

## **33 Isabella Street – Zoning By-law Amendment Application – Final Report**

Date: February 24, 2020

To: Toronto and East York Community Council

From: Director, Community Planning, Toronto and East York District

Ward 13 - Toronto Centre

**Planning Application Number: 18 195494 STE 27 OZ**

### **SUMMARY**

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This application proposes to amend former City of Toronto Zoning By-law No. 438-86 and City-wide Zoning By-law No. 569-2013 to permit the construction of a 4-storey mixed-use infill building at 33 Isabella Street. The site currently contains a 27-storey apartment building with 419 rental dwelling units, which will be retained. The proposed development will be located on the western portion of the 33 Isabella Street site and will include 388 square metres of office space and 15 new rental dwelling units. A total of 95 parking spaces (74 spaces for residents, 14 spaces for visitors, and 7 spaces for office use) along with 434 bicycle parking stalls will be provided, for both the new and current tenants, in the existing 2-level underground garage.

Rental tenure and improvements to the existing building have been agreed upon and will be secured as a legal convenience through an agreement pursuant to Section 37 of the *Planning Act*.

The application represents an appropriate and desirable infill redevelopment of the site, has a built form and public realm that are compatible with the surrounding context and meets the intent of the Official Plan. The proposed development is consistent with the Provincial Policy Statement (2014) and conforms with A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019).

This report reviews and recommends approval of the application to amend the Zoning By-laws.

### **RECOMMENDATIONS**

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The City Planning Division recommends that:

1. City Council amend Zoning By-law 438-86 for the lands at 33 Isabella Street substantially in accordance with the draft Zoning Bylaw Amendment attached as Attachment No. 6 to this report, dated February 24, 2020 from the Director, Community Planning, Toronto and East York District.
2. City Council amend City of Toronto Zoning By-law 569-2013 for the lands at 33 Isabella Street substantially in accordance with the draft Zoning By-law Amendment attached as Attachment No. 7 to this report, dated February 24, 2020 from the Director, Community Planning, Toronto and East York District.
3. City Council authorizes the City Solicitor to make such stylistic and technical changes to the draft Zoning By-law Amendments as may be required.
4. Before introducing the necessary Bills to City Council for enactment, City Council require the owner to:
  - a. Submit to the Chief Engineer and Executive Director, Engineering and Construction Services for review and acceptance, a revised Functional Servicing Report to determine the stormwater runoff, sanitary flow and water supply demand resulting from this development and whether there is adequate capacity in the existing municipal infrastructure to accommodate the proposed development;
  - b. Make satisfactory arrangements and enter into the appropriate agreement(s) with the City for the design and construction of any improvements to the municipal infrastructure, all to the satisfaction of the Chief Engineer and Executive Director, Engineering and Construction Services and the City Solicitor, should it be determined that upgrades are required to the infrastructure to support this development, according to the Functional Servicing Report accepted by the Chief Engineer and Executive Director, Engineering and Construction Services;
  - c. Provide space within the development for installation of maintenance access holes and sampling ports on private property, as close to the property line as possible, for both the storm and sanitary service connections, in accordance with the Sewers By-law Chapter 681-10 and to the satisfaction of the Chief Engineer and Executive Director, Engineering and Construction Services; and
  - d. Enter into a Section 37 Agreement satisfactory to the Chief Planner and Executive Director, City Planning, and the City Solicitor, and register the Section 37 Agreement on title to the subject property to the satisfaction of the City Solicitor, securing the matters of legal convenience outlined in Recommendation 5 below.
5. City Council authorize the City Solicitor to enter into an agreement pursuant to Section 37 of the Planning Act to secure the following matters as a legal convenience to

support the development, with no cost pass-through to the residents of the existing rental building on the subject site, all to the satisfaction of the Chief Planner and Executive Director, City Planning and the City Solicitor:

a. The owner shall continue to provide and maintain the 419 existing rental dwelling units at 33 Isabella Street as rental dwelling units, together with the new and retained associated facilities and amenities, for a period of at least twenty (20) years from the date of the Zoning By-law Amendments coming into full force and effect, with no applications for demolition or conversion from residential rental use made during such twenty (20) year period, to the satisfaction of the Chief Planner and Executive Director, City Planning and the City Solicitor;

