June 5, 2018

**BY EMAIL**

Members, Etobicoke York Community Council  
Etobicoke Civic Centre  
Main floor, 399 The West Mall  
Toronto, ON M9C 2Y2

Attention: Rosemary MacKenzie, Secretariat Contact and Gregory Byrne, Senior Planner

RE: Status Report – Bloor West Village Avenue Study  
17 103255 WSP 00 TM  
Etobicoke York Community Council Item EY31.5

We are providing planning consultant services for Choice Properties REIT Ontario Properties Limited, the owner of the property at 2187 Bloor Street West. The property is located within the study area of the Bloor West Village Avenue Study (BWV Avenue Study), as identified in the staff report dated May 17, 2018. Specifically, the property is located within the Village Main Street Character Area. Choice Properties REIT is actively exploring the potential redevelopment of the site as a mid-rise mixed use building. Since December 2016, the City has led a collaborative process with local stakeholders towards developing a new planning framework for this distinct corridor. In the spirit of this collaboration, we are writing on behalf of our client to identify concerns with emerging policy directions for the Village Main Street Character Area.

The final report for the Bloor West Village Avenue Study was published in April 2018. Chapter 7 of the report includes recommended guidelines and standards for each of the character areas. The following table outlines the recommended standards and guidelines for the Village Main Street Character Area, of which 2187 Bloor Street West is a part. The corresponding existing standards and guidelines from the 2010 Mid-Rise Guidelines and the 2016 Addendum to the Mid-Rise Guidelines are noted alongside for reference. In many cases, the recommended standards and guidelines are more onerous than the Mid-Rise Guidelines.

<table>
<thead>
<tr>
<th>BWV Avenue Study Recommendation</th>
<th>Existing Standard</th>
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<tr>
<td>A maximum allowable height of 20.0m, or 75% of the ROW.</td>
<td>The 2016 Addendum to establishes a maximum allowable height of 21.6m, or 80% of the 27m ROW, specific to Bloor West Village. (PS1: Maximum Allowable Height)</td>
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<tr>
<td>A 45-degree angular plane at 16.0m, or 60% of the ROW.</td>
<td>The Mid-Rise Guidelines indicate a 45-degree angular plane taken 80% of the 27m ROW (21.6m) (PS4A: Front Façade – Angular Plane)</td>
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<tr>
<td>Side step backs at upper storeys above the maximum street wall of 13.5m.</td>
<td>The Mid-Rise Guidelines require side stepbacks at 80% height. The 2016 Addendum establishes a maximum allowable height of 21.6m, therefore side stepbacks should be provided above 17.3m. (PS8C: Side Property Line: Stepbacks at Upper Storeys)</td>
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Planning Concerns

Bloor West Village is a unique retail environment within Toronto, and through the Avenue Study, the City and community seek to enhance the area’s village identity, heritage character, and pedestrian amenity. However, in our opinion, the consultant’s Final Report for the Bloor West Village Avenue Study has overlooked key policy direction from the Growth Plan for the Greater Golden Horseshoe. Specifically, the report does not consider policy related to intensification around higher-order transit stations, as outlined in Section 2.2.4 of the Growth Plan. The following outlines our concerns in detail.

1. The study does not evaluate people and job densities in accordance to Growth Plan targets

   Section 2.2.4 of the Growth Plan directs intensification around major transit station areas - the area approximately within a 500-meter radius of a higher-order transit station - to create compact and complete communities that optimize investment in transit infrastructure and other public service facilities. Runnymede Station, as a higher order transit station, is at the heart of a major transit station area.

   Major transit station areas on a subway lines are directed to be planned for a minimum density target of 200 people and jobs per hectare (Growth Plan Policy 2.2.4.3). In 2016, based on data from the 2016 Census and the City of Toronto’s annual employment survey, the Runnymede major transit station area had a density of 96 p+j/ha. With a below-average density compared other stations along the Bloor-Danforth Line, Runnymede Station is not a net contributor to Growth Plan targets.

2. The study does not consider the impact of the built form recommendations on achieving density targets

   Chapter 8 of the final report presents a demonstration plan to visualize the intention of the Avenue Study. The demonstration plan does not consider whether the recommended standards and guidelines for built form along Bloor Street West are able to achieve the density targets for major transit station areas. The recommended reduction in maximum allowable height for the Village Main Street Character Area and new standards and guidelines for angular planes and side stepbacks at upper storeys, as outlined above, would limit the potential for the Runnymede major transit station area to achieve density targets established in the Growth Plan. Within the major transit station area, the mixed-use designated lands along Bloor Street West represent the primary area where significant increases in density will be accommodated. As illustrated in Map 15 – Land Use Plan of the City’s Official Plan (Appendix A), areas to the north and south of the corridor are designated as Neighbourhoods and are not anticipated to accommodate significant population or job growth (City of Toronto Official Plan policy 4.1.1).

3. The study applies a uniform approach for the entire Village Main Street

   The final report includes recommended standards and guidelines for the entire Village Main Street Character Area – an eight-block stretch of Bloor Street West. Within the character area, there is a variation in the context and built form. Appropriate height and massing techniques should respond to the context on a site-by-site basis, in a manner that is still in keeping with the intent of the avenue study.
In this context of land use and land use policy, potential sites for intensification and redevelopment within the station area should not be overlooked. The site at 2187 Bloor Street West, which includes a surface parking lot, is an appropriate location for intensification, especially where much of the Village Main Street Character Area is built up. The consultant’s report related to the Bloor West Village Avenue Study recommends guidelines and standards related to allowable height and angular planes, as outlined in Table 7.1 of the final report, that would limit the height and density that could be achieved on the site, and thus restrict the station area’s ability to contribute to Growth Plan density targets.

It is our opinion that the property at 2187 Bloor Street West can be developed in a manner that both aligns with Growth Plan policy for major transit station areas and responds to the guiding principles of the Bloor West Village Avenue Study. Through a variety of massing techniques and building articulation, for example, it is possible to develop a mid-rise building on this site that reinforces the village identity (BWV Avenue Study principle 5.1) and establishes a context-sensitive relationship to the adjacent land uses and built form (BWV Avenue Study principle 5.3).

We look forward to future opportunities to discuss the contents of the draft Official Plan Amendment, draft Zoning By-law Amendment and draft Urban Design Guidelines with City planning staff. Furthermore, we encourage Community Council to take Growth Plan intensification policy and conformity with the Growth Plan into consideration when directing staff to bring forward draft OPA, ZBA and urban design guidelines.

Yours very truly,

Leigh McGrath
Senior Associate, RPP

URBAN STRATEGIES INC.
Appendix 1: Map 15 – Land Use Plan

500-m radius

Runnymede Station

2187 Bloor Street West