

# Brutto Consulting

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November 14, 2016

Mr. Dan Nicholson, Senior Planner  
Community Planning  
City of Toronto  
100 Queen Street West  
Toronto, Ontario  
M5H 2N2

**Attention:** Mr. Nicholson,

**Re:** 440, 444, 450 and 462 Front Street; 425, 439, 441 and 443 Wellington Street West; 6-18 Spadina Avenue and 1 and 19 Draper Street  
Zoning Amendment (14 116571 STE20 OZ)

**Concerns and Interest of CRAFT Acquisition Corporation, Neighbouring Landowner**

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Brutto Consulting are retained as the Planners for CRAFT Acquisition Corporation and 456 Wellington Ventures Limited (herein after referred to as CRAFT).

CRAFT is a major stakeholder and nearby property owner adjacent to the lands subject to the above mentioned zoning amendment application (file: 14 116571 STE 20 OZ).

The purpose of this letter and our anticipated representation at the Public Meeting which will take place on Tuesday November 15<sup>th</sup> 2016 is to advise that our Client has significant concerns regarding the staff recommendation to approve the above noted Zoning Amendment without proper regard to the in-force planning policies, including but not limited to the TOCore Study, the City of Toronto Official Plan and the City of Toronto Municipal Code regarding parkland dedication.

As owners of nearby lands, there are key concerns related to the parkland dedication provisions of the proposed by-law. Specifically, the proposed by-law includes a provision for the dedication of 19 Draper Street (approximately 310 square metres) for parkland purposes as well as a possible off-site parkland dedication contribution for 456 Wellington Street West (approximately 1,000 square metres), while the remainder of the requirement would be provided as a cash in lieu contribution. This contribution does not facilitate a feasible amount of on-site parkland and open space, nor allow for viable pedestrian connectivity for future developments along the rail deck corridor. Due consideration should be given to deferring this important matter rather than adopting the recommendations wholesale at this time. Respectfully of course this is the responsibility of the City and we merely seek your kind indulgence in this request as we believe it to be a better and likely more productive means to achieving proper local planning.

The Well development and the future CRAFT development clearly represent one of the last remaining large development precincts in the City of Toronto and together they could provide legacy status to the great City of Toronto as far as active parkland spaces. This decision to approve this development in spite of a significant shortfall of parkland is short sighted and represents poor planning at this time and we are confident that a better plan can emerge without losing density being sought by the Well. Our client is not in opposition to the density proposed by the applicant per say, but would recommend an altered built form which may include taller buildings. This would allow for a reduction in building footprints while still maintaining the proposed density and increasing at-grade areas suitable for on-site parkland.

In respect of the critical parkland matter, the City of Toronto Planning staff has the necessary tools and Council approved policies in place to create the parkland spaces needed in an area that has been long understood to be in a parkland shortfall status. There are ample reports to support the active and in force zoning by-law to require developers to address the need within their own developments rather than rely on the cash in lieu provision or on the parks that are deemed to be nearby or which in future may be provided by other developments.

The Zoning By-law approved and supported by the previous OPA for the Subject Lands and by the City of Toronto Council is very clear and does not leave much room for interpretation. Emphatically it states that appropriate (by prescriptive formula) physical and useable parkland (significant open space & parks) needs to be provided on the Well site.

Consultants have been retained to prepare visioning materials in consideration of its own land holdings and those within the tertiary planning area. Very clearly, the hallmark of its own visioning activities is the provision of parkland space that is commensurate with and in lock-step with the City policies for said parkland requirements.

In 2005 the City of Toronto introduced new city wide alternative parkland dedication policies. These policies in coordination with the City of Toronto Official Plan set forth recommended parkland acquisition areas. These policies aim to maximize opportunities for parkland contribution, for lands that fall within a "Parkland Acquisition Priority Area;" more specifically growth areas as identified on Map 2 of the Toronto Official Plan, which includes the Subject Lands.

In reference to Map 8B of the Toronto Official Plan the lands located at 440, 444, 450 and 462 Front Street, 425, 439, 441 and 443 Wellington Street West, 6-18 Spadina Avenue and 1 and 19 Draper Street are situated within an area that is subject to a large deficit in public parkland.

To assist in establishing additional parkland within the City of Toronto, proposed developments located within a parkland acquisition area will require physical on-site parkland dedication at a rate of 0.4 hectares per 300 units to be built with a cap however that the parkland is to cover no more than 15% of the development site. To greater maximize opportunities in obtaining usable parkland, cash-in-lieu is not preferred for sites greater than 1 hectare in size. To note, the proposed development is 3.11 hectares in area.

Based on the proposed development, we are of the understanding that the applicant will be dedicating only 310 square metres of on-site parkland whereby a partial amount of off-site parkland is proposed and the outstanding amount of the required parkland dedication will be addressed through parkland cash-in-lieu.

This approach is concerning and does not appropriately contemplate the direction and intent of the Alternative Parkland Dedication By-Law and should not be permitted given the size of the applicants lands. The proposed

development will ultimately generate thousands of new residents once completed, and in reference to the City of Toronto Official Plan, the Toronto Municipal Code and the proposed development statistics, a parkland dedication of 4,657.60 square metres would be required. The proposed 310 square metres of on-site a parkland dedication does not comply with the Toronto parkland dedication policies and only accounts for approximately 6.7% of the required dedication.

City staff has confirmed (May 2, 2014) that *"the subject site is within an area identified as having the second lowest quantile of current provision of parkland"*. Staff further advised that there are opportunities for significant open space areas and parks to be pursued within this area; however, the implementation of cash-in-lieu and off-site parkland would not allow for such to be established. As such, in our opinion, 310 square meters of public parkland is considerably insufficient to service future residents of the 7.7 acre proposed development. Although, the applicant has proposed to offer cash-in-lieu and off-site parkland dedications to meet the applicable requirements, this will have no benefiting impact to the future residents of the proposed development.

Our Client can only conclude that this will have an impact on CRAFT in its future development. Proper planning practices should aim to establish and promote self-sustaining communities that provide amenities and services for the residents within, and not impose conditions or make assumptions of services to be established on neighboring lands. As such, through our review of the proposed development it appears that the CRAFT development will be relied upon to service the parkland needs of the Well development.

Based on the foregoing, we respectfully request that the subject application be tabled in order to fully review opportunities for on-site parkland dedication. We would like to meet with City staff to understand why additional parkland has not been sought, including an opportunity for us to review all technical reports and plans. Moreover, we would like to be formally notified by way of communications from the City as to the decisions that may arise at the Public Meeting and the anticipated meeting of December 13<sup>th</sup> 2016 at which time the matter will come before Council for its decision.

If you have any questions please do not hesitate to contact me at any time.

Respectfully,



**Claudio P. Brutto, MCIP, RPP**  
*President Brutto Consulting*

*CC. Solicitor, Kagan Shastri LLP*  
*CRAFT Acquisition Corporation*