



25 St. Mary Street, Toronto - Comment Response Matrix

February 13, 2023

Third submission

Official Plan Amendment & Rezoning Application No. 21 166606 STE 13 OZ

Rental Housing Demolition Application No. 21 166617 STE 13 RH

Applicant: Urban Strategies Inc. (on behalf of Tenblock)

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1	How is the loading for the commercial spaces in the east tower being accommodated? Residents in the area have expressed concern with on-street loading along St. Nicholas Street, and this should be avoided.	A Type 'C' loading space is proposed within the P1 level, under the East Tower and has a direct elevator connection via a servicing hallway to the commercial space at grade. Given the small size of the proposed commercial area (which does not even meet the zoning by-law threshold of requiring a loading space), deliveries are expected to be infrequent and limited to small vehicles. Garbage collection will be handled internally and will be transferred through the loading bay/P1 level to prevent any on-street pick-up.																																								
2	Consider design scenarios to accommodate tenant parking on site.	No further revisions are proposed to the parking supply for the proposed development. As per recent discussions with City Housing staff to finalize details for rental replacement obligations, it was agreed to that eligible tenants who current lease a parking space will be entitled to receive additional compensation. As per the November 2022 resubmission, the proposal includes a minimum of 2 car share spaces.																																								
3	Describe the grade related uses abutting St. Mary Street and how these will provide animations.	<p>A concerted effort has been made in the revised proposal to maximize the extent of active street-facing frontages at grade, including residential lobbies, indoor amenity spaces, and retail space, while minimizing the extent and visual impact of necessary servicing areas. The smaller amenity spaces along St. Mary Street and adjacent to the center courtyard will be open to the rest of the lobby areas - contiguous to provide a larger open space and a community-building function for the residents of the building. Relative to closed rooms, a larger open space will provide greater opportunities for chance encounters and social stimulus. Future programming is expected to be communal in character: co-working spaces for those working from home and desire an active and public-facing environment; casual meeting areas; a fireplace or lounge, for example. The social character will be enhanced by the proximity to the landscaped courtyard, and St. Mary streetscape, which will add to the social stimulus provided by these spaces. Sun shades are expected to be provided for thermal control, and the facades bordering all ground level amenity areas are expected to remain open and transparent, promoting an active and more public character.</p> <p>The precise programming of the ground floor uses is outside of the scope of the rezoning and site plan control processes. Section 41 of the Planning Act outlines design matters that are subject to site plan control, and matters that are not. Per Subsection 4.1, matters of interior design and layout are not subject to the site plan control process. The Province of Ontario's Bill 23, More Homes Built Faster Act, 2022, further amends Section 41 of the Planning Act to further specify that exterior design is no longer a matter that is subject to site plan control.</p>																																								
Tower Design																																										
4	Increase the step-back of the east tower to 3 metres above the base building (combined with a 1.5 metre setback from the 1-storey element) to respond to the applicable policy framework and urban design guidelines and fit better with the context along St. Nicholas Street. This is also to be achieved by providing a more significant recess above the fifth floor by increasing the height of the reveal.	<p>The revised proposal's east tower accommodates a 3 metre setback from the 1-storey element (broken into a 1.5 metre step-back above the 1st floor and a further 1.5 metre step-back above the 4th floor) which achieves the intent of the applicable urban design guidelines to achieve separation between base and tower and to mitigate the visual impact of the tower on the public realm.</p> <p>Furthermore, the Revised Proposal provides a minimum 6.0 metre setback between the street curb and the building face along St. Nicholas and St. Mary Streets, as per the requirements of the North Downtown Yonge Site and Area Specific Policy 382 and the North Downtown Yonge Urban Design Guidelines. To require a further east tower setback would impose an unreasonable constraint on the east tower footprint and would compromise the 25 metre tower separation distance that has been achieved between the east and west towers. Any massing changes made to increase the step-back at this building face would require the podium to start crowding into the open space streetscape along St. Nicholas. We have heard from City staff and the community that a large 6.0 m public realm along St. Nicholas Street (and St. Mary Street) is a key priority to achieve for this project.</p> <p>Following a review of the heritage homes and context along St. Nicholas Street, the design team chose to deviate from the standard 3m step-back above the base building (4-storey podium) in order to emphasize and preserve the proposed 1.5m step-back from the double-height, 1-storey massing, with the conviction that this lower step-back is imperative to maintaining the pedestrian scale and heritage character of the St. Nicholas streetscape. The proposed 1-storey step-back has a height of 8.5m at the top of the pitch. This height is generally consistent with surrounding context:</p> <ul style="list-style-type: none"> - 75 St. Nicholas Street has a podium height of approximately 9m at the northern portion and 11.7m at the southern portion. - The newer townhomes to the south on the west side of St. Nicholas have a height of approximately 11.8m at the top of the roof pitch. - The heritage cottages to the south on the east side of St. Nicholas have a height of approximately 8.5m at the top of the roof pitch. 																																								
5	Please provide full elevations and 1:50 Elevations with material labels.	This request is a level of detail that is beyond what is required to finalize a rezoning approval. Detailed building elevations indicating proposed cladding materials will be developed and provided at subsequent stages.																																								
Amenity Space - Total																																										
6	The ratio of amenity space has decreased, and the total number of units has increased. Given the size and scale of the development, an increase in amenity space is requested.	<p>The revised proposal will provide amenity space at a minimum rate of 2.25 square metres of indoor amenity space per residential unit, and 1.25 square metres of outdoor amenity space per unit, for an overall total/blended rate of 3.5 square metres of common amenity space per unit. As the table below shows, this amenity provision rate is well within the range of recently approved developments in the vicinity of the site, including developments that have been approved by City Council, and by the Ontario Land Tribunal and its predecessors.</p> <p>Moreover, the revised proposal includes a 500 square metre parkland dedication, a 339 square metre privately-owned publicly-accessible space, and other landscaped open space that is contiguous with the public right-of-way. This generous provision of at-grade public and private open space mitigates the reduction in proposed outdoor amenity space and will be of utility to residents of the proposed development, as well as the broader community.</p> <table border="1"> <thead> <tr> <th>SITE</th> <th># UNITS</th> <th>INDOOR</th> <th>OUTDOOR</th> <th>TOTAL/BLENDED</th> </tr> </thead> <tbody> <tr> <td>25 St. Mary (proposed)</td> <td>1,283</td> <td>2.25 sm/unit</td> <td>1.25 sm/unit</td> <td>3.5 sm/unit</td> </tr> <tr> <td>1075 Bay St.</td> <td>540</td> <td>2.84 sm/unit</td> <td>1.16 sm/unit</td> <td>4.0 sm/unit</td> </tr> <tr> <td>10 St. Mary St.</td> <td>465</td> <td>2.02 sm/unit</td> <td>1.04 sm/unit</td> <td>3.06 sm/unit</td> </tr> <tr> <td>55 Charles St. E.</td> <td>641</td> <td>2.14 sm/unit</td> <td>1.17 sm/unit</td> <td>3.31 sm/unit</td> </tr> <tr> <td>2 Bloor St. W.</td> <td>1,575</td> <td>2.1 sm/unit</td> <td>0.73 sm/unit</td> <td>2.83 sm/unit</td> </tr> <tr> <td>27 Grosvenor St. & 26 Grenville St.</td> <td>770</td> <td>3.15 sm/unit</td> <td>0.85 sm/unit</td> <td>4.0 sm/unit</td> </tr> <tr> <td>6-16 Wellesley St. W., 5-7 St. Nicholas St. & 586 Yonge St.</td> <td>542</td> <td>2.0 sm/unit</td> <td>1.3 sm/unit</td> <td>3.3 sm/unit</td> </tr> </tbody> </table>	SITE	# UNITS	INDOOR	OUTDOOR	TOTAL/BLENDED	25 St. Mary (proposed)	1,283	2.25 sm/unit	1.25 sm/unit	3.5 sm/unit	1075 Bay St.	540	2.84 sm/unit	1.16 sm/unit	4.0 sm/unit	10 St. Mary St.	465	2.02 sm/unit	1.04 sm/unit	3.06 sm/unit	55 Charles St. E.	641	2.14 sm/unit	1.17 sm/unit	3.31 sm/unit	2 Bloor St. W.	1,575	2.1 sm/unit	0.73 sm/unit	2.83 sm/unit	27 Grosvenor St. & 26 Grenville St.	770	3.15 sm/unit	0.85 sm/unit	4.0 sm/unit	6-16 Wellesley St. W., 5-7 St. Nicholas St. & 586 Yonge St.	542	2.0 sm/unit	1.3 sm/unit	3.3 sm/unit
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Amenity Space - Programming and Details

