

From: [Emily Wall](#)
To: [Clerk](#)
Cc: [Cyndi Rottenberg-Walker](#)
Subject: Agenda Item PG29.4 Alexandra Park Revitalization - Response to Recommended Downtown Plan
Date: May 22, 2018 2:45:08 PM
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Hello,

On behalf of Tridel, I would like to submit the attached letter on the Recommended Downtown Plan (Agenda Item PG29.4) regarding the Alexandra Park Revitalization.

Thank you,

Emily

Emily Wall, MCIP, RPP, MScPI

Associate

tel 416 340 9004 x247

May 18, 2018

Andrew Farncombe
Project Manager, Strategic Initiatives, Policy & Analysis
Metro Hall, 55 John St.
Toronto, ON M5V 3C6

Dear Andrew:

Re: Response to Proposed Downtown Plan Regarding Alexandra Park Revitalization

We are writing on behalf of our client Tridel with respect to the ongoing revitalization of Alexandra Park. Toronto Community Housing (TCH) and the Atkinson Housing Co-operative have been working with the City of Toronto since 2009, and with Tridel since 2014, to revitalize Alexandra Park, a TCH community of approximately 2,500 residents in Downtown Toronto. We understand that the City of Toronto's Planning Division has released a Recommended Downtown Plan Official Plan Amendment, which applies to Alexandra Park, and which will be brought forward to City Council on May 22nd - May 24th, 2018.

The priorities and objectives of the Alexandra Park Master Plan align with the goals of the Downtown Plan, and the revitalization of Alexandra Park will help to further the aims of the Downtown Plan. Nonetheless, there are some specific policies within the Downtown Plan that are contradictory to existing Site and Area Specific Policy (SASP) 383 and Zoning By-Law 1710-2013 which are in-force for Alexandra Park, or that may limit the implementation of the revitalization plan, which has been developed over almost 10 years of close collaboration between the City of Toronto, TCH, Atkinson Co-op, Alexandra Park residents, Tridel and surrounding communities. As per Policy 1.6, we assume that existing SASP 383 and the amended SASP for Phase 2 of the revitalization will prevail over the Recommended Downtown Plan in the event of a conflict, but would like to identify specific policies within the Plan that should not apply to Alexandra Park.

Introduction

The revitalization of Alexandra Park was initiated by the residents of Alexandra Park and the Atkinson Housing Co-operative in 2009. A comprehensive Master Plan was prepared with extensive community involvement in 2011 to guide revitalization, and it included 10 Guiding Principles:

1. Zero Displacement
2. Providing good housing
3. Providing more than housing

4. Planning together first
5. Minimizing disruption
6. Protecting tenants' rights
7. Developing connections
8. Ensuring participation
9. Nurturing a green, clean & beautiful community
10. Enhancing opportunities

City Council approved an Official Plan Amendment and site-specific Zoning By-Law for the Alexandra Park Revitalization in 2012 and 2013, respectively. As a result of these amendments, Alexandra Park is currently subject to Site and Area Specific Policy (SASP) 383 and Zoning By-Law 1710-2013. Tridel was selected as the development partner for Phase 1 and Phase 2 of revitalization, and construction of Phase 1 began in 2014.

Following the completion of the first Phase 1 TCH townhomes, regular consultation with existing Alexandra Park and Atkinson Co-op residents identified the desire to review the Master Plan for Phase 2. The review of Phase 2 was required to ensure that all desired changes to the Master Plan could be self-financed, and to maintain the Zero Displacement policy for residents, which is one of the 10 original Revitalization Principles.

An updated Master Plan for Phase 2 has been developed, and applications for an Official Plan Amendment, Zoning By-Law Amendment and Rental Housing Demolition were submitted to the City of Toronto on December 22, 2017. Since submitting this application, TCH, Tridel and the consulting team have worked closely with the City of Toronto and the community to resolve outstanding issues and make revisions to the Master Plan. The revised application, which includes an Official Plan Amendment for the entire Phase 2 area and a Zoning By-Law for the first three sites to be redeveloped, was submitted on May 8, 2018.

Consultation

Since the first submission in December 2017, TCH and Tridel have met on numerous occasions with City of Toronto staff, and have worked through feedback received at two working sessions with City of Toronto Planning, Housing, Urban Design and Parks staff on February 28th and March 20th 2018.

Feedback on the submission has also been solicited from the Alexandra Park and Atkinson Housing Co-op community through the following:

- Monthly meetings with the community Working Group;
- Meeting with the Atkinson Co-op community to discuss townhouse design and safety on March 8, 2018; and
- A Public Meeting, hosted by Toronto City Planning on April 10, 2018

In addition, a third presentation was made to the TCH Design Review Panel on April 11, 2018. At this meeting, the Design Review Panel voted in support of the Master Plan and gave approval for the resubmission of the Official Plan Amendment and Zoning By-Law application.

