



# BOUSFIELDS INC.

Project No. 17341

November 13<sup>th</sup>, 2020

Katherine Bailey  
Planner, Community Planning  
City Planning  
City Hall, 100 Queen Street West  
East Tower, 18th Floor  
Toronto, ON M5H 2N2

Dear Ms. Bailey,

***RE: Addendum to March 2019 Planning and Urban Design Rationale  
Rezoning Application & Site Plan Approval Resubmission  
27 Grosvenor Street and 26 Grenville Street***

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As you are aware, we are planning consultants to Greenwin Holdings Inc. and Choice Properties REIT, the owners of the lands municipally known as 27 Grosvenor Street and 26 Grenville Street (the “subject site”), with respect to their applications for rezoning and site plan approval to permit a mixed-use development with retail, daycare and both market rental and affordable rental housing units.

We are pleased to submit this Planning and Urban Design Rationale Addendum Letter, which has been prepared to supplement our March 2019 Planning and Urban Design Rationale report (the “March 2019 Report”), in order to address revised plans and supportive materials enclosed with this resubmission. This addendum provides a summary of revisions made to the proposal to respond to comments received from City Staff and other commenting agencies, at the City-led community consultation meeting, and through numerous meetings with key stakeholders including the Ward Councillor, Infrastructure Ontario (IO), residents of the Simôn Apartments (32 Grenville Street), the Murano Condo Board (37 Grosvenor Street and 38 Grenville Street), residents of the Peregrine Co-op (18 Grenville Street), the Bloor Cloverdale Community Association (BCCA) and the Downtown Yonge BIA.

This letter also addresses updates to the policy framework since the application was submitted, including the Provincial Policy Statement, 2020, the Growth Plan for the Greater Golden Horseshoe, 2019, the Downtown Secondary Plan, and updated Official

Plan public realm and built form policies introduced by Official Plan Amendment 479 and 480.

The key revisions to the proposal include:

- a reduction in the building heights from 50 to 46 storeys and from 35 to 31 storeys;
- removing all new net shadow on Opera Place Park between 12 and 2 pm on March 21<sup>st</sup> and September 21<sup>st</sup>, in accordance with Policy 6.2.9 of Site and Area Specific Policy 382;
- refining and improving the ‘Green Loop’ design through the subject site;
- adjusting the lot line between 27 Grosvenor Street and 25 Grosvenor Street to allow for additional flexibility in the towers’ locations and orientation (pending approval of a lot line adjustment application);
- providing for a 12.65 metre tower setback from the south tower to 18 Grenville (Peregrine Co-op);
- securing, in principle, a limiting distance agreement with IO with respect to 32 Grenville Street, thereby eliminating the potential for a tower to be developed on 32 Grenville Street and eliminating tower separation concerns to the west;
- mitigating potential privacy impacts between the North Tower podium and the Murano Condo building to the west through suite design and the elimination of the majority windows; and
- increasing the childcare centre size from approximately 641 to 670 square metres and the childcare centre outdoor play area from approximately 192 to 218 square metres.

This addendum concludes that, with the design revisions summarized below, the revised proposal continues to be appropriate from the perspectives of intensification, land use policy, height, massing, density, built form, urban design, heritage, transportation and servicing. Subject to the additional comments set forth herein, the findings and analysis set out in our March 2019 Report continue to be relevant and accurate.

## **PUBLIC CONSULTATION**

As discussed in the Public Consultation Strategy Report Addendum Letter, prepared by Bousfields Inc. (dated November 13<sup>th</sup>, 2020) which forms part of this resubmission, the applicant and their consulting team organized a community consultation meeting in tandem with the City, facilitated targeted stakeholder meetings with neighbouring landowners and area associations, and have met with City Staff and the Ward Councillor.

The following is a list of key meetings that the applicant has organized and/or attended (not including meetings with City Staff) following the submission of the initial application in March 2019:

1. Meeting with Murano Condo Board Executive, April 2019;
2. Meeting with the Bay Cloverhill Community Association, May 2019;
3. Meeting with the Downtown Yonge BIA, May 2019;
4. Meeting with Peregrine Co-op, June 2019;
5. Meeting with Peregrine Co-op, June 2019;
6. Meeting with Murano Condo Board Executive, July 2019
7. Meeting with Councillor Kristyn Wong-Tam, September 2019;
8. Community Consultation Meeting, May 2020;
9. Meeting with Infrastructure Ontario, June 2020;
10. Meeting with Murano Condo Board Executive, September 2020; and,
11. Meeting with Bay Cloverhill Community Association, September 2020.

At a high level, the key feedback received through the above noted meetings and through comments from City Staff related to addressing the following matters:

- Shadow impact of the proposed towers on Opera Place Park;
- The appropriateness of the proposed tower setbacks from 32 Grenville Street to the west and 18 Grenville Street to the east, in the event those properties are redeveloped with tower form buildings;
- The appropriateness of the interface between the west facing units on floors 4-9 of the proposed podium and east facing units on floors 4-9 of Murano Condos North Tower;
- The proposed location of storage space along the Grenville Street frontage on floor 2 in place of more active uses;
- The proposed location and configuration of the childcare centre and covered outdoor play space;
- The proposed size and location of the parking garage exhaust shaft;
- The proposed width and design of the mid-block connection;
- The appropriateness of the setback of the proposed podium to existing street trees along Grosvenor Street;
- The shadow impact of the proposed towers on the outdoor amenity spaces of 18 Grenville Street; and,
- The overlook impact of the proposed 4<sup>th</sup> floor amenity terrace on the 3<sup>rd</sup> floor amenity area of 18 Grenville Street.

## **REVISED PROPOSAL**

On March 19, 2019, the owners filed Zoning By-law Amendment and Site Plan Approval applications to permit the redevelopment of the subject site with a new two-tower mixed-use development containing affordable and market rental residential, retail, and daycare uses. A total gross floor area (GFA) of 62,574.84 square metres was proposed, including 394.96 square metres of retail GFA and a 696.48 square metre childcare centre, resulting in an overall density of 16.27 times the area of the lot. A total of 844 rental dwelling units were proposed, of which 257 were proposed to be affordable rental units. The proposed development consisted of a 50-storey South Tower and a 35-storey North Tower, connected by a 9- to 11-storey podium.

Since the time of the initial application, we have reviewed the technical circulation comments, met with staff, the community and neighbouring landowners and tenants on a number of occasions, gathered feedback on the project website, and have made a number of key revisions in response to the feedback provided.

The revised proposal continues to provide for a landmark two-tower mixed-use and transit-oriented development on the subject site with a childcare centre and a large proportion of the proposed rental units at affordable rents. The proposal continues to provide an appropriate mix of compatible and complimentary uses on the underutilized property while introducing substantial public realm improvements that advance longstanding community initiatives.

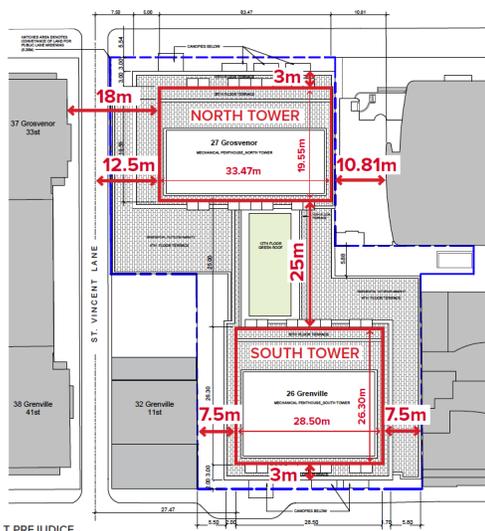
The key revisions include the following:

- increasing the site area from 3,844 m<sup>2</sup> to 3,902 m<sup>2</sup>, in accordance with a future lot line adjustment application (see below for further details);
- reducing the tower heights from 50 storeys (161.7 metres) to 46 storeys (155.2 metres) and 35 storeys (117 metres) to 31 storeys (110.05 metres), respectively, thereby removing all new net shadow on Opera Place Park, in accordance with Policy 6.2.9 of SASP 382;
- adjusting the South Tower floor plate to increase the easterly tower setback from 18 Grenville Street from 7.5 metres to 12.65 metres and decrease the westerly tower setback from 32 Grenville Street from 7.2 metres to 5.5 metres, in accordance with the limiting distance agreement that is to be secured over 32 Grenville Street;

- slightly reducing the North Tower's easterly tower separation from the abutting office building at 25 Grosvenor Street from 10.81 to 9.27 metres (with a 0.77 metre tower setback from the lot line), in accordance with the future lot line adjustment;
- reducing both towers' stepbacks from the edges of the street-facing podiums from 3 metres to 2 metres while increasing the podium setbacks from 1.7 metres to 2 metres along Grenville Street and from 2.7 to 3.0 metres along Grosvenor Street;
- slightly reducing the separation distance between the North Tower and South Tower from 25.0 to 24.5 metres (see **Figure 1**);
- adjusting the North Tower and South Tower floorplates from 787 to 782 square metres and from 782.8 to 783 square metres, respectively;
- reducing the overall gross floor area from 62,574.84 to 60,722.20 square metres, resulting in a reduction in density from 16.27 FSI to 15.56 FSI;
- reducing the number of residential units from 844 to 763, including the elimination of 53 market and 28 affordable rental dwelling units;
- slightly reducing the size of the retail unit along Grenville Street from 308.8 to 257.8 square metres while increasing the retail unit size along Grosvenor Street from 86.2 to 99.9 square metres;
- increasing the childcare centre size from 641 to 669.8 square metres with the addition of at-grade stroller storage space, and increasing the childcare centre's covered outdoor play space size from 192.4 to 217.5 square metres;
- replacing the storage area facing Grenville Street on Floor 2 with a leasing office, and relocating the storage area to an internal portion of the podium;
- refining the interface between west-facing units on Floors 4-9 of the north end of the podium and Murano Condos North Tower by limiting window locations and offsetting unit areas;
- refining the interface between west-facing units on Floors 3-7 of the south end of the podium and 32 Grenville Street by providing more details of the proposed screening system (see Drawing A-307 of the Sweeny architectural drawing package);
- reducing the indoor amenity space from 3.56 to 3.10 square metres per unit while slightly increasing the outdoor amenity space from 0.87 to 0.90 square metres per unit, while continuing to provide 4.0 square metres of amenity space per unit overall;
- introducing a 2,071.29 square metre privately-operated gym within the proposal's indoor amenity space, which will be fully and freely accessible to all tenants of the building (including those in affordable rental units);

- reconfiguring the childcare centre outdoor play area into a squarer shape in response to comments from staff;
- increasing the width of the mid-block connection on the southern portion of the subject site from 5.2 to 5.5 metres;
- providing a wider pedestrian zone on the northern portion of the subject site by reducing the number of structural columns beneath the cantilever from 5 to 2 and removing the previously-proposed planters;
- comprehensively redesigning the mid-block connection to incorporate paving, landscaping, and lighting elements, a translucent sculptural canopy element, seating and a protected entryway, in a manner that creates a defined sense of place;
- internalizing the parking garage exhaust shaft at the northern edge of the mid-block connection and replacing it with a smaller intake shaft that has been integrated into a sculptural bench;
- refining the construction management plan in order to preserve the five existing mature trees along the Grosvenor Street frontage; and
- decreasing the total number of vehicle parking spaces from 215 to 201 and the total number of bicycle parking spaces from 845 to 782.

