



June 6th 2025

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Senior Manager, Development & Planning
Choice Grosvenor / Grenville Inc.

**RE: 26 GRENVILLE STREET AND 27 GROSVENOR STREET, TORONTO, MIXED-USE DEVELOPMENT
MINOR VARIANCE APPLICATION**

1.0 INTRODUCTION

BA Group is retained by Choice Grosvenor / Grenville Inc. to provide transportation consulting services in relation to a Minor Variance application being made to the City of Toronto for the proposed redevelopment of the lands located at 26 Grenville Street and 27 Grosvenor Street (referred to herein as “the site”).

Since the submissions detailed in **Section 1.1**, the development team has reviewed the feasibility of reducing the vehicular parking supply to ensure that vehicular parking isn’t over provided relative to the current demand and policy context. A minor increase in residential units is also proposed compared to the previous application.

1.1 Background

The following materials have been submitted as part of the Zoning By-law Amendment and Site Plan Applications:

1. *26 Grenville & 27 Grosvenor Zoning By-law Amendment Urban Transportation Considerations Report, City of Toronto* dated March 2019 (referred herein as the “March 2019 report”)
2. *26 Grenville & 27 Grosvenor Zoning – Site Plan Application – Response to City Comments*, dated November 2020 (referred herein as the “November 2020 letter”)
3. *26 Grenville & 27 Grosvenor Zoning – Site Plan Application – Response to City Comments*, dated February 2021 (referred herein as the “February 2021 letter”)
4. *26 Grenville & 27 Grosvenor Zoning – Site Plan Application – Response to City Comments*, dated June 2021 (referred herein as the “June 2021 letter”)

It is noteworthy that the Site-Specific Zoning By-law 1095-2021 & 1096-2021 was enacted by City Council on December 17th, 2021.

1.2 This Letter

A Minor Variance application is being made to the City of Toronto seeking relief from the requirements of Site-Specific Zoning By-law 1095-2021 & 1096-2021. The proposed variance would permit the adoption of a parking supply for the 26 Grenville Street and 27 Grosvenor Street development that is less than the currently in-force site specific Zoning standard that was approved in 2021.

A rationale is provided within this letter in support of the proposed minor variance related to the parking. The rationale for variance is described herein.

In addition, this letter provides the following as part of the Minor Variance application submission:

- a comparison of the changes proposed to the key elements of the development programme from a transportation perspective; and
- a review of the proposed elements of the current site plan as it pertains to the adequacy and functionality of the vehicle parking, loading, bicycle supply and facilities.

2.0 PROPOSED CHANGES TO THE DEVELOPMENT PROGRAMME

Since the last submission to the City of Toronto in June 2021 the project has undergone several changes. The changes to the development proposal include an increase in the number of units proposed, the reduction of number of underground levels of vehicular parking, a relocation of the daycare space proposed from the north tower to the south tower, and the removal of the at-grade retail space. The changes to the development programme are the result of a continued refinement of the project by the client in conjunction with feedback from the City of Toronto.

Transportation related changes to the application include a reduction in the number of vehicular parking spaces proposed resulting from the decrease in the number of underground parking levels proposed. The number of loading spaces proposed has also been reduced from 5 spaces total to 4 spaces total as the prior loading supply exceeded the number of spaces required.

Reduced scale architectural plans of the proposed development are provided **Appendix A. Table 1** below provides a summary of the key changes to the development proposal between the previous submission and current development proposal.

Table 1 Proposed Changes to the Development Programme

		Previous Submission (June 2021)	Current Development Proposal
Residential (Units)	Bachelor Units	12 units	158 units <i>(inclusive of 42 affordable)</i>
	1 Bedroom Units	314 units	337 units <i>(inclusive of 42 affordable)</i>
	2 Bedroom Units	343 units	154 units <i>(inclusive of 50 affordable)</i>
	3 Bedroom Units	101 units	120 units <i>(inclusive of 47 affordable)</i>
	Total	770 units	769 units <i>(inclusive of 233 affordable)</i>
Retail	GFA	465 m ²	0 m ²
Daycare	GFA	694 m ²	685 m ²
Parking Space Supply	Residential	97 spaces	84 spaces
	Non-Residential	97 spaces	9 spaces
	Car-Share	6 spaces	--
	Total	200 spaces	93 spaces
Loading Space Supply	-	5 loading spaces (2 Type 'G' & 2 Type 'B', 1 Type 'C')	4 loading spaces (2 Type 'G' & 1 Type 'B' 1 Type 'C')
Bicycle Parking Space Supply	Residential Long-Term	693 spaces	716 spaces
	Residential Short-Term	77 spaces	84 spaces
	Daycare Spaces	--	10 spaces
	Total	770 spaces	810 spaces
Proposed Access Location	-	One (1) parking and loading driveway off of St. Vincent Lane	One (1) parking and loading driveway off of St. Vincent Lane

Notes:

1. Site statistics are based upon the architectural plans, dated June 6, 2025.

2.1 Site Plan Changes

The current site plan and configuration of the transportation related elements supporting the proposed development are generally consistent with that illustrated as part of the initial March 2019 application.

An overview of the key transportation elements is provided in the following sections.

Building Entrance

The north residential tower main pedestrian entrance is on Grosvenor Street and the south residential tower will have its main pedestrian entrance on Grenville Street. The daycare pedestrian entrance will be on Grenville Street.

In addition to the pedestrian entrances, a new north-south mid block pedestrian connection is proposed along the west side of the tower's connecting Grenville Street to Grosvenor Street.

