



August 6, 2014

Planning and Growth Management Committee  
10<sup>th</sup> floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

**Attention:**            **Nancy Martins, Administrator, Planning and Growth  
Management Committee**

Dear Ms. Martins,

**RE:**                    **Eglinton Connects Planning Study – Phase 1 (Part 2)  
Implementation  
Zoning By-law Amendment  
825 and 839 Eglinton Avenue West  
Armel Corporation  
14.511**

We represent Armel Corporation, owners of the property located on the southeast corner of the intersection of Eglinton Avenue West and Bathurst Street, known municipally as 825 and 839 Eglinton Avenue West ('subject site'). We have been retained to review the Eglinton Connects Planning Study materials including amendments to the Official Plan and applicable zoning by-law(s) as they affect the subject site.

We have previously made submissions on May 26<sup>th</sup> and June 5<sup>th</sup> of this year with regard to the study materials and the recently adopted Official Plan Amendment implementing a portion of the study's recommendations.

We have reviewed the proposed zoning by-law amendment as it applies to the subject site. Site and area specific exception 2632 is proposed for the subject site and would apply the following regulations to the subject site:

- A maximum height of 19.5 metres;

- A requirement for 75% of the main wall of the building to be built within 1.4 metres and 1.9 metres from the front lot line and the remaining 25% of the main wall of the building to be built within 6.9 metres of the front lot line; and,
- A stepback of at least 1.5 metres for any building element extending above a height of 13.5 metres.

The proposed zoning by-law amendment would limit the total height of any building on the subject site to 19.5 metres/six storeys. The Eglinton Connects Planning Study Comprehensive map indicates that the subject site is contemplated to have a permitted height of 21 metres, higher than the 19.5 metre height limit contained within the proposed implementing zoning by-law.

The subject site is located at the intersection of Bathurst Street and Eglinton Avenue West which is proposed to be a station location on the Eglinton Crosstown LRT and, as such, represents an ideal opportunity to maximize the development potential of the subject site thus contributing to the overall viability of the transit infrastructure. Our previous correspondence indicated that, given proximity to a station location, and the subject site's location on the south side of Eglinton Avenue West, a building with a minimum height of 27 metres, consistent with the right-of-way width of Eglinton Avenue West in proximity to the subject site, and the height permissions of other properties in the vicinity, is appropriate.

The requirement to build 75% of the main wall of the building within 1.4 and 1.9 metres is essentially the imposition of a 1.4 metre front yard setback. In conjunction with the requirement for the provision of a 6 metre wide public lane, required through the related Official Plan Amendment (previously adopted), results in an overall reduction in site depth of 7.4 metres. With an overall site depth of approximately 30 metres, this represents a significant reduction in development potential limiting the viability of the redevelopment of the subject site.

The requirement for a pedestrian perception stepback above 13.5 metres, or roughly 4 storeys, is unnecessarily restrictive on the subject site. The Eglinton Connects Planning Study envisions a transition in the built form of Eglinton Avenue towards a mid-rise context. Performance Standard #4B of the Mid-rise Design Guidelines, the guiding document for mid-rise development in the City of Toronto since 2010, does not require a pedestrian perception for any building with a height of less than 23 metres. When such a stepback is required, the height at which it is provided is flexible. As previously mentioned, the subject site is located on the south side of Eglinton Avenue West. As such, there are minimal concerns related to shadows or overlook onto adjacent neighbourhood areas. The elimination of the requirement for a pedestrian perception stepback for buildings with a height of less than 23 metres would be appropriate.

The proposed zoning by-law amendment as it applies to the subject site is overly restrictive, inconsistent with other municipal planning documents and, significantly reduces the development potential of the subject site. We would respectfully request that the zoning by-law amendment be further amended to better reflect both the context of the subject site in its location in proximity to a station and the urban character envisioned for the street.

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We respectfully request notice of any decision made in this matter. We trust that the information presented is sufficiently clear. However, should you have any questions or require clarification, please do not hesitate to contact the undersigned.

Yours very truly,

**WND associates**

planning + urban design

A handwritten signature in black ink, appearing to read "Wendy Nott". The signature is fluid and cursive, with the first name "Wendy" written in a larger, more prominent script than the last name "Nott".

Wendy Nott, FCIP, RPP  
Senior Principal

cc. C. Corosky, Armel Corporation

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