Tridel and TCH appreciate the proactive collaboration from City of Toronto Planning staff in advancing this application and ensuring that revitalization of this vibrant community continues to move forward.

Phase 2 of Alexandra Park Revitalization

The comprehensive Site and Area Specific Policy (SASP) proposed for Phase 2 of the Alexandra Park revitalization is the product of almost 10 years of collaborative engagement to ensure that the community that emerges is healthy, cohesive, vibrant and diverse, and fits within the evolving Downtown Toronto built form context. The proposed SASP responds to the unique context and vision for the site, which requires the replacement of all social housing units on site, ensures that the revitalization plan is self-financing and maintains a zero displacement policy for existing tenants. The Master Plan includes:

- The replacement or refurbishment of 806 social housing units;
- The creation of a 473 square metre Local Social Enterprise Centre;
- A new 1,100 square metre Community Recreation Hub;
- A new public park, which will be a minimum of 0.6 hectares in size;
- A new space for the City-run Child Care Centre, which accommodates 36 children;
- Retail spaces and live-work units; and
- The introduction of approximately 1,500 market units to finance the revitalization of the social housing units. The first market building to be constructed as part of Phase 2 will achieve the minimum number of 2 and 3 bedroom units of the minimum sizes identified in the City's Growing Up Guidelines.

The SASP submitted for Phase 2 of redevelopment of Alexandra Park provides policies related to built form, housing, the public realm, parks and open spaces, streets, retail and live/work units and community services and facilities. Together, these policies result in a revitalization plan that will create a community that supports and furthers the achievement of the 5 key goals of the Downtown Plan – complete communities, connectivity, prosperity, resilience and responsibility. The proposed Official Plan and Zoning By-Law Amendments are also supported by a comprehensive set of technical studies including servicing and stormwater management, pedestrian level wind impacts, transportation considerations, functional servicing, and a community servicing and facilities study, all of which take into account the existing and planned development context.

Response to the Recommended Downtown Plan (May 1, 2018)

As a result of the long history of revitalization planning, and the comprehensive nature of the Master Plan and its supporting technical studies, it is essential that conflicting provisions in the Recommended Downtown Plan (May 1, 2018) not apply to Alexandra Park. In particular, there are several key policies within the Recommended Downtown Plan that either contradict the existing SASP 383 and Zoning By-Law 1710-2013 that are in force for the site, or will limit the implementation of the revitalization plan. These are summarized below.

1. Complete Community Assessments (Section 5)

The revitalization of Alexandra Park is inherently based on an objective to create a complete community – one that includes community services, economic opportunities, connectivity to the surrounding city and neighbourhoods, and a diverse community of mixed incomes and backgrounds. The comprehensive nature of the planning and urban design work behind the Phase 2 Master Plan, as well as the development of technical studies in support of the Official Plan Amendment and Zoning By-Law application, have fulfilled the objectives of the Complete Community Assessment called for in Section 5. As a result, Section 5 should not apply to Alexandra Park.

2. Mixed Use Areas (Section 6)

The Recommended Downtown Plan identifies Dundas Street West adjacent to Alexandra Park as *Mixed Use Areas 3*. Policy 6.28 states that “*development in Mixed Use Areas 3 will be in the form of low-rise and mid-rise buildings.*” In addition, Policy 9.29.1 states that “*mid-rise development will have heights generally no greater than the width of the right-of-way that it fronts onto.*” Furthermore, Policy 9.13.2 states that “*tall buildings will not be permitted on sites within Neighbourhoods, Mixed Use Areas 3 and Mixed Use Areas 4.*”

The existing in-force SASP 383 currently permits buildings fronting onto Dundas Street West that are taller than the width of the right-of-way (ROW), which is 20 metres in this location. The proposed SASP continues to allow buildings that are taller than the adjacent ROW, requiring that Alexandra Park either be exempted from the policies above or be designated *Mixed Use Areas 2*.

3. Priority Retail Streets (Section 6)

Policy 6.37 states that “*the frontages of buildings on Priority Retail Streets will contain retail and service commercial space with exceptions for lobbies, parking entrances, servicing spaces and other service exits.*” The existing in force SASP 383 for Alexandra Park allows for a Local Social Enterprise Space fronting onto Dundas Street. This is an important aspect of the revitalization plan, as it encourages economic development and opportunity within the neighbourhood, and creates a public community space on Dundas Street West.

The existing SASP calls for the Dundas Street Frontage to contain a mix of community, retail and mixed commercial uses, and the Zoning By-Law establishes a maximum amount of the frontage that may contain uses other than street related retail and service uses or office uses. Given these provisions and the need for additional flexibility to attain social and economic objectives in Alexandra Park, Policy 6.37 should not apply to Alexandra Park.