### Current Application



### Proposed Revisions

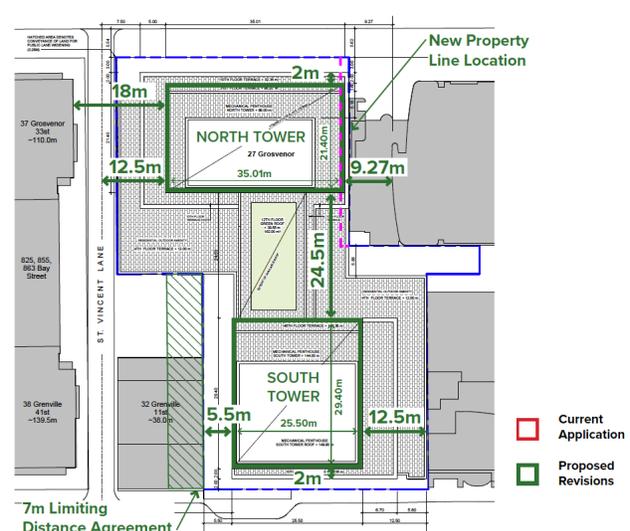


Figure 1 – Conceptual Illustration of tower relocations

### Lot Line Adjustment

As noted in our March 2019 Report, the subject site was formerly part of a larger consolidated property owned by Infrastructure Ontario known municipally as 15-27 Grosvenor Street and 26 and 32 Grenville Street. By way of background, the subject site was created through an application for consent filed by Infrastructure Ontario, and then approved with conditions by the Committee of Adjustment on October 24, 2018 (File No: 18 115208 STE 27 CO). The consent application had the effect of severing the subject site (27 Grosvenor Street and 26 Grenville Street) from the rest of the property. At the time our March 2019 Report was written, the consent application had been appealed to the Toronto Local Appeal Body (TLAB) by both IO and the applicant as a result of the wording of some of the preconditions to the issuance of a consent certificate. The City of Toronto and the applicant reached a settlement, and the application was approved with revised conditions on March 14, 2019 (TLAB Case File Number: 18 258367 S53 27 TLAB).

Since the TLAB hearing in March 2019, the applicant and IO continued to study the eastern boundary of the northern portion of the site at 27 Grosvenor Street property, which abuts the western boundary of 25 Grosvenor Street (retained by IO). It is our understanding that the delineation of the boundary between these two properties was done in a conceptual manner at the time consent application 18 115208 STE 27 CO was filed. Further review and study of the as-built condition between the two properties –below, at, and above grade – has resulted in an agreement-in-principle to shift the boundary between 25 Grosvenor Street and 27 Grosvenor Street eastward (toward 25 Grosvenor Street) by approximately 1.54 metres. A consent application to permit this lot line adjustment is forthcoming. The resulting area of the subject site will be approximately 3,902 square metres, slightly larger than the 3,844 square metre area of the site at the time of the initial application. While this application has not been formally submitted or approved, this addendum letter will measure setbacks, separation distances etc. from this new boundary and will calculate density based on the new site area.

In addition, the lot line adjustment has been included in the drawing set to ensure that all City departments commenting on the revised proposal are aware of the adjustments. It is our intention to update the Site Plan Approval drawing set after the Committee of Adjustment has dealt with the lot line adjustment.

### Limiting Distance Agreement

In addition, since the submission of the initial application, the owners have secured a limiting distance agreement in principle with IO with respect to 32 Grenville Street, which immediately abuts 26 Grenville Street to the west and is currently occupied by the Simôn Apartments, an 11-storey, 40 unit assisted living apartment building that is designated under Part IV of the Ontario Heritage Act. As set out in our March 2019 Report, it continues to be our opinion that this property is not a good candidate for a tall building as a result of its minimal lot frontage, area, and configuration (resulting in a difficulty accommodating an efficient tower floorplate), its designation under Part IV of the Ontario Heritage Act, and its inability to maintain adequate tower separation distances from Murano Condos south tower and from the subject site.

Notwithstanding the foregoing, in order to further secure appropriate light, view, and privacy for prospective residents of west facing units in the South Tower and south facing units in the North Tower, the applicant and IO intend to execute a limiting distance agreement which would have the effect of limiting any potential for a tower or vertical addition on top of the easternmost 7 metres of 32 Grenville Street. The City of Toronto is expected to be a signatory to this limiting distance agreement. On this basis, it continues to be our opinion that the appropriateness of the South Tower's separation distance to the west be assessed based on its distance to Murano Condos South Tower.

### Public Realm

The revised proposal advances a number of public realm improvements beyond those contemplated by the original proposal. The revised proposal provides for wider pedestrian zones along Grenville Street and Grosvenor Street by providing for a 2 metre setback from the south property line and a 3 metre setback from the north property line, 0.29 metres and 0.30 metres wider than the setbacks contemplated by the original proposal, respectively. These increased setbacks would result in curb-to-building face distances of 5.0 to 7.8 metres along Grenville Street and 8.86 metres along Grosvenor Street.

The revised proposal also continues to propose the conveyance of a 0.26 metre strip of land along the north portion of the site to widen St. Vincent Lane to 6.0 metres.

Further, the revised proposal includes a substantial redesign of the mid-block connection in response to feedback from the BCCA and City Staff. On the south half of the subject site, the width of the mid-block connection has been increased from 5.2 metres to 5.5

metres, providing for a wider pedestrian clearway. On the north half of the subject site, the width of the pedestrian clearway has been increased by reducing the number of structural columns beneath the cantilever from 5 to 2 and by removing the previously-proposed planters. The revised design includes a new unique geometric paving pattern, to be continuous throughout the length of the mid-block connection whereas the original proposal did not include paving in the east-west portion of the connection. The extension of the paving is intended to indicate to users that the connection continues around the connection's central jog.

The revised design includes a colourful translucent sculptural canopy with lighting, a green wall and other planting and landscaping features, along with seating areas and bollards. The revised design also relocates the parking garage exhaust shaft previously proposed at the northern edge of the mid-block connection and replaces this with a smaller intake shaft designed to function as part of a sculptural bench. Finally, the revised proposal contemplates repurposing the curb in front of the midblock connection as a protected entryway.

#### Amenity

The revised proposal includes 2,367.2 square metres of interior residential amenity space, a decrease from the 3,008.83 square metres contemplated as part of the original proposal, while continuing to provide for at least 4.0 square metres of overall amenity space per dwelling unit. The per unit rate has only decreased from 3.56 square metres per dwelling unit to 3.10 square metres per dwelling unit, given the reduction in the number of units. The revised proposal includes 1,520.33 square metres of indoor amenity space on Floor 3 and 846.9 square metres of indoor amenity space on Floor 4. We note that the revised proposal will include a 2,071.29 square metre private gym on Floor 3, 73.4% (or 1,520.33 square metres) of which is proposed to be included as indoor amenity space for the purpose of the zoning by-law.

The revised proposal includes approximately 685.3 square metres of outdoor residential amenity space, a decrease from the 731.77 square metres contemplated as part of the original proposal. However, given the reduction in the unit count, the per unit rate has increased from 0.87 to 0.90 square metres per dwelling unit. The revised proposal includes a 319 square metre outdoor amenity terrace on the west side of the 11-storey podium element that connects the two towers and a 366 square metre terrace on the east side of this massing.

The revised proposal introduces a 1.8 metre tall glass screen along the west edge of the west amenity area to provide for wind protection and a 1.8 metre tall patterned glass screen along the east edge of the east amenity area to address privacy and overlook concerns between this terrace and the existing outdoor amenity terrace on the 4<sup>th</sup> floor of 18 Grenville Street.

A summary setting out a comparison of the revised design to the original proposal is provided in **Table 1** below.

