

June 7, 2021

Matthew Zentner
City Planning
Toronto City Hall
12th fl. E., 100 Queen St W
Toronto, ON M5H 2N2

**Re: 25 St. Mary Street
Application for an Official Plan Amendment, Zoning By-law Amendment, Site Plan Approval
and Rental Housing Demolition**

Dear Mr. Zentner,

Urban Strategies Inc. is acting on behalf of Tenblock in submitting this application for an Official Plan Amendment, Zoning By-law Amendment, Site Plan Approval and Rental Housing Demolition to advance the comprehensive redevelopment of 25 St. Mary Street (the “Subject Site” or “the Site”).

The Subject Site is centrally located in Downtown Toronto within the Bay Street corridor. It is a large, 5,212 square metre (1.3 acre) property located at the southwest corner of St. Mary Street and St. Nicholas Street. It is currently occupied by a 24-storey rental apartment building which was constructed during the 1960s and contains 259 units.

25 St. Mary Street is strategically situated within the Downtown Toronto Urban Growth Centre and within the Bay Street Corridor – one of Toronto’s most densely populated and dynamic mixed-use neighbourhoods. The site sits within a rapidly developing high-rise context and is surrounded on three sides by designated Mixed Use Areas, which are focal points for growth and intensification. Some of the tallest towers in the City have been approved or are built within the surrounding area, including near the Yonge and Bloor intersection, only two blocks north of the site, and along the Bay Street and Yonge Street corridors.

The Site is also among the most accessible locations in the city, being situated 350 metres from Bloor-Yonge and Bay subway stations and less than 500 metres from Wellesley and Museum stations. The Site is also within four draft Protected Major Transit Station Areas (PMTSAs) identified by the City. The Site benefits from the robust pedestrian and cycling networks which exist Downtown, and also has the potential to better leverage the exceptional depth and breadth of municipal services, public infrastructure, commercial amenities, retail uses, and employment opportunities that exist within the Downtown.

The City-Building Opportunity

The 25 St. Mary site has great potential for renewal and reinvestment in a manner that meets broader city-building objectives. The holistic redevelopment will appropriately intensify an underutilized site in the Downtown and is envisioned as an opportunity to:

- Improve the City's supply of rental housing through the replacement of all existing rental units and the provision of improved indoor and outdoor amenity space for residents;
- Create new housing and enhance housing supply and diversity;
- Deliver on-site parkland, which can be accommodated due to the Site's large size;
- Provide community amenities, including the proposed daycare facility;
- Enhance the public realm, provide improved public amenities, and enhance the quality of the adjacent streetscapes; and
- Achieve design excellence and placemaking.

The delivery of these city-building benefits is made possible and can be implemented through the proposed development application.

Overview of the Proposed Development

The redevelopment involves the comprehensive renewal of the Site, delivering an integrated mix of uses, including two new residential towers, a new public park, publicly accessible open space, a daycare facility, and at-grade retail uses.

The Proposed Development includes two contemporary towers which will replace the existing building and free up space at grade to improve the overall public realm. The East Tower would have a height of 54 storeys (171 metres, excluding the mechanical penthouse) and the West Tower would have a height of 59 storeys (186.6 metres, excluding the mechanical penthouse). A total of 1,143 residential dwelling units are proposed, comprised of 259 replacement rental units, 14 new rental units, and 870 new residential units. A broad range of unit sizes are proposed, ranging from studios to three-bedroom units.

An approximately 521 square metre public park is proposed at the southeast corner of the property, with frontage onto St. Nicholas Street and Inkerman Street. The park would create a new significant green space asset within the Downtown, in an area that is currently deficient in parkland. In addition to the park, publicly accessible open space is also proposed at grade through the middle of the site, functioning as a new mid-block connection. A second midblock connection is proposed along the west edge of the property, as envisioned in the planning framework for the area.

