

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

**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**

Urban Strategies Inc. is acting on behalf of Tenblock in submitting this revised application for an Official Plan Amendment, Zoning By-law Amendment, Site Plan Approval, and Rental Housing Demolition (“Revised Proposal”) to advance the comprehensive redevelopment of 25 St. Mary Street (the “Subject Site” or “the Site”). An initial proposal (“Original Submission”) was submitted on June 7, 2021 to facilitate the redevelopment of the Site with two new towers at 54 and 59 storeys, linked by a podium. The Original Submission has undergone full City and agency review, with comments provided between August 2021 and June 2022. Tenblock and their development team has participated in numerous meetings and discussions with City staff, existing tenants, and the local community. These discussions have provided our team with direction to undertake various revisions to the development proposal, as further described herein.

The Revised Proposal continues to meet the applicable policies of the Official Plan and Downtown Plan, including compliance with applicable North Downtown Yonge Site and Area Specific Policy (SASP 382). It is intended that this resubmission will satisfy all remaining comments related to the Official Plan Amendment, Zoning By-law Amendment, 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 on-going discussions with City staff and Councillor Moise to achieve this timeline.

In response to the received comments, significant revisions have been undertaken:

- **Site Layout:** The Revised Proposal continues to feature two towers at 54 storeys (East Tower) and 59 storeys (West Tower), linked by a podium that ranges in height from 4 to 8 storeys, to respond to the Site’s varied street frontages. The Revised Proposal continues to reflect good urban design and site organization principles, including providing appropriate building setbacks, tower step-backs, and separation distances that are consistent with applicable policies and guidelines. Tower-to-podium step-backs have been increased to 3.0 metres, where feasible. The at-grade building setbacks along St. Mary and St. Nicholas Streets have been increased to a

minimum of 6.0 metres (curb-to-building-face width) to comply with North Downtown Yonge Site and Area Specific Policies (“SASP 382”), accommodate more generous space for the pedestrian realm, and support the growth of mature trees. The East Tower podium setback from the proposed public park has been increased to 5.0 metres. The Revised 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), to conform with policies in SASP 382. The Revised Proposal also incorporates podium articulation to respond appropriately to the more-intimate streetscape condition along St. Nicholas.

- **Tower Heights and Floor Plates:** The heights of the towers have increased slightly to account for space to accommodate mechanical equipment and clear spans at amenity levels. Specifically, the East Tower increased from 179.0 to 189.5 metres, and the West Tower increased from 194.9 to 199.5 metres. Notwithstanding this modification, the revised geodetic heights of the towers are compatible with the surrounding development context and form a transition moving from Bay Street toward Yonge Street. This includes the approved 59-storey (210.25 metre) tower immediately to the west of the Site at 1075 Bay Street, and the approved 50-storey (170.0 metre) tower at 10 St. Mary Street to the northeast of Site. Tower floorplates have also been slightly revised, with the West Tower reducing from 786 to 779 square metres and the East Tower increasing from 750 to 773 square metres.
- **Building Elevations and Balconies:** Comments from urban design noted that the continuous balconies around the towers in the Original Submission add visual bulk to the towers. The design team is in the process of developing an alternative approach to the balcony treatment for a future Site Plan Approval resubmission. As such, this resubmission does not include a revised set of building elevations or renderings. It is proposed that the general siting and massing of the towers be reviewed and finalized as part of the requested zoning by-law amendment, and that precise architectural details be left for a future Site Plan Approval application resubmission(s). 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.
- **Bicycle Infrastructure:** Tenblock is seeking to become a trailblazer among housing developers in the design, provision, and promotion of bike-friendly facilities. The revised architectural plans include a dedicated cycling ramp, separate from the main vehicle ramp, to provide access from the site’s driveway down to the P1 level long-term bicycle parking room. The bicycle ramp and long-term bicycle parking area on the P1 level is physically separated from the vehicle visitor parking to avoid unsafe interactions. In addition, cyclists will also have the option of using a dedicated bike/freight elevator accessed from the driveway.

The P1 bicycle parking room will be designed in a future Site Plan Approval resubmission in coordination with MJMA Architecture & Design to ensure an innovative layout and design. This

would incorporate spaces for e-bikes, cargo bikes, e-cargo bikes and other cycling-supportive amenities. 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. Tenblock is excited to support vehicular alternatives and will continue to improve bike parking and infrastructure on-site.

- **Parking:** The Original Proposal included 367 parking spaces spread across four underground levels (P1-P4). Since this time, the City of Toronto has adopted By-law 89-2022. In keeping with this City's direction to shift away from personal vehicle use to promote transit ridership and active transportation, the Revised Proposal removes all resident parking except for 22 parking spaces for visitors, daycare staff, or public car share vehicles on the P1 level, which meets the requirements of the Zoning By-law. This revision encourages a shift away from single-occupancy vehicle use and helps further encourage the already high usage of transit, walking, and cycling modes of travel in the area. In addition, the space reclaimed within the P1 level from the reduced parking supply will be used to provide residents with first-in-class, high-quality bicycle parking and amenities. Importantly, the elimination of three underground levels compared with the initial submission will significantly reduce future construction timelines (initial estimates state this could equal eliminating one year of construction time). This allows returning eligible tenants to return to their rental replacement units sooner. It also represents a significant reduction in carbon emissions associated with the construction of the proposed development.
- **Embodied Carbon Emissions and 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 kgCO₂e/unit under Tier 1 of the Toronto Green Standard (Version 3) in the Original Submission to 1,069 kgCO₂e/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.