b. Prior to the earlier of either two years after issuance of the first above-grade building permit for the subject site or occupancy of the new building at 33 Isabella Street, the owner shall provide, repair, operate, or maintain at its sole expense the following facilities, amenities and improvements on the subject site as illustrated in the architectural plans and landscape plans dated December 16, 2019, with no pass-through of the costs to the existing tenants, to the satisfaction of the Chief Planner and Executive Director, City Planning and the City Solicitor:

i. 434 Bicycle Parking Spaces, including 430 spaces within the underground parking, and 4 spaces at-grade;

ii. Indoor storage of garbage, recycling and composting, located at the P1 Parking Level and the ground floor of the new building;

iii. New Indoor amenity space of 373 square metres which shall include, but is not limited to: theatre/media room; gymnasium which shall include, nine cardiovascular and six weight machines, and space for stretching exercises; communal/multi-purpose space which shall include, lockers, seating and tables; party room which shall include, a kitchen, tables and chairs, and a direct connection to the adjacent outdoor amenity area; and a games room which shall include, a kitchen, table, seating and pool table;

iv. Two universal washrooms located on the ground floor of the retained building;

v. New outdoor amenity space of 868 square metres which shall include: outdoor seating, dining tables and five picnic tables; two outdoor cooking appliances, and associated food preparation surfaces and sinks; planting and landscape treatments; and play structure/equipment; and

vi. A total of 285 storage lockers accessible to tenants of the retained rental building and located within the three underground levels of the retained rental building, to the satisfaction of the Chief Planner and Executive Director, City Planning.

c. The owner shall provide residents of the existing residential rental units with access to the new indoor and outdoor amenity spaces of the new and retained building at 33 Isabella Street at no extra charge to the tenants and with no pass-through cost to the tenants of the existing building. Access and the use of these amenities shall be on the same terms and conditions as any other resident on the subject site;

d. Prior to the issuance of any below grade building permit for the subject site, the owner shall develop a Construction Mitigation Strategy and a Tenant Communication Plan to mitigate the impacts of construction on existing tenants, all to the satisfaction of the Chief Planner and Executive Director, City Planning; and

e. The owner shall provide existing tenants occupying the retained rental units which will directly face the new mixed-use building with the option to relocate to a comparable rental dwelling unit elsewhere in the retained building, should such a comparable rental dwelling unit become vacant and should the existing tenant choose the option to relocate within the retained rental building. The tenant's rent for such comparable rental dwelling unit shall not exceed the rent last paid by the tenant. The order of priority for consideration for relocation shall be based on tenant seniority. The retained rental units identified above include the bachelor units located on the west side of the retained rental building, from the second floor to the seventh floor, inclusive. These studio units are typically identified as Unit 5 on the Typical Floor Plans submitted as part of the Existing Architectural Plans. The unit number will vary depending on the floor on which it is located. The order of priority for consideration for relocation shall be based on tenant seniority.

## **FINANCIAL IMPACT**

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City Planning confirms that there are no financial implications resulting from the recommendations included in the report in the current budget year or in future years.

## **DECISION HISTORY**

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The rezoning application was submitted on July 17, 2018 and was deemed complete on March 29, 2019. Revised plans were submitted by the applicant on September 11, 2019 and December 19, 2019.

A Preliminary Report on the application was adopted by Toronto and East York Community Council on January 15, 2019 authorizing staff to conduct a community

consultation meeting for landowners and residents within 120 metres of the site. Key issues identified at the time were:

- The appropriate building height, massing, and setbacks;
- The separation distance between the proposed and the existing building on site;
- The adequacy and suitability of the proposed indoor and outdoor amenity spaces;
- The location and visibility of the garbage staging area;
- Impacts to on-site rental housing; and
- The need to improve the existing building's facilities and amenities.

A Community Consultation Meeting was held on May 8, 2019. The decision of Community Council and the Preliminary Report can be found at the following link:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.TE2.16>

## **PROPOSAL**

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The application proposes to amend the Zoning By-laws to permit a new 4-storey infill building on the west side of an existing 27-storey apartment tower site at 33 Isabella Street. The new mixed-use building would have a total gross floor area of 2,470 square metres of which 388 square metres would be for office uses at grade and the remaining 2,082 square metres would be for residential uses. Including the existing 27-storey apartment tower on site, there would be a total gross floor area of 24,588 square metres and a total density of 5.06 times the area of the lot. The overall height of the infill building would be 20.65 metres, including the mechanical penthouse.