The Proposed Development will also introduce new community infrastructure to support growth within the Downtown. A 62-space two-level childcare facility is proposed to be integrated into the podium of the West Tower, with a new outdoor forecourt proposed at grade, which will contribute to the creation of an open space linkage along the north side of Inkerman Street. Along St. Nicholas Street, retail space is proposed at grade within the podium of the East Tower, helping to animate the public realm. St. Mary Street will continue to be the primary point of arrival for residents and visitors, with the lobby entrances oriented along this street frontage.

A Strategic Official Plan Amendment Which Aligns with and Implements the Provincial and Municipal Policy Framework

The 25 St. Mary site is unique within the Downtown. The property is:

- Located within the Downtown Toronto Urban Growth Centre;
- Within 500 metres of four TTC subway stations, and within two blocks (350 metres) of the Bloor-Yonge interchange station;
- Situated within four draft PMTSAs identified by the City;
- Located within a highly urban and high-rise context which contains some of the tallest buildings within the City;
- An existing tall tower site, occupied by an existing 24-storey apartment building, that does not contain any heritage assets;
- Surrounded by designated Mixed Use Areas to the north, east and west; and
- Large in size (0.52 hectares or 1.3 acres) and considered to be underutilized today in the context of the prevailing policy framework and infrastructure availability.

Given the Site's unique qualities and locational attributes, the current Apartment Neighbourhood land use designation is not appropriate. The proposed re-designation to Mixed Use Areas is desirable and appropriate, as it would achieve a range of planning policy and city-building objectives, optimize the use of the Site, and more appropriately respond to the Site's unique attributes and the opportunity for renewal.

The proposed re-designation to *Mixed Use Areas* would also enable desirable and appropriate redevelopment options pursuant to Site and Area Specific Policy 382 (SASP 382). The re-designation would create a more consistent land use framework which is appropriate for an existing tall tower site in the high-density heart of the Downtown and near extensive high-order transit and municipal infrastructure.

The application proposes to re-designate most of the property to *Mixed Use Areas* in the parent Official Plan, while also re-designating the proposed park in the southeast corner of the Site to *Parks*. A related amendment is also proposed to integrate the Site into the Downtown Plan mixed use framework by designating it *Mixed Use Areas 1 – Growth*. By re-designating the lands to *Mixed Use Areas*, which is desirable and appropriate, no amendments would be required to SASP 382.

A comprehensive planning rationale in support of this application has been provided as part of this submission. In our opinion, the proposed Official Plan Amendment, and the accompanying Rezoning, Site Plan Approval and Rental Housing Demolition applications, are appropriate and desirable, and they achieve good planning.

Enclosed Materials


In support of the Official Plan Amendment, Zoning By-law Amendment, Site Plan Approval application, and Rental Housing Demolition Application, the following digital materials are enclosed:

