

May 22, 2018

Mayor Tory & Toronto City Council Members
Toronto City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

(sent electronically)

Dear Mayor Tory and Council Members,

Re: Recommended Downtown Plan OPA – Potential Impacts to Ryerson University

Urban Strategies Inc. is acting on behalf of Ryerson University (“Ryerson”), a major post-secondary teaching and research institution in Downtown Toronto. Established in 1948, Ryerson University has grown to over 45,000 students in 62 undergraduate and 55 graduate programs, 125 research institutes and labs, and is recognized as one of the top universities in Canada. The Ryerson University campus today is roughly bound by Yonge Street to the west, Gerrard Street to the north, Jarvis Street to the east, and Dundas Street to the south. However, Ryerson’s continued growth and expansion necessitates creativity and flexibility in a highly constrained urban environment.

We submitted a letter to Planning staff on Ryerson’s behalf on January 19, 2018 outlining Ryerson’s concerns with the draft of the TOCore Downtown Secondary Plan, and a subsequent letter on April 27, 2018 regarding the Recommended Downtown Plan and OPA. Further to the April 27, 2018 letter, Ryerson University, Urban Strategies Inc., and their legal counsel met with City Planning staff on May 9, 2018 to discuss concerns related to the Recommended Downtown Plan and policies that apply to institutional uses, including post-secondary.

Ryerson is appreciative of the dialogue with the City, and that City Planning staff have further revised the Recommended Downtown Plan to support institutional growth and vitality in the Downtown. Respectfully, Ryerson does remain concerned about the following three issues:

A. Community Services and Facilities - Section 10 – Community Services and Facilities

Section 10 of the Downtown Plan requires new development to contribute towards the provision of community service facilities, with no specific exemption for publicly funded post-secondary and educational institutions. Policy has been revised to state: “10.3. *Development will contribute to the delivery of community service facilities, as appropriate, through....*”

This revised wording – “as appropriate” – does not provide any specific direction that would exempt institutional uses from the provision of community services facilities. It does not explicitly recognize that post-secondary institutions already provide community services in the Downtown, and would risk forfeiting core program space if required to provide additional community service facilities through development applications.

Recommendation: Amend Policy 10.3 to specifically exempt institutional uses from additional community service facilities obligations.

B. Tower Floorplates – Section 9 – Built Form

Ryerson appreciates that the City has responded to concerns regarding tower floorplates. However, despite the changes made to Policy 9.16 as detailed in the May 14, 2018 Supplementary Report, the proposed policy may still restrict future institutional growth. Policy 9.16 has been revised to state the following:

“9.16. Non-residential buildings may have floorplate sizes greater than 750 square metres above the base building, provided it is demonstrated to the City’s satisfaction that the impacts of the larger floorplate, including but not necessarily limited to pedestrian comfort, shadow, transition, sky-view and wind, can be addressed.”

This proposed policy continues to establish 750 square metres as the baseline tower floorplate for non-residential developments, and continues to assume a tower-base building form. This does not respond to or allow for the programmatic needs related to universities and other institutional uses, the nature of contemporary workspaces, and the robust vertical circulation requirements of more intensively occupied workplace buildings. Derived from an entirely residential built form model, the 750 square metre baseline is an entirely arbitrary target for non-residential floorplates, and has no basis in contemporary non-residential precedents. Further, the new policy tests related to pedestrian comfort, shadow, transition, sky-view and wind do not balance support for the growth and expansion of universities and large institutions in the Downtown, which is recognized elsewhere in the Official Plan and the Downtown Plan as an important policy objective. Built form tests around pedestrian comfort, light, privacy, shadowing and wind are adequately addressed in Policy 3.1.2.3 of the general Official Plan, and so the proposed non-residential floor-plate policy introduces complexity and risk for institutional development.

Recommendation: Delete Policy 9.16 in its entirety. In absence of this, amend Policy 9.16 to remove the reference to 750 square metres in favour of a more generic reference to larger floorplates. Consider adjustments to the tests for larger floorplates to more clearly distinguish

between residential and non-residential floorplates, and specifically recognize the programmatic needs of institutional uses.

C. Mid-rise Requirements – Section 9 – Built Form

In addition to the policies raised in the April 27, 2018 letter, we are also concerned how Policy 9.29 guiding mid-rise building development will impact the development of institutional uses in the Downtown. Specifically, we are concerned with the requirements that height are generally no greater than the width of the right-of-way and that building generally fit within a 45-degree angular plane measured from 80% of the right-of-way width. Similar to the above concern re: tall building floorplates, institutional buildings do not typically fit within a residential mid-rise building typology. Institutional and commercial mid-rise buildings have distinct programmatic needs and taller floor-to-floor heights that would be unduly constrained by built form policies originally developed as guidelines for residential mid-rise buildings outside of the Downtown. Policy 9.29 would significantly constrain the ability of institutions to grow in a mid-rise form of development.

Recommendation: Amend Policy 9.29 to specifically state that this policy only applies to residential mid-rise development, and does not apply to institutional uses.

In summary, we believe that development for Ryerson University and other institutional uses should not be subject to the same policies that seek to regulate other forms of development, and particularly residential intensification. We ask that Council consider the unique circumstances of institutional uses within the Downtown, and recognize the public interest that is by allowing these institutions to flourish.

On behalf of Ryerson University, we thank staff for their time and consideration undertaken to date in revising a number of the policies in the Recommended Downtown Plan. Ryerson is supportive of the vision for a healthy and sustainable downtown core. However, in view of the above issues, we would seek further refinements to the policies of the Recommended Downtown Plan to address the specialized needs of post-secondary and other institutions within the Downtown. As it has for many decades, Ryerson looks forward to future collaboration with the City of Toronto in building a thriving urban centre.

Sincerely,

URBAN STRATEGIES INC.



Benjamin Hoff, MCIP RPP

Partner

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