On the ground floor, the application proposes office uses, residential uses, and amenity space. There will be 15 residential units contained on the upper three floors, consisting of 2 bachelor units, 6 one-bedroom units, 2 two-bedroom units, and 5 three or more bedroom units. The proposal includes a total 373 square metres servicing the entire site (0.86 square metres per unit) of indoor amenity space located on the ground floor of both the existing and proposed buildings in the form of a media room, gym, party room, games room, and multi-purpose space. The proposed outdoor amenity space would total 868 square metres (2 square metres per unit), and would connect to the indoor amenity areas, and include landscaped open space, hardscaping, play area, outdoor cooking facilities, and seating.

The lobby entrance for the existing building will be maintained while the new building will have separate entrances for the office uses and the residences that will be accessed from Isabella Street. A total of 95 parking spaces are proposed for the site, located in the existing underground parking garage and accessed from the existing entrance and exit ramp from Isabella Street. The application includes a reconfigured pick-up and drop-off and a Type G loading area that is to be accessed by the existing

driveway from Isabella Street between the two buildings. Garbage, recycling and composting would be stored in the renovated garbage room at the P1 level of the underground garage and on the ground floor of the new infill building. The application also proposes 434 bicycle parking spaces, including 390 long-term and 44 short-term parking spaces that are to be located on the first level of the underground garage and at-grade.

The applicant proposes to maintain all of the 419 existing rental dwelling units, 417 of which have affordable and mid-range rents and 2 of which are superintendent-occupied.

Based on feedback from City staff and the community, the following revisions have been made by the applicant since their original submission in July 2018.

Table 1: Summary of Application

	July 2018	December 2019
Storeys	5	4
Height (m)	25.5	20.65
GFA (m2)	2,395	2,470
*Vehicle Parking	100	95
*Bike Parking	21	434
*Indoor Amenity (m2)	39	373
*Outdoor Amenity (m2)	30	868

\* Statistics reflect parking and amenity space for the entire site.

For additional project data, see Attachment No. 1: Application Data Sheet. For illustration of the site plan, see Attachment No. 8: Site Plan. For proposed building elevations, see Attachment No. 9.

## Site and Surrounding Area

The subject site is located within the Church-Wellesley neighbourhood, north of Wellesley Street, between Yonge and Church Streets. The lands at 33 Isabella Street are irregularly shaped with a varied rear lot line condition. There is an 88 metre frontage along Isabella Street and a varied lot depth reaching its widest extent of 88 metres for a total site area of 4,861 square metres. The irregular site configuration resulted from a land severance with 30 Gloucester Street, a 22-storey apartment tower to the south, which formerly shared common elements and outdoor amenity space with 33 Isabella Street. A one-storey building addition continues to connect the existing apartment towers at 33 Isabella Street and 30 Gloucester Street.

The site is currently occupied by a 27-storey "tower in the park" style apartment building that is setback 18.7 metres from the north lot line. The existing apartment building has 419 rental dwelling units, 2 of which are superintendent units, and a gross floor area of 22,356 square metres, with no indoor amenity space and 675 square metres of outdoor space. The density of the site is currently 4.6 times the area of the lot.

To the west of the tower is a tennis court facing onto Isabella Street with additional landscaped open space to the south. The tower entrance is currently serviced by a U-shaped pick-up and drop-off. A separate driveway provides access to the underground parking garage. Garbage is currently stored on the west side of the driveway.

According to the Housing Issues Report provided by the applicant, all of the 419 residential units on the site are rental in tenure and 417 of the rental dwelling units have affordable or mid-range rents. The 2 additional rental dwelling units are occupied by building superintendents. All but 25 of the rental units were occupied at the time of the application. The rental units have the following bedroom type and rent classification:

Table 2: Breakdown of Existing Rental Dwelling Units at 33 Isabella Street

Unit Type	Number of Units	Rent Classification	
		Affordable	Mid-Range
Bachelor	209	40	169
1 Bedroom	207	38	169
2 Bedroom	1	1	0
*Total	417	79	338

\*Excludes 2 two-bedroom superintendent units.

