

April 30, 2018

TORONTO PLANNING AND
GROWTH MANAGEMENT COMMITTEE
Attn: Nancy Martins, Secretariat
Toronto City Hall, West Tower, 10th Floor
100 Queen Street West Toronto, ON M5H 2N2
VIA EMAIL: pgmc@toronto.ca

Dear Planning and Growth Management Committee,

Re: TOcore: Proposed Downtown Plan- ABCRA Delegation to Planning Committee of Council

I am writing on behalf of the ABC Residents Association (ABCRA) which reviewed the above captioned plan amendment and offers the following comments of support and concern.

ABCRA has been actively involved in planning and urban design matters in the Bloor-Yorkville/ North Midtown (BYNM) district of the city. ABCRA in conjunction with the BIA and GYRA prepared and tabled the Bloor-Yorkville /North Midtown Planning Framework document in anticipation of the City preparing a new Secondary Plan to guide development in this sector. ABCRA understood that the TOcore Plan would be an important step towards realizing this plan and we welcome its new policies to guide future downtown development.

The following are the key comments, concerns and requested amendments of ABCRA

ABCRA is encouraged by the finer definition of Mixed Use designations which support a context sensitive relationship to adjacent built form scale and character.

The inclusion of Transition Policies also helps to clarify built form expectations at the boundaries of differing development intensities and scales.

These are the key topics that in the past have generated great variations in interpretation under the existing Official Plan.

ABCRA are encouraged by Policy 3.3, which sets out specific goals for Complete Communities as follows:

New buildings will fit within their existing and planned context, conserve heritage attributes, expand and improve the public realm, create a comfortable microclimate, provide transition between differing scales of development and include indoor and outdoor amenities for both residents and workers.

This statement of goals is clearly in line with ABCRA's fundamental goals for the district.



Similarly, policies that require an interconnected public realm are aligned with the unique pedestrian scaled passages of Yorkville, where intimate mid-block connections reinforce the character of this district.

We are encouraged by Policy 3.8 which states:

A connected public realm with an expanded system of parks and open, spaces linked together by a fine-grain network of streets, sidewalks, laneways, mid-block connections and pathways will provide the foundation for health, liveability and public life as Downtown grows.

There are, however, a few areas where ABCRA recommends modifications.

Small Sites- 3.16

The Plan appropriately identifies the trend toward the proliferation of smaller development sites in the Downtown.

*The pattern of growth Downtown is predominantly infill on increasingly smaller sites. Small sites afford **far fewer on-site opportunities** to address the full range of infrastructure and require comprehensive planning by the City and its partners to ensure complete communities.*

Our ongoing concern in the ABCRA district is with the above wording in bold type, that will be used to minimize or eliminate public realm contributions on small sites seeking significant intensified development. The Bloor-Yorkville/North Midtown Planning Framework & Implementation Strategy dated August 2015 (the “BYNM Planning Framework”) identified a series of finer scale public realm improvements that should be created even on the smallest sites. These include “sliver parks” and “enhanced setbacks” and “enhanced intersections” among other public realm improvements. ABCRA would recommend the removal of the “**far fewer**” text and identify the continuing responsibility to provide private-side public realm improvements on all sites, independent of size.

Growth within Neighbourhoods

The plan clearly directs growth to Mixed Use designations. ABCRA, however, continues to witness applications for increased height and density within Neighbourhoods that are out of scale and character. The BYNM Planning Framework identified several concepts to set limits to growth within Neighbourhoods. ABCRA requests that similar policies that define and limit growth within Neighbourhoods be added to the Plan.

Mixed Use Area 3 Designation

The BYNM Planning Framework identified parts of Avenue Rd., Davenport Rd. and Yonge St. as Corridors with descending height permissions moving away from the height peak. We are encouraged that the proposed Mixed Use Areas 3 generally corresponds to those corridors beyond the SASP 211 Height Ridge boundaries. Within these areas the height of proposed buildings “will generally not exceed the width of the right-of-way onto which the building fronts.” This text is in the preamble to the policies. In our view this height limitation should be in the form of a specific Policy to have greater force in the review of applications in these areas. Policy 6.3 should be expanded to include a specific reference to the height limits of the Mid-rise Guidelines.



Mixed Use Area 4 Designation

ABCRA were pleased to see the inclusion of a Mixed Use Area 4 designation that limited heights to 4 storeys. We note that the September 2017 draft of the Plan included in this designation, a section of Avenue Rd. north of Pears Avenue up to Dupont St. The current Plan has changed the Mixed Use Area 4 designation to a Mixed Use Area 3 designation.

We do not support this change and do not see the planning rationale for it. The BYNM Planning Framework recommendations were consistent with the Mixed Use Area 4 designation for this part of Avenue Road, and further the Mixed Use Area 4 designation for this part of Avenue Road also had the support of the area community planner. Most of the properties on the east side of Avenue Road back onto Ramsden Park, a Portal Park, and should revert to Mixed Use Area 4 designation to ensure an appropriate scale relationship to the park. ABCRA is of the opinion that Mixed Use Area 4 designations are the appropriate designation for this part of Avenue Road and recommends that this change be made to the Plan.

Development in Proximity to Planned Rapid Transit Stations

ABCRA welcomes the proposed study of these locations within 500m of transit nodes. We note that in some cases Neighbourhood designations are located within 500m of existing stations. The study should recognize these contexts with a particular focus on transition and impacts related to increased intensified development.

7. Objectives for the Planning, Design and Development of Parks and the Public Realm

ABCRA recommends that policies should clearly include the responsibility for the provision of an enhanced public realm through the provision of on-site land conveyance or POPS agreements on the private side of development sites. This will be particularly applicable for the designated Great Streets.

9. Built Form

The BYNM Planning Framework identified improvements to the public realm through the provision of a minimum 6-metre curb to building face dimension. We are pleased to see this metric included in the Plan under Policies 9.2 through 9.7, and the requirement for developments to provide this through increased setbacks on private land.

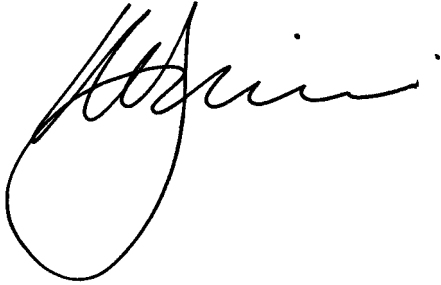
We, however, do have one concern with Policy 9.6.3 which offers a reduction to the 6-metre dimension where *“the prevailing pattern of buildings consists of narrow frontages with little or no setbacks”*. ABCRA is concerned that this condition exists in many downtown contexts and would eliminate the potential public realm benefits that the 6-metre boulevard would afford. For example, introducing this increased setback in such a context may be the only opportunity for tree planting on a street. ABCRA requests that 9.6.3 be deleted as a policy.

ABCRA also requests that this concept of a widened boulevard, be included in Section 7, Public Realm, to echo the development’s responsibility in achieving this goal of an enhanced public realm.



Thank you for this opportunity to both support and offer minor amendments to the Downtown Plan. We look forward to continuing to work with City staff and Council to create the best outcome for a complete and liveable Downtown. We also remain committed to establishing a Secondary Plan for the BYNM district in conjunction with the City, following these Downtown Plan amendments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Spaziani', with a large, stylized loop at the end.

Michael Spaziani, B. Arch, OAA, FRAIC

On behalf of the ABC Residents Association

MS/ch

cc. Councillor Wong-Tam councillor_wongtam@toronto.ca
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