

Mr. Barry Brooks
Senior Planner, City of Toronto
City Hall, 18th Floor, East Tower
100 Queen Street West
Toronto, ON

TE21-1.9
Submission from
Dermot Sweeny

Dear Mr. Brooks,

Re 342 to 348 Bloor Street West – Draft Official Plan Amendment Bloor Corridor / Annex Block Study

Please be advised that Sweeny&Co architects inc. attended the stakeholder public meeting on June 23, 2016 on behalf of the Starbank Developments 350 Corp., the owners of 342 and 348 Bloor Street West. We have reviewed the studies for the Bloor Corridor Annex Block. The purpose of this review was to evaluate the impacts of the proposed Draft Official Plan Amendment on future redevelopment potential of the properties located between 342 and 348 Bloor Street West, on the Northwest corner of the Bloor/Spadina intersections

Concerns with proposed Official Plan Amendment

Existing in-force policies

The City of Toronto currently has in place multiple recent city-wide and area specific municipal policy documents that dictate and inform City Staff and Council on matters regarding growth, intensification, height, and built form. All of these policies are currently available to City Staff and Council when evaluating proposals found in the Bloor Corridor/Annex Block Study Area. The following is an overview of some of the current City of Toronto policies in place:

The principal City of Toronto municipal planning policy document is the Official Plan. The Official Plan does have numerous policies that deal with growth, intensification, height and built form.

Under Section 2.2, the Official Plan states that future growth shall be steered to areas which are well served by transit. In addition, the growth areas should be in locations where good transit access can be provided along bus and streetcar routes and at transit stations. Moreover, section 2.2(2) stipulates that growth is to be directed to the centres, Avenues, employment districts and the downtown. Section 2.2.1(4) encourages a full range of housing opportunities through, among other things, residential intensification in the Mixed Use Areas designations in Toronto.

The Official Plan also encourages locating and organizing buildings to fit-in with the existing and/or planned context (Section 3.1.2 (1)). In regards to built form, Section 3.2.1 (3) indicates that new developments ought to be massed and designed to fit harmoniously into the existing and/or planned context. This includes massing new buildings to frame adjacent streets, creating appropriate transition in scale to neighbouring existing and/or planned buildings, and minimizing additional shadowing and uncomfortable wind conditions. Section 4.5 (2) of the Official Plan sets out criteria for development in the City of Toronto. These criteria include locating and massing buildings to provide transition, limit shadow impacts, and maintain sunlight and comfortable wind conditions for pedestrians.

In December 2009, the City of Toronto Council adopted Official Plan Amendment 98 to enact Site and Area Specific Policy(SASP) 334 to Bloor Street West, between Avenue Road and Bathurst. Under "Map 1- Nodes and Precincts" of SASP 334, the properties between 342 to 348 Bloor Street are located in the "Spadina Node". SASP 334 (c) states that development will generally transition in height, density and scale from the from higher built form in the east to low-rise mainstreet character in the west, with "nodes of development concentrated at key intersections adjacent to transit hubs". SASP 334 (c) (iii) further describes the height peak of the "Spadina Node", noting that it will be focused on the four corners of Bloor/Spadina. In addition, development will be subject to a view corridor analysis from Spadina Crescent. SASP 334 (h) states the all applications in the area can be reviewed with Urban Design Guidelines to assist in meeting the objectives of SASP 334.

In April 2013, the City of Toronto Council adopted Official Plan Amendment (OPA) 199 with respect to Public Realm and Heritage Policies. OPA 199 has specific implications with regards to the identification and protection of views from the public realm onto prominent buildings.

Appendix no.1 (A5) of OPA 199 describes the four (4) following views towards Knox College and its spire as protected views:

- 1) South end of Spadina Circle,
- 2) Southwest corner College/Spadina,
- 3) Southeast corner College/Spadina, and
- 4) The middle of Spadina ROW at College Street towards Knox College.

This means that the heritage attributes and silhouette of Knox College are protected under OPA 199.

The Bloor Corridor Urban Design Guidelines were published in 2009. As previously mentioned, the Site and Area Specific Policy 334 did encourage the concurrent application of Urban Design Guidelines. Section 3 of the Guidelines state that density will be directed to transit nodes and that buildings along Bloor Street West should provide a transition in height and built form to stable residential neighbourhoods. Under the Urban Design Guidelines, the Bloor and Spadina intersection is a key multi-modal transit hub where it is appropriate to accommodate intensification through greater heights and densities. Moreover, development in the Spadina Node should incorporate low-rise podium with similar fine-grained uses and characteristics. Given the high-rise context, the Guidelines state that significant building height can be located at the northwest corner of Bloor and Spadina. At the same time, buildings should not be built to a height that would detract from the silhouette of the spire at 1 Spadina Crescent, as viewed from College Street. (Section 4.1.3). Section 5 of the Urban Design Guidelines which speak to the General Built Form Guidelines suggests that new buildings should be designed with pedestrian scale narrow retail frontages, street scale of 4-5 storeys base in the Spadina node at approximately 75% glazing at grade. In addition, above-grade building setbacks are recommended.

