

City of Toronto, City Planning Division
Community Planning – Toronto & East York District
City Hall, 18th floor, East Tower
100 Queen Street West
Toronto ON M5H 2N2

November 21, 2022

**Attn: Jeremy Humphrey
Planner, Community Planning**

Dear Mr. Humphrey,

**Re: 25 St. Mary Street
2nd Submission of Official Plan Amendment, Zoning By-law Amendment,
Rental Housing Demolition & Site Plan Approval applications
21 166606 STE 13 OZ, 21 166617 STE 13 RH and 21 166615 STE 13 SA**

Planning Rationale Addendum Letter

1.0 Introduction

On June 7, 2021, Urban Strategies Inc. submitted applications for Official Plan and Zoning By-law Amendments, Rental Housing Demolition and Site Plan Approval on behalf of Tenblock (the “**Applicant**”) for 25 St. Mary Street (the “**Site**”) to facilitate the redevelopment of the Site with two new towers of 54 and 59 storeys, linked by a new podium (the “**Original Submission**”).

The Original Submission contained 1,143 residential units, inclusive of 259 replacement rental units, as well as 265 m² of ground-floor commercial space, a 709 m² daycare, and a 521 square-metre public park. A total of 367 parking spaces were proposed in a four-level underground garage.

Since the June 2021 submission, the applications have undergone full City and Agency review, with comments provided to the Applicant between August 2021 and June 2022. The Applicant has also held several meetings with City staff, existing tenants of 25 St. Mary, and the local community. The comments, consultation, and engagement have

provided the Applicant with direction to undertake various revisions to the development proposal, as further described herein.

This Planning Rationale Addendum has been prepared in support of a revised development proposal, henceforth referred to as the **Revised Proposal**. The following memo outlines the revisions made to the initial Original Submission in response to the City and Agency comments and input from prior consultation and community/stakeholder engagement. The Revised Proposal provides supplementary analysis as to the appropriateness of the revised development proposal from a land use planning and urban design perspective.

In summary, we maintain the opinion expressed in the original Planning Rationale, Urban Design Analysis & Block Context Study report (dated June 7, 2021) and find that the Revised Proposal, as well as the implementing OPA and ZBA, are consistent with the Provincial Policy Statement, conform to the Growth Plan and City of Toronto Official Plan (including the Downtown Secondary Plan and North Downtown Yonge Site and Area Specific Policy) and have regard for the applicable urban design guidelines.

It is intended that this resubmission will satisfy all remaining comments related to the Official Plan Amendment, Zoning By-law Amendment and Rental Housing Demolition applications to allow for a final Recommendation Report to be advanced in the first quarter of 2023. Tenblock looks forward to continuing their ongoing discussions and collaboration with City staff and Councillor Moise to achieve this timeline. Since the initial application submission, Tenblock has undertaken significant consultation with tenants, adjacent landowners, and the local community and looks forward to continuing their ongoing discussions as the next steps of the project unfold.

2.0 Original Application

The Original Submission involved the demolition of the existing 24-storey 259-unit apartment building constructed in the early 1960s. In its place, a new development would be constructed, comprised of two towers with heights of 54 and 59 storeys. The new development proposed 1,143 residential units, including 259 rental replacement units, 14 additional rental units, and 870 new residential units for which the tenure was not yet determined.

The development proposed a more-complete, vibrant and animated mixed-use environment, integrating a 521 m² public park and a 709 m² child care facility designed to accommodate a 62-space City-run facility. A total of 265 m² of locally-oriented retail space was proposed facing St. Nicholas Street. Four underground levels were proposed, accommodating 367 parking spaces. The proposal also included numerous enhancements

to improve the pedestrian experience at grade, including streetscape and public realm improvements, animated podiums with active uses, and the integration of public art.

3.0 Consultation Undertaken to Date

Prior to and since the initial development application submission in June 2021, the Applicant has undertaken significant consultation with adjacent landowners, the local community and Ward Councillor, and City staff. A summary of consultation undertaken to date is described below.

Table 1

Date	Audience	Purpose/Subject Matter
January 17, 2021	City Planning	Preliminary City discussion and presentation of design concept
January 27, 2021	Canderel	Coordination with 1075 Bay proposal (1/2)
March 12, 2021	City Planning	Formal Pre-Application Consultation
March 29, 2021	Canderel	Coordination with 1075 Bay proposal (2/2)
April 28, 2021	Bay Cloverhill Community Association	Community outreach and project orientation
May 3, 2021	City Planning	Policy discussion
May 18, 2021	Councillor Kristyn Wong-Tam	Councillor outreach and project orientation
July 26, 2021	St. Nicholas Housing Co-op	Intro meeting to review development proposal
September 21, 2021	Urban Design	Review Urban Design issues/comments
October 18, 2021	City Planning	Meeting with Director, City Planning
November 26, 2021	City Planning	Proposed Re-Designation (OPA)
November 29, 2021	Bay Cloverhill Community Association	Meeting with members of executive and delivery of physical package of application materials
December 1, 2021	Tenant Meeting	Applicant-led meeting to outline proposed development and City's rental replacement process, as well as to discuss Tenant concerns
February 28, 2022	Bloor-Yorkville BIA	BIA provided with requested architectural drawings and landscape plan to review for transportation considerations
April 26, 2022	Tenant Drop-In	Informal Tenant engagement in the lobby of existing building. Information boards also installed in building lobby
April 28, 2022	Polo Club 1 (1055 Bay Street)	Introduction meeting to review the development proposal. Polo Club 1 provided with wind study, following request at meeting