**Table 1 – Statistical Comparison**

| <b>Statistic</b>               | <b>Initial Submission<br/>(March 2019)</b>              | <b>Resubmission<br/>(September 2020)</b>                |
|--------------------------------|---|---|
| Site Area                      | 3,846 m <sup>2</sup>                                    | 3,902 m <sup>2</sup>                                    |
| <b>Total Gross Floor Area:</b> | <b>62,574.84 m<sup>2</sup></b>                          | 60,722.20 m <sup>2</sup>                                |
| • Residential                  | 61,483.40 m <sup>2</sup>                                | 58,950.70 m <sup>2</sup>                                |
| • Retail                       | 394.96 m <sup>2</sup>                                   | 390.20 m <sup>2</sup>                                   |
| • Daycare                      | 696.48 m <sup>2</sup>                                   | 741.10 m <sup>2</sup>                                   |
| Density                        | 16.27 FSI   | 15.56 FSI   |
| <b>Total Units</b>             | <b>844 (100%)</b>                                       | <b>763 (100%)</b>                                       |
| • Market Studios               | 14 (1.7%)   | 12 (1.6%)   |
| • Market 1-br                  | 237 (28%)   | 221 (29%)   |
| • Market 2-br                  | 275 (32.6%)   | 243 (31.8%)   |
| • Market 3-br                  | 61 (7.2%)   | 58 (7.6%)   |
| • Affordable 1-br              | 99 (11.7%)  | 92 (12%)  |
| • Affordable 2-br              | 103 (12.2%)   | 92 (12%)  |
| • Affordable 3-br              | 55 (6.5%)   | 45 (6%)   |
| <b>Amenity Space</b>           | <b>3,732.60 m<sup>2</sup> (4.43 m<sup>2</sup>/unit)</b> | <b>3,052.40 m<sup>2</sup> (4.00 m<sup>2</sup>/unit)</b> |
| • Indoor                       | 3,000.83 m <sup>2</sup> (3.56 m <sup>2</sup> /unit)     | 2,367.20 m <sup>2</sup> (3.10 m <sup>2</sup> /unit)     |
| • Outdoor                      | 731.77 m <sup>2</sup> (0.87 m <sup>2</sup> /unit)       | 685.30 m <sup>2</sup> (0.90 m <sup>2</sup> /unit)       |
| <b>Vehicle Parking Spaces</b>  | <b>215</b>  | <b>201</b>  |
| • Residential                  | 112   | 96  |
| • Commercial                   | 103   | 99  |
| • Car Share                    | 6   | 6   |
| <b>Bicycle Parking Spaces</b>  | <b>845</b>  | <b>782</b>  |
| • Res. long-term               | 760   | 687   |
| • Res. short-term              | 85  | 77  |
| • Childcare Centre             | 0   | 18  |
| Loading Spaces                 | 2 Type 'G'<br>1 Type 'C'                                | 2 Type 'G'<br>1 Type 'C'                                |

|                                   | 2 Type 'B'                     | 2 Type 'B'                      |
|-----------------------------------|--------------------------------|---------------------------------|
| Podium Height                     | 11-storeys (38.55 metres)      | 11-storeys (38.55 metres)       |
| Street wall Height                | 9-storeys (32.35 m)            | 9-storeys (32.35 m)             |
| North Tower Height                | 35 storeys (117 m incl. MPH)   | 31 storeys (110.05 m incl. MPH) |
| South Tower Height                | 50 storeys (161.7 m incl. MPH) | 46 storeys (155.2 m incl. MPH)  |
| <b>Tower Setback (prop. line)</b> |                                |                                 |
| North Tower setback (east)        | 0.48 metres                    | 0.77 metres                     |
| North Tower setback (west)        | 8.94 metres                    | 8.94 metres                     |
| North Tower setback (north)       | 5.7 metres                     | 5 metres                        |
| South Tower setback (east)        | 7.46 metres                    | 12.65 metres                    |
| South Tower setback (west)        | 7.2 metres                     | 5.5 metres                      |
| South Tower setback (south)       | 4.71 metres                    | 4 metres                        |
| <b>Minimum Separation</b>         |                                |                                 |
| North Tower – South Tower         | 25 metres                      | 24.50 metres                    |
| North Tower – Murano (N)          | 18 metres                      | 18 metres                       |
| North Tower – 25 Grosvenor        | 10.81 metres                   | 9.27 metres                     |
| South Tower – 32 Grenville        | 7.2 metres                     | 5.5 metres                      |
| South Tower – 18 Grenville        | 7.46 metres                    | 12.65 metres                    |
| South Tower – 25 Grosvenor        | 15.88 metres                   | 14.64 metres                    |
| North Tower Floorplate            | 787 m <sup>2</sup> (GCA)       | 782 m <sup>2</sup> (GCA)        |
| South Tower Floorplate            | 782.8 m <sup>2</sup> (GCA)     | 783 m <sup>2</sup> (GCA)        |

## POLICY AND REGULATORY CONTEXT

The following provides an overview of the planning policy and regulatory framework applicable to the subject site which has been updated since the original submission. Subject to these updates, Section 4.0 of our March 2019 Report remains relevant and accurate.

### Provincial Policy Statement (2020)

On February 28, 2020, the Ministry of Municipal Affairs and Housing released the Provincial Policy Statement, 2020, which came into effect on May 1, 2020 (the “2020 PPS”). The PPS provides policy direction on matters of Provincial interest related to land use planning and development. In accordance with Section 3(5) of the Planning Act, all decisions that affect a planning matter are required to be consistent with the PPS. In this regard, Policy 4.2 provides that the PPS “shall be read in its entirety and all relevant policies are to be applied to each situation”.

As compared with the 2014 PPS, the 2020 PPS includes an increased emphasis on encouraging an increase in the mix and supply of housing, protecting the environment and public safety, reducing barriers and costs for development and providing greater certainty, and supporting the economy and job creation.

One of the key policy directions expressed in the PPS is to build strong communities by promoting efficient development and land use patterns. To that end, Part V of the PPS contains a number of policies that promote intensification, redevelopment and compact built form, particularly in areas well served by public transit.

In particular, Policy 1.1.1 provides that healthy, liveable and safe communities are to be sustained by promoting efficient development and land use patterns; accommodating an appropriate affordable and market-based range and mix of residential types, employment, institutional, recreation, park and open space, and other uses to meet long-term needs; and promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments and standards to minimize land consumption and servicing costs.

Policy 1.1.2 requires that sufficient land be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 25 years, informed by provincial guidelines. This policy also notes that within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas.

Policy 1.1.3.1 provides that settlement areas shall be the focus of growth and development. Policy 1.1.3.2 supports densities and a mix of land uses which efficiently use land, resources, infrastructure and public service facilities and which are transit-supportive, where transit is planned, exists or may be developed, and support active transportation. Policy 1.1.3.3 directs planning authorities to identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment, where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities.

In addition, Policy 1.1.3.4 promotes appropriate development standards, which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety.

With respect to housing, Policy 1.4.3 requires provision to be made for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents by, among other matters, permitting and facilitating all types of residential intensification and redevelopment; promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities and support the use of active transportation and transit; and requiring transit-supportive development and prioritizing intensification in proximity to transit, including corridors and stations, including potential air rights development (our emphasis).

The efficient use of infrastructure (particularly transit) is a key element of provincial policy (Section 1.6). Section 1.6.3 states that the use of existing infrastructure and public service facilities should be optimized, before consideration is given to developing new infrastructure and public service facilities. With respect to transportation systems, Policy 1.6.7.4 promotes a land use pattern, density and mix of uses that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.

Policy 1.7.1 of the PPS states that long-term prosperity should be supported through a number of initiatives including: encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and a range of housing options for a diverse workforce; optimizing the use of land, resources, infrastructure and public service facilities; maintaining and enhancing the vitality and viability of downtowns and mainstreets; and encouraging a sense of place by promoting well-designed built form and cultural planning, and by conserving features that help define character, including built heritage resources; and promoting the redevelopment of brownfield sites.

With respect to energy conservation, air quality and climate change, Policy 1.8.1 directs planning authorities to support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions and preparing for the impacts of a changing climate through land use and development patterns which: promote compact form and a structure of nodes and corridors; promote the use of active transportation and transit in and between residential, employment and other areas; and encourage transit-supportive development

and intensification to improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion.

Finally, with respect to cultural heritage, Policy 2.6.1 indicates that significant built heritage resources and significant cultural heritage landscapes shall be conserved. In this regard, Policy 2.6.3 indicates 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.

While Policy 4.6 provides that the official plan is “the most important vehicle for implementation of this Provincial Policy Statement”, it goes on to say that “the policies of this Provincial Policy Statement continue to apply after adoption and approval of an official plan”. Accordingly, the above-noted PPS policies continue to be relevant and determinative.

In our opinion, the proposed development and the requested Zoning By-law Amendment are consistent with the 2020 PPS, and, in particular, the policies promoting the efficient use of land and infrastructure with new employment and housing uses (particularly affordable housing), in a transit-supportive manner.

#### **4.2 Growth Plan for the Greater Golden Horseshoe**

On May 16, 2019, a new Growth Plan (A Place to Grow: The Growth Plan for the Greater Golden Horseshoe) came into effect, replacing the 2017 edition of the Growth Plan. On August 28, 2020, the 2019 Growth Plan was amended by Growth Plan Amendment No. 1. All decisions made on or after this date in respect of the exercise of any authority that affects a planning matter will conform with the updated 2019 Growth Plan, subject to any legislative or regulatory provisions providing otherwise. Section 1.2.3 provides that the Growth Plan is to be read in its entirety and the relevant policies are to be applied to each situation.

While many policies in the 2019 Growth Plan are unchanged from the 2017 Growth Plan, modifications were made to policies related to employment areas, settlement area boundary expansions, agricultural and natural heritage systems, intensification and density targets, and major transit station areas.

The Guiding Principles which are important for the successful realization of the Growth Plan are set out in Section 1.2.1. Key principles relevant to the proposal include:

- supporting the achievement of complete communities that are designed to support healthy and active living and meet people’s needs for daily living throughout an entire lifetime;
- prioritizing intensification and higher densities in strategic growth areas to make efficient use of land and infrastructure and support transit viability; and,
- supporting a range and mix of housing options, including second units and affordable housing, to serve all sizes, incomes and ages of households.

The Growth Plan policies emphasize the importance of integrating land use and infrastructure planning, and the need to optimize the use of the land supply and infrastructure. It includes objectives that support the development of complete communities and promotes transit-supportive development in proximity to higher-order transit. As noted in Section 2.1 of the Plan:

*To support the achievement of complete communities that are healthier, safer, and more equitable, choices about where and how growth occurs in the GGH need to be made carefully. Better use of land and infrastructure can be made by directing growth to settlement areas and prioritizing intensification, with a focus on strategic growth areas, including urban growth centres and major transit station areas, as well as brownfield sites and greyfields. Concentrating new development in these areas provides a focus for investments in transit as well as other types of infrastructure and public service facilities to support forecasted growth, while also supporting a more diverse range and mix of housing options... It is important that we maximize the benefits of land use planning as well as existing and future investments in infrastructure so that our communities are well-positioned to leverage economic change.”*

Section 2.1 of the Growth Plan goes on to further emphasize the importance of optimizing land use in urban areas:

*“This Plan’s emphasis on optimizing the use of the existing urban land supply represents an intensification first approach to development and city-building, one which focuses on making better use of our existing infrastructure and public service facilities, and less on continuously expanding the urban area.”*

The subject site is located within a “strategic growth area” pursuant to the Growth Plan. Strategic growth areas are defined as nodes, corridors, and other areas that have been identified by municipalities or the Province to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form. Strategic growth areas include urban growth centres, major transit station areas, and other major opportunities that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields.