The surrounding uses include:

North: On the north side of Isabella Street, there is 7-storey office building which is the head office for the Children's Aid Society of Toronto at 30 Isabella Street; a 3-storey Part IV heritage designated building at 34 Isabella Street which houses the Canadian Lesbian and Gay Archives; a 3-storey heritage listed building at 38 Isabella Street (the Renascent Wright Centre); and a heritage listed 3.5-storey apartment building at 40-42 Isabella Street. Further east along Isabella Street are additional high-rise apartment towers.

East: Directly to the east of the 33 Isabella Street site is a 12-storey "tower in the park" style apartment building at 55 Isabella Street and a 13-storey apartment building at 59 Isabella Street. Building heights then transition downwards along the south side of Isabella Street towards Church Street.

South: To the south, a 22-storey slab style condominium apartment building (formerly part of the 33 Isabella Street site) fronts onto Gloucester Street. On the south side of Gloucester Street there are primarily low-rise residential dwellings with *Neighbourhoods* land use designation.

West: Immediately to the west is 17 Isabella Street, a heritage listed 3-storey single-detached former residential building with office uses, which is connected to a row of 3-storey townhomes directly to the south. Beyond the heritage building is Norman Jewison Park and Gloucester Lane, a section of the linear park that has been built on top of the Yonge Street subway tunnel, and helps to demarcate the *Apartment Neighbourhoods* to the east and the *Mixed Use Areas* along Yonge Street corridor to the west.

### **Reasons for Application**

The Zoning By-law Amendments are required to permit office uses on site and to increase the density from 4.6 to 5.06 times the area of the lot. The proposed Zoning By-law Amendments also contain regulations for building setbacks, vehicle parking supply, and amenity space rates.

## **APPLICATION BACKGROUND**

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### **Application Submission Requirements**

The application was received on July 17, 2018 and deemed complete on March 27, 2019.

The following reports/studies were submitted in support of the application:

- Architectural Plans
- Landscape Plans
- Topographical Survey
- Planning Rationale Report
- Housing Issues Report
- Green Development Standards Checklist and Statistics
- Pedestrian Level Wind Study
- Transportation Impact Assessment
- Sun/Shadow Study; Request for Direction Report
- Preliminary Geotechnical Investigation Report
- Hydrogeological Investigation Report
- Functional Servicing and Stormwater Management Report
- Noise Control Feasibility Study
- Tree Inventory and Preservation Plan
- Arborist Report



- Sun Shadow Study
- Community Services and Facilities Study

The application material referenced above can be accessed from the City's Application Information Centre using the following link:

<http://app.toronto.ca/AIC/index.do?folderRsn=Uq%2BybnELmQPxQ0LWBxrPSg%3D%3D>

### **Agency Circulation Outcomes**

The application together with the applicable reports noted above, were circulated to all appropriate agencies and City Divisions. Responses received have been used to assist in evaluating the application and to formulate appropriate Zoning By-law standards.

### **Statutory Public Meeting Comments**

In making their decision with regard to this application, Council members have been given an opportunity to view the oral submissions made at the statutory public meeting held by the Toronto East York Community Council for this application, as these submissions are broadcast live over the internet and recorded for review.

## **POLICY CONSIDERATIONS**

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### **Provincial Land-Use Policies: Provincial Policy Statement and Provincial Plans**

Provincial Policy Statements and geographically specific Provincial Plans, along with municipal Official Plans, provide a policy framework for planning and development in the Province. This framework is implemented through a range of land use controls such as zoning by-laws, plans of subdivision and site plans.

### **The Provincial Policy Statement (2014)**

The Provincial Policy Statement (2014) (the "PPS") provides policy direction province-wide on land use planning and development to promote strong communities, a strong economy, and a clean and healthy environment. It includes policies on key issues that affect communities, such as:

- The efficient and wise use and management of land and infrastructure over the long term in order to minimize impacts on air, water and other resources;
- Protection of the natural and built environment;
- Building strong, sustainable and resilient communities that enhance health and social well-being by ensuring opportunities exist locally for employment;

- Residential development promoting a mix of housing; recreation, parks and open space; and transportation choices that increase the use of active transportation and transit; and
- Encouraging a sense of place in communities, by promoting well-designed built form and by conserving features that help define local character.