April - May 2022	Bay Cloverhill Community Association, St. Nicholas Housing Co-op, University of Toronto, Bloor-Yorkville BIA	Email correspondence updates on upcoming Community Consultation Meeting
May 3, 2022	Community Consultation	City Planning-hosted Community Meeting
June 22, 2022	Bay Cloverhill Community Association	BCCA provided with current comment set for review and additions
August 18, 2022	Bay Cloverhill Community Association	Site tour including a site staking of key outlines of the proposal
August 18, 2022	Polo Club 1 (1055 Bay Street) and St. Nicholas Housing Co-Op	Site flag map of key outlines provided to Polo 1 and Co-Op to allow for self-guided site walk
August 25, 2022	Bay Cloverhill Community Association	Provided BCCA with copy of loading and loading bay drawings, per August 18 request
September 9, 2022	Tenant Update Letter	Letter delivered to all building residents to provide quick project update
September – November 2022	City Planning, Urban Design, Parks Planning & Transportation Services	Various discussions on addressing received City comments and reviewing potential revisions to the Development Proposal

City and Agency comments on the Original Submission were provided to the Applicant between August 2021 and June 2022. A consolidated Comment-Response Matrix is included with this resubmission under separate cover.

4.0 Revised Proposal

The Revised Proposal continues to propose the removal of the existing 24-apartment building and the redevelopment of the Site with two towers of 54 storeys (East Tower) and 59 storeys (West Tower), linked by a podium that ranges in height to respond to the Site’s varied street frontages. The heights of the towers, while the same as before as measured in storeys, have increased modestly overall as further detailed design has been undertaken to determine necessary mechanical and amenity space heights.

The at-grade building setbacks along St. Mary and St. Nicholas Streets have been increased to a minimum 6.0 metres of curb-to-building-face width to satisfy the direction of the North Downtown Yonge Site and Area Specific Policy (“SASP 382”) and to achieve a generous pedestrian realm with opportunities for mature tree growth and other amenities. The towers maintain the same general size and orientation as in the Original Submission, and tower-to-podium step-backs have been increased to 3.0 metres, where feasible.

The Revised Proposal continues to reflect principles of good site organization and built form, including providing building setbacks, tower step-backs, and separation distances

that comply with the City’s standards, to respect the abutting properties and contribute to a harmonious overall block development pattern.

Moreover, the Revised Proposal continues to demonstrate good transition to the adjoining properties in the North Downtown Yonge area. This area continues to experience applications for tall building development, with several recent approvals, including for a 59-storey (210.25 metre) tower immediately to the west at 1075 Bay Street (see the Appendix for a 3D view of the Revised Proposal and the surrounding development activity context). The Proposal continues to provide for a tower setback in excess of 20 metres to the lower-scale uses to the south along St. Nicholas (approximately 26 metres to the south edge of the Inkerman ROW), as required by SASP 382, and incorporates podium articulation to respond appropriately to the more-intimate streetscape condition along St. Nicholas.

The Revised Proposal includes: an increased unit count of 1,283 residential units, including full replacement of the 259 existing rental units (100% existing rental net leasable area), 18 additional rental units, and 1,006 new residential units for which tenure has not yet been determined; an increase in the amount of at-grade retail space; a daycare space that will continue to accommodate a 62-space childcare facility; a slightly re-configured on-site parkland dedication (10% of net site area); and the addition of a new 339 m² Privately-Owned Publicly Accessible Space (POPS) at the southwest corner of the Site, which will integrate seamlessly with the City laneway and the adjacent POPS proposed at 1075 Bay to create a generous mid-block open space.

The main revisions to the proposed development are described in Section 5 of this Addendum. The following table provides a comparison between the first submission and this resubmission.

Table 2

	Original Proposal (June 2021)	Revised Proposal (November 2022)
Overall GFA	81,915 m ²	76,941 m ²
Residential GFA	80,941 m ²	76,630 m ²
Retail GFA	265 m ²	310 m ²
Daycare GFA	709 m ²	730 m ²
Parkland Dedication	10% of net site area (521 m ²)	10% of net site area (500 m ²)
POPS	No POPS proposed	339 m ²
# Residential Units	1,143	1,283
# Rental Replacement Units	259	259 or more
Indoor Amenity Space	2,445 m ² (2.14 m ² /unit)	2,886 m ² (2.25 m ² /unit)

Outdoor Amenity Space	1,679 m ² (1.47 m ² /unit)	1,605 m ² (1.25 m ² /unit)
Vehicle Parking Spaces	367	22 parking spaces (visitor, daycare staff, and public car share parking)
Bicycle Parking Spaces	1,156	1,424
Height	<ul style="list-style-type: none"> • East Tower: 54 storeys (179.0 metres) • West Tower: 59 storeys (194.9 metres) 	<ul style="list-style-type: none"> • East Tower: 54 storeys (189.5 metres) • West Tower: 59 storeys (199.5 metres)
Density	15.72 FSI	15.39 FSI
Tower Floorplate Size	<ul style="list-style-type: none"> • East Tower: 750 m² • West Tower: 786 m² 	<ul style="list-style-type: none"> • East Tower: 773 m² • West Tower: 779 m²

