

Public Attachment 1

GOLDBERG GROUP | LAND USE PLANNING AND DEVELOPMENT
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March 15, 2018

WITH PREJUDICE

Mr. Henry Tang
Community Planning – Toronto & East York District
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, Ontario M5H 2N2

Dear Mr. Tang:

**RE: Official Plan and Zoning By-law Amendment Applications
16 188179 STE 28 OZ
31 Parliament Street
1150782 Ontario Inc.**

This submission is being made as a “with prejudice” offer to settle the Ontario Municipal Board appeal and as such, we request that this settlement offer be presented to City Council at its meeting of April 24, 2018.

The purpose of this correspondence is to identify the revisions from the July 2016 submission to this current submission arising from comments received by the City and others through the planning process. This correspondence also serves as a Planning Addendum to the original Planning Report prepared by this firm.

Comparison of July 2016 to March 2018 Plans

The major statistical changes between the plans are as follows:

- a reduction in height from 49 to 39 storeys and a measured overall height reduction from 172.75 m to 150.1 m (inclusive of mechanical penthouse) or from 167.05 m to 144.1 m exclusive of mechanical penthouse;
- Reduction in total gross floor area (GFA) from 39,040.33 m² to 33,461.5 m²
- Reduction of Floor Space Index (FSI) from 16.4 to 14.0
- Reduction in total number of units from 495 to 294
- Provision of additional opportunity for more 3BR units that would further reduce unit count to 284
- Increase the number of 3BR units located on the lower 10 floors to 25 units (9%) with the option of increasing to 35 units and 13% of the unit mix

- relocate retail space from lower level to ground level along Parliament Street frontage for a total of 319.3 m²
- eliminate above ground parking levels and locate all parking in 3 below grade levels of parking;
- provide for 153 vehicle parking spaces, an overall parking rate of 0.52 spaces per unit
- Alter the unit mix as follows:

UNIT TYPE	JULY 2016	MARCH 2018
1BR	283 (57%)	130 (44%)
1BR + Den	42 (8%)	5 (2%)
2BR	149 (30%)	132 (44%)
2BR + Den	13 (3%)	2 (1%)
3BR	8 (2%)	20 (7%)
3BR + Den	NA	5 (2%)

The major built form changes between the plans are as follows:

- a reduction in height from 49 to 39 storeys;
- pull back/reduction of the base building from the north property line and over the proposed driveway along north property line to provide for fully uncovered/open driveway access and locate ground floor 9.5 m from the property line with levels 2-4 located 6 m from the north property line
- reduce the base building height from 7 storeys (28.45 m) to 5 storeys (21.9 m)
- reduce the crash wall height along the south side of the base building from 22.5 m to 8.5 m (2.5 m above railway) a significant reduction in height and appearance
- the building has been visually divided into a base building (floors 1-6), a middle (Floors 8 to 25) and a top (26-39)
- Significant terraces are included at levels 6, 13 and 26.
- All tower portions above the 4th floor provide for a tower separation of 36 m to the approved tower at 31A Parliament Street

Planning Addendum

The City Refusal Report of December 20, 2016 identifies the following reasons for refusal of the application:

- (a) does not fit within the existing or planned context;
- (b) is not mutually compatible and complementary to the King-Parliament Area;
- (c) does not provide sufficient transition in height towards the St. Lawrence Neighbourhood;
- (d) does not provide adequate pedestrian connections;
- (e) causes excessive shadow impact on the site of Canada's First Parliament buildings and the Distillery District; and
- (f) has excessive above-grade parking that detracts from the pedestrian realm.

In response, we provide the following:

Existing and Planned Context

The proposed use, form and height of development on 31 Parliament Street fits appropriately and compatibly within all of the existing building and open space patterns.

The built form of the building facing west is appropriately scaled street wall building framing Parliament Street at a scale commensurate with the mid-rise scale buildings located within the St Lawrence Neighbourhood creating a transitional scale to the west. The building now steps at the front from 5 to 12 to 25 to 39 storeys.

The historic Gooderham and Worts Distillery complex (the Distillery District), is located south of Front Street East generally along Mill Street from the east side of Parliament Street to Cherry Street south to the rail corridor. Although the major heritage buildings and at-grade spatial patterns have been preserved, renovated and utilized for new festival and commercial uses, the comprehensive plan has also resulted in the addition of contemporary high-rise residential towers being developed, creating a built form pattern and a new high-rise skyline node for the Distillery District. The proposed tower is similar in form and scale with the existing structures within the Distillery area and would add to the existing skyline pattern created by the Distillery District. The shadow effects of the tower are limited and would not have unacceptable shadow impacts on the open spaces of the Distillery District, specifically Trinity Square.

