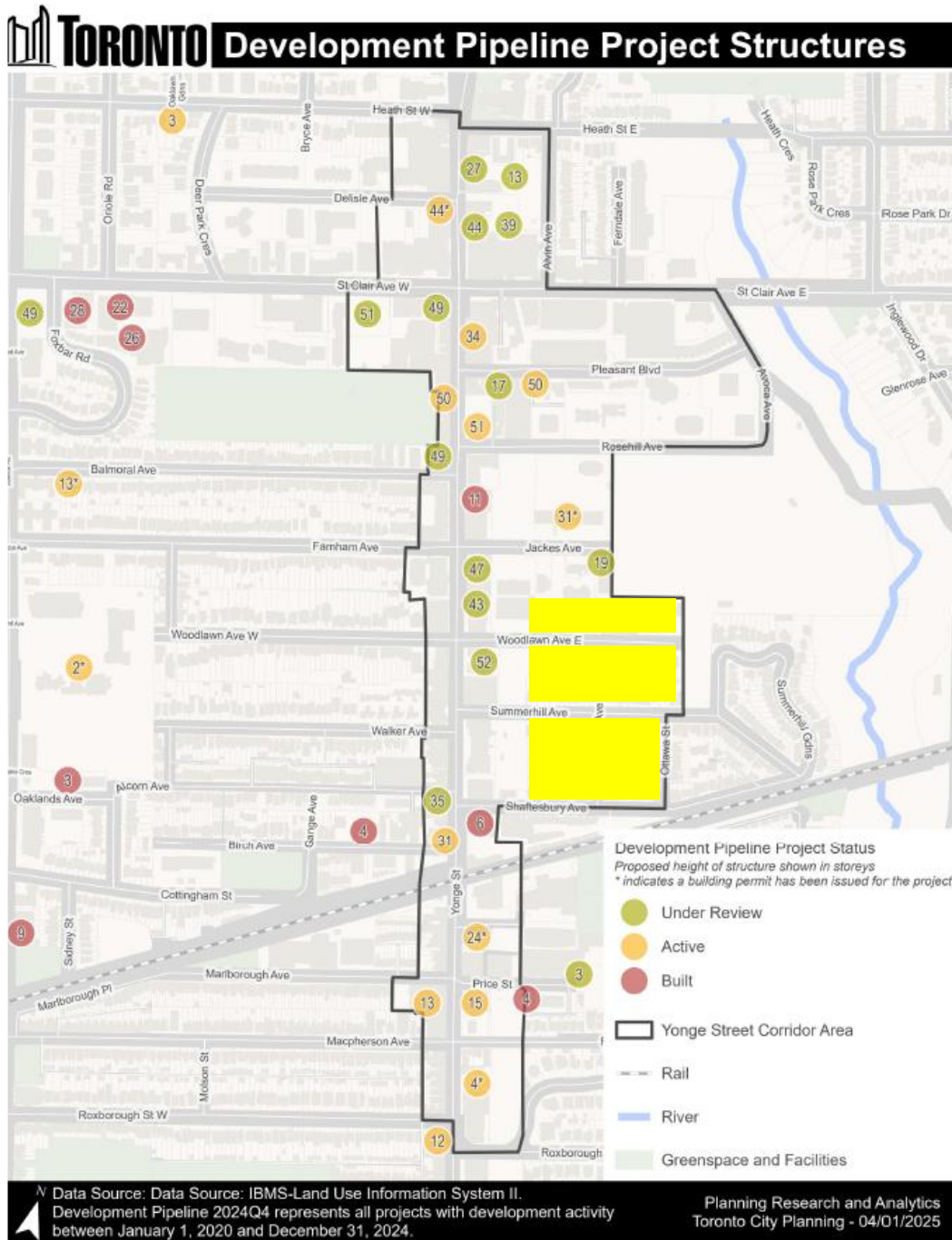
Winter Wind Conditions



Avenue Segment Review Study for 1233 Yonge Street

	Site Area m ²	Non-Residential m ²	Number of Floors	Number of Units	FSI	U/ha
Soft Site 1	3,546.2	2,300.3	50	477	11.4	1,363
Soft Site 2	1,555.0	1,046.0	45	376	20.0	2,350
Soft Site 3	3,261.9	2,236.4	12-15	263	6.9	797
Soft Site 4	1,908.7	1,522.0	45	388	17.1	2,042
Soft Site 5	2,406.0	1,797.9	6-22	233	8.5	971
Soft Site 6	2,584.6	300.0	4	50	2.1	192
Soft Site 7	1,540.7	1,125.6	22	195	11.0	1,300
Soft Site 8	3,017.0	2,310.4	7-12	218	6.6	727
Soft Site 9	1,269.5	1,022.8	22	63	4.8	485
Soft Site 10	2,094.7	1,607.1	12	192	8.1	914
Total Soft Sites	23,184.3	15,268.5		2,455		
1233 Yonge Street	1,908.0	344.0	52	763	25.0	4,016
1251-1311 Yonge Street	3,717.9	1,283.0	43-47	832	16.8	2,249
TOTAL	28,810.2	16,895.5		4,050		
Population/Jobs		603		8,100		

Projected Population and Jobs for Summerhill PMTSA Avenue Segment



Summerhill Neighbourhood area in City's Development Pipeline Corridor?

APPENDIX

Summerhill Residents Association

123 Summerhill Avenue, Toronto Ontario, M4T 1B1
summerhillresidentsassociation@gmail.com

20 June 2022

VIA EMAIL: corinna.prior@toronto.ca

Ms. Corinna Prior
Planner
Toronto City Hall
Toronto Ontario M5H 2N2

Planning Application 22 133670 STE 11 OZ
1303 Yonge Street – Proposed OPA and ZBA

Dear Ms. Prior:

The *Summerhill Residents Association* ("SRA") has attended the recent Community Consultation meeting and has carefully reviewed both the Preliminary Staff Report and the Applicant's Supporting Material filed with the City. On this basis, we offer the following observations:

1. **Building Height:** No issues. While the Secondary Plan permits heights of up to 21 metres, and the application is 39.3 metres exclusive of the mechanical penthouse, the SRA noted that the proposed height is generally consistent and harmonious with adjacent and surrounding buildings.
2. **Built Form:** No issues. The SRA noted that the height, stepbacks, and massing are appropriate within this context. We encourage the applicant to maintain the articulation and elegant transition in height along the sloping site as much as possible, as well as the high-quality materials that were evident in the project elevations and renderings.
