

Summary of Questions and Comments Received during and after the Tall Buildings Downtown Study Consultation Meetings

The Study Team would like to thank all those who attended the Community and Industry Consultation Meetings and provided valuable comments and feedback. The Team summarized the comments made, but, as mentioned during the presentations and discussions themselves, would like to reiterate that some of the issues raised fall beyond the purview of this project. They are either already addressed in the City's Official Plan and/or will form part of the City's current review of its Official Plan. Other issues or matters are being addressed through the Citywide Design Criteria for Review of Tall Building Proposals (which are currently being fine-tuned and which will eventually form the document under which the tall buildings downtown performance standards will ultimately reside). However, it is also understood that any gap between design based solutions regarding tall buildings downtown and their relationship to each other and to the surrounding context, including the public realm, should be bridged with policies that 1) address the issue of community building and 2) recognize the impact of this form of development on the housing mix in the downtown and on soft and hard servicing capacity and delivery.

Below is the summary of comments by subject matter:

Sustainability, Health and Complete Communities

- The Study is design-based and does not address the outcomes of promoting more development downtown. What is the anticipated population growth resulting from this study and how will the City address the added stress that this will place on access to soft services, aging hard services and aging infrastructure, which is already at maximum capacity and cannot handle additional growth?
- Is the tall building a healthy building? Does higher density and intensity living inherently promote greater access to social services, retail, entertainment and employment opportunities? And does this encourage use of healthier modes of transportation such as walking and cycling?
- The Study deals with external built form issues only and assumes that the entire downtown will continue to be populated by mixed-use condo buildings geared towards a younger transient population and to investors. There is a need to move away from this and encourage development that includes a diversity of unit sizes and affordability to create a City that can support individuals and families at all stages of life and economic status.
- The study does not address the need to set aside areas for non-residential employment uses. People living in tall buildings need employment opportunities in their neighbourhoods.
- The Study should encourage cultural space to locate within tall building development.
- Is a tall building city a more economically viable city?

- How does the Study address the environmental sustainability of tall buildings and are tall building typologies a more 'green' form of development?
- What impact will tall buildings have on bird migration paths?
- What impact do helicopter flight paths have on the location of tall buildings?

At-Grade Uses and Façade Treatments

- There ought to be more discussion about the types of retail uses that should be encouraged or discouraged at the base of tall buildings.
- There is a need to animate the street and provide the type of retail required by tall building residents (grocery stores for example).
- As a performance standard, the Study requires permeable street level facades and this could limit design flexibility.

Public Realm and Sidewalk Widths

- The study places much emphasis on the design of the building, but lacks discussion regarding the built quality of the public realm, landscaping around the building, the continuity of materials and design of the public realm between tall buildings.
- Tall building development and sidewalk widths go hand in hand and there is a very real need in this City for wider sidewalks.
- The Study should incorporate ways of encouraging or mandating wider sidewalks as opportunities arise, such as in cases where the entire block is redeveloped and especially along the north sides of High Streets.
- Similar to performance standards dealing with sidewalk widths in the City's Mid-Rise Study, tall buildings fronting on a street that's between 20 to 30 meters in width, must have a sidewalk of at least 4.8 meters wide, and at least 6 meters wide where the street is over 30 meters. This performance standard requiring wider public sidewalks, should form part of the development approval and site plan approval process.

All-weather Protection, Pedestrian Comfort and Pedestrian Flow

- The Study lacks discussion regarding the role that canopies, awnings, colonnades, etc. can play in improving pedestrian comfort at the podium level of tall buildings (protection against rain, sun and wind).
- There is also no mention of the need to encourage above-grade and underground links to improve pedestrian flow between tall buildings and between tall buildings and transit nodes and other important community facilities.
- The study lacks discussion regarding wind patterns and measures to be taken to mitigate uncomfortable street level wind conditions caused by tall buildings.