- **Parkland and Public Realm:** The Original Proposal continues to incorporate a 500 m² (10%) parkland dedication at the southeast corner of the Site. Tenblock has engaged in discussions with Parks, Forestry & Recreation staff and has confirmed that the parkland size and configuration is acceptable. The proposed location in the southeast corner of the site will also maximize the amount of sunlight the new proposed park receives. 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. The proposed sidewalk and lay-by spaces along Inkerman Street are also now shown as a right-of-way dedication.
- **Rental 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.

- **Project Statistics and Unit Count:** The overall unit count has increased from 1,143 in the Original Proposal to 1,283 in the Revised Proposal as a result of refinements to unit sizes and mix. This total unit count is comprised of 259 rental replacement units, a minimum of 18 new rental units, and 1,006 new residential units with tenure to be determined. 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. In addition, the enclosed floor plans include notation of where certain smaller units can be combined to meet the additional 15% unit requirement for 2 and 3 bedroom units in the Downtown Plan.

- Day care and Retail Uses:** The revised development proposal continues to deliver the key City-building components of a proposed daycare facility along Inkerman Street and at-grade retail uses along St. Nicholas Street. These uses will help introduce a mix of uses and community infrastructure to support growth within the neighbourhood. The proposed day care (sized for 62 children) is integrated within two storeys into the podium of the west tower with an outdoor pavilion on the second floor. The retail space facing St. Nicholas Street (with potential entrances from St. Mary to the north and the public park to the south) is sized at 310 m² and is envisioned as a bike café for some or all of the space. A bike café is a hybrid retail space with a publicly-accessible café and bike shop (service and retail). Tenblock intends for this use to contribute to local vibrancy, help animate the street, and support active transportation choices for residents of the site and surrounding community.

The following table provides a comparison between the first submission and this resubmission:

	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)
Bicycle Parking Spaces	1,156	1,424 (1,286 long-term and 138 short-term)
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

SUBMISSION MATERIALS

In support of the resubmission of the Official Plan Amendment, Zoning By-law Amendment, Rental Housing Demolition and Site Plan Approval application resubmission for 25 St. Mary, the following materials are enclosed:

1. **Development Approval Resubmission Form;**
2. **Comment Response Matrix**, with comments and responses to 1st OPA, ZBA & SPA Submission, dated November 21, 2022;
3. **Project Data Sheet;**
4. **Draft Official Plan Amendment;**
5. **Draft Zoning By-law Amendment** to City of Toronto By-law 569-2013;
6. **Planning Rationale Addendum**, dated November 21, 2022, prepared by Urban Strategies Inc.;
7. **Housing Issues Report Addendum Letter**, dated November 21, 2022, prepared by Urban Strategies Inc.;
8. **Architectural Drawing Set**, dated November 21, 2022, prepared by gh3, including:
 - o project statistics
 - o TGS statistics template ,
 - o context plan
 - o site plan
 - o P1 plan
 - o floor plans
 - o sections;
9. **Residential Building Accessibility Checklist**, dated November 21, 2022, prepared by gh3;
10. **Proposed Daycare Feasibility Plans**, prepared by Scott Shields Architects, dated November 21, 2022;
11. **Sun Shadow Study**, dated November 21, 2022, prepared by Urban Strategies Inc.;
12. **Computer Generated Building Mass Model**, dated November 21, 2022, prepared by gh3;
13. **Toronto Green Standards Checklist**, dated November 21, 2022
14. **Landscape Drawing Set**, dated November 21, 2022, prepared by CCxA, including:

- Ground Floor, Public Realm, Landscape and Lighting Plan
 - Subsurface and Soil Volume Plan
 - Sections with site
 - Details – Site Furnishings
 - Sections within Right-of-Way
 - Level 2,5 & 9 Amenity Floor Plan.
15. **Pedestrian Level Wind Study Addendum Letter**, dated November 21, 2022, prepared by Gradient Wind Engineers & Scientists;
16. **Transportation Study Response Letter**, dated November 21, 2022, prepared by WSP Inc.;
17. **Lighting & Photometric Plan Set**, dated November 21, 2022, prepared by Mulvey & Banani;
18. **FSR / SWM Report (including Servicing Report Groundwater Summary)**, dated November 2, 2022, prepared by Lithos Group;
19. **Civil Drawing Set**, dated November 21, 2022, prepared by Lithos Group, including:
- Site Grading Plan
 - Site Servicing Plan
 - Site Servicing Cross Sections
 - Erosion Control Plan
 - Detail Drawings
 - Composite Landscape and Utilities Plan
 - Construction Management Plan
20. **Geotechnical Report**, dated November 21, 2022, prepared by Grounded Engineering;
21. **Hydrogeological Review Report (including Hydrological Review Summary)**, dated November 21, 2022, prepared by Grounded Engineering; and
22. **Carbon Analysis Report**, dated November 21, 2022, prepared by Footprint.

We look forward to discussing and reviewing our revised development proposal with you and your colleagues. Note that a comprehensive comment response matrix to received comments is enclosed with this resubmission for circulation and review. As noted, it is intended that this resubmission will satisfy all remaining comments related to the Official Plan Amendment, Zoning By-law Amendment, 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 on-going discussions with City staff and Councillor Moise to achieve this timeline. Should you have any further questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christine Fang-Denissov', written in a cursive style.

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

cc. Evan Perlman, MCIP, RPP – Tenblock