5.0 Description of Key Revisions

5.1 Site Area

A right-of-way dedication is now proposed for Inkerman Street, which will see a 213 m² public conveyance to facilitate a 2.1-metre pedestrian clearway and a layby parking area adjacent to the proposed daycare. This conveyance reduces the net Site area to 4,999 m² (previously 5,212 m²) which in turn slightly reduces the required amount of parkland dedication.

5.2 Built Form Revisions

In response to received City comments, the at-grade building setbacks along St. Mary and St. Nicholas Streets have been increased to provide a minimum 6.0-metre curb-to-building-face width, in keeping with the direction of SASP 382.

The East and West Tower have maintained the same general size and orientation as in the Original Submission, and will have 3.0-metre tower setbacks from the street-facing podium edges along St. Mary and St. Nicholas Streets. The towers also continue to maintain a 12.5-metre setback from the 1075 Bay property line to the west and the centrelines of St. Mary and St. Nicholas Streets. The East Tower podium setback from the proposed public park has increased to 5.0 metres.

Measured in storeys, the tower heights at 54 and 59 storeys remain the same as in the Original Submission. The overall building heights have slightly increased (the East Tower from 179.0 to 189.5 metres, and the West Tower from 194.9 to 199.5 metres) as a result of

further design development that has clarified the requirements for amenity and mechanical floor heights.

This resubmission does not include a revised set of building elevations and renderings. Received comments from Planning and Urban Design noted that the proposed continuous balconies around the towers add more bulk to the massing and visually expand the tower floor plates. It is proposed that remaining concerns of continuous balconies be addressed via proposed draft zoning by-law provisions and that precise architectural details be left for a future Site Plan Approval application resubmission. The revised draft zoning by-law enclosed with this resubmission includes provisions that would ensure tower balconies do not occupy more than 50% of the length of any main wall of a building, are not located within 2.5 metres of corners of a portion of a building, and only project a maximum of 1.5 metres in depth.

5.3 Residential Unit Count and Mix

The overall unit count has increased from 1,143 in the Original Submission to 1,283 as a result of refinements to unit sizes and mix. The Revised Proposal continues to provide for full replacement of the 259 existing rental units. The proportion of unit types for the 1,024 new residential units is:

- Studio: **13.1%** (134 units)
- 1 Bedroom: **19.5%** (200 units)
- 1 Bedroom + den: **41.9%** (429 units)
- 2 Bedroom: **15.3%** (157 units)
- 3 Bedroom: **10.2%** (104 units)
- (total: 1,024 new residential units)*

This unit type breakdown conforms to the Downtown Secondary Plan requirement for the proportion of two- and three-bedroom units, and will provide a variety of housing options for new residents. The architectural plans also indicate a number of 1-bedroom and studio units that may be combined into 2- or 3-bedroom units, thereby meeting the requirements of the Downtown Secondary Plan (Policy 11.1.3).

5.4 Parkland and Public Realm

The Revised Proposal incorporates a 500 m² parkland dedication at the southeast corner of the Site. The parkland size and configuration has been confirmed as acceptable to Parks, Forestry & Recreation further to correspondence with Tenblock in October 2022. The East Tower podium is set back 5.0 metres from the north edge of the park. The proposed retail space at the base of the East Tower has been enlarged to wrap around a

greater length of the south elevation, with the potential for a retail entrance facing the park, to increase animation and porosity in this location.

The Revised Proposal also includes a 339 m² POPS at the southwest corner of the Site adjacent to the daycare entrance. The existing City lane is proposed to be incorporated with the proposed POPS design. Correspondence with City staff has confirmed that the City lane does not need to be widened and can be incorporated into the design of the POPS. This will also allow for a seamless ribbon of publicly accessible mid-block open space on the north side of Inkerman Street and with the proposed POPS by 1075 Bay further to the west.

A publicly-accessible at-grade courtyard has been maintained between the East and West Towers to provide a north-south mid-block connection with pedestrian walkways and planting beds. The at-grade building setbacks along St. Mary and St. Nicholas Streets have been increased to provide a minimum 6.0-metre curb-to-building-face width to accommodate a generous pedestrian realm. Tenblock has engaged with Toronto Parking Authority to explore the potential to integrate new Bike Share Toronto docks on the Site or along the adjacent street rights-of-way.

5.5 Parking and Loading

The Original Submission included 367 parking spaces spread across four underground levels (P1-P4). Since this time, the City of Toronto has adopted By-law 89-2022 which has the effect of eliminating most mandatory minimum parking requirements for new development.

In keeping with this City direction to shift away from personal vehicle use to promote transit ridership and active transportation, Tenblock has removed all resident parking in the Revised Proposal with the exception of 22 visitor parking spaces on the P1 level, which meets the requirements of the Zoning By-law. This enables Tenblock to focus its efforts on providing exceptional bicycle infrastructure, as further detailed in Section 5.8.