Vehicular Entrance

Vehicular access is proposed via a ramp to the underground parking garage on St. Vincent Lane. In addition, a new private east-west laneway, connecting St. Luke Lane to St. Vincent Lane, is proposed between the north and south residential tower. The laneway will remain open to the public, however, will remain in private ownership.

Bicycle Parking Access

Bicycles will access the bicycle parking areas located in 27 Grosvenor Street from the private east-west lane and 26 Grosvenor Street from the mid-block pedestrian connection.

3.0 PARKING CONSIDERATIONS

3.1 Zoning By-Law Requirements

3.1.1 Zoning By-law 1095-2021 & 1096-2021

The City of Toronto Zoning By-law 1095-2021 & 1096-2021 (enacted 2021-10-1) included the provision for the following parking requirements:

- a minimum of 121 parking spaces must be provided for the use of resident of the mixed-use building; and
- a minimum of 97 parking spaces must be provided for residential visitors and non-residential uses in the mixed-use building, which may be provided as public parking.
- a reduction of four resident parking spaces for each of the proposed six (6) car-share parking spaces provided and that the maximum reduction permitted by this means be capped by the application of the following formula:
 $4 \times (\text{Total of Units} / 60)$, rounded down to the nearest whole number.

Taking the above into consideration the current in-force site specific requirements would require a minimum of 218 parking spaces.

3.1.2 Zoning By-law 569-2013, as Amended (Parking Zone A)

The City of Toronto has signalled a change in policy direction regarding its Zoning By-law and minimum parking requirements. In December 2021, after approximately a year of study and consultation, City Council adopted the Review of Parking Requirements for New Development, which recommended the elimination of minimum parking requirements for most land uses, city-wide, replacing them with maximum parking standards within Zoning By-law 569-2013. In February 2022, Zoning By-law 89-2022 was published to amend Zoning By-law 569-2013 with the proposed changes, which included adjusted minimum accessible parking requirements for most land uses. Since that time, Zoning By-law 89-2022 was amended by Zoning By-law 125-2022 to establish parking zones, and was approved. On this basis, Zoning By-law 569-2013, as Amended, is considered to be applicable law.

While the minimum parking requirements of the Site Specific Zoning By-law are considered to be applicable, if the application were made today, the City of Toronto Zoning By-law 569-2013, as Amended, would be appropriate on similar development applications and is therefore considered for comparison and summarized in **Table 2**.

Table 2 City of Toronto Zoning By-law 569-2013 As Amended (Parking Zone A)
Parking Requirements

Use	Units / Floor Area ¹		Minimum Rate	Minimum Parking Space Req ²	Maximum Rate	Maximum Parking Space Req ²	Effective Parking Rate ³	Effective Parking Space Req ^{2,3}
Resident								
Resident	Studio	158 units	None	0	0.3 spaces / unit	47	0.3 spaces / unit	47
	1-Bedroom	337 units	None	0	0.5 spaces / unit	168	0.5 spaces / unit	168
	2-Bedroom	154 units	None	0	0.8 spaces / unit	123	0.8 spaces / unit	123
	3-Bedroom	120 units	None	0	1.0 spaces / unit	120	1.0 spaces / unit	120
Resident Sub-Total			-	0	-	458	-	458
Non-Resident								
Visitor	795 units		2 plus 0.01 spaces / unit	9	1.0 spaces / unit for the first five units and 0.1 spaces / unit for the sixth and subsequent units	80	0.10 spaces / unit	79
Daycare	685 m ²		None	0	0.8 spaces / 100 m ²	5	0.8 spaces / 100 m ²	5
Non-Resident Sub-Total			-	9	-	85	-	84
TOTAL			-	9	-	543	-	542
Accessible Parking Spaces ⁴ (included in TOTAL)				14				

Notes:

1. Site statistics are based upon the architectural plans, dated June 6, 2025.
2. If the number of required parking spaces results in a number with a fraction, the number is rounded down to the nearest whole number but there may not be less than one parking space.
3. Application of "Effective" Parking Rate and Requirement is a procedural requirement, stipulated by By-law 89-2022, intended to calculate the required quantity of parking spaces (see Section 200.15.10.5).
4. Accessible parking spaces calculated per Section 200.15.10.10
(C) if the number of effective parking spaces is more than 100, a minimum of 5 accessible parking spaces plus 1 accessible parking space for every 50 effective parking spaces or part thereof in excess of 100 parking spaces must comply with all regulations for an accessible parking space in Section 200.15.

On this basis, although not directly applicable to this site, consideration for new City policy as reflected in Zoning By-law 569-2013, as Amended, would result in a minimum requirement of 9 visitor parking spaces and 14 accessible parking spaces.

3.2 Proposed Parking Supply

The total parking supply of the revised proposal is 93 parking spaces. The proposed parking supply is broken down as follows.

Residential Parking Supply

A total of 84 resident parking spaces are proposed for the development within the underground garage. The residential parking supply results in an effective residential parking supply of 0.11 spaces per unit.

The residential parking spaces are primarily located on P1 to P2 on 26 Grenville Street.

Non-Residential Parking Supply

A total of 9 non-resident parking spaces are proposed for the development within the underground garage. The non-resident parking supply is considered appropriate and will meet the parking demand needs of the proposed residential visitor and daycare uses, recognizing a sharing between these uses on the site.

The non-residential spaces are located primarily in the 27 Grosvenor Street side of the site, on level P1.

Accessible Parking Supply

The current proposal incorporates a total of 14 accessible parking spaces, including 12 spaces within the resident parking area, and 2 spaces within the non-resident parking area. Accessible parking spaces are located in close proximity to the parking elevator lobbies.

