The following comments are submitted on behalf of the *Garment District Neighbourhood Association* (GDNA). The GDNA has been working with our Ward Councillor's office and the applicant to address concerns raised by area residents regarding the 49-51 Camden Street development proposal.

The GDNA's concerns about this development are similar to those identified during the public consultation meetings in April and November 2015.

List of concerns:

- 1. Height and Shadow
- 2. Noise
- 3. Traffic
- 4. Laneway Use

1. HEIGHT AND SHADOW

The GDNA feels strongly that a building height of 45 metres is not appropriate in scale and context given the immediate surroundings:

- (a) Camden and Brant Streets are narrow, each only 11 metres wide. Other tall buildings in the area are located on wider arterial roads such as Richmond (16 metres) and Adelaide (21 metres).
- (b) It is 30% higher than 39 Brant (35.3 metres) to its south, which is the newest tall building in the area. We are extremely concerned about the trend of setting ever increasing height precedents in the Spadina West Precinct, which is a highly undesirable outcome for area residents and inconsistent with the expectation that building heights will progressively decrease moving west from Spadina until they peak again at Bathurst.
- (c) St. Andrew's Playground would be in shadow in the mornings for 1.5 hours during spring and fall, and 5.5 hours during summer. It is noteworthy that the shadow study, although compliant with city guidelines, is incomplete and does not reflect the early morning hours before 9:18 am, which is a popular time of use.
- (d) Given this shadow impact on St. Andrew's Playground, the GDNA suggests the applicant make an annual financial commitment specifically towards maintenance of the park. For example, they might take responsibility for the flowerbeds on the east side of the park.
- (e) During March and September, buildings on the north side of Camden (50, 42, 32 Camden) would be in shadow between 10:00 am and 5:00 pm, and those on the south side of Camden (29 Camden) would be in shadow after 4:00 pm. This shadowing would be even worse through the fall and winter months. Thus, surrounding residential buildings would be in shadow for most of the day during 7 months of the year.

2. NOISE

The GDNA has concerns about the negative impact of noise on local residents given that there are five condominium residences (50 Camden, 42 Camden, 32 Camden, 29 Camden, 39 Brant) in its immediate vicinity. We are particularly concerned about noise originating from the street level, penthouse lounge and rooftop terrace.

If the development proposal is approved, the GDNA intends to work with the City of Toronto and the applicant to ensure adequate noise mitigation measures are in place with respect to building form and during operations.

- (a) We would like assurances that the building construction, materials and form will minimize external transmission of noise from the lobby and restaurant level, the penthouse lounge and rooftop terrace.
- (b) We suggest that amplified sound be prohibited from the restaurant level and rooftop terrace.
- (c) We suggest that operations from the rooftop terrace cease from 11:00 pm to 7:00 am Monday through Friday, and from 11:00 pm to 9:00 am Saturday, Sundays and Holidays in accordance with the Noise By-law.
- (d) We suggest a loitering restriction in the area surrounding the hotel to address the concern of street level noise from smokers or people lining up for special events.

3. TRAFFIC

The combination of the proposed development's size, lack of parking and narrowness of Camden and Brant Streets would create significant traffic challenges along these streets.

- (a) The GDNA suggested changing Brant and Maud to one-way streets, a suggestion which our Ward Councillor's office brought forward to Transportation Services for consideration.
- (b) Given the lack of parking on site, we suggest that the applicant arrange for reserved parking spots for their patrons use at nearby public parking lots.
- (c) During construction, we suggest the applicant arrange for reserved parking spots for their employees use at nearby public parking lots.

4. LANEWAY USE

Loading is proposed off a private laneway to the south shared with 39 Brant, a 243-unit condominium residence. The GNDA has concerns about traffic congestion and noise disruption from delivery and garbage trucks given the narrow laneway width of 5.5 metres. If the development proposal is approved, the GDNA intends to work with the City of Toronto and the applicant to ensure the Loading Management Plan will minimize impact on local residents.

Prepared by the Garment District Neighbourhood Association, Ace Hotel Subcommittee June 12, 2016