The elimination of all resident parking is supported by a Transportation Study Response Letter prepared by WSP which confirms that the updated parking strategy is in-keeping with By-law 89-2022. The Site, which benefits from excellent proximity to public transit, is situated within four Protected Major Transit Station Areas.

The Revised Proposal includes one Type C loading space on the P1 level which is directly adjacent to a moving corridor serving the East Tower. A Type G loading space has been maintained on the ground floor level of the West Tower, accessed from the driveway.

5.6 Floorplate Size

The Original Submission included tower floorplate sizes of 750 m² (East Tower) and 786 m² (West Tower). The tower floorplates in the Revised Proposal are 773 m² (East Tower) and 779 m² (West Tower). This represents a modest increase of the east tower floorplate compared with the initial submission, and a decrease of the west tower. Adequate tower setbacks and separation distances continue to be provided.

In our opinion, the proposed floorplate sizes are appropriate, as the tower shapes and configurations are substantially similar to the initial proposal, the increased floorplate sizes will be imperceptible from the public realm, and there will be no associated undue adverse impacts. Section 7 of this Addendum provides supplementary rationale for the proposed floorplate sizes, including a review of nearby Council approvals for floorplates in excess of the 750 m² guideline.

5.7 Retail Space

The Original Submission included 265 m² of retail space separated into two retail units in the base of the East Tower podium. The Revised Proposal contains 310 m² of contiguous retail space in the base of the East Tower Podium, occupying the full east frontage and with north and south frontage onto St. Mary and the new public parkland dedication, respectively.

The enlarged and reconfigured retail space will provide increased animation of the ground floor frontages, including along the new park edge where access to the retail space is proposed.

5.8 Bicycle Infrastructure

The shift away from providing resident parking has created an opportunity for Tenblock to deliver exceptional bicycle parking and amenities. Whereas the Original Submission included 1,156 bicycle parking spaces, the Revised Proposal incorporates 1,286 long-term bicycle parking spaces at the P1 level. The revised architectural plans include a dedicated cycling ramp, separate from the automobile ramp, to provide access from the driveway down to the P1 level bicycle parking room. The detailed design and layout of the long-term bicycle parking area will be determined through a future Site Plan Approval resubmission in coordination with MJMA Architecture & Design. The room will include for oversized bicycle parking spaces which can accommodate cargo bikes and other larger bicycles, and energized outlets for E-bikes, and potentially space for other family-friendly recreational equipment (i.e. trailers, strollers).

In addition to exceeding the Zoning By-law required levels of short-term and long-term bike parking, the revised proposal has provided for two Bike Share Toronto stations to support the network's fast expansion throughout the City. One station is proposed along the south side of St. Mary Street (currently occupied by on-street parking spaces) and a second is proposed with the existing City lane at the southwest of the site. Tenblock has engaged in preliminary discussions with the Toronto Parking Authority to incorporate Bike Share stations at the subject site and they have indicated that they are open to such an arrangement of on-street parking spaces being replaced with a Bike Share station. Short-term public bike corrals are also proposed along the south side of the St. Mary Street right-of-way for additional bike parking options.

5.9 Private Amenity Space Provision

The Original Submission proposed common amenity space at a rate of:

- Indoor: 2,445 m² (2.14 m²/unit)
- Outdoor: 1,679 m² (1.47 m²/unit)
- TOTAL (blended): 4,124 (3.61 m²/unit)

The Revised Proposal proposes common amenity space at a rate of:

- Indoor: 2,886 m² (2.25 m²/unit)
- Outdoor: 1,605 m² (1.25 m²/unit)
- TOTAL (blended): 4,491 m² (3.25 m²/unit)

In our opinion, the amount of common indoor and outdoor amenity space that is shown in the Revised Proposal is appropriate and reflects a reasonable maximization of the amount of functional outdoor amenity space on the podium rooftops. Both the East Tower and the West Tower will have their own amenity space provision that meets the overall rates of 2.25 m² of indoor and 1.25 m² of outdoor amenity space per dwelling unit.

The West Tower indoor and outdoor amenity spaces are fully shared between residents of the rental replacement units as well as occupants of the new residential units. Although not meeting the exact requirements of the Zoning By-law, the rate of outdoor amenity space (1.25 m²/unit) is appropriate in light of the provision of on-site parkland, POPS and the generously-sized publicly-accessible courtyard space. Pet amenity and relief areas have been integrated into the outdoor amenity spaces in keeping with the City's Pet Friendly Guidelines.

Further, the proposed quantity of amenity space is in line with what has been approved for other nearby area developments, as summarized in the table below.

Table 3

Site	# Units	Indoor	Outdoor	Total/Blended
1075 Bay	540	1,533 sm (2.84/unit)	627 sm (1.16/unit)	2,160 sm (4.0/unit)
10 St. Mary	465	941 sm (2.02/unit)	485 sm (1.04/unit)	1,426 sm (3.06/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

5.10 Rental Housing Replacement

The revised development proposal continues to provide for the replacement of all the 259 rental units from the existing apartment building. The 259 rental replacement units will represent a 100% replacement of the existing net leasable area. All units will be replaced at the same bedroom type and rents. All rental replacement units are located within levels 2 through 30 of the West Tower and will share the ground floor lobby, all amenities, and elevators with the market units in the same building.