The proposed location and street-related form of development will improve the at-grade Parliament Street connection north of the rail corridor overpass to the Waterfront area located south by normalizing that part of Parliament Street as a pedestrian oriented street frontage.

The proposed form, scale and location of the proposed development fits with the current and anticipated planned context. At this point, the planned context of the King Parliament area has been largely established and the subject tall building fits within this new existing context.

Compatible and Complementary to King-Parliament Area

The King Parliament Area is a mixed-use, regeneration area that also contains a significant amount of heritage open space and built form. As identified through draft City policy, the protection of view corridors and limiting of new net shadows on significant Distillery District features is given high priority. The proposed tall building built form and the proposed residential uses on the subject reflect the recent post-industrial redevelopment within the Distillery District and create no unacceptable or adverse typological, functional, visual or shadow impacts upon the Distillery District.

The King Parliament Area has been planned in a manner that seeks to establish the area as a complete community with respect to land uses, residential population and tenures, the creation of community facilities, amenities and resources. The proposed development would complement the larger community area on this basis.

Transition in Height to St. Lawrence Neighbourhood

The proposed development provides a meaningful physical and visual transition to the St Lawrence Neighbourhood at grade along Parliament Street and in terms of the skyline. The built form facing west is an appropriately scaled street wall building framing Parliament Street at a scale commensurate with the mid-rise scale buildings located within the St Lawrence

Neighbourhood, thus creating a transitional scale to the west from the taller buildings located east within the Distillery District.

Pedestrian Connections

The reconfigured base building provides for an animated street frontage along Parliament with at-grade retail proposed. The lobby area is located immediately east of the retail space from the driveway and drop-off area located on the north side of the building. The proposed driveway provides appropriate connections to the east and north through the Distillery District and provides linkages between sites including 31A Parliament.

Shadows

The reduction of the tower height from 49 to 39 storeys reduces the incremental shadows. Of key importance is that the shadows touch only the southwest corner of the First Parliament Site at 10:18 am on March 21 and at no other time period. Parliament Square Park experiences some incremental shadows during the spring and fall time periods generally between 10:18 and 11:18 am. For all other time periods, there is minimal shadow cast on the Distillery District and at all time periods the proposed shadows will have no impact on Trinity Square.

Excessive Above-Grade Parking

The parking is now located in 3 levels of underground parking.

The Growth Plan for the Greater Golden Horseshoe 2017 (Growth Plan 2017)

The July 2016 application was evaluated against the 2014 Growth Plan. The Growth Plan 2017 has been approved by the Lieutenant Governor in Council, Order in Council No 1024/2017. The Growth Plan for the Greater Golden Horseshoe, 2017 is in effect as of July 1, 2017.

The policies of this Growth Plan 2017 have been reviewed as they relate to the proposed development and it is our opinion that the revised proposal is in conformity with the Growth Plan 2017.

Conclusions

The proposed revisions to the plans create an appropriate and integrated development fitting with this context. The reduction in tower height, modifications to the base building, additional articulation of the building through base, middle and top create an appropriate tall building in an appropriate location. The changes outlined result in a development that is compatible with the existing and planned context, offers appropriate transition to the St. Lawrence Neighbourhood and creates a well-connected pedestrian and street realm that will benefit the Distillery District and King-Parliament Area as a whole.

Accordingly, the analysis and conclusions from the original Planning Report of July 2016 continue to apply to the revised proposal, which, in our opinion, represents good planning.

In support of the revised submission, the following is provided:

- Resubmission Form

- Project Data Sheet Update
- DVD with all electronic files
- Three (3) copies of 11 x 17 Architectural plans including shadows, prepared by Arquitectonica, dated March 15, 2018
- Pedestrian Level Wind Addendum, prepared by Gradient Wind Engineering Inc, dated March 14, 2018
- Heritage Impact Addendum, prepared by GBCA Architects, dated March 14, 2018

Additional report addendums will be provided in support of the modified proposal. These will include updates to the Functional Servicing/Stormwater Management Report, Traffic Impact Analysis/Parking Study, Noise Study, Heritage Impact Analysis, Landscaping and the Draft OPA and ZBA. These documents are expected to be completed prior to the meeting to be scheduled with the City for early April.

Should you have any questions, please contact me.

Yours very truly,
GOLDBERG GROUP



Michael S. Goldberg, MCIP, RPP
Principal

cc: B. Smith, 1150782 Ontario Inc.
M. Flowers, Davies Howe