

February 22, 2018

Paul Farish
Senior Planner, Strategic Initiatives
City Planning Division
Metro Hall, 22nd Floor
55 John Street
Toronto, ON
M5B 3C6

Dear Mr. Farish:

**RE: MIDTOWN IN FOCUS PLANNING STUDY
COMMENT SUBMISSION
OUR FILE: 17164A**

On behalf of our client Amelin Properties, the owner of the property located at 95-131 and 155 Balliol Street (hereinafter the "Subject Lands" as shown on the **Figure 1**), we submit the following comments regarding the Midtown in Focus Planning Study and the associated proposed Yonge-Eglinton Secondary Plan (hereinafter "the proposed Secondary Plan").

PROPOSED YONGE- EGLINTON SECONDARY PLAN

We have reviewed the proposed Yonge-Eglinton Secondary Plan, dated November 2017, as they pertain to the Subject Lands. We request that certain amendments to the proposed Secondary Plan to be made as follows:

1) Rectifying Mapping Inconsistency Issues

Maps 21-6 and 21-9 of the proposed Secondary Plan, which relate to the development potential and maximum tall building heights in the Davisville area, have excluded the western portion of the Subject Lands as areas with "No Tall Building Potential or Infill Potential". Given the unity of ownership of the Subject Lands and the existing building's footprint, we believe the entirety of the Subject Lands should be included within the same areas designated as "Infill Development Potential" on Map 21-6 and areas designated with the same maximum height range on Map 21-9.

We therefore request that Maps 21-6 and 21-9 be amended so that the entirety of the Subject Lands are included within the same “Infill Development Potential” and “Maximum Height Range” areas.

2) Increasing Height and Density Provisions on the Subject Lands

Notwithstanding the above mapping inconsistency issues, the proposed Secondary Plan identified the Subject Lands to have “Infill Development Potential” with a “Maximum Height Range” of “20-23” storeys. We believe that 23 to 25 storeys would be a more appropriate maximum height for the Subject Lands.

The Subject Lands are located wholly within the D.4 Davisville Apartment Neighbourhood. Existing and new residential buildings immediately to the north of the Subject Lands are of 28 to 30 storeys in height. The requested maximum height range of 23 to 25 storeys would provide a better balance between intensification and a transition of heights towards the E4. Davisville Community Street and E5. Merton Street character areas to the north and south respectively.

We therefore request that the maximum height range for the Subject Lands as shown on Map 21-9: Maximum Tall Building Heights (Davisville Area) to be increased to 23 to 25 storeys.

3) Lack of Provisions to Cap Parkland Dedication or Equivalent Cash-In-Lieu

The proposed Secondary Plan’s Policies 3.29 and 3.2.40 would require a parkland dedication or equivalent cash-in-lieu rate of 0.4 hectares per 300 units for development in the Yonge-Eglinton Secondary Plan area. Policies 3.29 and 3.2.40 do not mention a cap for the land contribution or equivalent cash-in-lieu in accordance with Chapter 415, Article III, Provision 23 of the Toronto Municipal Code, which caps the land contribution or equivalent cash-in-lieu to 10% of the overall land area for residential development on sites less than one hectare in size and 15% for sites greater than one hectare in size.

We therefore request that Policies 3.29 and 3.2.40 of the proposed Secondary Plan specifically reference the alternative rate provisions in the Toronto Municipal Code vis-à-vis the required parkland cap.

4) Overly Restrictive Tall Building Design for Apartment Neighbourhoods

Policies in section 4.3 of the proposed Secondary Plan contain a set of strong design policies for the Apartment Neighbourhoods areas. We believe that policies should allow for flexibility in design while encouraging sky view and sufficient access to sunlight and open spaces for residents in existing and future developments in the Apartment Neighbourhood.

We therefore request that Policies in section 4.3 of the proposed Secondary Plan be revised to align with the permitted Tall Building Design Guidelines standards.

Thank you for consideration of our comments.

We look forward to continuing working with Staff through the Midtown in Focus Planning Study process and the associated Yonge-Eglinton Secondary Plan and Midtown Parks and Open Space Network Plan and Citywide Parkland Strategy.