In addition to the rental replacement units above, Tenblock is excited to work with City of Toronto staff to deliver new affordable rental units in the building. Under this approach, units with returning eligible tenants would be replaced at the same bedroom type, same rent range category and as close as possible to existing sizes, which meets the City's standard rental replacement requirements. However, units without returning eligible tenants would be reduced in size to match the average size of the market units in the development. These units would still be replaced at the same bedroom type and same rent range category. The resulting 'freed up' net leasable area would be used to create net new rental replacement units – and all of these would be secured at the affordable rent category. The exact unit mix and number of net new units would be determined via a future Site Plan Approval resubmission. Collectively, all the rental replacement types (eligible, non-eligible and net new units) outlined in this scenario would total the net leasable area in the existing rental building. This approach leverages the fact that older rental apartment buildings, such as the one at 25 St. Mary, reflect a different era of development with unit sizes that are much larger than typical new apartments. This represents a significant opportunity to deliver a sizeable amount of new affordable rental housing while still meeting and maintaining the City's rental replacement objectives and requirements.

It would be proposed that the unit mix of the net new affordable rental replacement units would meet the same requirements of the Downtown Plan, which would be the same as

the market units in the proposed development. This would represent a minimum requirement of 15% 2-bedroom units, 10% 3-bedroom units, plus another 15% as 2- or 3-bedroom units or the ability to convert units to achieve that additional 15%.

Based on the above-mentioned criteria, a very preliminary calculation of the number of potential net new affordable units that could be created within the proposed development could be approximately +/- 40 new units. Please refer to the Housing Issues Report Addendum enclosed with this resubmission for further details.

5.11 Embodied Carbon Emissions & Sustainability

Tenblock has heard the clear goals of the City and local community on the importance of sustainability and being cognizant of the environmental impacts of both demolition and construction. Tenblock intends for the proposed development to be a Tier 2 project in the Toronto Green Standard (Version 3). This will also involve the incorporation of a geothermal system for heating and cooling of the proposed buildings. As mentioned, the Revised Proposal removes all resident car parking and three underground levels which significantly reduces the carbon emissions associated with construction and reduces the construction timeline.

The Carbon Analysis Report has been updated to reflect the Revised Proposal and is enclosed with this resubmission:

- The embodied carbon associated with the proposed development has decreased from 31,122 kgCO_{2e}/unit in the Original Submission to 26,977 kgCO_{2e}/unit in the Revised Proposal. This represents a 13.3% improvement.
- The annual carbon emissions per unit (including factoring in transportation emissions) has decreased from 1,519 kgCO_{2e}/unit under Tier 1 of the Toronto Green Standard (Version 3) in the Original Submission to 1,069 kgCO_{2e}/unit under Tier 2 of the Toronto Green Standard (Version 3) in the Revised Proposal. This represents a 29.6% improvement.
- In turn, the carbon positive timeline for the proposed development compared with the existing building improved to 8 years after construction for Tier 2 (Toronto Green Standard V3), which is a whole 5 years faster than the 13 years under Tier 1 in the Original Submission.

These changes are in significant part due to the elimination of three underground parking levels and the different transportation patterns that will result from a reduced parking count, as well as the intent to meet Tier 2 of the Toronto Green Standard (Version 3).

The Carbon Analysis Report has been prepared by Footprint, a firm that specializes in preparing energy strategies and efficiency reports. In October 2021, Tenblock submitted a Carbon Analysis Report to City Planning staff for the proposed development as part of the Original Submission. The report included an analysis of the overall carbon emissions associated with demolition of the existing apartment building, the construction and life of cycle of the proposed development, and a comparison of transportation emissions between the project site and a suburban development (new detached homes measuring 1,700 square feet) with a similar number of units.

6.0 Planning Policy Updates

Since the submission of the Original Submission, there have been several Provincial and Municipal planning policy updates that are supportive of the planning merits of the proposed development. Relevant updates are summarized below.

6.1 PMTSAs

At its meeting February 2, 2022, City Council adopted Official Plan Amendment 524 regarding Protected Major Transit Station Area (PMTSA) delineations in the Downtown Secondary Plan area. PMTSAs are areas planned for increased growth surrounding existing or planned higher order transit.

The Site is within 4 overlapping PMTSAs:

Table 4

SASP	PMTSA	Min. ppl/jobs per hectare	Min. density for subject site
599	Bay	900	1.5 FSI
600	Bloor-Yonge	900	1.5 FSI
602	Wellesley	1,000	1.5 FSI
612	Museum	700	1.5 FSI

The City’s PMTSAs have been submitted to the Minister of Municipal Affairs and Housing for final approval. As a result of Bill 23, announced by the Province on October 25, 2022, municipalities will be required to update zoning to include minimum heights and densities within approved PMTSAs.

Although not currently in effect, the existence of the Site within 4 overlapping PMTSAs contributes to the planning rationale for the proposed development, which will add transit-supportive density and new housing in close proximity to several higher-order transit stations.