Heights

- There needs to be further discussion to determine the process of deciding appropriate heights and where these heights should be permitted. Is a height range the most appropriate method, or will the maximum height automatically become the starting point for even more height? How will the proposed height limits be implemented?
- There is concern about the way that height is measured and the exclusion of roof-top mechanicals from the calculation.
- Additional height at subway nodes should be strongly encouraged but the additional 10-storey height addition being proposed should be better understood.
- The process to determine appropriate heights along Secondary High Streets has not been fully explained in the Study.
- The concept of maximum height does not permit any flexibility, nor does it allow for innovative architectural design exceeding these maximums.
- Height limit maximums in the Study are on the low side, are based on out-of-date information and do not reflect the more recently approved built environment.
- The portions of the High Street fronting onto Front Street West between York and John Streets should be 107 to 182 meters in height (currently shown as 62 to 107 m).
- The community should decide what their neighbourhood will look like and how high it will be, not the developer.

Maximum Floor Plates

- There is concern that the 750 square meter floor plate maximums are not feasible for commercial and institutional buildings (Note: the Study does not propose a maximum floor plate size for commercial towers).
- Structurally, above 50 storeys in height, a building requires a floor plate larger than 750 square meters.

Minimum Separation Distances

- Balconies should be allowed to protrude within the proposed separation distances.
- There is concern that the requirement for a 10 meter tower setback at the side and rear lot lines is too restrictive and will reduce the development potential of many sites across the City.
- Downtown Toronto should not be defined by its existing low-rise buildings as evidenced by a requirement in the Study for a minimum 20 meter tower setback from abutting stable low-rise residential areas.

Stifled Creativity and Homogeneity in Urban Design

- There is concern that the typologies and performance standards identified in the Study will stifle architectural creativity and create mediocre, monotonous cookie cutter buildings.
- The Study regulations impact the ability of an architect, builder or developer to propose a true out-of-the-box iconic architectural marvel such as the "Marilyn Monroe" towers in Mississauga.
- Is it desirable to require a podium in almost all cases?
- The small plate requirement for the tower portion of the building may also contribute to stifled creativity.
- Will the Study impact the current role of the City's Design Review Panel?

Building Typologies

- The Landscape Setback Form has been applied to the section of Jarvis Street between Isabella Street and Queen Street East, minus a small area excluded from the Study adjacent to Allan Gardens. There are concerns with this as recent development applications either received or anticipated do not necessarily reflect this built form and therefore, while this typology may be appropriate for some portions of Jarvis Street, it does not fit the entire section as identified in the Study.

Areas excluded from the Study

- Why did the Study select to exclude Secondary Plan Areas? In particular, won't there be a lot of spill-over effects onto the King-Spadina and King-Parliament Secondary Plan Areas? These secondary planning areas, where tall building development was not previously contemplated, receive a lot of applications for tall buildings and now need protection, guidelines and established heights, in order to guide the evaluation of these site specific applications.
- A number of streets with a lot of tall building pressure were excluded from the Study, such as Spadina Avenue, Sherbourne Street, parts of Yonge Street and parts of Church Street. This should be reconsidered.
- The excluded sections of Yonge and Church Streets referred to in the Study should not be excluded if they can comply with the following: a 10 to 20 meter setback from the property line, with the building height within this setback area not exceeding 4 storeys.
- Why was Bloor Street between Sherbourne and Parliament Streets included in the Study as a High Street? It doesn't seem to fit.
- Some of the Secondary High Streets identified in the Study such as Cumberland Street and Yorkville Avenue east of Bay Street, should not be considered as Secondary High Streets
- What happens to the white areas in the downtown that are found between the High Streets and the Secondary High Streets? There is a lot of tall building pressure currently on some of

these downtown streets and there is a concern that these will be seen as the ‘anything goes’ areas by some developers.

- There should be more discussion about what happens in these white areas to mitigate "inappropriate" development.