The proposed accessible parking supply is consistent with the supply requirements outlined in the City of Toronto Zoning By-law 569-22013, as Amended.

3.3 Proposed Minor Variance

The proposed parking supply of 93 spaces is less than the current in force site specific zoning requirement of 218 parking spaces. A minor variance is therefore proposed to reduce the current Zoning By-law Parking requirement of 218 spaces. The proposed variance will reduce the requirement to be consistent with the recent changes to City of Toronto Zoning By-law 569-2013 which eliminated / greatly decreased the minimum parking requirements for most land uses.

The corresponding minor variance proposed is as follows:

- i. A minimum of 0 parking spaces for the use of residents of the mixed use building;
- ii. A minimum of 9 parking spaces must be provided for residential visitor and non-residential uses in the mixed-use building, which may be provided as public parking.
- iii. A minimum of 14 accessible parking spaces for the mixed-use building.

3.4 Appropriateness of the Proposed Parking Supply

The approval of a reduced parking standard is considered appropriate based upon the following considerations:

- consistency with planning policy context;
- the locational context of the site, which is highly supportive of non-automobile modes of travel; and
- the proposed TDM measures for the site that will influence parking demand.

3.4.1 Consistency With Planning Policy Context

As summarized in **Section 3.1.2**, the City of Toronto recently adopted a change in policy direction regarding contemporary Zoning By-law 569-2013 and the minimum parking requirements contained therein.

In December 2021, after approximately a year of study and consultation, City Council adopted the Review of Parking Requirements for New Development which recommended the elimination of minimum parking requirements for most land uses, city-wide, replacing them with maximum parking standards within Zoning By-law 569-2013, as amended. Minimum residential visitor parking requirements were kept in the Zoning By-law but were significantly reduced. In February 2022, By-law 89-2022 was published to amend Zoning By-law 569-2013 with the proposed changes, which included adjusted minimum accessible parking requirements for most land uses. By-law 89-2022 was appealed during the 20-day appeal period mandated by the provincial Planning Act and has since been resolved, without amendment, and is now in force and effect.

Throughout the year of study, City of Toronto staff reports¹ provided rationale for the change. It was noted that while development applications frequently get approved with reduced parking in comparison to Zoning By-law requirements, City Council has the power to prohibit residents, visitors, and tradespeople of a building subject to a development application from parking on local area streets when there is community concern, and that many other cities have completely or partially eliminated parking minimums in their Zoning By-laws.

The staff report noted that development application activity in Toronto **“suggests a market driven approach, capped with maximums, is more responsive to trends and aligned with public objectives.”**

Staff stipulated that the “review should be guided by the principle that parking standards should allow only the maximum amount of automobile parking reasonably required for a given use and minimums should be avoided except where necessary to ensure equitable access, such as for accessible parking or in areas which would be difficult to serve with transit.”

Generally, the staff report represents a definitive shift in the public position of the City of Toronto with regards to minimum parking requirements and their enforcement. The most notable of the positions stated within the staff reports is that the **then prior minimum parking requirements in Zoning By-law 569-2013 did not advance the policies of the City’s Official Plan which call for the City to reduce auto-dependence and support non-auto modes of transportation.**

As it relates to the project, the proposed parking supply is significantly lower than the currently in force Zoning By-law parking requirement outlined in By-law 1095-2021. That requirement was established prior to the City’s passing of By-law 89-2022 which eliminated and/or reduced most parking minimums. The revised parking supply is therefore consistent with the City of Toronto’s policy direction to reduce vehicular parking provisions. Therefore, recognizing the proposed parking supply is within the established minimum and maximum range established by the now current City policy standards now in force in Zoning By-law 569-2013 (as enacted through By-law 89-2022), the proposed parking supply is therefore appropriate.

¹ Two City of Toronto staff reports are referenced herein:
“Proposed Review of Parking Requirements for New Development,” dated January 5, 2021
“Recommended Parking Requirements for New Development,” dated November 10, 2021

On the basis of the recent change to City policy, the proposed parking supply and corresponding minor variance for the site is appropriate.

3.4.2 Site Transportation Context

The site is extremely well positioned relative to multi-modal transportation infrastructure. The transportation context for the site facilitates the ability for residents and visitors of the project to utilize a variety of transportation options and in turn, to not require the use of a private automobile.

A number of TTC subway stations are located less than a 5-minute walking distance from the site including Wellesley Station and College Station of TTC Subway Line 1 (Yonge - University). The site is therefore well connected by foot to the City's rapid transit network.

In addition, the site is surrounded by a variety of well-connected cycling infrastructure, including cycle tracks, bike lanes and a multi-use trails.

Within 500 metres of the site, cycle tracks are currently operating east-west along Wellesley Street West and Gerrard Street West (east of Yonge Street). Bike lanes currently run east-west along College Street (west of Bay Street) and Gerrard Street West (west of Yonge Street). In addition, bike lanes run north-south along Bay Street (south of College Street) and Elizabeth Street (between College Street and Gerrard Street West).

There is a multi-use trail located nearby in Queen's Park that provides users with a direct connection between Wellesley Street West and Hoskin Avenue.

3.4.3 Transportation Demand Management Measures

A comprehensive Mobility Choice Plan has been developed for the site. That Mobility Choice Plan was documented in the June 2021 submission to the City of Toronto. The objectives of the Mobility Choice Plan is to:

- a) reduce automobile dependence and reliance on single-occupancy vehicle travel;
- b) promote and incentivize walking and cycling as alternative modes of travel to and from the site; and
- c) promote transit and low carbon-emitting alternatives relative to automobile ownership and use.