The provincial policy-led planning system recognizes and addresses the complex inter-relationships among environmental, economic and social factors in land use planning. The PPS supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas.

The PPS is issued under Section 3 of the [Planning Act](#) and all decisions of Council in respect of the exercise of any authority that affects a planning matter shall be consistent with the PPS. Comments, submissions or advice affecting a planning matter that are provided by Council shall also be consistent with the PPS.

The PPS recognizes and acknowledges the Official Plan as an important document for implementing the policies within the PPS. Policy 4.7 of the PPS states that, "The official plan is the most important vehicle for implementation of this Provincial Policy Statement. Comprehensive, integrated and long-term planning is best achieved through official plans."

## **Provincial Plans**

Provincial Plans are intended to be read in their entirety and relevant policies are to be applied to each situation. The policies of the Plans represent minimum standards. Council may go beyond these minimum standards to address matters of local importance, unless doing so would conflict with any policies of the Plans.

All decisions of Council in respect of the exercise of any authority that affects a planning matter shall be consistent with the PPS and shall conform with Provincial Plans. All comments, submissions or advice affecting a planning matter that are provided by Council shall also be consistent with the PPS and conform with Provincial Plans.

## **A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019)**

A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019) (the "Growth Plan (2019)") came into effect on May 16, 2019. This new plan replaces the previous Growth Plan for the Greater Golden Horseshoe, 2017. The Growth Plan (2019) continues to provide a strategic framework for managing growth and environmental protection in the Greater Golden Horseshoe ("GGH") region, of which the City forms an integral part. The Growth Plan (2019) establishes policies that require implementation through a Municipal Comprehensive Review (MCR), which is a requirement pursuant to Section 26 of the *Planning Act* that comprehensively applies the policies and schedules of the Growth Plan (2019), including the establishment of minimum density targets for

and the delineation of strategic growth areas, the conversion of provincially significant employment zones, and others.

Policies not expressly linked to a MCR can be applied as part of the review process for development applications, in advance of the next MCR. These policies include:

- Directing municipalities to make more efficient use of land, resources and infrastructure to reduce sprawl, contribute to environmental sustainability and provide for a more compact built form and vibrant public realm;
- Directing municipalities to engage in an integrated approach to infrastructure planning and investment optimization as part of the land use planning process;
- Achieving complete communities with access to a diverse range of housing options, protected employment zones, public service facilities, recreation and green space that better connect transit to where people live and work;
- Retaining viable lands designated as employment areas and ensuring redevelopment of lands outside of employment areas retain space for jobs to be accommodated on site;
- Minimizing the negative impacts of climate change by undertaking stormwater management planning that assesses the impacts of extreme weather events and incorporates green infrastructure; and
- Recognizing the importance of watershed planning for the protection of the quality and quantity of water and hydrologic features and areas.

The Growth Plan (2019) builds upon the policy foundation provided by the PPS and provides more specific land use planning policies to address issues facing the GGH region. The policies of the Growth Plan (2019) take precedence over the policies of the PPS to the extent of any conflict, except where the relevant legislation provides otherwise.

In accordance with Section 3 of the *Planning Act* all decisions of Council in respect of the exercise of any authority that affects a planning matter shall conform with the Growth Plan. Comments, submissions or advice affecting a planning matter that are provided by Council shall also conform with the Growth Plan.

The Growth Plan (2019) contains policies pertaining to population and employment densities that should be planned for in major transit station areas (MTSAs) along priority transit corridors or subway lines. MTSAs are generally defined as the area within an approximately 500 metre radius of a transit station, representing about a 10-minute walk. The Growth Plan requires that, at the time of the next municipal comprehensive review (MCR), the City update its Official Plan to delineate MTSA boundaries and demonstrate how the MTSAs achieve appropriate densities. At the time of the MCR, municipalities can make a request to the Province for alternative targets to those set out in the Growth Plan. Major Transit Station Area boundaries will not be delineated until such time as the City initiates and completes an MCR in conformity with the Growth Plan (2019).

Staff have reviewed the proposed development for consistency with the PPS (2014) and for conformity with the Growth Plan (2019). The outcome of staff analysis and review are summarized in the Comments section of the Report.