7	What is the intended programming for the indoor amenity spaces adjacent to the lobbies in both towers? How will this space be differentiated from the lobbies?	Please see the response to comment #3 above as the same response applies.
8	Please provide the vision for the indoor amenity spaces and their programming. Amenities for children should be provided at the lower levels, and an ideal location is at the ground floor facing into the internal courtyard for natural surveillance and potential synergy with play areas in the courtyard.	As noted, this is not a matter to be resolved as part of the rezoning process. However, as an initial vision, the amenities for children may be allocated at upper levels as the ground level indoor amenity areas are expected to be part of a larger and contiguous open space and will experience higher traffic. Future programming at the ground level is expected to be communal in character: co-working spaces for those working from home and desire an active and public-facing environment; casual meeting areas; a fireplace or lounge, for example. Future programming of the indoor amenity areas on levels 5 (east tower) and 9 (west tower) will include programs that encourage connections with the exterior lounge, dining, and BBQ areas. Both building indoor amenity spaces are intended to include workshop spaces for messy activities and dedicated children's play areas that feature whimsical landscape elements that respond to children's scale. A portion of indoor amenity area will be dedicated as "multi-purpose" flexible space. Indoor amenity areas will also include pet-friendly design and wash stations adjacent to outdoor dog runs and relief areas.
9	For the pet amenities, please provide sections, paving materials and details of the proposed pet play areas, including relief areas and connection to the sanitary system. These areas should be contained by a curb, winterized and ready to be maintained through hose connections.	This is not a matter to be resolved as part of the rezoning process. Please refer to Detail 4 on Landscape Sheet L-202 which includes a detail section of the proposed pet relief areas and was included as part of the November 2022 resubmission and will be further developed in a future SPA resubmission.