The Mobility Choice Strategy is comprised of a number of individual Transportation Demand Management (TDM) strategies. The TDM Strategies proposed for the site include:

1. Provision of cycling supportive infrastructure such as bicycle parking in excess of minimum requirements, a bicycle repair station, and a financial contribution towards a new bike share station in the area.
2. The provision of enhanced sidewalks adjacent to the site to encourage walking trips.
3. A reduced vehicle parking supply.
4. Provision of travel mode information packages to new residents informing them of the various non-automobile mode choices available to them.
5. Provision of pre-loaded Presto cards to encourage and incentivize residents to try transit.

The cumulative impact of the proposed TDM Strategies for the site will be a reduced need to own a vehicle. The proposed Mobility Choice Plan and associated TDM Strategies therefore provides a strong rationale for reducing the on-site vehicle parking supply proposed.

4.0 LOADING CONSIDERATIONS

4.1 Zoning By-Law Requirements

The City of Toronto Zoning By-law 1095-2021 & 1096-2021 (enacted 2021-10-1) included the provision for the following loading requirements:

- a minimum of *two loading spaces - Type G* must be provided, of which one loading space - type G shall be reserved for the use of 15-25 Grosvenor Street;
- a minimum of *two loading spaces - Type B* must be provided, of which one loading space - type B shall be reserved for the use of 15-25 Grosvenor Street;
- a minimum of *one loading space - Type C* must be provided; and
- *one loading space - Type G* and *one loading space - Type B* are permitted to be located within a single shared loading space servicing the mixed-use building.

The above requirement results in a total requirement of 5 loading spaces, with the ability to reduce the requirement to 4 loading spaces on account of a Type B and Type G space being able to be located and shared within a single loading space for the mixed-use building.

4.2 Proposed Loading Facilities

The proposed development includes four loading spaces in total. This is comprised of 1 Type B, 1 Type C, and 2 Type G loading spaces. Of this, two spaces (1 Type B, 1 Type G) are proposed to be dedicated for the use of the adjacent 15-25 Grosvenor office building, as specified in the By-law.

The proposed loading supply meets the applicable site-specific Zoning By-law loading requirement and is appropriate.

4.3 Operation of Proposed Loading Facilities

For the two loading spaces proposed for the mixed-use building, 1 Type G space is proposed in the south building. The south Type G space will be the designated location for accommodating City of Toronto waste collection / pickup for both residential buildings. As such, the south Type G loading space has been designed to accommodate the bin staging areas and access. The south Type G loading space will also be utilized for moving to/from the south tower. The Type C loading space in the north tower will be utilized for moving and deliveries into the north tower.

The proposed Type G loading space in the north tower, and the adjacent Type B loading space, located in the lane at the rear of the 15-25 Grosvenor building, will be utilized and assigned to the 15-25 Grosvenor office building. Given that 15-25 Grosvenor building is an office use, the Type G space in the north tower will not be utilized for City of Toronto waste collection. While the Type G space conforms to the spatial requirements in the Zoning By-law (13m long, 4.0m wide, 6.1m clear), the additional design requirements associated with City of Toronto waste pick-up do not apply to the 15-25 Grosvenor Type G loading space.

The proposed loading spaces are to be located at grade and are accessed through the proposed private east-west laneway between 27 Grosvenor Street and 26 Grenville Street.

5.0 BICYCLE PARKING CONSIDERATIONS

5.1 Zoning By-Law Requirements

5.1.1 Zoning By-law 1095-2021 & 1096-2021

Table 3 summarizes the bicycle parking requirements based on application of the Zoning By-law 1095-2021 & 1096-2021.

Table 3 City of Toronto Zoning By-law 1095-2021 & 1096-2021 - Minimum Bicycle Parking Requirements

Use	Units / Floor Area ¹	Minimum Rate		Minimum Requirement ²
Residential	795 units	Short-Term	0.1 spaces / unit	80 spaces
		Long-Term	0.9 spaces / unit	716 spaces
Daycare	685 m ²	Short Term	10 spaces	10 spaces
		Long Term	No Requirement	0 spaces
Total	Short-Term			90 spaces
	Long-Term			716 spaces
	Total			806 spaces

Notes:

1. Site statistics are based upon the architectural plans, dated June 6th, 2025.
2. In accordance with City of Toronto Zoning By-law 569-2013, bicycle parking calculations resulting in a fraction are rounded up to the nearest whole number.
3. As per Zoning By-law 569-2013 Section 230.5.10.1 (3), if a bicycle parking spaces is required for uses on a lot, other than dwelling units, and the total interior floor area of all such uses on the lot is 2000 square metres or less, then no bicycle parking space is required.

Based on application of the Zoning By-law 1095-2021 & 1096-2021, a total of 806 bicycle parking spaces are required, including 716 long term spaces and 90 short term spaces.

5.2 Proposed Bicycle Parking Supply

A total bicycle parking supply of 810 spaces (including 716 residential long term, 84 residential short-term and 10 daycare short-term spaces) are provided to service the bicycle parking demands for the proposed development. The current proposal incorporates all bicycle parking spaces located on the P2, P1, and ground floor of the proposed development.

The proposed supply meets the City of Toronto Zoning By-law 569-2013 (amended by By-laws 89-2022 and 125-2022). The proposed bicycle parking facilities, based upon the above, are appropriate and will adequately support the proposed development as planned.

6.0 SUMMARY AND CONCLUSIONS

BA Group has been retained by Choice Grosvenor / Grenville Inc. to provide urban transportation consulting services in relation to a proposed mixed-use development located at the property with a municipal address of 26 Grenville Street and 27 Grosvenor Street in the City of Toronto.