In July 2012, the City of Toronto published the Downtown Tall Buildings: Vision and Supplementary Guidelines. The objective of the Guidelines was to create a vision for tall buildings in the Downtown, where they should be located, what the height range ought to be, and what type of building typology should be applied. In doing so, the guidelines outline performance standards which are intended to add a finer grain of detail to the review of tall building applications. Map 1 of the Guidelines identifies the properties at 342 to 348 Bloor Street West as being located on a "High Street". Map 2 identifies the properties as being located on a 47 to 77 metre (15-25 storeys) height recommendation. Under Section 1.4, the Guidelines recommend that additional height of 30 metres (10 storeys) higher than the surroundings should be permitted on the four corners of a subway station along a "high street". The Guidelines also state that the recommended separation distances are 12.5 metre separation from property lines and 25 metre separation between tall buildings.

Proposed Draft Official Plan Amendment 2016

Based on the public presentation of June 23rd 2016, the proposed draft Official Plan Amendment (OPA) would establish a separation distance of 25 metres between tall buildings and 12.5 metres from the property lines. In addition all tall buildings would be no taller than 25 storeys (77 metres) in height. The proposed draft OPA also proposes that development should respect the view from Knox College by preventing any further intrusion visible above and behind the building silhouette.

Concerns

As clearly shown in the above, all of the proposed policies of the June 2016 draft Official Plan Amendment are repeating already existing policies which have been approved by the City of Toronto. The addition of another policy document which repeats objectives already approved by the City of Toronto will not in our opinion contribute greater clarity or precision to the approvals process.

Notwithstanding Provincial Policies and enforce zoning bylaws, the proposed draft OPA would only serve to duplicate four (4) already existing policy documents which cover this area and in some cases contradict elements of previous policies. For example, the draft OPA suggests to cap the height at 25 storeys (77 metres), while the SASP 334 and the Urban Design Guidelines suggest that the Spadina Node is a height peak, and that significant building heights can be located at the northwest corner. Moreover, the Tall Buildings Guidelines suggest heights up to 25 storeys (77 metres), and an additional 10 storeys (30 metres) where a subway station is located.

In regards to protected views from Knox College, the draft OPA repeats already in force policy that is already in place in the Official Plan under SASP 334 and Official Plan Amendment 199.

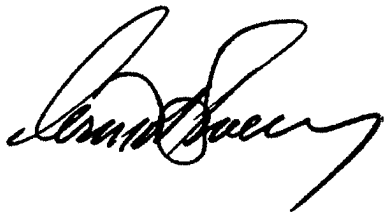
Furthermore, during the public presentation of June 23rd, some of the information presented was inaccurate. The model that was presented to the public was inaccurate and incomplete in that only 2 of the 4 protected views were shown. Additionally, the building at 666 Spadina Avenue was absent from the model and the views.

We believe that the proposed Official Plan Amendment is not in the public interest, is not good planning, and is putting an unfair and unnecessary burden on the owners of 342 to 348 Bloor Street West. All the policies to date encourage intensification at the intersection of Bloor and Spadina, and even more so on the properties of 342 to 348 Bloor Street West. By proposing a height limit of 25 storeys, the city planning department has not demonstrated that allowing higher levels of intensification at this location would be detrimental to the public interest or inconsistent with existing city policies and guidelines.

We understand that City Staff and the Councillor are attempting to clarify policy in the area. However the proposed draft OPA would contradict existing policies and guidelines. The policies and guidelines in place are very clear on this topic. Growth, intensification and height are encouraged at this intersection, and even more so between 342 to 348 Bloor Street West. The existing limits have already been set out in SASP 334, OPA 199, the Bloor Corridor Urban Design Guidelines and the Downtown Tall Buildings Guidelines. This site is not only located at transit station, it is located on a transit hub, where three (3) higher order transportation corridors meet. The proposed draft OPA would be detrimental to future development at this intersection and between 342 to 348 Bloor Street, and it would be inconsistent with city's own policies and guidelines. This would lead to the underdevelopment of a major transportation hub, a practice discouraged by provincial and municipal policies. This would not serve the public interest, and would be putting an unfair and unnecessary burden on the owners of 342 to 348 Bloor Street West.