Unit Sizes and Layout

10	The proposed unit sizes do not align with the Growing Up Guidelines, Please revise the units sizes proposed to achieve the required minimum sizes, and include the details of the unit sizes within the next submission.	The Growing Up Guidelines recommend minimum unit sizes for 2- and 3-bedroom units (87-90 sq.m/936-969 SF and 100-106 sq.m/1,076-1,140 SF, respectively) that are significantly larger than current housing market demand. It is rare for new developments to provide 2- and 3-bedroom units that meet or exceed the Growing Up Guidelines except for higher-end luxury projects, as these unit sizes are extremely expensive and not attainable to a broad segment of the residential market. In the context of its location, this development would provide an appropriate range of sizes, tenures, and levels of affordability for many households.
11	We continue to be concerned about potential impact on overlook / loss privacy of units that meet in the corners, please provide internal layouts. We acknowledge that this information can be provided at next submissions.	Full-height guards will separate the balconies of units that meet at the interior corners. It is not anticipated that there will be increased visual exposure relative to other units. Where possible, bedrooms will be located to provide maximum privacy; internal layouts will be provided with the next SPA submission.

Landscape and Public Realm

12	The internal courtyard between the two buildings may also be used for seating and children play areas. Current design seems to function only as a mid-block connection and this generous space can be used for some other activities such as informal gathering and children play. The edges of the planters, for instance, can be designed as seating walls in some sections.	Noted. This will be further explored in a future SPA resubmission.
13	Please explore spacing out a bit more the short-term bicycle parking between the POPS and the 1075 Bay POPS to minimize visual and physical barriers between the two open spaces.	Noted. Future coordination can be held with the 1075 Bay Street team to coordinate the design of the two POPS during the SPA stage.
14	Proposed illumination levels in the public art area fronting on St. Mary St. still feels low, especially as it is in a space that will be tucked under massing. Consider increasing light levels in this location.	This comment is a level of detail that is beyond what is required to finalize a rezoning. A revised lighting plan will be included as part of a future SPA resubmission. It is our intention that this area will be a well-lit publicly accessible space.

Affordable Housing Units

15	Please confirm the intended configuration of the 18 additional rental units. Are these to be secured as part of the ~40 additional units secured through the rental replacement program, or provided in addition to those units?	Discussions remain on-going with City staff. The tenure of these units will be determined at SPA. We intend to have mixed tenure development.
16	Affordable units, mix, sizes, and number to be confirmed prior to zoning approval, and are to be included on a revised set of architectural plans.	This subject is in active coordination with City staff and the Councillor's office.

Draft By-law

17	Comments related to the draft by-law will be provided under separate cover.	Comments on the draft by-law were received on February 8, 2023. A revised by-law will be resubmitted shortly under separate cover.
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2.0 City of Toronto - Heritage Planning