4. Mid-Rise and Tall Building Development (Section 9)

Policies in Section 9 address Built Form. Our team has worked closely with City of Toronto Planning and Urban Design staff to establish carefully articulated built form envelopes that achieve key urban design performance objectives contained within the Official Plan and the City's Mid-Rise and Tall Building Guidelines, while also achieving the unique goals and needs of the Alexandra Park community and the guiding principles of self-financed revitalization and zero displacement. The proposed multi-unit residential and mixed use buildings in Alexandra Park do not strictly meet the requirements for built form within the Recommended Downtown Plan. However, proposed building envelopes achieve the intent of these requirements, and serve to establish a unique, high quality presence on the Dundas Street frontage with appropriate transitions to the interior of the neighbourhood and adjacent built form.

The proposed SASP identifies key performance objectives for buildings taller than 4 storeys in height, while the proposed Zoning By-Law identifies angular plane requirements, maximum building and base building heights and required setbacks and stepbacks on all frontages. Buildings taller than 4 storeys will establish base buildings that fit within the existing context, establish appropriate transitions to Kensington Market to the north and to the Alexandra Park neighbourhood to the south, maintain appropriate access to sunlight on Dundas Street West, parks and open spaces, and recognize important view corridors.

Due to the extensive collaboration we have undertaken with City of Toronto Planning and Urban Design staff to establish these context-appropriate building envelopes, Policy 9.29 should not apply to Alexandra Park.

Finally, with respect to building floorplate sizes, Policy 9.15 states that "*mixed-use and residential buildings will have a maximum floorplate size of 750 square metres above the base building. Increases to the 750 square metre floorplate size may be considered when it has been demonstrated to the City's satisfaction that the impacts of the larger floorplate, including but not necessarily limited to pedestrian comfort including shadow and wind impacts, sky-view, and transition, can be mitigated.*" The existing in force SASP 383 defines tall buildings as those above 12 storeys, and applies tall building provisions only to portions of the building above 12 storeys. Above 12 storeys, buildings will have a maximum floorplate of 750 square metres, and below 12 storeys, we have established zoning provisions that will shape and orient larger building floorplates to mitigate their impacts. As a result, the provisions of Policy 9.15 should not apply to Alexandra Park.

5. Setbacks in *Apartment Neighbourhoods* (Policy 9.5)

Policy 9.5 requires that “*development in Mixed Use Areas 1, Mixed Use Areas 2, Mixed Use Areas 3, Regeneration Areas, Institutional Areas and Apartment Neighbourhoods will be set back from any property line adjacent to a street to achieve at least 6 metres measured from the curb to building face.*”

Development along the Dundas Street West frontage provides more than 6 metres between the curb and the building face, reflecting the role of Dundas Street West as a major street with active ground floor uses. Within the *Apartment Neighbourhood* areas of Alexandra Park, however, the community has a more residential neighbourhood character with a mix of grade-related townhouses and multi-unit residential buildings. The existing Zoning By-Law for the site does not require a 6 metre setback from curb to building face in recognition of the finer grain, residential character of this built form. In addition, the site is constrained by the need to replace 349 social housing units with units that have the same number of bedrooms and to replace a minimum of 65% of the existing townhouses with new townhouses. Given this planned character, Policy 9.5 should not apply to *Apartment Neighbourhoods* within Alexandra Park.

6. Housing (Section 11)

As part of the resubmission on May 8, 2018, a Zoning By-Law for the first three sites to be developed within Phase 2 was submitted. This By-law ensures that the first market building to be constructed will meet the Growing Up Guidelines for 2-bedroom and 3-bedroom units. While the Growing Up Guidelines are proposed to be met in the first market building, it is expected that Phase 2 will be built out over more than 10 years. At this time, it is not certain that the market will support those unit sizes and counts moving forward. Furthermore, Policy 11.1.3 goes beyond the Growing Up Guidelines by requiring an additional 15% of 2-bedroom or 3-bedroom units. Given this long-term build-out and uncertainty over future market conditions, this policy should not apply to Alexandra Park; however, Tridel remains committed to working with the City of Toronto to ensure that unit sizes appropriately meet needs for affordability and family-sized housing in Downtown Toronto.

Given the long history of collaborative planning and the comprehensive nature of the Phase 2 Alexandra Park Master Plan, we respectfully request that the City exempt Alexandra Park from the policies contained within the Downtown Plan. We look forward to working with the City to finalize the updated SASP for Phase 2 of the revitalization, and to continue to realize this important transformation in Alexandra Park.

Thank you for the opportunity to submit this letter. Should you have any questions regarding this memo or require further clarification with respect to its contents, please do not hesitate to contact us via the phone number and email addresses listed above.

Yours very truly,



Cyndi Rottenberg-Walker
Partner, Urban Strategies
FCIP, RPP

cc: Ann-Marie Nasr, Strategic Initiatives & Policy Analysis
Lynda Macdonald, Community Planning
Graig Uens, Senior Planner