Parks and Open Space

- Parks are a valuable commodity downtown and should all be treated equally. Is it appropriate for some parks to have more protection than others by incorporating the two-tier approach included in the Study?
- If podiums are required to be built lot line to lot line, this does not leave much room for open space.
- The Study omitted mention of some important parks that should be considered for Second Tier protection.
- Measuring shadow impact should be amended by using averaging over the peak spring, summer and fall months, when residents are most likely to utilize parks and open spaces, as opposed to measuring shadow cast on the Fall Equinox on September 21st.

View Corridors

- The Study only identifies three views requiring protection: the Legislative Building at Queen’s Park, Old City Hall and City Hall. There needs to be further discussion about adding other views to this group.
- Not all the heights proposed in the Study are compatible with the protection of certain view corridors (heights along Bloor Street, in and around the intersection of Bloor and Avenue Road being one such area).
- There are concerns that specific views, in particular the Legislative Building, are not properly protected in the Study, namely that the view corridor should be taken from Queen Street and not from College Street.
- Further modelling is needed to test whether the heights in the policy protect important views.
- Performance standards relating to protecting the three identified landmark views should be removed entirely because the protection of these viewsheds can be determined on a site-specific basis.

Heritage

- There is concern that the statement "tall buildings will not visually impede the setting of listed/designated heritage buildings" is too ambiguous and may limit flexibility for new development especially as more heritage buildings acquire a heritage listing or designation.

Small Sites

- There is concern regarding the inability to adhere to the Study's performance standards across many sites in the Downtown because they are too small.
- The Study essentially sterilizes tall building development potential on small sites.

Scope of the Study

- The Study has no relationship to land use and density issues.
- Planning for downtown requires more than a narrow focus on buildings as "architecture".
- The Study does not provide enough protection for heritage resources.
- The Study does not conform to the City's Official Plan in philosophy as well as in policy and is too prescriptive and regulatory in nature.
- The Study introduces an arbitrary street-based system for identifying tall building sites rather than a district approach, as has been taken by other municipalities.

Potential Impact of the Study on Ontario Municipal Board Decisions

- What is the likelihood that the Ontario Municipal Board will adhere to the regulations contained in the Study and how can it be ensured that the new maximum heights will be respected by the OMB?

Section 37 of the Planning Act (Density Bonusing)

- Has the City determined the value of S.37 between the 'as-of-right' height identified in the Study and the maximum height? Will the new 'as-of-right' height limit the City's ability to obtain S.37 funds?
- There is concern that the monies generated through S.37 will become a mechanism used by the City to pay for services and infrastructure and therefore, heights above the 'as-of-right' height will automatically be encouraged.
- The calculation of S.37 should become much more transparent and consistent so that it is obvious to the developer and to the community how much is required and when.
- How will the City determine where and how S.37 monies are utilized?

Implementation of the Study

- The Study recommendations are a step in the right direction and should be implemented as soon as possible given the unrelenting development pressures downtown.
- Which parts of this Study are likely to be implemented by the City and what is likely to be the mechanism used?
- There are differing opinions about leaving the performance standards simply as guidelines, versus using the Official Plan and the Zoning By-law as tools for implementing some of the standards. If the performance standards were implemented in the Official Plan and the

Zoning By-law, they would be given much more credibility, but on the other hand, if they were to remain as guidelines, they would allow for much more flexibility. Which option is likely to be recommended to City Council by staff?

- What are the chances that the performance standards will actually lead to as-of-right development? If a maximum height is presented, are developers not more likely to automatically apply for the maximum height through a re-zoning?
- If most development becomes as-of-right development due to up-zoning of the new "as-of-right" heights, what will be the mechanism available to staff to ensure that non-statutory Community Consultation meetings continue to take place?
- Has the City considered the role of the Development Permit System as a better means of implementing this study?

Relationship to Other Studies Across the City

- The relationship between this study and the following pre-existing studies, need to be better clarified: Design Criteria for Review of Tall Building Proposals (HOK Report); the Bloor Corridor Visioning Study; the Urban Design Streetscape Manual; the Avenues and Mid-Rise Buildings Study; the Bloor-Yorkville/North Midtown Urban Design Guidelines.