3. **Commercial Uses:** The applicant is proposing office uses at grade. The SRA encourages retail and other public-facing commercial uses that will animate the streetscape and contribute to the overall vitality of the neighbourhood. In addition, we suggest that a variety of commercial retail units are provided, including smaller units that would support neighbourhood-friendly amenities and retailers. This may be achieved by reducing the overall commercial component, for example, and focusing on at-grade commercial uses that have the greatest impact on the community at large.
4. **Street Trees & Landscaping:** Ensure that the existing street trees on Yonge and Jackes are adequately replaced with large-growing shade trees and that new landscaping is introduced, in a way that is consistent with the established landscaping and tree cover at 6 Jackes.
5. **Public Art:** The SRA encourages the applicant to consider opportunities to incorporate on-site public art in a way that complements the architectural quality of the proposal.

6. **Community Benefits:** The SRA encourages the applicant to direct community benefits to local amenities. This may include continued improvements at David Balfour/Little Park and other parkland in the neighbourhood, as well as parkland that may be dedicated as part of active local applications.
7. **Loading & Access:** The SRA noted that separate means of vehicular access are provided for the loading and parkade entrances, on Jackes and Woodlawn respectively. It appears the latter access is only 3.66 metres wide (suitable for one-way traffic only) and secured by way of an easement with 1251 Yonge, which is not part of the subject application. We encourage Staff and the applicant to thoroughly study the feasibility and impacts of the proposed below-grade parkade access given the uses and number of stalls proposed by the applicant.
8. **Construction Management Plan:** The SRA noted that the site has multiple rights-of-way for site access and disruption to Yonge Street should be minimized as much as possible. We encourage the applicant to work with the SRA and other stakeholders to ensure that Construction Management Plans are developed with the needs of the community in mind.

The SRA is looking forward to continuing discussions with you and with the applicant regarding the resolution of the issues identified above.

Yours sincerely,

Summerhill Residents Association



Deborah Briggs
President

Copies:

Councillor Mike Layton

Councillor Josh Matlow

Oren Tamir, Manager Community Planning, Midtown Section

Darius Rybak, Aspen Ridge Homes