This letter provides a review of the planned parking proposed as part of a Minor Variance Application to the City of Toronto to permit a reduction in the minimum parking requirement from 218 spaces to 93 spaces. Of the 93 spaces proposed, parking supply will be comprised of 84 resident spaces and 9 visitor spaces. The corresponding minor variance proposed is as follows:

- (i) A minimum of 0 parking spaces for the use of residents of the mixed use building;
- (ii) A minimum of 9 parking spaces must be provided for residential visitor and non-residential uses in the mixed-use building, which may be provided as public parking.
- (iii) A minimum of 14 accessible parking spaces for the mixed-use building.

The approval of the above noted minor variance permitting a reduced parking standard is considered appropriate based on the following justification.

- A reduction in the minimum parking supply for the site is consistent with the City of Toronto's recently amended planning policy context which notably eliminated minimum parking requirements in 2022, which was after the site-specific Zoning By-law for the site were adopted in 2021. This suggests that the current site-specific requirements represent an over-requirement relative to modern requirements and that a reduction in the parking supply for the site is consistent with the City's policy goal of encouraging sustainable travel through reducing single auto vehicle use.
- A reduction in the minimum parking supply would be well supported by the transportation context of the site, which is highly supportive of non-automobile modes of travel. This in turn will allow future residents and visitors to not require the use of a private automobile to travel to and from the site.
- A reduction of the parking supply will be supported through a comprehensive Mobility Choice Plan being proposed as part of the development. The proposed Mobility Choice Plan is comprised of several Transportation Demand Management (TDM) Strategies that will leverage the area transportation context to reduce vehicular trips made to and from the site and thus reduce vehicular parking demand. The proposed Mobility Choice Plan is an important element to support the proposed reduction in the minimum parking requirement for the site.

Taking the above into consideration the proposed minor variance is appropriate.

In addition, BA Group has undertaken a review of the bicycle parking and loading supply and confirmed that both the bicycle parking supply and the loading supply meet the Zoning By-law requirements and is also appropriate. We trust the foregoing is in order. Please do not hesitate to contact us if you have any questions or concerns.

Sincerely,

BA Consulting Group Ltd.



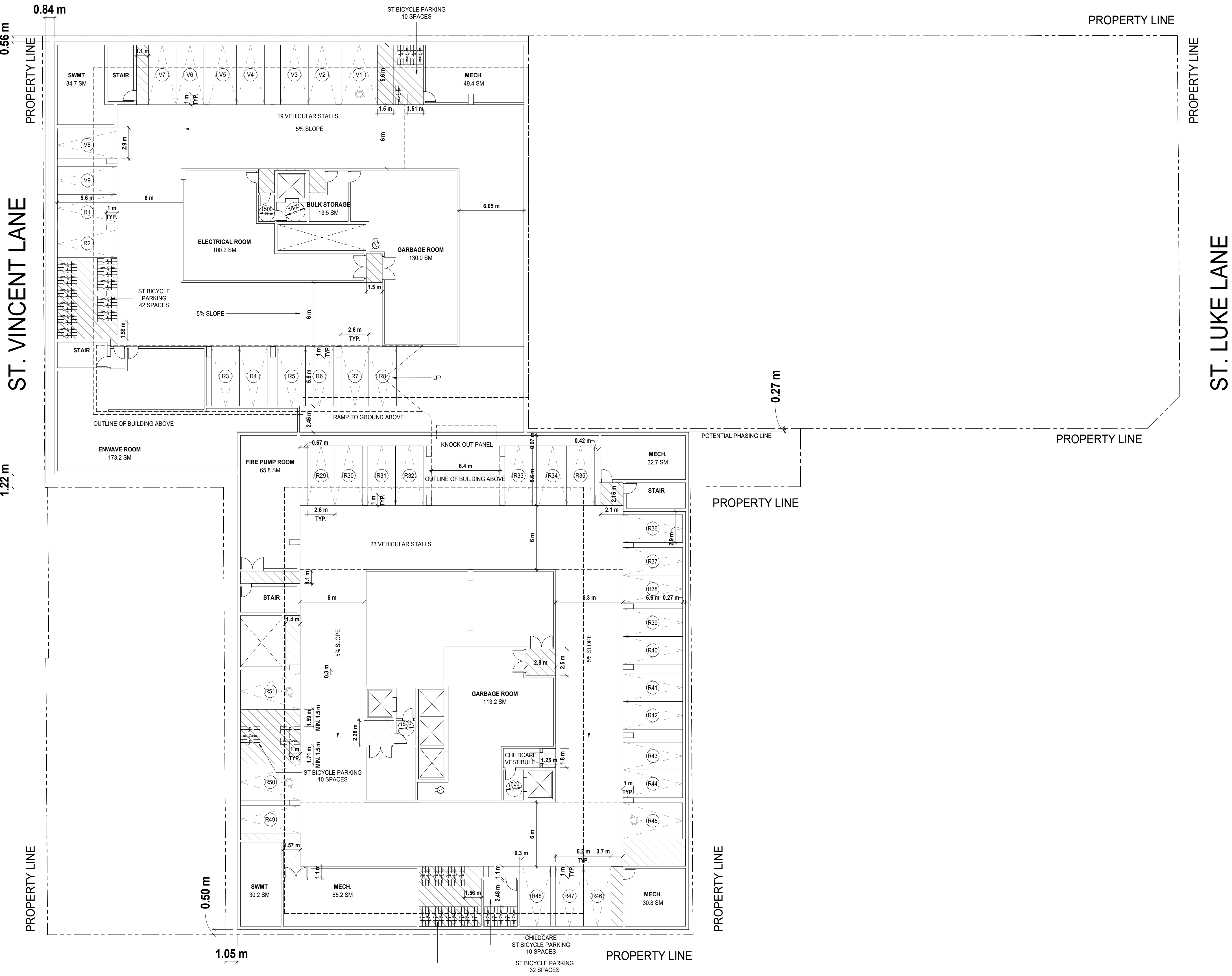
Mark Jamieson, P.Eng., MBA
Principal and CEO