In this respect, we emphasize that the subject site is located within Downtown Toronto (an Urban Growth Centre). As provided in the Growth Plan, Downtown Toronto is planned to accommodate and support major transit infrastructure, as well as accommodate a significant share of population and employment growth (at minimum 400 residents and jobs per hectare by 2031 or earlier).

The subject site would also fall within an area that meets the definition of a major transit station area. In the 2019 Growth Plan, major transit station areas are defined as the area within an approximate 500- to 800-metre radius of a transit station representing about a 10-minute walk. As noted in our March 2019 Report, the subject site is located in one of the most transit-accessible locations in the city, approximately 220 metres from College Subway Station, 415 metres from Wellesley Subway Station and 550 metres from Queen’s Park Station (walking distance), all of which provide access to Line 1.

Policy 2.2.1(2)(a) provides that the vast majority of growth will be directed to settlement areas that have a delineated built boundary, have existing or planned municipal water and wastewater systems, and can support the achievement of complete communities. The subject site is located in a settlement area which meets all three of the above noted considerations.

Policy 2.2.1(2)(c) provides that, within settlement areas, growth will be focused in delineated built-up areas, strategic growth areas, locations with existing or planned transit (with a priority on higher order transit where it exists or is planned), and areas with existing or planned public service facilities. We emphasize that growth is focused in areas where any of the above considerations are applicable; in the case of the subject site, all of the above considerations are applicable.

Policy 2.2.1(3)(c) directs municipalities to undertake integrated planning to manage forecasted growth to the horizon of this Plan, which will, among other things, provide direction for an urban form that will optimize infrastructure, particularly along transit and

transportation corridors, to support the achievement of complete communities through a more compact built form.

In this respect, Schedule 3 of the Growth Plan forecasts a population of 3,190,000 and 1,660,000 jobs for the City of Toronto by 2031, increasing to 3,400,000 and 1,720,000, respectively by 2041. Amendment 1 to the Growth Plan extended these forecasts to 2051, by which the City of Toronto is forecast to have a population of 3,650,000 and 1,980,000 jobs. The 2016 Census data indicates that population growth in Toronto is continuing to fall short of the Growth Plan forecasts. The City's population growth from 2001 to 2016 (adjusted for net Census undercoverage) represents only 73.2% of the growth that would be necessary on an annualized basis to achieve the population forecast of 3,650,000 by 2051.

Policy 2.2.1(4) states that applying the policies of the Growth Plan will support the achievement of complete communities that, among other things, feature a diverse mix of land uses including residential and employment uses, provide a diverse range and mix of housing options, expand convenient access to a range of transportation options, provide for a more compact built form and a vibrant public realm, mitigate and adapt to climate change impacts, and contribute to environmental sustainability.

Policy 2.2.2(3) requires municipalities to develop a strategy to achieve the minimum intensification target and intensification throughout delineated built-up areas, which will, among other things, identify strategic growth areas to support achievement of the target and recognize them as a key focus for development, identify the appropriate type and scale of development in strategic growth areas and transition of built form to adjacent areas, and ensure lands are zoned and development is designed in a manner that supports the achievement of complete communities.

Policy 2.2.3(1) states that urban growth centres will be planned to accommodate and support the transit network at the regional scale and to accommodate a significant population and employment growth. In this regard, Policy 2.2.3(2) requires that each urban growth centre in the City of Toronto be planned to achieve a minimum density target of 400 residents and jobs combined per hectare by 2031 or earlier.

The Growth Plan includes a number of policies applying to major transit station areas. In particular, Policy 2.2.4(1) requires that "priority transit corridors" shown on Schedule 5 will be identified in official plans and that planning will be prioritized for "major transit station areas" on "priority transit corridors", including "zoning in a manner that implements the

policies of this Plan”. In this regard, Schedule 5 identifies the Yonge-University subway line (Line 1) as “existing higher order transit”.

Policy 2.2.4(2) requires the City of Toronto to delineate the boundaries of “major transit station areas” on priority transit corridors or subway lines “in a transit supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station” (our emphasis).

Policy 2.2.4(3)(a) goes on to require that “major transit station areas” on subway lines be planned for a minimum density target of 200 residents and jobs combined per hectare. Policy 2.2.4(6) states that, within major transit station areas on priority transit corridors or on subway lines, land uses and built form that would adversely affect the achievement of the minimum density targets will be prohibited.

Policy 2.2.4(9) provides that, within all “major transit station areas”, development will be supported, where appropriate, by: planning for a diverse mix of uses to support existing and planned transit service levels; providing alternative development standards, such as reduced parking standards; and prohibiting land uses and built form that would adversely affect the achievement of transit-supportive densities.

Policy 2.2.4(10) provides that lands adjacent to or near to existing and planned frequent transit should be planned to be transit-supportive and supportive of active transportation and a range and mix of uses and activities.

Section 2.2.6 of the Growth Plan deals with housing. Policy 2.2.6(1) requires municipalities to support housing choice through, among other matters, the achievement of the minimum intensification and density targets in the Growth Plan by identifying a diverse range and mix of housing options and densities to meet projected needs of current and future residents, including establishing targets for affordable ownership and rental housing.

Notwithstanding Policy 1.4.1 of the PPS, Policy 2.2.6(2) states that, in implementing Policy 2.2.6(1), municipalities will support the achievement of complete communities by: planning to accommodate forecasted growth; planning to achieve the minimum intensification and density targets; considering the range and mix of housing options and densities of the existing housing stock; and planning to diversify the overall housing stock across the municipality.

Generally, the infrastructure policies set out in Chapter 3 place an emphasis on the need to integrate land use planning and investment in both infrastructure and transportation. The introductory text in Section 3.1 states that:

*“The infrastructure framework in this Plan requires that municipalities undertake an integrated approach to land use planning, infrastructure investments, and environmental protection to achieve the outcomes of the Plan. Co-ordination of these different dimensions of planning allows municipalities to identify the most cost-effective options for sustainably accommodating forecasted growth to the horizon of this Plan to support the achievement of complete communities. It is estimated that over 30 per cent of infrastructure capital costs, and 15 per cent of operating costs, could be saved by moving from unmanaged growth to a more compact built form. This Plan is aligned with the Province’s approach to long-term infrastructure planning as enshrined in the Infrastructure for Jobs and Prosperity Act, 2015, which established mechanisms to encourage principled, evidence-based and strategic long-term infrastructure planning.”*

Policies 3.2.3(1) and 3.2.3(2) state that public transit will be the first priority for transportation infrastructure planning and major transportation investments, and that decisions on transit planning and investment will be made according to a number of criteria including prioritizing areas with existing or planned higher residential or employment densities to optimize return on investment and the efficiency and viability of existing and planned transit service levels, and increasing the capacity of existing transit systems to support strategic growth areas.

Policy 5.2.5(6) addresses targets and states that, in planning to achieve the minimum intensification and density targets in this Plan, municipalities are to develop and implement urban design and site design official plan policies and other supporting documents that direct the development of a high-quality public realm and compact built form.

In our opinion, the proposed development and the requested Zoning By-law Amendment conform with the Growth Plan and, in particular, the policies that seek to optimize the use of land and infrastructure and to encourage growth and intensification in “strategic growth areas”, including “urban growth centres” and “major transit station areas”.

### **Official Plan Amendments 479 and 480**

Section 3.1.1 of the City of Toronto Official Plan was recently modified by Official Plan Amendment (“OPA”) No. 479 (approved on September 11, 2020). These policies provide direction on the public realm, including streets, parks, open spaces and public buildings – and indicate that the public realm is comprised of all public and private spaces to which the public has access.

At the same time, Sections 3.1.2 and 3.1.3 of the Official Plan were modified by OPA No. 480 . Section 3.1.2 – Built form and 3.1.3 – Built Form – Tall Buildings (now renamed Built Form – Building Types) were modified to introduce principles for built form relationships of the location and organization of development, its massing and appropriate amenity within the existing and planned context to inform the built form and ensure new buildings promote and achieve the overall objectives of the Plan.

Although they would not technically apply to the proposed development given that they were adopted by Council on January 29, 2020 and approved by the Minister on September 11, 2020, following the submission of the application in March of 2019, it is our opinion that the proposed development would conform with the Official Plan, as amended by OPA 479 and 480, including all modified public realm and built form policies.

### **Proposed Transportation Policies (OPA 456)**

On February 26, 2020, City Council adopted Official Plan Amendment No. 456 (OPA 456), which amends the Official Plan’s transportation policies as part of the Five Year Review. OPA 456 was submitted to the Minister of Municipal Affairs and Housing for approval pursuant to Section 26 of the *Planning Act* and is not yet in force.

The amendments introduced by OPA 456 affect transportation policies related to transit, cycling, automated vehicles, shared mobility and other emerging mobility technologies, as well as policies related to water, wastewater and stormwater. The proposed policy amendments are intended to strengthen the existing policies and provide greater clarity regarding the City’s goals related to transportation and the tools to achieve them, and add to an initial set of transportation policy amendments introduced by OPA 274 which was adopted in 2014.

An overview of the revisions to the relevant transportation policies is provided below.

The recommended amendments to Section 2.2 (Structuring Growth in The City: Integrating Land Use and Transportation) restructure the section to separate the policies related to transportation network improvements from policies related to new development and water infrastructure. The amendments also replace references to “rapid transit” with references to “higher-order transit” to reflect the language used in the 2019 Growth Plan.

Section 2.2 also includes additional language with respect to Maintaining and Developing a Sustainable Transportation System. In this respect, it is noted that the network of public rights-of-way which accommodates the City’s streets and laneways is a vital component of the public realm, serving to connect people and places and to support existing and future development and economic growth. Further, the City will provide better and increased transit service in support of the overall objective of achieving a sustainable pattern of growth and development.

Amendments have been made to Section 2.4 (Bringing the City Together: A Progressive Agenda of Transportation Change), which include additional context in the explanatory text for the amended policies related to cycling and new mobility technologies.

A new section is also proposed to be added between Policies 3.1.1 (The Public Realm) and 3.1.2 (Built Form) entitled Public Realm – Higher Order Transit. This new section articulates the City’s objectives for the public realm around higher-order transit infrastructure, namely, to support efficient movement by integrating higher-order transit with other modes as well as community building objectives.