Yours truly,

MHBC

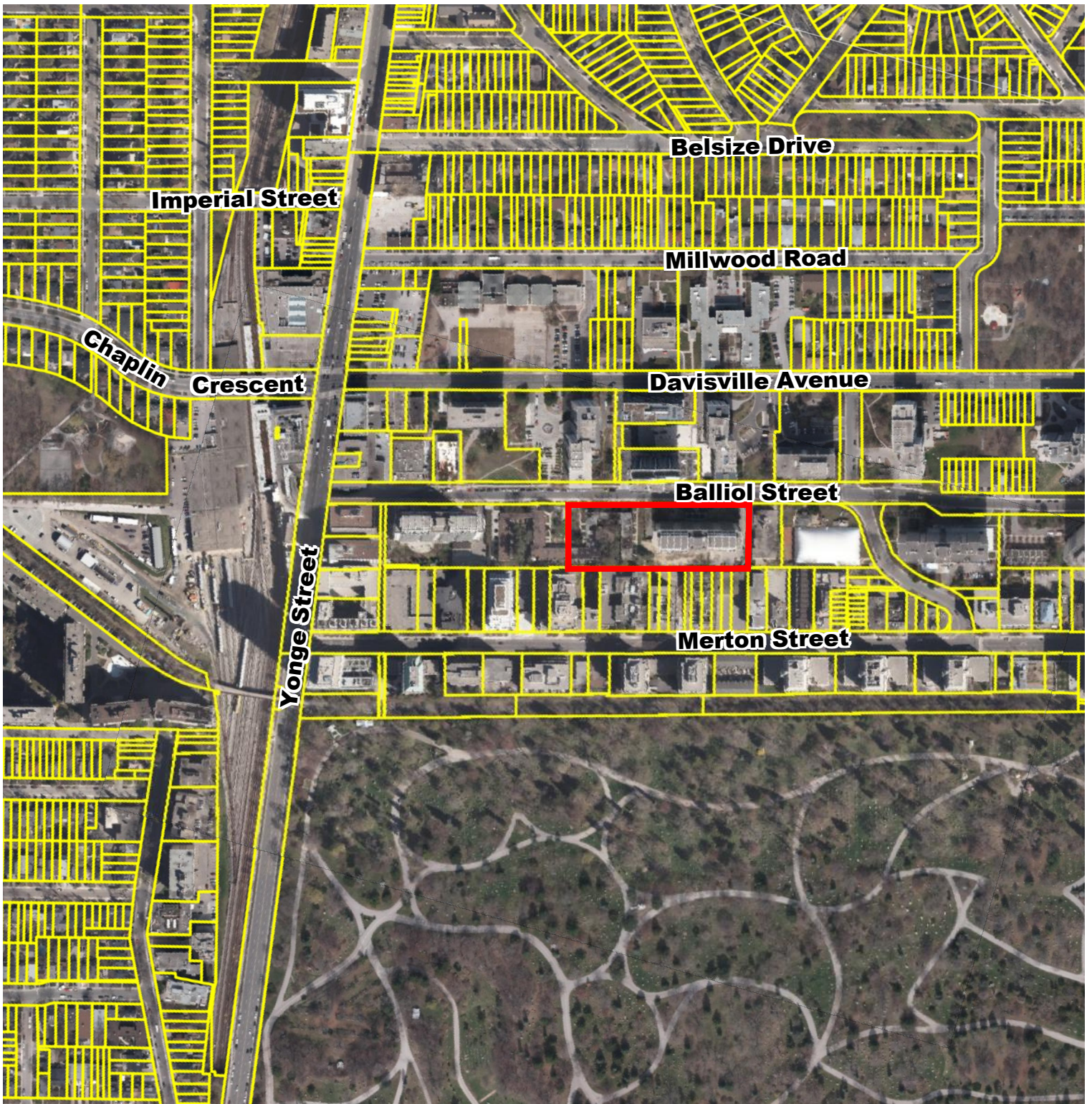


David A. McKay, MScPl, MCIP, RPP
Vice President & Partner



Edwin Li, MScPl
Planner


cc. City Clerk
Manager, Strategic Initiatives
Client



Data Source: First base Solutions Aerial Flown 2017

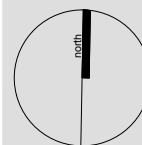
**Figure 1
Location Map**

LEGEND

 Subject Lands

DATE: February 21, 2018

SCALE: 1:5000



**95-131, 155 Balliol Street,
Toronto, Ontario**

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**PLANNING
URBAN DESIGN
& LANDSCAPE
ARCHITECTURE**

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