Copy: Cristina Campos-Herrera, BA Group

Appendix A:

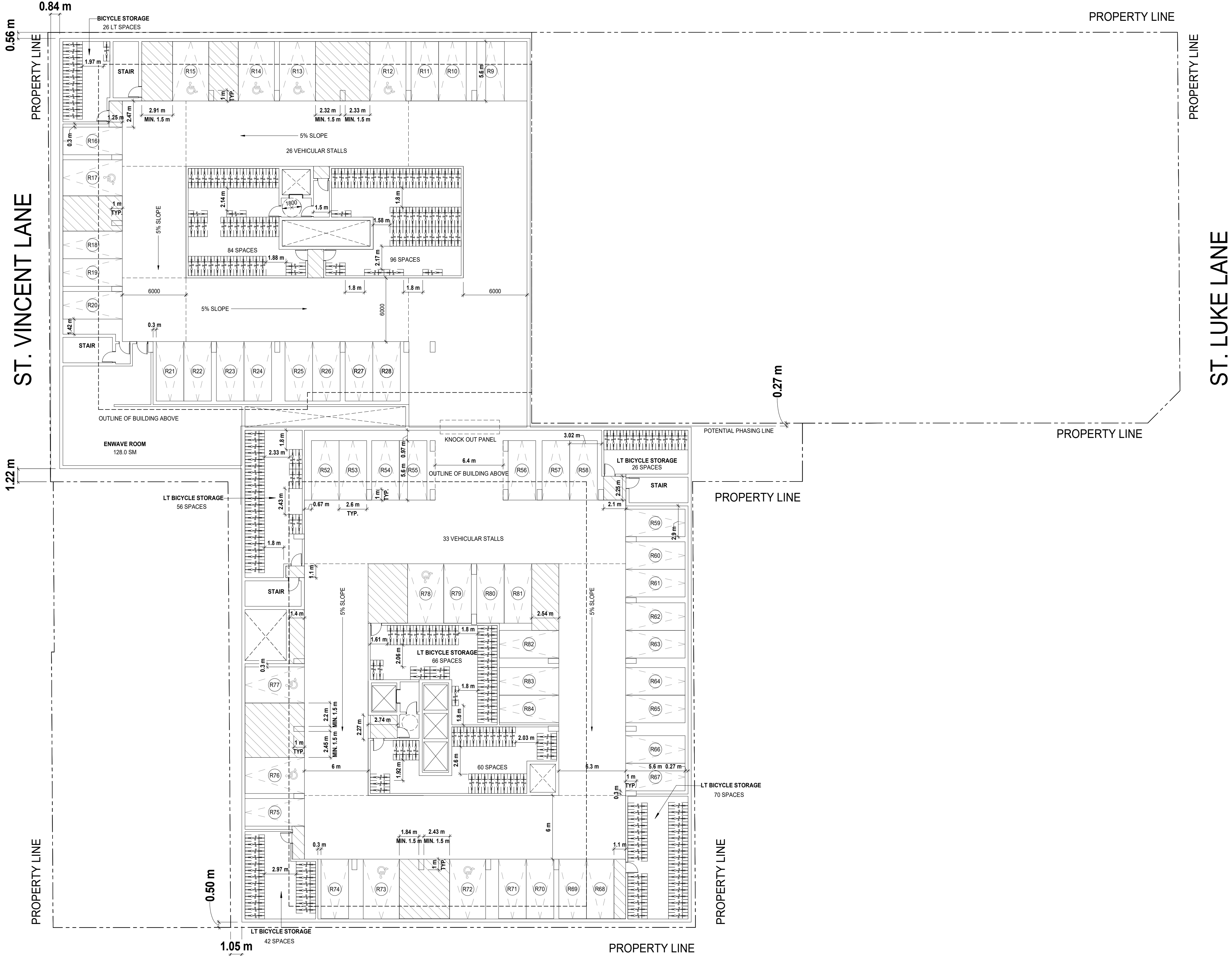
Reduced Scale Architectural Plans

GROSVENOR STREET



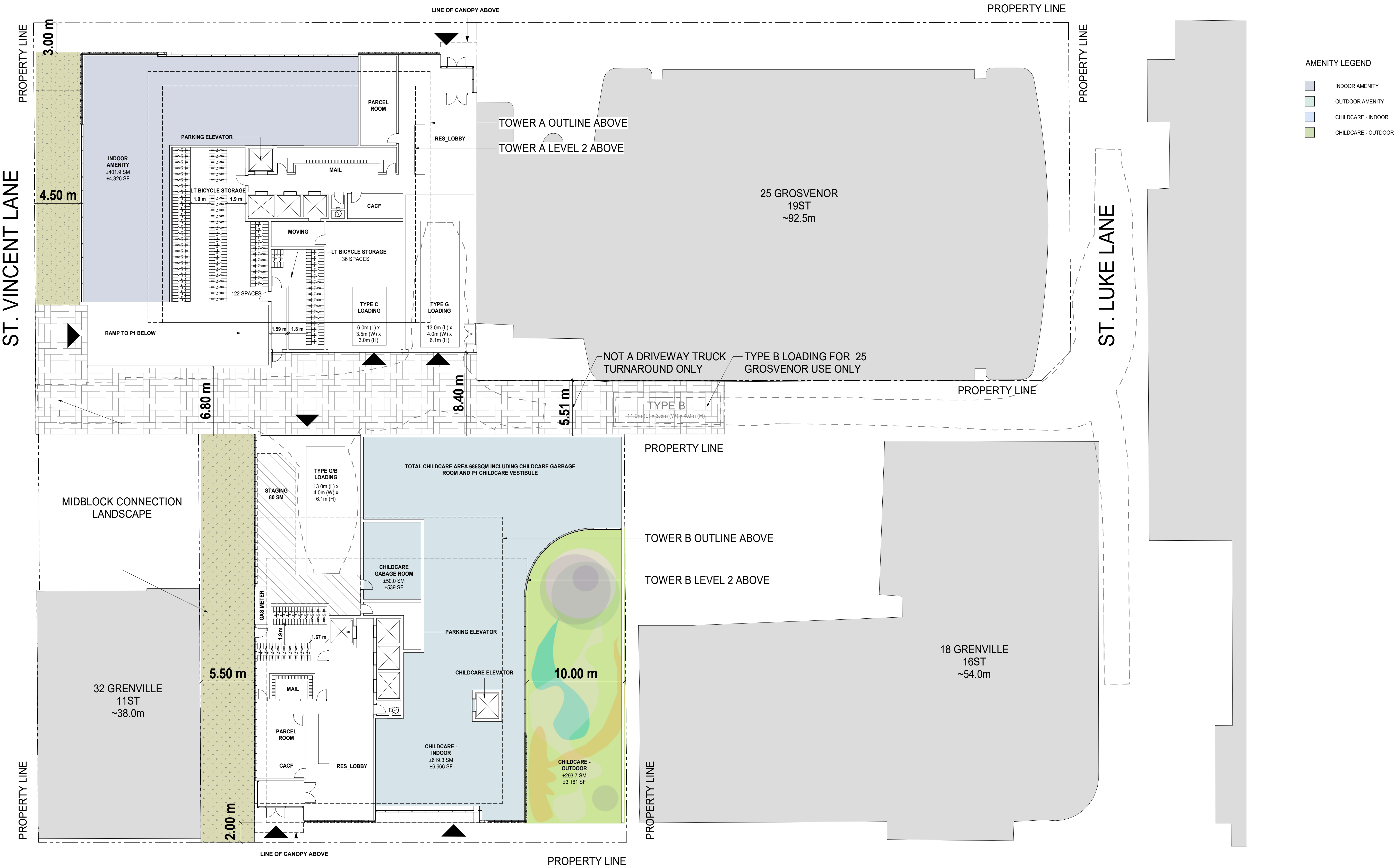
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GROSVENOR STREET