We are writing to be on public record as expressing these concerns in regards to the draft Official Plan Amendment. We urge City Staff and the Councillor to reconsider or at the very least re-examine the direction of the Official Plan Amendment in light of these very serious concerns. We are amenable to meeting with City Staff to review and further discuss the draft Official Plan Amendment.

Yours very truly,
Sweeny & Co. Architects Inc.



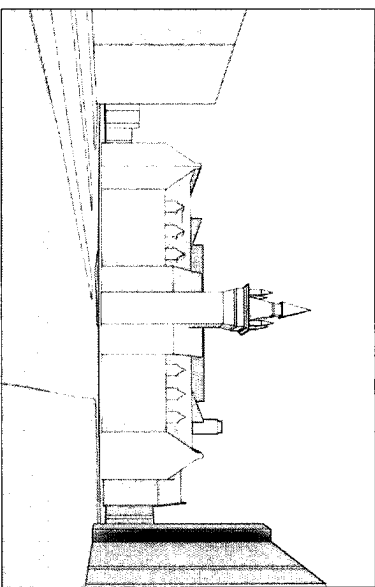
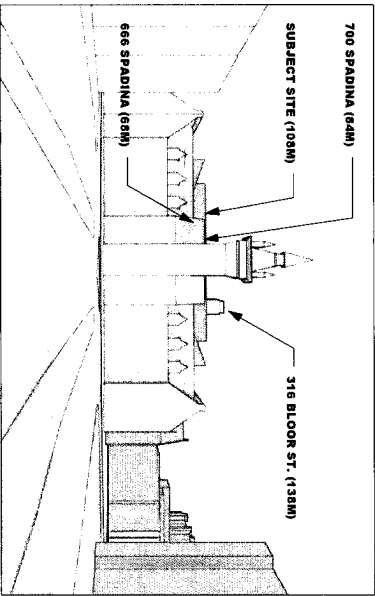
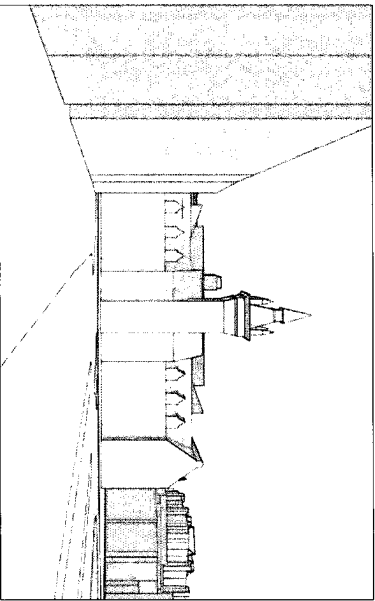
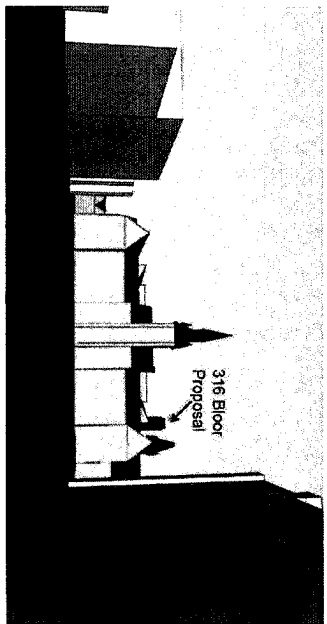
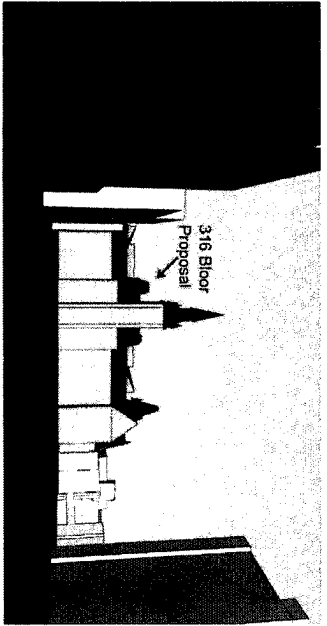
Dermot J. Sweeny

President

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cc. Jay Brown, Howard Kerbel of Starbank Developments 350 Corp.