6.2 By-laws 89-2022 and 839-2022

At its December 2021 meeting, City Council adopted By-laws 89-2022 and 839-2022 to modify zoning standards for automobile and bicycle parking. The amendments reflect support the City's implementation of Official Plan policies related to discouraging auto dependence and encouraging active transportation, and have the effect of eliminating most minimum parking standards and updating bicycle parking standards. By-law 89-2022, which relates to automobile parking, was appealed to the OLT, however the sole appellant has subsequently scoped their appeal to be site-specific, and thus the by-law is otherwise in-force.

The Revised Proposal is in-keeping with By-laws 89-2022 and 839-2022 to the extent that all resident parking has been eliminated except for 22 visitor parking spaces, and the quantity of bicycle parking has been significantly increased, alongside the provision of infrastructure and amenities to support and encourage a diverse population of cyclists.

7.0 Response to City Planning Comments

Comments on the initial application submission were provided by City Planning in a memo dated June 3, 2022. A consolidated Comment-Response Matrix has been provided under separate cover. Several of the City Planning comments necessitated lengthier responses, which are provided below.

CP Comment (not numbered): *Staff request that the applicant compile a response to Policy 5.1.3 of SASP 382, and reference elements of the design in terms of the building and site orientation that address the policy, notably policies (a) and (b).*

USI Response: (explanatory note: SASP 382 was subsequently amended by the Tribunal with certain of its policies re-numbered such that Policy 5.1.3 in the Council-adopted version of SASP 382 is now **Policy 5.1.1** in the Tribunal-approved version of the SASP. The wording of the policy otherwise remains the same in both versions).

Policy 5.1.1 states that "The only development/redevelopment permitted in the *Apartment Neighbourhoods* designated areas of the Bay Street Character Area will be sensitive low-rise infill that: (a) respects and reinforces the general physical character, pattern, scale, massing, setbacks and heritage value of the area; (b) maintains the prevailing patterns of landscaped open space; and (c) makes best efforts to preserve and enhance existing private amenity space.

The Revised Proposal continues to seek an Official Plan Amendment to re-designate the Site from *Apartment Neighbourhoods* to *Mixed Use Areas* such that Policy 5.1.1 will no longer continue to apply to the Site. In discussions with the Applicant, City Staff have indicated their support, in principle, for the re-designation of the Site.

Notwithstanding, the Proposal maintains the intent of Policy 5.1.1 by:

- (a) Replacing an existing 24-storey apartment building with two new tall towers thereby reinforcing the existing physical character and development pattern, albeit at a greater, but compatible, intensity. The building demonstrates a podium-tower typology with a lower, 4-storey podium along the east side of the Site and an 8-storey podium along the west side, having regard for the varied streetscape conditions and built form adjacencies. The provision of a minimum 6-metre sidewalk zone along St. Mary and St. Nicholas is consistent with the requirements of SASP 382, and the towers are setback 3 metres from the street-facing podium edges along St. Mary and St. Nicholas Streets. The proposed tower setbacks and separation distances achieve the requirements of OPA 352 and the Tall Building Design Guidelines (TBDG). The podium articulation along the east side of the building has regard for the proximate heritage properties and the more-intimate streetscape character along St. Nicholas.
- (b) The proposed development continues to represent a net decrease in the amount of site area covered by buildings and driveways/paved surfaces, thus increasing the amount of landscaped open space in comparison with the existing condition. Moreover, the ground plane will feature significant areas of publicly accessible space, including a park, POPS, and mid-block courtyard connection, that is seamlessly integrated with the surrounding sidewalks.
- (c) The Proposal retains a significant amount of publicly-accessible private space at grade that will remain accessible to the building occupants as well as the broader community for the purpose of active and passive recreation and pedestrian porosity through the block. The Proposal incorporates adequate common indoor and outdoor amenity space to augment residents' individual units and to accommodate a range of community functions.

CP Comment 2A: *The use of the exterior frame based on the balconies has the effect of inflating the buildings to look larger than they appear on paper. It is unclear why the tower of the west building cannot be kept within the 750 m² floor plate size. Please also confirm the floor plate size of the tower with the balconies included as this number will be the true reflection of the bulk and size of the tower.*

USI Response: The TBDG provide that a tower floor plate is to be measured from the exterior wall of the building, excluding balconies. The Revised Proposal comprises two towers with floorplate sizes of 773 (west tower) and 779 (east tower) m². This represents a minor increase over 750 m² that is relatively imperceptible and does not exacerbate

sunlight, sky view or privacy impacts. City Council has supported even greater floorplate size increases in other nearby recent development approvals, including:

- 1075 Bay Street (Council-approved 800 m² floorplate): "Above the base building, the proposed tower floorplate is 800 square metres. While the tower floorplate exceeds the recommended size contained in the TBDG, City Planning staff consider this acceptable given the resulting shadow and wind impacts described in the following sections of this report, as well as appropriate setbacks as discussed further below (Final Report excerpt)."
- 55 Charles Street East (Council-approved 880 m² floorplate): "While the size of the tower floor plate exceeds the recommended size contained in the TBDG, it is acceptable in this instance based on a number of factors including the north-south orientation of the tower which will minimize the impact of a larger floor plate on Charles Street East with respect to loss of sky view and shadow impacts, as well as limiting the extent of balconies projecting in the zoning by-law to minimize the perceived addition to the tower mass of long or wrap-around balconies (Final Report excerpt)."