OPA 456 amends Map 4 (Higher-Order Transit Corridors) and Map 5 (Enhanced Surface Transit Network), although none of the revisions are specifically applicable to the subject site.

### **Downtown Secondary Plan (OPA 406)**

As noted in our March 2019 Report, City Council enacted By-law 1111-2018, adopting OPA 406, which included a new Downtown Secondary Plan (“Downtown Plan”) and associated amendments to Section 2.2.1 and Map 6 of the Official Plan. On August 2, 2018, the City submitted OPA 406 to the Minister of Municipal Affairs and Housing (the “Minister”) for approval under Section 26 of the *Planning Act*. At the time the initial application was made, the Minister had not approved OPA 406, and accordingly, the plan was not yet in force and effect.

On June 5, 2019, the Minister issued a decision with respect to OPA 406, which included a number of significant modifications to the Downtown Secondary Plan and brought it into full force and effect. Of the modifications incorporated by the Province, the most relevant to the subject application was the addition of a transition policy (Policy 1.9) which provides that the Downtown Plan will not apply to applications that were deemed complete prior to June 5, 2019. As the application was deemed complete on April 22, 2019, the Downtown Plan does not apply to the subject application. Notwithstanding the foregoing, it is our opinion that the proposed development is in keeping with the policy directions set out in the Downtown Plan.

Policy 4.1 states that growth is encouraged within the *Downtown*, in particular on lands designated *Mixed Use Areas 1*, *Mixed Use Areas 2*, *Mixed Use Areas 3*, *Regeneration Areas* and *Institutional Areas*. The highest density of development within the *Downtown* shall be directed to *Mixed Use Areas* in close proximity to existing or planned transit stations. Other areas of *Downtown* will have more modest levels of growth, in keeping with the applicable policies.

In this respect, we note that the subject site is designated *Mixed Use Areas 1 – Growth* by the Downtown Secondary Plan, and is located within an 800 metre radius of three existing TTC subway stations.

The non-policy introductory text for *Mixed Use Areas 1* provides that these include areas with the greatest heights, the highest intensity of development and largest proportion of non-residential uses. Intensification will occur in a diverse range of building typologies and scales, one of which is tall buildings, that contribute to and enhance liveability. Non-residential space requirements will sustain a mix of uses and support prosperity.

Policy 6.23 provides that development within *Mixed Use Areas 1* will include a diverse range of building typologies, including tall buildings, with height, scale and massing, dependent on the site characteristics and supportive of intensification suitable for a downtown growth area. Policy 6.32 states that development within *Mixed Use Areas 1* will generally be encouraged to provide a significant proportion of non-residential uses within new mixed-use developments.

Policy 6.34 provides that development in proximity to existing and planned rapid transit stations, as shown on Map 41-4, will prioritize mixed-use development. These areas will be planned to accommodate higher density development to optimize the return on

investment and increase the efficiency and viability of existing and planned transit service levels.

Policy 6.36 provides that the highest density of development within the *Downtown* shall be directed to *Mixed Use Areas* in close proximity to existing or planned rapid transit stations.

While the proposed development is not technically subject to the land use designation policies set out in the Downtown Plan, in our opinion it implements the relevant policies of this plan as they relate to lands *designated Mixed Use Areas 1* in proximity to major transit stations.

The Downtown Plan also includes built form policies in Section 9. We have reviewed these policies, and while the proposed development is not subject to these policies, in our opinion, the proposed development would conform with these policies.

## **ANALYSIS**

The following provides an analysis of the revised proposal focusing on those elements of the proposed development that have been revised since the initial submission. Subject to the additional commentary and analysis provided below, the findings and analysis set out in our March 2019 Report continue to be relevant and accurate.

### **Intensification**

As set out in Section 5.1 of our March 2019 Report, mixed-use intensification on the subject site is consistent with the policy directions articulated in the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe and the City of Toronto Official Plan, all of which promote intensification on sites well served by municipal infrastructure, particularly higher-order public transit.

The revised proposal, albeit with somewhat reduced heights and a reduced density, will continue to redevelop the subject site with an appropriately scaled transit-supportive mixed-use development. While the Downtown Plan was not in force at the time the application was deemed complete, the revised proposal conforms with the urban form and growth management directions set out in that plan, which direct the greatest heights and highest intensity of development to areas designated *Mixed Use Areas 1* in close proximity to existing or planned rapid transit stations.

## Land Use

As set out in Section 5.2 of our March 2019 Report, the subject site is an appropriate location for a mixed use development. The revised proposal continues to provide a mix of compatible and complimentary uses and represents a mixed-use community within a single development. The revised proposal includes 534 market and 229 affordable rental dwelling units, two at-grade retail units (one along each street frontage), a childcare centre accessed off Grosvenor Street, a private gym that also functions as part of the revised proposal's interior residential amenity offerings, and substantial public realm improvements along Grenville Street and Grosvenor Street including a well-designed mid-block connection that implements the Bay Cloverhill Green Loop concept identified in the Downtown Secondary Plan and associated Parks and Public Realm Strategy.

The proposal provides housing opportunities that accommodate a range of household sizes and income levels, shopping and high-quality fitness opportunities for prospective residents and the broader community, 49 new childcare spaces in a growing area of the Downtown, and an attractive, well designed community gathering space that simultaneously improves block permeability. While the Downtown Plan was not in force at the time the application was deemed complete, the proposed development implements the land use vision of the Downtown Plan for properties designated *Mixed Use Areas 1*.

As noted, the revised proposal's residential gross floor area has been reduced from approximately 61,483 to 58,951 square metres due to the reduction in height, and consequently, 53 market rental units and 28 affordable rental units have been eliminated. However, we note that the revised proposal continues to provide well over 150 affordable rental units (229 in total) and that a minimum of 30% of the total rental dwelling units continue to be affordable, in line with the requirements of the Broker Led Disposition Document.

With respect to the unit mix, while a portion of the proposed two-bedroom units and proposed three-bedroom units are smaller than the ideal unit size recommendations in the Growing Up Guidelines (which we note were in draft form at the time of the original submission), we note that the proposed development provides a significantly greater percentage of family-sized units. The Growing Up Guidelines recommend a minimum of 15 percent of the units as two-bedroom units, whereas 44% of the units will be two-bedroom units; similarly, while only 10 percent of the units are recommended to be three-bedroom units, 13.4% of the units will be three-bedroom units. While the individual unit

sizes of some of the units will be smaller than the ideal sizes, the proposal will provide a much greater number of larger units than recommended by the Guidelines.

Moreover, we note that if the proposed two-bedroom units and proposed three-bedroom units were increased in size to meet the ideal unit size recommendations, within the same gross floor area allocated to residential uses, it would result in a reduction in the space available for affordable dwelling units. Also, as the Broker Led Disposition Document requires that a minimum of 30% of the overall unit mix be affordable units, a further reduction in the overall count through increasing the sizes of units would result in the 30% proportion being applied to a smaller number, leading to a further reduction in the number of affordable units proposed, beyond the 28 already eliminated. Accordingly, the provision of smaller units allows for the optimization of the number of affordable units.

We also reiterate that these guidelines were only in draft form at the time of the submission of the application and that, even if they had been in final form at the time, Policy 5.3.2(1) of the Official Plan provides that, while guidelines and plans express Council policy, they are not part of the Plan unless the Plan has been specifically amended to include them, and do not have the status of policies in the Official Plan adopted under the *Planning Act*. Furthermore, in a report from the Planning Department to the Planning and Housing Committee dated June 20, 2020, it is recognized that the Growing Up Guidelines are intended to be “instructive” and not “determinative”. The proposed unit mix conforms with the Official Plan, and more specifically Policy 11.1 of the Downtown Secondary Plan, by providing more than 10 percent of the units as three-bedroom units (13.6%), more than 15 percent of the units as two-bedroom units (43.8%), and therefore significantly more than an additional 15 percent of the units as a combination of two- and three-bedroom units.

With respect to the proposed childcare centre, we note that feedback received from Children’s Services Staff has resulted in further refinement of this space. The childcare centre has been increased in size and through discussions between the applicant and Children’s Services Staff, has now been designed to accommodate 49 childcare spaces (one room with 10 infants, one room with 15 toddlers, and one room with 24 preschool aged children). As noted, the covered outdoor play area has been increased in size, moved to the south of the childcare centre, and is now rectangular in shape, as opposed to the L-shaped play area previously contemplated. The revised outdoor play area provides a larger, more functional and more programable space.

As noted, the revised proposal will integrate a 2,071.29 square metre private gym on Floor 3. Approximately 73.4 percent of the gym is proposed to be considered indoor amenity space, bringing the total amount of indoor amenity space provided to 2,367.2 square metres (3.10 square metres per dwelling unit) when including the 846.9 square metres of indoor amenity space on Floor 4 that will be dedicated solely to the building's residents. This arrangement will allow simultaneous free access to the gym for residents (both market and affordable) and paid membership access for individuals who do not live in the proposed development. It will result in a gym with higher quality facilities and machines along with dedicated fitness staff, something not typically associated with a gym within a residential building's amenity space.

Further, the inclusion of a private gym that also serves as indoor amenity space further broadens the mix of uses provided by the proposed development and makes better use of the space by ensuring it serves the needs of residents and responds to the growing need for fitness spaces in *Downtown*. Similarly, the gym is also anticipated to increase the number of jobs created by the proposed development as well as diversify the types of jobs being created within the subject site, which already includes retail, childcare, building management, leasing and maintenance, and work-from-home jobs.

Moreover, we note that a number of recent mixed-use developments include an arrangement where a gym use is shared between uses (90 Harbour Street and 1 York Street, 325 Bay Street, 1 King Street West, 181 and 183 Wellington Street West, 60 Yorkville Avenue and 55 Scollard Avenue, 180 and 188 University Avenue, 550 Wellington Street West, 37 King Street East and 22 Leader Lane and 15-35 Mercer Street). Specifically at 90 Harbour Street and 1 York Street, By-law 1649-2012 provides that a maximum of 70 percent of the indoor amenity space may be located in a fitness club use, provided that no residents of the mixed-use building are excluded from eligibility as members of the fitness club and that the remaining indoor residential amenity space otherwise required in the building is provided elsewhere within the building for the exclusive use of its residents and is not located within guest suites. In the case of the proposed development, no residents will be excluded from eligibility as members of the fitness club, and the remaining indoor residential amenity space (approximately 35.77% of the indoor amenity provided, and 100% of the outdoor amenity space provided) will be located on Floor 4, and be completely separated from the gym. This space would be for the exclusive use of its residents and will not include guest suites.