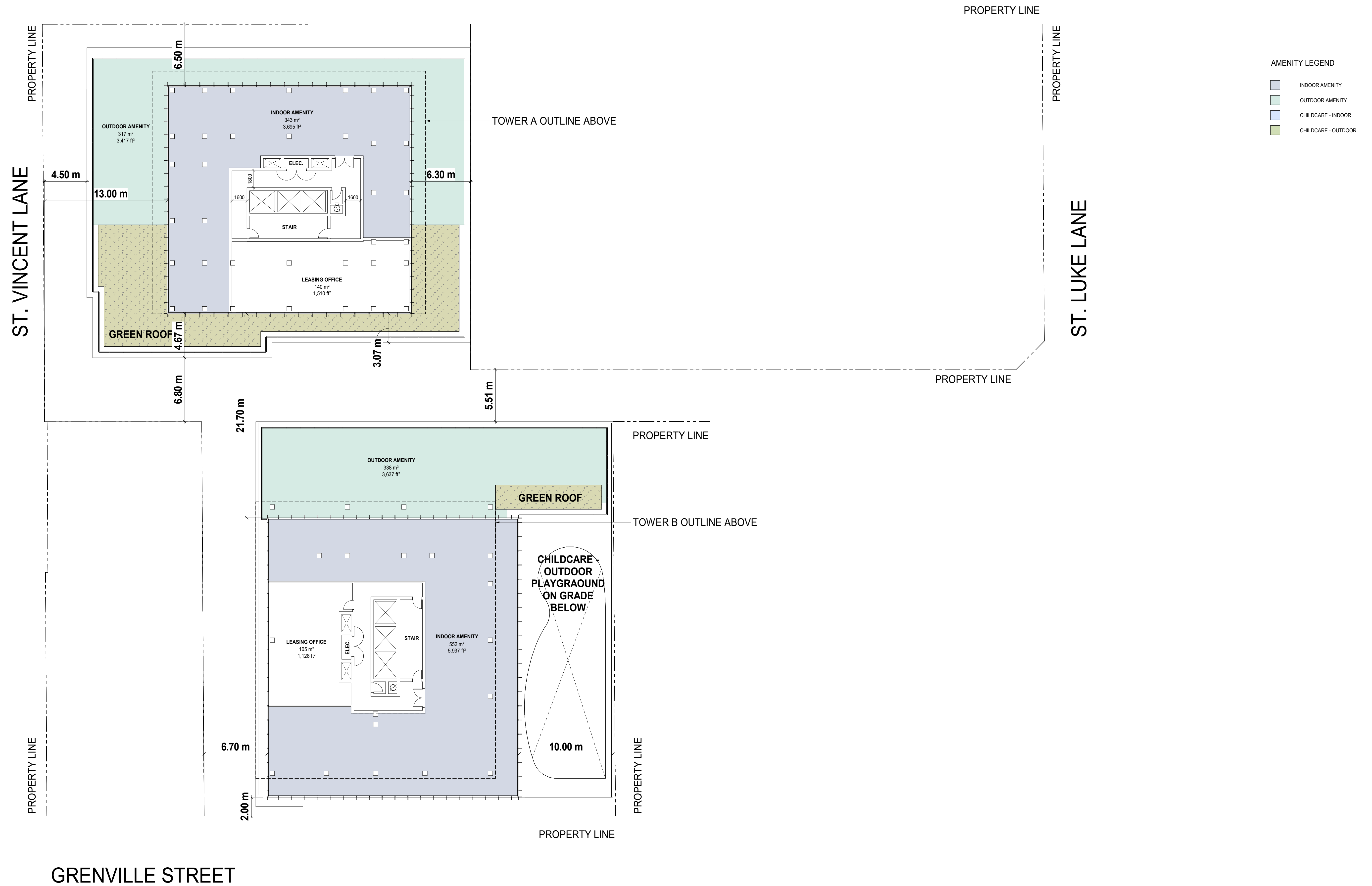


GRENVILLE STREET

GROSVENOR STREET



GROSVENOR STREET



GROSVENOR STREET



GRENVILLE STREET

GROSVENOR STREET



UNIT LEGEND

RENTAL

- STUDIO
- 1 BEDROOM
- 1 BEDROOM + DEN
- 2 BEDROOM
- 3 BEDROOM

AFFORDABLE