1. Signed Application Form and Fee Schedule for the combined Official Plan and Zoning By-law Amendment and Site Plan Control application;
2. Signed Rental housing Demolition and Conversion Application and Screening Form;
3. Planning Application Checklists;
4. Project Data Sheet;
5. Draft Zoning By-law Amendment and Official Plan Amendment, prepared by Goodmans LLP and dated June 7, 2021;
6. Architectural Drawing Set, prepared by gh3 and dated June 7, 2021, including:
 - a. Context Plan
 - b. Roof Plan
 - c. Ground Floor Site Plan
 - d. Underground Garage Plans
 - e. Ground Floor Plan
 - f. Floor Plans
 - g. Site Elevations
 - h. Building Elevations
 - i. Site Sections
 - j. Massing Views
 - k. Perspective Drawings
 - l. ZBA 569-2013 Area Plans.
7. Proposed City of Toronto Daycare Feasibility Plans, prepared by Scott Shields Architects and dated June 7, 2021;
8. Bird Friendly Architectural Elevations prepared by gh3 and EQ Building Performance and dated June 7, 2021;
9. Computer Generated Building Mass Model, prepared by gh3;
10. Landscape Architecture Drawing Set, prepared by Claude Cormier + Associés and dated June 7, 2021, including:
 - a. Rendered Site Plan (Ground Floor)
 - b. Rendered Site Plan (Amenity Floors)
 - c. Rendered Site Plan (Roof Level)
 - d. Ground Floor Plan, Public Realm Plan, Landscape Plan and Lighting Plan
 - e. Subsurface Plan
 - f. Sections within Site
 - g. Sections within Right-of-Way
 - h. Level 2,5 & 9 Amenity Floor Plan.
11. Lighting Plan prepared by Mulvey & Banani and dated June 7, 2021;
12. Tree Inventory and Preservation Plan Report and Signed Arborist Report for Development Applications Form, prepared by Kuntz Forestry Consulting Inc. and dated June 7, 2021;
13. Planning Rationale, Urban Design Analysis and Block Context Study, prepared by Urban Strategies Inc. and dated June 7, 2021;
14. Housing Issues Report, prepared by Urban Strategies Inc. and dated June 7, 2021;
15. Community Services and Facilities Study, prepared by Urban Strategies Inc. and dated June 7, 2021;
16. Complete Community Assessment, prepared by Urban Strategies Inc. and dated June 7, 2021;
17. Public Consultation Strategy, prepared by Urban Strategies Inc. and dated June 7, 2021;
18. Toronto Green Standards Checklist and Energy Modelling Services Memo prepared by EQ Building Performance and dated June 7, 2021;
19. Pedestrian Level Wind Study, prepared by Gradient Wind Engineering Inc. and dated June 7, 2021;
20. Noise Impact Study, prepared by Gradient Wind Engineering Inc. and dated June 7, 2021;
21. Vibration Study, prepared by Gradient Wind Engineering Inc. and dated June 7, 2021;
22. Residential Building Accessibility Checklist, prepared by gh3 and dated June 7, 2021;
23. Heritage Impact Assessment Report, prepared by ERA Architects and dated June 7, 2021;

24. Energy Strategy Report and Take Off Calculations, prepared by EQ Building Performance and dated June 7, 2021;
25. Residential Development Transportation Study, prepared by WSP Canada and dated June 7, 2021;
26. Geotechnical Engineering Report, prepared by Grounded Engineering Inc. and dated May 26, 2021;
27. Phase One Environmental Site Assessment, prepared by Grounded Engineering Inc. and dated May 26, 2021;
28. Phase Two Environmental Site Assessment, prepared by Grounded Engineering Inc. and dated May 26, 2021;
29. Qualified Person Preliminary Statement Letter, prepared by Grounded Engineering Inc. And dated May 26, 2021;
30. Hydrogeological Review Report, prepared by Grounded Engineering Inc. and dated May 26, 2021;
31. Functional Servicing and Stormwater Management Report, prepared by Lithos Group Inc. and dated June 7, 2021;
32. Civil Engineering & Utilities Plans prepared by Lithos Group Inc. and date June 7, 2021, including:
 - a. Site Grading Plan
 - b. Site Servicing Plan
 - c. Site Servicing Cross Sections
 - d. Erosion Control Plan
 - e. Construction Management Plan
 - f. Detail Drawings Plan
 - g. Detail Drawings Plan (Parkland)
 - h. Composite Landscape and Utilities Plan
33. Boundary Plan and Topographical Survey, prepared by R. Avis Surveying Inc. dated May 27, 2020;
34. Sun Shadow Study prepared by Urban Strategies Inc. and dated June 7, 2021.

Urban Strategies is pleased to submit these reports and plans on behalf of Tenblock and looks forward to working with the City to process this application. Please do not hesitate to get in touch with me directly should you have any questions regarding this application.

Yours very truly,
URBAN STRATEGIES INC.



Christine Fang-Denissov, MCIP, RPP, MRAIC
Principal, Urban Strategies Inc.

Cc Stephen Job, Tenblock
Vanessa Bulfon, Tenblock