## Height, Massing and Density

With respect to height, as set out in Section 5.3 of our March 2019 Report, the subject site is an appropriate location for a tall building. At the proposed height of 144 metres to the roof of the South Tower (155.2 metres including mechanical elements) and 99.15 metres to the roof of the North Tower (110.05 metres including mechanical elements), the proposed towers continue to be designed and massed to contextually fit within the immediate and surrounding area, while resulting in minimal and acceptable built form impacts on *Neighbourhoods*, parks and other shadow-sensitive areas. We note that the revised proposal's reduced heights result in no new net shadows on Opera Place Park between 12:00 pm and 2:00 pm, in accordance with Policy 6.2.9 of SASP 382.

The proposed towers would continue to fit harmoniously both within a broad urban structure context and with existing building heights in the vicinity. In this respect, we note that the revised South Tower height of 155.2 metres is generally in line with the 140 metre height of Murano Condos South Tower and transitions down from building heights in the height peak area along Yonge Street, including YC Condos (198 metres) and Karma Condos (166 metres) located along Grenville Street further east. Similarly, the revised North Tower height of 110.05 metres is in line with the 110 metre height of Murano Condos North Tower, and is now closer in height to the 92.9 metre height of 25 Grosvenor Street. The revised North Tower continues to provide a transition down from the height transition area along Yonge Street, including from Halo Residences (131 metres) located at the southwest corner of Yonge Street and Grosvenor Street. Table 2 outlines building heights in the area.

*Table 2 – Area Height Context*

| Address  | Height (Storeys) | Height (m) |
|--|------------------|------------|
| 383 Yonge Street (YSL Residences)**                        | 85               | 299        |
| Chelsea Green (south tower)**                              | 84               | 276        |
| 388 Yonge Street (Aura)                                    | 78               | 272        |
| 2 Carlton Street***  | 73               | 251        |
| 415 Yonge Street***  | 61               | 239        |
| 586 Yonge St, 10-16 Wellesley St W, 5-7 St. Nicholas St*** | 57               | 198        |
| 454-464 Yonge Street (YC Condos)                           | 62               | 198        |
| 510-528 Yonge Street and 7 Breadalbane Street***           | 59               | 197        |
| 11 Wellesley Street West*                                  | 60               | 194        |
| 880 Bay Street, 60 Grosvenor Street, and 900 Bay Street**  | 45               | 192        |
| 475 Yonge Street**   | 58, 48           | 191, 164   |

|   |           |               |
|---|-----------|---------------|
| 10-16 Wellesley Street West**                       | 55        | 175           |
| 501 Yonge Street (Tea House) *                      | 52, 25    | 170, 86       |
| 9-21 Grenville Street (Karma Condos)                | 50        | 166           |
| <b>Revised Proposal – North Tower***</b>            | <b>46</b> | <b>155.20</b> |
| 832 and 860 Bay Street                              | 48        | 154           |
| 20-26 Maitland Street***                            | 45        | 144.9         |
| 951-971 Bay St, 31 Phipps St and 36 Wellesley St W* | 41        | 142           |
| 38 Grenville Street (Murano South)                  | 41        | 140           |
| 480-494 Yonge Street and 3 Grosvenor Street*        | 38        | 131           |
| 37 Grosvenor Street (Murano North)                  | 33        | 110           |
| <b>Revised Proposal – South Tower***</b>            | <b>31</b> | <b>110.05</b> |
| 25 Grosvenor Street                                 | 21        | 92.9          |
| 909 Bay Street                                      | 32, 27    | 91.7, 78.5    |
| 23-25 Grenville Street                              | 26        | 77.4          |
| 24 Wellesley Street West                            | 29        | 73.5          |
| 887-889 Bay Street                                  | 16        | 47.6          |

With respect to massing, as set out in Section 5.3 of our March 2019 Report, the design of the proposal continues to consist of three elements, a base element, the South Tower and the North Tower.

With respect to the base element, the revised proposal generally maintains the original massing, with two notable revisions. First, along Grenville Street and Grosvenor Street, additional space for pedestrians has been provided by setting the building back an additional 0.27 metres and 0.30 metres, respectively. This results in a 4 metre setback from the south property line and a 5 metre setback from the north property line. These larger setbacks provide for an even further expanded public realm along Grenville Street and Grosvenor Street. Along Grosvenor Street, the additional setback will help ensure that there is sufficient space for the five existing street trees along Grosvenor Street to be preserved and to continue to grow .

Second, on the south half of the subject site, the west face of the podium will be set back an additional 0.3 metres providing for a 5.5 metre setback from the west property line. This increased setback provides for a larger pedestrian clearway on the southern half of the mid-block connection and allows for the introduction of unique landscaping and sculptural elements that will help realize a design that implements the Bay Cloverhill Green Loop.

The street wall height of the proposed development continues to be 32.35 metres (9 storeys) along both Grenville Street and Grosvenor Street. For the reasons set out in our

March 2019 Report, it continues to be our opinion that this height is appropriate in land use planning and urban design terms. We note that the street wall heights of buildings along Grosvenor Street, between Yonge Street and Bay Street, include buildings with no stepbacks such as Murano Condos North Tower (110 metre street wall) and 25 Grosvenor Street (92.9 metre street wall), a building at 887-889 Bay Street (Opera Place Condos) with some stepping that results in a streetwall height of between 27 and 47 metres, and the 14 metre street wall height of Halo Residences. Grosvenor Street lacks a cohesive and uniform street wall height context, and it is our opinion that a street wall height that is similar to the street wall height of 887-889 Bay Street is appropriate.

Along Grenville Street, the proposed podium height of 32.35 metres fits well with the two adjacent properties. While the Murano Condos South Tower has a 140 metre height with no tower stepback, 32 Grenville Street immediately west of the site has a 23 metre street wall and a building height of approximately 33 metres, while 18 Grenville Street to the east of the site has a street wall height of 33 metres. As such, it continues to be our opinion that a street wall height that is generally reflects the heights of the street wall of 18 Grenville Street and the overall height of 32 Grenville Street is appropriate from a massing perspective.

We note that, while the tower floorplate dimensions have changed slightly, the revised proposal continues to include two slender point towers. We note that the floor plates were measured erroneously at the time of the original application, as the measurements represented the gross construction area (GCA) to the face of the window frames, not to the outside of the precast cladding. In our experience, the 750 square metre tower floorplate recommendation in the Tall Building Guidelines would typically be measured to the outside of the precast. On that basis, the original proposal's North Tower floorplate should have been identified as having a floorplate of 787 square metres (GCA), not 753 square metres. Similarly, the South Tower floorplate was actually 782.8 square metres, not 749 square metres. The revised floor plates are similar to these, at 782 square metres and 783 square metres respectively.

While the proposed floor plates are slightly larger than the 750 square metre recommendation in the Tall Building Guidelines, we note that the Downtown Secondary Plan indicates that tall buildings will generally have a maximum floorplate size of 750 square metres and that increases may be appropriate where the impacts of the larger floorplate, including but not necessarily limited to shadow, sky-view, and wind, are addressed. As discussed subsequently in this Letter, shadowing, sky view and wind impacts have been appropriately addressed by the revised proposal through a

combination of tower placement and height reductions.

Furthermore, the 782 square metre and 783 square metre floorplates would be in keeping with larger residential floorplates located within the immediate vicinity of the subject site, including 769 square metres (YC Condos), 798 square metres (Burano Condos), 1,068 square metres (Floors 6-18 of Halo Residences) and 855 square metres (Floors 19-34 of Halo Residences). We also note that that the office tower at 25 Grosvenor Street, which immediately abuts the subject site to the east has a floorplate exceeding 750 square metres while 880 Bay Street to the west of the site has an approved floorplate of 2,352 square metres, although we note that both of these buildings are non-residential buildings. **Table 3** provides additional examples of larger tower floorplates located within the *Downtown*, focusing on residential towers.

Table 3 – Surrounding Tower Floorplates in the Downtown

| Address  | Floorplate (m <sup>2</sup> )                   |
|--|--|
| 60 Yorkville Avenue  | 1,380 (Floors 1-21)<br>984 (Floors 21-52)      |
| 382-388 Yonge Street (Aura)  | 1,250 (Floors 1-46)<br>975 (Floors 46-78)      |
| 711-717 Bay Street & 44 Gerrard Street West                          | 2,841  |
| 633 Bay Street   | 1,633  |
| 22 Edward Street   | 1,544  |
| 38 Elm Street  | 1,188  |
| 43, 49 & 51 Gerrard Street West                                      | 1,184  |
| 60-66 Isabella Street  | 1,168  |
| 11 Wellesley Street West   | 1,135  |
| 20-26 Lombard Street & 25 Richmond Street East                       | 1,081  |
| 197 Yonge Street (Massey Tower)                                      | 1,050  |
| 27-37 Yorkville Avenue (North Tower)                                 | 1,012  |
| 27-37 Yorkville Avenue (South Tower)                                 | 958  |
| 11-25 Yorkville Avenue and 16-18 Cumberland Street                   | 1,000 (Floors 10-23)<br>757-880 (Floors 24-62) |
| 120-130 Harbour Street and 10 York Street                            | 992  |
| 50 Bloor Street West   | 974  |
| 1 Bloor Street West  | 956  |
| 1 & 23 Bloor Street East, 14 Hayden Street, 709 and 711 Yonge Street | 918  |

|  |   |
|--|---|
| 55 Charles Street East                               | 880                                     |
| 592 Sherbourne Street (The Selby)                    | 737 (Floors 5-35)<br>815 (Floors 36-49) |
| 568-580 Jarvis Street and 99-103 Charles Street East | 776                                     |
| 1-9A Yorkville Road and 836-850 Yonge Street         | 758                                     |

As noted previously, the revised proposal's North Tower and South Tower now provide 2 metre setbacks from the north and south podium edges, respectively, as compared to the 3 metre step backs previously contemplated. The reduced setbacks were a result of the relocation of the tower floor plates on the subject site, which was done to respond to staff and community comments and provide additional tower separation distances. Shifting each tower a metre further from the edges of the podiums to achieve 3 metre tower setbacks would result in the separation distance between the two towers being reduced by an additional 2 metres, resulting in a 22.5 metre separation distance.

