



1547 Bloor Street West
 Toronto, Ontario M6P 1A5
 ☎ (416) 923-6630
 ✉ info@sglplanning.ca

January 28, 2020 '

Our File: OI.TO

Ulli S. Watkiss
 City Clerk, City of Toronto
 Toronto City Hall
 Toronto, ON M5M N2N

Dear Mr. Watkiss:

**Re: Item TE12.4 – Toronto and East York Community Council (January 8, 2020)
 King-Spadina Secondary Plan Update
 Comments from 1094950 Ontario Limited, owner of 479 Wellington St. West**

On behalf of our client, 1094950 Ontario Limited, owner of 479 Wellington Street West, we are writing with our comments and concerns with respect to the King-Spadina Secondary Plan Update.

479 Wellington Street West, the “subject property”, is located at the southeast corner of Wellington Street West and Draper Street, within the King-Spadina Secondary Plan area. There is an existing 2-storey building on the subject property that contains office uses.

We have reviewed the adopted King-Spadina Secondary Plan and have identified some key concerns as they relate to the subject property:

- Objective 3.1.2 states that development within the Secondary Plan Area shall provide either the replacement of all existing non-residential gross floor area, or a min. of 25% of the total proposed gross floor area to be non-residential, whichever is greater. We are generally supportive of providing for continued non-residential uses in King-Spadina. However, we are concerned that this requirement could potentially restrict the future development potential for residential gross floor area on the subject property, given that the entirety of the gross floor area that exists on the subject property today is non-residential. This is particularly a concern if the potential residential gross floor area is restricted on the site. Further, clarification is requested from the City on whether this requirement is a policy or an objective of the Secondary Plan.
- Policy 4.2 requires development to be oriented and designed to protect and (where possible) enhance views and vistas as shown on Map 16-3A, which includes the view between Clarence Square and Victoria Memorial Park along Wellington. While we recognize the intent of this policy for protecting views to both parks, we would like clarification on the purpose of this policy and how it will be implemented given that the Secondary Plan already requires significant setbacks from Wellington Street.
- Policy 6.3 requires development within the Secondary Plan Area to provide stepbacks facing public streets, and that the stepbacks will be free of any projections. Further, Policy 6.3.3 states that stepbacks greater than three metres may be required to conserve existing heritage resources or address the built form character of the street. We are concerned that given there is already a significant setback requirement from

Wellington Street, and recognizing that there are existing listed heritage resources on the subject property, these policies could restrict development opportunities on the subject property, including the potential to provide for balconies facing Wellington and/or Draper Streets.

- Policy 6.5 states that no “net-new shadow” shall be cast on certain parks and properties between the specified times and dates. At this stage, it is not known whether any development on the subject property would cast a shadow on the noted parks and properties between the times noted, and as such, we are concerned about this policy. In our opinion, the matter is better addressed through the established guidelines that the City has in place, and we request that this policy be removed.
- Policy 6.11 limits height to a maximum of 50 metres. We are concerned that this policy may limit the potential development opportunities on the subject property, where a taller building may be appropriate given the context of the lands. As such, we request that this policy be removed.
- Clarification is requested regarding policy 6.13. The policy appears to require base buildings to be set back from adjacent properties; however, it is unclear if this is meant to apply to all sides of a building, or only certain sides and/or yard setbacks. Further, it is unclear how this policy would apply to listed heritage buildings.
- Policy 6.14 requires stepbacks above the base building of a minimum 5.5 metres from any property line adjacent to another property. We are unclear about how this requirement applies to listed heritage buildings. It is also our understanding that there appear to be inconsistencies between this stepback requirement and that of the updated HCD plan that is currently the subject of ongoing discussions through an LPAT appeal process. Further, we are concerned that this policy is too prescriptive and may unnecessarily restrict development and stepbacks that may otherwise be appropriate in certain contexts.
- Policies 7.16 to 7.19 apply to Draper Street Area of Special Identify. The policies require new buildings to match setbacks along Draper Street, to respect the pattern of private front yards and back yards, and to provide a “*noticeable and discernable step down in height of development downwards toward the Draper Street Area of Special Identity*”. With respect to the subject property, we request clarification on how these policies would be applied to a building that fronts onto both Wellington and Draper, and we are concerned that these policies may restrict development opportunities on the subject property.

Please do not hesitate to contact us should you require more information.

Yours very truly, '
SGL PLANNING & DESIGN INC.



David Riley, MCIP, RPP
Principal



Paul Lowes, MCIP, RPP
Principal

copy: Christian Kieller, representative for 1094950 Ontario Limited '