### **Toronto Official Plan**

This application has been reviewed against the policies of the City of Toronto Official Plan as follows:

## **Chapter 2 – Shaping the City**

### **Section 2.2.1 Downtown: The Heart of Toronto**

The proposed development is located in the Downtown. A dynamic downtown is critical to the health of a city and to the region that surrounds it. Downtown, with its dramatic skyline, is Toronto's image to the world and to itself: comfortable, cosmopolitan, civil, urbane and diverse. It is the oldest, densest and most complex part of the urban landscape, with a rich variety of building forms and activities. Downtown will continue to evolve as a healthy and attractive place to live and work as new development that supports the reurbanization strategy and the goals for Downtown is attracted to the area.

### **Section 2.3.1 Healthy Neighbourhoods**

This section of the Official Plan contains policies that specifically address the relationship between *Neighbourhoods* and areas with other Official Plan designations in order to ensure development is sensitive to the physically stable areas within the *Neighbourhoods* designation. Policies in this section require development in *Mixed Use Areas*, *Regeneration Areas* and *Apartment Neighbourhoods* that are adjacent or close to *Neighbourhoods* to be: compatible with those *Neighbourhoods*; provide a gradual transition of scale and density, as necessary to achieve the objective of the Official Plan through the stepping down of buildings towards and setbacks from those *Neighbourhoods*; and, maintain adequate light and privacy for residents in those *Neighbourhoods*.

## **Chapter 3 – Building a Successful City**

Chapter 3 of the Official Plan contains policies that guide growth by integrating social, economic and environmental perspectives in decision making to create an attractive Toronto with a strong economy and complete communities. The policies focus on the built environment, the human environment, the natural environment, economic health and new neighbourhoods. All applications for development are to be evaluated against the policies and criteria in the Chapter to ensure the best possible development choices are made. Chapter Three also identifies that most of the City's future development will be infill and redevelopment and, as such, will need to fit in, respect and improve the character of the surrounding area.

### Section 3.1.1 - The Public Realm

The Public Realm policies in the Official Plan speak to the design and function of Toronto's streets, parks, sidewalks, and other open spaces that residents and visitors use to get around the city and connect with each other. Streets, sidewalks, and other open spaces should be designed to be safe, accessible, enjoyable, connected, and related appropriately to adjacent and nearby buildings.

### Section 3.1.2 Built Form

The built form policies in the Official Plan require new development to be located and organized to fit harmoniously into its existing and/or planned context, and limit its impact on neighbouring streets, parks, open spaces and properties by:

- Massing new buildings to frame adjacent streets and open spaces in a way that respects the existing and/or planned street proportion;
- Incorporating exterior design elements, their form, scale, proportion, pattern and materials, and their sustainable design, to influence the character, scale and appearance of the development;
- Creating appropriate transitions in scale to neighbouring existing and/or planned buildings for the purpose of achieving the objectives of this Plan;
- Providing for adequate light and privacy; and,
- Adequately limiting any resulting shadowing of, and uncomfortable wind conditions on, neighbouring streets, properties and open spaces. New development will be massed to define the edges of streets, parks and open spaces to ensure adequate access to sky view for the proposed and future uses.

New development will also provide public amenity, enhance the public realm through streetscape improvements and ensure that significant new multi-unit residential development provides indoor and outdoor amenity space for residents of the new development.

### Section 3.2.1 Housing

Section 3.2.1 of the Official Plan encourages the provision of a full range of housing, in terms of form, tenure and affordability, and the protection of rental housing units.

Policy 3.2.1.5 states that significant new development on sites containing six or more rental units, where existing rental units will be kept in the new development:

- Will secure as rental housing, the existing rental housing units which have affordable rents and mid-range rents; and,
- May secure any needed improvements and renovations to the existing rental housing, in accordance with and subject to Section 5.1.1 of the Plan, without pass-through of such costs in the rents to tenants.

### Section 3.1.5 Heritage Conservation

Section 3.1.5 of the Official Plan provides policies regarding heritage conservation. Policy 3.1.5.5 states that proposed development on or adjacent to a property on the Heritage Register will ensure that the integrity of the heritage property's cultural heritage value and attributes will be retained. Policy 3.1.5.26 requires that new construction on, or adjacent to, a property on the Heritage Register will be designed to conserve the cultural heritage values, attributes and character of that property and to mitigate visual and physical impact on it.