While a 2 metre tower setback is less than the 3 metre recommendation in the Tall Building Guidelines, it would fit into the existing and approved context along Grenville and Grosvenor Street. In this respect, we note that 18 Grenville Street and 887-889 Bay Street both have a discernible base element and upper elements, despite having setbacks of less than 3 metres. In addition, the recently approved Halo Residences at Yonge Street and Grosvenor Street provides a 2 metre tower setback from the north (Grosvenor Street) face of its podium. In our opinion, the provision of a 2 metre tower setback will achieve the intent of the guideline, by ensuring the tower element is distinguished from the base element.

From a density perspective, it is our opinion that the revised proposal's density of 15.56 FSI (based on a slightly larger site area of 3,902 square metres) continues to be appropriate and desirable and represents a modest reduction of 0.85 FSI from the original proposal. From a planning policy perspective, it is important to optimize the use of land and infrastructure on the subject site given its location within the Downtown Toronto urban growth centre and its proximity to frequent transit (streetcar routes and three subway stations).

### **Built Form**

It continues to be our opinion that the proposed development will have no unacceptable built form impacts on surrounding streets, open spaces or properties and, in particular, on lands designated *Neighbourhoods*. As set out in Section 5.4 of our March 2019 Report, a

combination of the significant separation to the nearest *Neighbourhoods* (257 metres to the southeast and 400 metres to the north east) and intervening existing and approved tall buildings, will result in an appropriate transition being provided between the revised proposal and the closest *Neighbourhoods* designated lands, in accordance with Policy 4.5(2)(c) of the Official Plan.

As it relates to impacts on neighbouring streets and open spaces, the revised proposal continues to conform with Policy 3.1.2(3) of the Official Plan (in force at the time of submission) in that it will be massed to fit harmoniously into its existing and planned context by framing Grenville Street and Grosvenor Street in a way that provides an appropriate street wall height, creates appropriate transitions in scale to neighboring buildings and provides adequate sunlight conditions on the street. In addition, the proposed development would conform with Policies 3.1.2(1) and 3.1.2(5) of the Official Plan (as amended by OPA 480 since the original submission), in that it will be massed to fit harmoniously into its existing and planned context. In terms of its existing context, the proposed tall buildings will be comparable in terms of their height and scale to other tall buildings in the vicinity. In terms of its planned context, the development is located within the *Downtown*, in the *Mixed Use Areas* and *Mixed Use Areas 1* designations, and within proximity of rapid transit, and is therefore in an area in which tall building forms are anticipated and promoted.

#### *Light, View and Privacy*

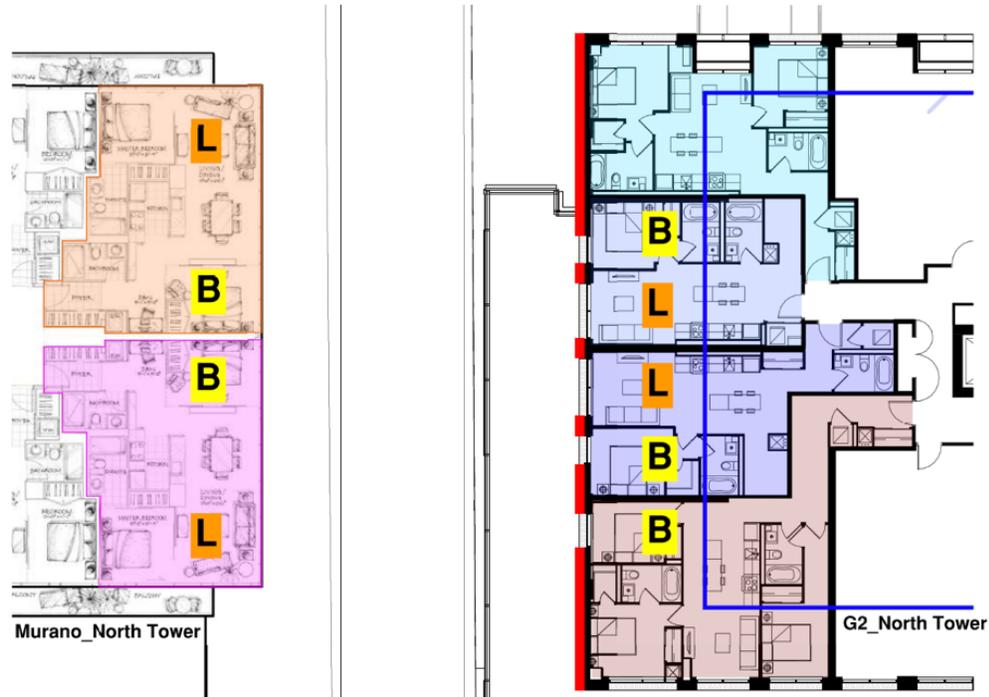
As set out in our March 2019 Report, it continues to be our opinion that the original proposal had no unacceptable built form impacts with respect to Light, View and Privacy (LVP). In it also our opinion that the revised proposal further mitigates potential LVP impacts and, accordingly, it is our opinion that it would not result in unacceptable built form impacts as well.

In this regard, LVP impacts are generally dealt with through a combination of spatial separation, orientation and mitigating measures between buildings – the typical nature of which are described in our March 2019 Report. In our opinion, the revised proposal will not have unacceptable incremental built form impacts on lower-scale *Neighbourhoods* given the separation distance between the proposed buildings any *Neighbourhoods* designated properties.

With respect to the base element, the massing contemplated by the revised proposal continues to be similar to that of the original proposal, and subject to the additional

commentary below, the findings of our March 2019 Report remain relevant and accurate. In addition, along the south half of the subject site, the west face of the podium will be setback an additional 0.3 metres providing for a 5.5 metre setback from the west property line and the windows of the existing building at 32 Grenville Street, which as noted, is built to the shared property line. The privacy screens discussed in our March 2019 continue to be proposed on Floors 3 through 7. These screens are permanently fixed vertical laminated glass privacy screens which are not clear but translucent, allowing light into the proposed residential units but providing no clear line of sight through them. The fins are proposed to be fixed at 45 degrees and overlap slightly, and accordingly provide privacy for all existing units across the laneway by diverting a direct line of site to oblique views from within the residential suites within the revised proposal. It continues to be our opinion that this architectural treatment provides an appropriate and creative solution to minimize potential light, view, and privacy for prospective residents of six west facing units on Floors 4, 5, and 6 (there are no residential uses on Floor 3) and for the existing residents in east facing units at 32 Grenville Street.

Along the north half the subject site, the west face of the podium on Floors 2-3 continues to be built to what will be the new west property line (after the conveyance of lands to widen St. Vincent Lane). On Floors 4-9, where the residential units begin, the west face steps back 3.94 metres, and the four west facing rental dwelling units on each of these levels have been reconfigured to minimize overlook and privacy impacts on Floors 4-9 of Murano Condos North Tower. The northernmost unit on each floor no longer includes west facing windows, instead being configured to receive light from windows facing Grosvenor Street. The three other units have been designed to minimize privacy and overlook impacts by locating living rooms and bedrooms in a manner that lines up with the opposite room type in Murano Condos North Tower. In this regard, bedrooms in the North Tower face living rooms in Murano Condos, and conversely, living rooms in the North Tower face bedrooms in Murano Condos. As residents tend to be in living rooms during the day and bedrooms during the night, this reduces privacy and overlook impacts by minimizing the amount of time residents in either building will be in rooms directly across from each other at the same time (see Figure 2 below).



*Figure 2 – Interface between North Tower and Murano Condos North Tower*

With respect to LVP impacts on 18 Grenville Street, while it continues to be our opinion that the proposed base building would have no unacceptable impacts, we note that a 1.8 metre tall patterned glass screen has been introduced along the east edge of the east outdoor amenity area on Floor 4 to address privacy and overlook concerns between this amenity area and the existing outdoor amenity terrace on the 3<sup>rd</sup> floor of 18 Grenville Street.

In terms of tower separation, the South Tower now provides for a 12.65 metre setback from the east lot line abutting 18 Grenville Street in accordance with the Tall Building Design Guidelines. Although there are no windows on the west face of 18 Grenville Street and, for the reasons set out in Section 5.4 of our March 2019 Report this site is unlikely to redevelop with a tower, the proposed 12.65 metre setback would theoretically allow for this site to be redeveloped with a tower that provides for at least a 25 metre tower separation, again, in accordance with the Tall Building Design Guidelines.

Although the South Tower is now located 1.7 metres closer to the building at 32 Grenville Street, resulting in a 5.5 metre setback to the west property line, it continues to be our opinion that the 32 Grenville Street property is not a tower site, and that a reduced separation distance is appropriate given that the west facing units in the South Tower do not interface with east facing units on 32 Grenville Street. In this regard, the west face of the South Tower begins at a height of 32.35 metres, which is approximately equal to the height of the 11-storey building at 32 Grenville Street. Moreover, the limiting distance agreement anticipated to be executed between the owners, the City and IO will further limit the ability for any vertical addition to that building on the easternmost 7 metres of the 32 Grenville Street. This agreement further secures light, view, and privacy for prospective residents in west facing units located above the 32.35 metre mark, and accordingly, it continues to be our opinion that the South Tower's separation distance to the west be measured between it and Murano Condos South Tower.

In addition, although the South Tower has been moved 0.71 metres closer to the south property line (resulting in a 4 metre setback from the south lot line), this setback, in combination with the 18 metre right-of-way along Grenville Street, provides an approximately 22 metre separation distance between the South Tower and the properties on the south side of Grenville Street. Were a similar tower setback provided on a site to the south, a tower separation distance of at least 25 metres could be achieved.

With respect to the North Tower, the building maintains a 12.5 metre setback to the centreline of St. Vincent Lane. For the reasons set out in Section 5.4 of our March 2019 Report, this separation distance continues to be appropriate. The North Tower has also been relocated and reshaped, and is now 1.54 metres closer to 25 Grosvenor Street as a result of the proposed lot line adjustment, resulting in a 9.27 metre separation distance. In addition, the tower is now proposed to be 0.71 metres closer to Grosvenor Street (for a 5 metre tower setback to the north property line).