Neil MacKay, Assistant Planner

Date: January 23, 2023

Comment	Response
<p>The Provincial Policy Statement (PPS) 2020 states that planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property except where the proposed development and site alteration has been evaluated and it has been demonstrated that the heritage attributes of the protected heritage property will be conserved (PPS Section 2.6.3).</p> <p>The City's Official Plan policies state that proposed alterations, development, and/or public works on or adjacent to a property on the Heritage Register will ensure that the integrity of the heritage property's cultural heritage value and attributes will be retained, prior to work commencing on the property and to the satisfaction of the City (OP Policy 3.1.6.5).</p> <p>The HIA states that the design of the new building is intended to improve the relationship of the subject property to adjacent heritage resources. The massing of the podium relates to the scale of the St. Nicholas Street row houses and warehouse buildings, as well as the mid-century office buildings along St. Mary Street. The vertical articulation of the podium references the fine-grained streetscape along St. Nicholas Street and the arched openings reference the openings at the designated Robert Barron Stables at 81-85 St. Nicholas Street. The proposed parkland dedication to the south of the subject property is located adjacent to the listed and designated row houses on St. Nicholas Street.</p> <p>Heritage Planning has no comment on the proposed development in principle; however, in order to minimize the potential impact of the proposal at 25 St. Mary Street to the adjacent heritage properties, the application should show how the proposal respects and complements the scale, character, form and setting of adjacent heritage properties. An elevation drawing and a rendering that shows the proposed building in relation to the adjacent heritage buildings would be helpful in this regard. In 2021, Heritage Planning staff requested 1:100 elevations to evaluate the adjacency relationships to the properties on St. Nicholas Street.</p> <p>Through Urban Design, Heritage Planning staff encourages a high quality design that respects the historic context of the Historic Yonge Street HCD.</p>	<p>Aside from the exclusion of matters of exterior design from the site plan control process, it is unclear why 1:100 block elevations are required from a heritage perspective when it has been determined that the site does not contain any cultural heritage resources. This was not an item that was identified as required during the PAC meeting stage, nor does it appear on the City's terms of reference for application support materials. A Heritage Impact Assessment Report, prepared by ERA Architects Inc. (dated June 2021) was submitted with the first rezoning application submission in June 2021. The report concluded that the proposed development "has been designed to respond to the character of the neighbourhood" and that "it does not negatively impact adjacent heritage resources". It also notes that the proposed development conforms with the applicable Official Plan policies and relevant urban design guidelines. The revised proposal from the November 2022 resubmission provides a minimum 6.0 metre setback between the street curb and the building face along St. Nicholas and St. Mary Streets, as per the requirements of the North Downtown Yonge Site and Area Specific Policy 382 and the North Downtown Yonge Urban Design Guidelines, as well as an articulated east podium elevation that has regard for the scale and character of the nearby cultural heritage properties.</p> <p>Building elevations were not included for the Revised Proposal as the exterior architectural expression is still being refined by Tenblock and its architect. Tenblock would be happy to provide detailed elevations to Heritage Planning staff when available during a future SPA resubmission.</p>

3.0 City of Toronto - Engineering and Construction Services

Jacqueline Rodrigues, P.Eng, Senior Engineer, Development Engineering

Date: January 9, 2023

#	Comment	Response
A. Engineering and Construction Services - Revisions & Additional Information Required for Plans, Studies & Drawings (ZBA APPLICATION)		
<u>1. Transportation Services</u>		
1.1	Shift or enlarge the proposed parkland dedication so that 500 square metres of unencumbered park space is provided, separate from the required Pedestrian Clearway Easement along the St. Nicholas Street frontage.	As per discussions with Kevin Friedrich, Parks Planning and Roberto Ionescu, Transportation Services, the proposed parkland dedication has been shifted slightly west to ensure it is clear of the required sidewalk along St. Nicholas Street. The remaining sliver of land between the parkland dedication and the St. Nicholas right-of-way is now proposed to form part of the contiguous right-of-way dedication from Inkerman Street.
<u>2. Solid Waste Services</u>		
2.1	Revise drawings to indicate and annotate the staging pad abutting the front of the Type G loading space will be at least 123 square metres, and has an unencumbered vertical clearance of 6.1 metres.	The size of the staging pad abutting the Type G loading space has been revised to an area of 128.3 sq.m. As per discussions with Robert Hanna, Solid Waste Management Services and Evan Periman, Tenblock, in January 2023 it was agreed that this site could be upgraded to the 2022 waste management standards which allows for staging area to be located to the side of a Type G loading space. A note has also been added that the staging area in front of the Type G loading space has a vertical clearance of minimum 6.1 metres.
2.2	Revise drawings to indicate the collection vehicle with a length of 12 metres and a width of 2.4 metres, has a minimum turning radii of 9.5m inside and 14m outside entering, exiting and travelling throughout the site and the type G loading space in an unobstructed fashion. The diagram must also indicate the ability of the collection vehicle to enter and exit the site in a forward motion with no more than a three-point turn.	As per discussions with Robert Hanna, Solid Waste Management Services and Evan Perlman, Tenblock, in January 2023 it was agreed that revised collection truck turning diagrams can be deferred to a future SPA resubmission.
<u>3. Engineering & Construction Services</u>		
Please refer to the enclosed response letter prepared by Lithos Group (dated Feb. 10, 2023) for all comments and responses for this section.		