The 750 m² guideline is intended to be a general best practice, with recognition in the TBDG that larger floorplates may be required for taller buildings to accommodate increased core (elevator/stair) requirements. Moreover, the TBDG recognize that balcony projections are *in addition to* the tower floorplate. In this case, the Revised Proposal includes tower floorplates that modestly exceed 750 m² and do not give rise to undue adverse impacts. As the towers otherwise satisfy applicable criteria for setbacks, stepbacks and separation distance, the minor increase in floorplate size is appropriate and represents good planning and urban design.

Moreover, the initial building design in the Original Submission featured an embedded, wraparound balcony design. The revised draft zoning by-law included with this resubmission includes provisions that would propose that projecting tower balconies do not occupy more than 50% of the length of any main wall of a building, are not located within 2.5 metres of corners of a portion of a building, and would only project a maximum of 1.5 metres in depth.

City Planning Comment 2C: *The policies within Section 6.4 of the North Downtown Yonge SASP are to be applied to the site, specifically to the areas along St. Nicholas Street and Inkerman Street.*

USI Response: SASP 382, Section 6.4, as approved by the LPAT in its decisions June 21, 2016 and November 8, 2016 (PL131355) contains the following policies:

Policy 6.4.1: Development/redevelopment will have a high standard of design, be appropriately scaled, relate positively to the existing and planned context and contribute to enhancing the surrounding public realm.

Response: The Revised Proposal aims to make a positive contribution to the North Downtown Yonge skyline with distinctive architecture and an active and engaging ground plane. The Revised Proposal is appropriately scaled and massed to contribute to a transition between areas of different intensity, including a stepping down of building height to the lower-scale neighbourhood to the south. The development fits within the context of the existing and approved tall buildings surrounding the site (including a 59-storey tower at 1075 Bay and a 51-storey tower at 10 St. Mary Street) and includes a generous public realm consisting of parkland dedication, POPS and a publicly-accessible landscaped courtyard.

Policy 6.4.2: Development/redevelopment will be massed to fit harmoniously with its surroundings. Setbacks, stepbacks, height restrictions, angular planes, appropriate floorplate areas, and/or facade articulation will be employed to achieve appropriate transition for this purpose.

Response: The Revised Proposal is massed to fit harmoniously with the adjacent properties and buildings, and incorporates appropriate building setbacks, stepbacks, separation distances and façade articulation to support the orderly and comprehensive development of the larger block and to provide a good transition to the adjoining properties. In particular, the Revised Proposal:

- Incorporates a minimum 6.0-metre curb-to-building-face setback along St. Mary and St. Nicholas to allow a generous pedestrian zone;
- Incorporates 3.0-metre tower stepbacks on all street-facing elevations;
- Incorporates a setback in excess of 20.0 metres to the lower-scale neighbourhood south of Inkerman Street; and
- Incorporates minimum 12.5-metre tower setbacks to the west property line, and to the centrelines of St. Mary and St. Nicholas.

Policy 6.4.3: The portion of the base building of a tall building immediately adjacent to the lower scale area will generally be no higher than the height of the adjacent buildings, transitioning into a higher base as the distance from the lower scale area increases.

Response: The placement of the public park at the southeast corner of the Site provides a buffer between the development and the lower-scale area to the south along St. Nicholas. The West Tower podium is four storeys in height, with a one-storey (8.5m) projecting

streetwall element on the east side, to establish a lower-scale streetwall that has regard to the more-intimate character of St. Nicholas.

Policy 6.4.4: Floorplate sizes, setbacks and tower separation distances will be important considerations in the evaluation of tall building development/redevelopment in order to address sunlight, shadow, sky view and privacy as set out in the policies of this North Downtown Yonge Site and Area Specific Policy.

Response: The Revised Proposal incorporates floorplate sizes, building setbacks, and tower separation distances to achieve contextually-appropriate built form that co-exists harmoniously with the surrounding properties to allow for adequate sunlight, sky view and privacy, both at-grade and for existing and future building occupants. The placement of the public park and POPS along the south edge of the Site maximizes sunlight on these important public realm features.

The Revised Proposal continues to adequately limit net new shadow impacts on surrounding lands, does not shadow any Signature Parks and Open Spaces within the Downtown, does not impact any designated Neighbourhoods and does not create any net new shadows on the St. Nicholas Character Area. An updated Sun-Shadow Study has been included with this resubmission.

Policy 6.4.5: Above-ground parking structures are not permitted except where a property is located directly above the Yonge subway line or where there is another site specific constraint such that it is demonstrated that it is not possible to construct below grade parking. Above-grade parking structures will be lined with residential units, offices, retail, institutional or indoor recreational uses on exterior walls so that the above-ground parking structure is not visible.

Response: Not applicable—all parking is accommodated in one underground level.