Towards 25 Grosvenor Street, the North Tower now provides a 0.77 metre setback from the (new) east property line, as a result of the forthcoming consent application to adjust the lot line. The resulting reduced tower separation from 25 Grosvenor Street continues to be appropriate from a built form perspective given that the west face of 25 Grosvenor Street is a blank wall, is curved, and is occupied by an office use. Further, the east face of the North Tower has no balconies. In our opinion, this separation distance is appropriate and results in adequate light, view, and privacy for prospective residents in east facing units.

The reduced north tower setback of the North Tower (5 metres), in combination with the 20 metre right-of-way along Grosvenor Street, provides a 25 metre separation distance between the North Tower and the south property line of the Central YMCA building and entry way to Opera Place Park. Were those lands to be redeveloped with a tower, the recommended 25 metre separation distance would be met.

Finally, the revised proposal's two towers are now separated by 24.5 metres, a slight reduction from the 25 metre separation distance contemplated by the original proposal and recommended by the Tall Building Design Guidelines. In our opinion, this proposed separation distance is appropriate because this reduced separation distance allowed the tower floor plates to be maintained at similar sizes while providing for an additional separation distance from 18 Grenville Street. Maintaining the floor plate sizes allowed the unit mix to be generally maintained and a significant number of purpose-built rental units to be built, 30 percent of which will be affordable rental units. In addition, we note that the two towers are slightly offset, such that the South Tower only interfaces with approximately half of the south face of the North Tower. Finally, we note that the proposed 24.5 metre separation distance is only 0.5 metres less than the recommended 25 metres, and that there are numerous examples of reduced tower separation distances in the surrounding area and within the *Downtown*. For example, northeast of the site, 22 Wellesley Street East was approved with a 0 metre tower setback from its east property line, 40 Wellesley Street East was approved with 5.5 metre tower setbacks from its west and east property lines and 50 Wellesley Street East was approved with a 3.7 metre tower setback from its east property line.

### *Shadow Impacts*

A revised shadow study has been prepared by Sweeny & Co Architects, assessing the shadow impacts at the spring/fall equinoxes (March/September 21st) and the summer/winter solstices (June/December 21st). The reduced tower heights have resulted in a decrease in the amount of incremental impact the revised proposal generates and represents an improvement from the original proposal. We have reviewed this shadow study and our conclusions are generally consistent with the results analyzed in our March 2019 Report in that the incremental shadow impacts the revised proposal has on neighbouring streets, properties and open spaces, particularly low-rise *Neighborhoods* and nearby parks, are “adequately limited”, in accordance with the applicable Official Plan policies, having regard for the urban context and the proximity of existing tall buildings.

As noted previously, the basis for the reduction in the height of both towers was to conform to Policy 6.2.9 of SASP 382. We emphasize that the revised proposal now results in no new net shadows on Opera Place Park between 12:00 pm and 2:00 pm on March 21<sup>st</sup> and September 21<sup>st</sup>, and would therefore fully conform with this policy, responding to feedback received from City Staff and the community.

#### *Sky view Impacts*

In our opinion, the proposed tower setbacks and floor plate sizes would continue to not have an unacceptable impact on sky view from the public realm (e.g. from Grosvenor Street or Grenville Street), and the base building would define the scale along both streets.

Above the base building, both the North Tower's east-west width of 35.0 metres and north-south length of 21.4 metres and the South Tower's east-west width of 25.5 metres and north-south length of 29.4 metres are within the range of typical tower dimensions and would not have unacceptable sky view impacts. Furthermore, the tower locations, orientations and setbacks from the base building are similar to those in the previous submission and, as set out in our March 2019 Report, would not have any unacceptable sky view impacts.

#### *Wind Impacts*

Finally, with respect to wind impacts, an updated Pedestrian Level Wind Study was prepared by Gradient Wind Engineering Inc. assessing the wind impacts of the revised proposal at areas of interest, which include those areas that pedestrians are expected to use on a frequent basis.

The study anticipates that wind conditions at grade-level locations are expected to be similar and somewhat calmer as compared to the original proposal and that all primary and secondary entrances at grade are expected to continue to be comfortable for standing or better throughout the year. The study also expects calm wind conditions suitable for sitting at the covered outdoor childcare play area and notes that the addition of the Floor 10 green roof is also anticipated to marginally improve wind conditions over the Floor 4 amenity terrace below. The reduction of the heights of both towers is also expected to marginally improve wind conditions across the site. As noted previously, a 1.8 metre wind screen has been added along the west face the west amenity terrace on Floor 4, as per the recommendation of the original Wind Study.

## Urban Design

From an urban design perspective, the revised scheme continues to fit harmoniously with the surrounding existing and planned built form context, is appropriate and desirable in urban design terms and conforms with the applicable built form and urban design policies of the Official Plan. In particular, the revised proposal continues to conform with the built form policies of the Official Plan, including both those in force at the time and those modified by OPA 480 since the submission, despite the fact that they would not technically apply. Similarly, the revised proposal has appropriate regard for the policies presented in Section 9 (Built Form) of the Downtown Secondary Plan, despite the fact that the Downtown Secondary Plan was approved following the submission of the application and would not apply. In particular, the revised proposal:

- locates the base building parallel to Grosvenor Street and Grenville Street with consistent front yard setbacks and locates the main entrances to residential lobbies, retail units, and the childcare centre so that they are clearly visible and have direct access from public sidewalks along street frontages;
- provides a base building which includes high-quality materials and design elements that fit with neighbouring buildings and contributes to a pedestrian scale;
- animates and promotes the use of adjacent streets, parks and open spaces by providing active uses at grade and multiple entrances;
- provides an attractive, comfortable and safe pedestrian environment through improvements to adjacent sidewalks, the maintenance of existing street trees and the planting of a new street tree, the consolidation of the number and width of curb cuts to access the proposal, along with a further widening of the public realm along Grenville Street, Grosvenor Street, and the proposed mid-block connection;
- designs the proposed towers with distinct bases, middles and tops;
- locates and screens from public view service areas, ramps and garbage storage and provides all parking underground;
- adequately limits any resulting shadowing of, and uncomfortable wind conditions on, neighbouring streets, properties and open spaces (including Opera Place Park), having regard for the varied nature of such areas;
- demonstrates design excellence of the building and surrounding public realm and enhances the liveability of the building's surroundings;
- provides tall building floorplates designed to adequately limit shadow impacts of the towers on the public realm and neighbouring properties and maintains adequate sky view from the public realm; and,

- includes distinctive architectural characteristics as part of each tower element that conceal mechanical systems and appropriately contribute to the skyline.

It is also our continued opinion that the proposed development has appropriate regard for the applicable design guidelines set out in the Tall Building Design Guidelines and Downtown Tall Building Guidelines. The analysis in Section 5.5 of our March 2019 Report continues to apply, subject to the following additional commentary:

*1.4 Sunlight and Sky View recommends locating and designing tall buildings to protect access to sunlight and sky view within the surrounding context of streets, parks, public and private open space, and other shadow sensitive areas.*

- The shadow and sky view impacts of the revised proposal are limited by the point tower design, and continue to not result in any unacceptable shadow impacts on any sensitive land uses. As noted earlier, the revised proposal's height has been reduced to remove any new net shadow on Opera Place Park and thereby conform with Policy 6.2.9 of SASP 382.

*2.1 Building Placement recommends locating the base of tall buildings to frame the edges of streets, parks and open space, reinforce corners, to fit harmoniously with the existing context, and to provide opportunities for high-quality landscaped open space on-site.*

- As described earlier, the revised proposal's base element continues to be oriented parallel to each street frontage, frames the edges of the streets and entrance to Opera Place Park with good proportion, and fits harmoniously with the existing context. The increased base building setbacks from Grenville Street, Grosvenor Street, and the south half of the mid-block connection provide opportunities for new and maintained tree plantings and provide strong opportunities for placemaking through the implementation of the Bay Cloverhill Green Loop.

*3.2.1 Floor Plate Size and Shape encourages limiting tower floor plates to 750 square metres, excluding balconies.*

- The proposed tower floorplates for the North and South Tower are 782 square metres and 783 square metres, respectively, and are appropriate for the reasons noted earlier in this Letter.

*3.2.2 Tower Placement encourages placing towers away from streets, parks, open space*

*and neighbouring properties to reduce visual and physical impacts.*

- As discussed in earlier in this Letter, the revised proposal's towers have been appropriately placed to reduce visual and physical impacts on the streets, Opera Place Park to the north and the neighbouring properties to the east and west.

*3.2.3 Separation Distances recommends that tall buildings be set back 12.5 metres from side and rear property lines or centre lines of abutting lanes.*

- As discussed in detail above, the North Tower is setback 12.5 metres from the centreline of St Vincent Lane to the west and the South Tower is setback 12.65 metres from the east property line. While the North Tower setback to the east property line and the South Tower setback to the west property line are less than the recommended setbacks, it is our opinion that these setbacks are appropriate for the subject site for the reasons noted above.

*4.1 Streetscape and Landscape Design encourages the provision of high-quality, sustainable streetscape and landscape design between the tall building and adjacent streets, parks and open space.*

- The revised proposal continues to represent a substantial improvement of the existing condition. As discussed throughout this Letter, the revised proposal provides for a 2 metre setback from the south property line and a 3 metre setback from the north property line. This allows for the retention and healthy growth of five street trees along Grosvenor Street and the introduction of a new street tree along Grenville Street. In addition to this, the landscape plans prepared by Studio TLA, which form part of this resubmission, introduce a cohesive streetscaping and paving scheme between the base building and Grenville Street and Grosvenor Street.

## **Conclusion**

Subject to the additional analysis and opinion provided above, the findings set out in our Planning and Urban Design Rationale report dated March 2019 are still relevant and applicable to the revised proposal, and as a result, it is our opinion that the proposed development, as revised, continues to be appropriate and desirable in land use planning and urban design terms and should be approved.

If you have any questions and/or comments regarding this addendum letter, please do not hesitate to contact the undersigned or Simran Bhatti, Planner of our office.

Yours very truly,

**Bousfields Inc.**



Mike Dror MCIP, RPP



Tony Volpentesta, MCIP, RPP

Cc: Cynthia Bird, Greenwin Holdings Inc.  
Sidonia Tomasella, Aird and Berlis LLP