- STUDIO
- 1 BEDROOM
- 1 BEDROOM + DEN
- 2 BEDROOM
- 3 BEDROOM

GRENVILLE STREET

GROSVENOR STREET



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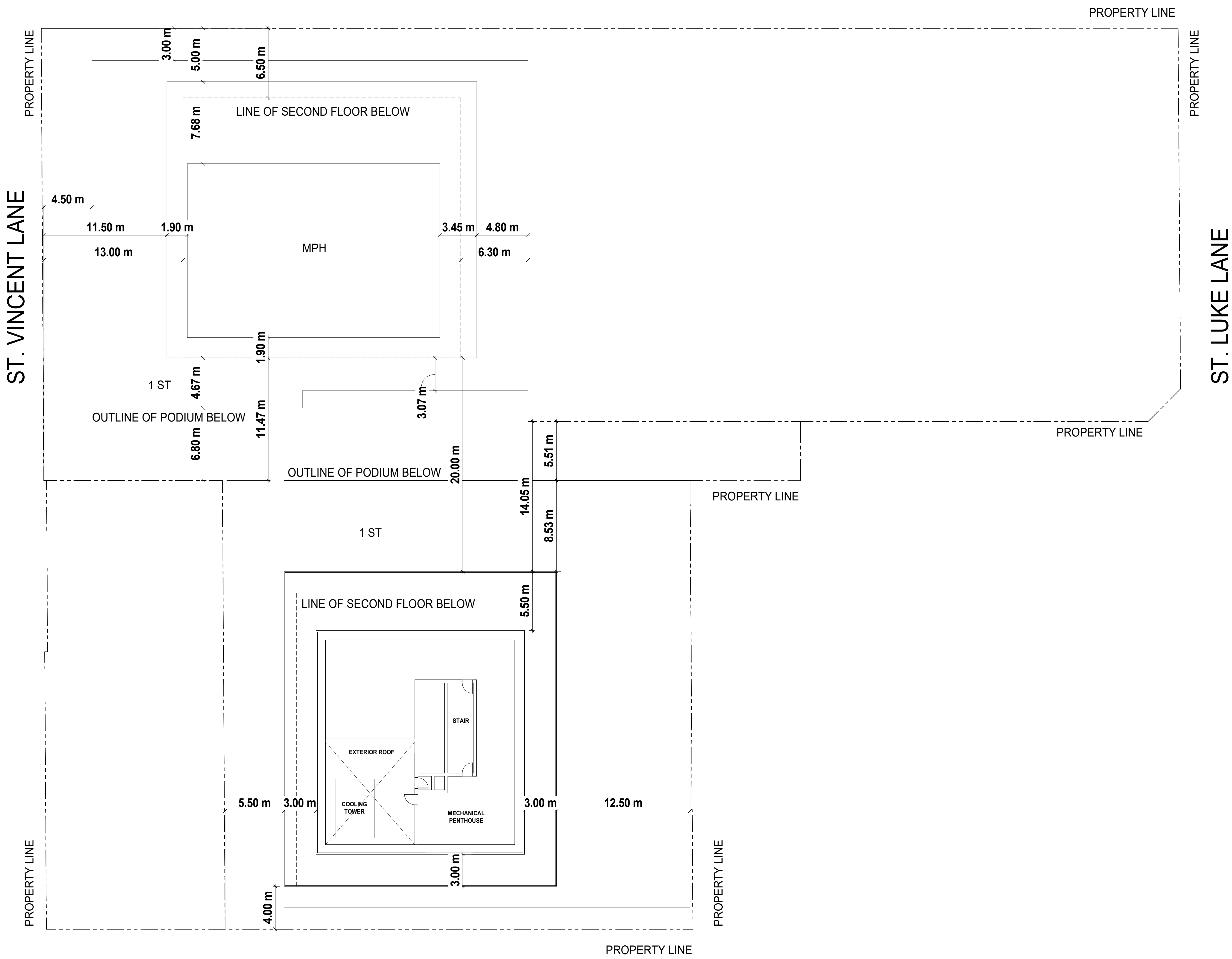
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