3 3D View 4 - Spadina North-west

2 3D View 3 - Spadina Middle-North

1 3D View 2 - Spadina North-east

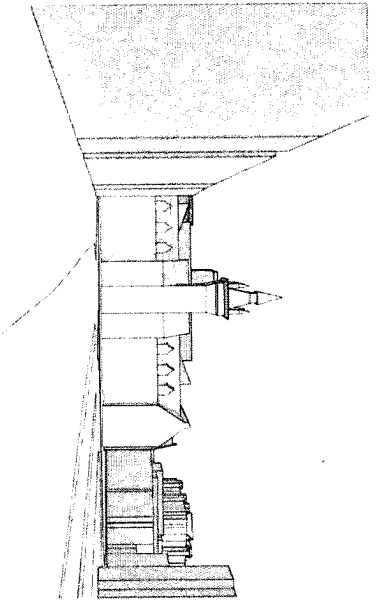
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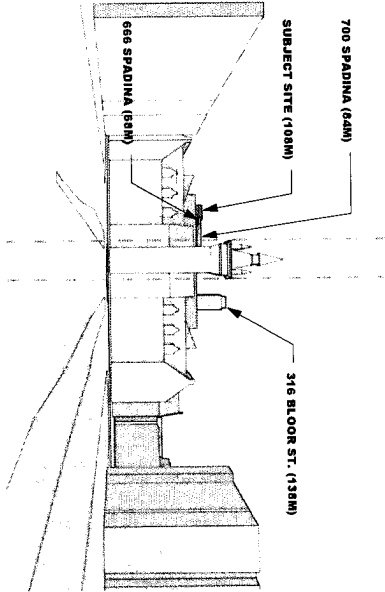


Street View - Draft OPA
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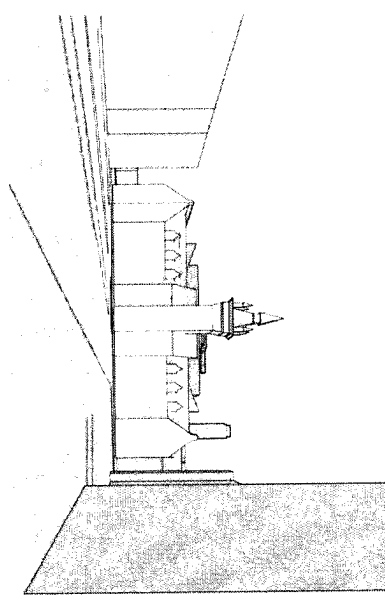


3 Scenario 1 - Spadina West



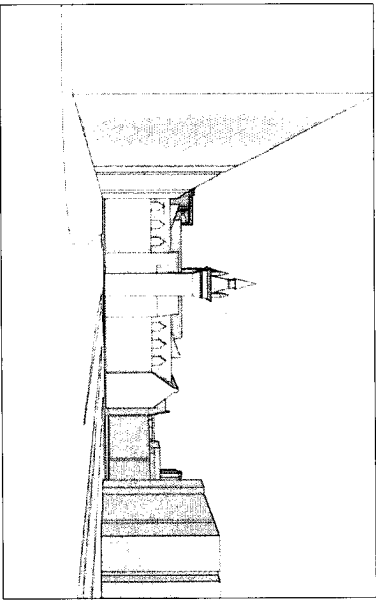
2 Scenario 1 - Spadina Middle

Protected vista at sight line from centre of Spadina Avenue looking North. Unclear height datum is created by redevelopment of One Spadina and already existing 666 Spadina.



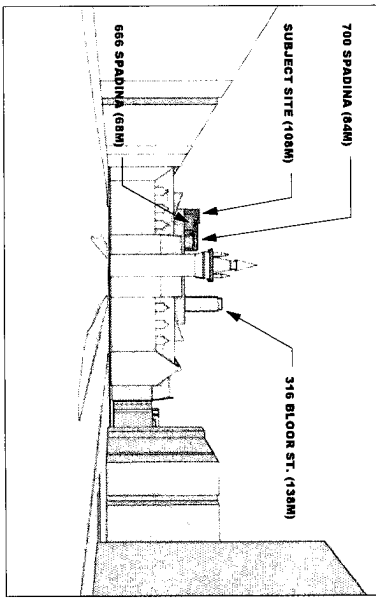
1 Scenario 1 - Spadina East





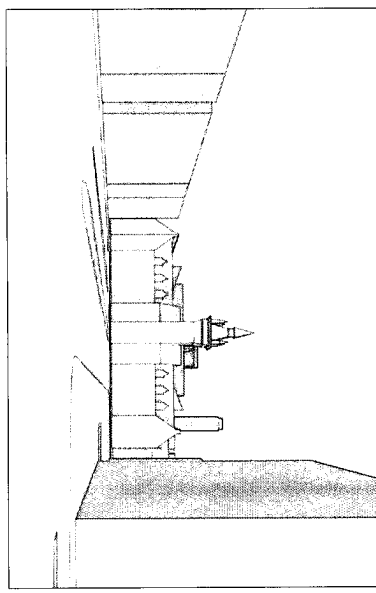
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3D View 4 - Spadina South-west



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3D View 3 - Spadina Middle-south



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3D View 2 - Spadina South-east

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Street Views - OPA 199

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