Policy 6.4.6: Tall buildings will not generally be permitted on: (a) Sites that have a planned context that does not contemplate tall buildings as a suitable form of development; or (b) Sites where development/redevelopment is not able to provide floor plate sizes, tower separation distances, setbacks and setback distances that achieve the policies as set out in this North Downtown Yonge Site and Area Specific Policy.

Response: The Site currently contains a tall 24-storey apartment building. The proposed Official Plan Amendment seeks to re-designate the Site to *Mixed Use Areas* in keeping with other lands in the Bay Street Character Area as well as the adjacent lands to the west, north and east, where there are existing and approved tall buildings up to 59 storeys in height. The size and configuration of the Site can accommodate two new tall buildings in

accordance with applicable built form policies and guidelines, including the North Downtown Yonge Site and Area Specific Policy.

CP Comment 2D: The policies of the North Downtown Yonge Urban Design Guidelines should be incorporated into the design of the base buildings, including but not limited to the policies within Section 5.

USI Response: The Revised Proposal has appropriate regard for the North Downtown Yonge Urban Design Guidelines (“NDYUDG”), which are intended to “help improve the quality of life in the North Downtown Yonge area by providing appropriate built form and public space guidance, while being respectful of the integrity of the surrounding context” (Section 1.1).

Section 5.0 includes guidelines regarding Built Form. The Revised Proposal meets the general built form guidelines for new tall building development, and reflects distinct tower base/middle/top elements, porosity and permeability at the ground plane, active grade-related uses, appropriate setbacks and stepbacks with regard to the varied character of the adjacent properties, a contextually-appropriate design that is responsive to adjacent heritage resources, and internalizes parking and loading away from the street.

The guidelines state that the base building will be no smaller than 3 storeys and no taller than 80% of the street ROW width. Although portions of the base building are not consistent with this guideline, the scale and height of the building podium has regard for the Site’s varied street frontages, providing a lower 4-storey scale along St. Nicholas and a more-intermediate 8-storey scale at the west, which transitions to 1075 Bay’s approved 11-storey podium.

The Guidelines speak to tower floorplates. They state that floorplates should be less than 750 m², or otherwise highly articulated. The Proposal includes a minor increase in floorplate size above 750 m², which maintains the intent of the guideline to limit the tall building mass, and is consistent with other area approvals. The Guidelines further state that tower should be 20m away from abutting low-rise buildings. The Proposal is generally consistent with these guidelines.

The guidelines address grade-related retail, and state that newly built retail should have a minimum 4.5-metre floor height. The Proposal will have a ground floor height of 7 metres to support active frontages and overlook onto St. Mary and St. Nicholas Streets. The Proposal maximizes the amount of active building frontages, incorporates a high proportion of glazed surfaces at-grade, provides visible and clear entrance and includes continuous weather protection for pedestrians.

With respect to servicing features including parking and loading, the Proposal accommodates these back-of-house functions via a single driveway along the western edge of the Site from St. Mary Street, and integrates parking and loading within the building mass. Generous bicycle infrastructure is accommodated at grade and at the P1 level.

Section 6.0 contains guidelines related to Street Character Types, with an accompanying figure showing St. Mary and St. Nicholas Streets as “neighbourhood streets”. Per the guideline, neighbourhood streets are intended to reinforce a residential scale. Buildings on these streets should have a large setback from the front property line, creating generous front landscaped areas. The Proposal maintains the residential character of the adjacent streets and provides a sidewalk zone of at least 6.0 metres, in keeping with the requirements of SASP 382.

Section 8.0 contains guidelines on Gateway Treatments, with the corner of St. Mary and St. Nicholas identified as an opportunity for such treatment. Matters of detailed architectural/landscape design for this important corner of the Site will be determined through a future SPA resubmission. The Proposal does not obstruct or encroach into any views or vistas identified in Section 9.0.

Overall, the Revised Proposal has appropriate regard for the totality of the NDYUDG and will support the area character with a compatible new tall building development.

8.0 Conclusion

In summary, it is our opinion that the Revised Proposal continues to represent an appropriate redevelopment of the Site that supports the applicable Provincial and Municipal policy objectives and provides desirable intensification in the heart of Downtown Toronto.

In addition to renewing 259 existing rental apartment units and providing a significant quantity of new housing, the Proposal contributes to a complete community by providing new smaller-scale locally-oriented retail space, a 62-child daycare facility, and new public parkland, POPS, and opportunities for public art integration.

From a built form perspective, the Revised Proposal continues to demonstrate fit and compatibility with the existing and planned context of the Site and surrounding block, and will rejuvenate an underutilized site in the vibrant North Downtown Yonge community.

Updated draft Official Plan and Zoning By-law Amendments to implement the Proposal have been included with this resubmission.

On behalf of Tenblock, we look forward to continuing to work with the City and local community to implement this exciting redevelopment initiative. If you have any questions, please do not hesitate to contact me.

Sincerely,



Christine Fang-Denissov, Partner
M. Arch., MCIP, RPP, MRAIC
URBAN STRATEGIES INC.



Peter Pantalone
Associate Planner
URBAN STRATEGIES INC.

CC. Evan Perlman, MCIP, RPP, Tenblock

APPENDIX: November 2022 Proposal and Surrounding Development Activity