## Chapter 4 – Land Use Designations

### Section 4.2 Apartment Neighbourhoods

The subject lands are designated *Apartment Neighbourhoods* on Map 18 – Land Use of the Official Plan (see Attachment No. 3: Official Plan Land Use Map). *Apartment Neighbourhoods* are made up of apartment buildings, parks, local institutions, cultural and recreational facilities, small-scale retail, services and office uses. *Apartment Neighbourhoods* are stable areas of the City and are generally not intended for significant growth. Compatible infill, however, is contemplated on sites containing existing apartment buildings that have underutilized land.

Development in *Apartment Neighbourhoods* should contribute to the quality of life of new and existing residents by massing new buildings to provide a transition between areas of different development intensity and scale. In particular, *Neighbourhoods* will be protected through setbacks and/or stepping down of heights. New and infill development will also frame the edges of streets and parks, screen service areas, limit shadow and mitigate wind on parks and open spaces as well as *Neighbourhoods*. It will provide ground floor uses that enhance the safety, amenity and animation of adjacent streets and open spaces along with the provision of indoor and outdoor recreation space for building residents in every significant multi-unit residential development.

Section 4.2.2 of the Official Plan sets out the development criteria for *Apartment Neighbourhoods* and requires that new development contribute to the quality of life by:

- a. Locating and massing new buildings to provide a transition between areas of different development intensity and scale, as necessary to achieve the objectives of this Plan, through means such as providing setbacks from, and/or a stepping down of heights towards, lower-scale *Neighbourhoods*;
- b. Locating and massing new buildings so as to adequately limit shadow impacts on properties in adjacent lower-scale *Neighbourhoods*, particularly during the spring and fall equinoxes;

- c. Locating and massing new buildings to frame the edge of streets and parks with good proportion and maintain sunlight and comfortable wind conditions for pedestrians on adjacent streets, parks and open spaces;
- d. Including sufficient off-street motor vehicle and bicycle parking for residents and visitors;
- e. Locating and screening service areas, ramps and garbage storage to minimize the impact on adjacent streets and residences;
- f. Providing indoor and outdoor recreation space for building residents in every significant multi-unit residential development;
- g. Providing ground floor uses that enhance the safety, amenity and animation of adjacent streets and open spaces; and
- h) Providing buildings that conform to the principles of universal design, and wherever possible contain units that are accessible or adaptable for persons with physical disabilities.

Section 4.2.3 states that although significant growth is not intended within developed *Apartment Neighbourhoods*, compatible infill development may be permitted on a site with an existing apartment building which improves the existing site conditions by means such as:

- a. Meeting the development criteria set out in Section 4.2.2;
- b. Being compatible with the scale, including height and massing, of the existing apartment building(s) on and adjacent to the site;
- c. Providing separation distances between buildings on and adjacent to the site so as to achieve adequate sunlight and privacy;
- d. Maintaining or replacing and improving indoor and outdoor residential amenities on the site, including, where achievable, equipping and managing indoor and outdoor amenity space to encourage use by residents;
- e. Improving upon the quality of landscaped open space and outdoor amenity space for new and existing residents, including the preservation or replacement of significant landscape features and walkways and creating such features where they did not previously exist;
- f. Providing adequate on-site structured shared vehicular parking for both new and existing development;

- g. Consolidating and where achievable, relocating parking and servicing areas where they are not visible from streets, parks and landscaped open spaces;
- h. Placing parking ramps within the building where achievable;
- i. Providing all residents, including existing residents with access to the community benefits where additional height and/ or density is permitted and community benefits are provided pursuant to Section 5.1.1 of this Plan;
- j. Providing privacy and areas of landscaped open space, and maintaining adequate sunlight to units, outdoor amenity spaces and open spaces, for both new and existing residents;
- k. Organizing development on the site to frame streets, parks and open spaces at good proportion, providing adequate skyviews from the public realm, and creating safe and comfortable open spaces;
- l. Promoting grade-related dwellings at the edge of public streets, parks and landscaped open spaces where achievable, that front onto and provide pedestrian entrances from those public spaces, and provide a generous pedestrian realm adjacent to public streets;
- m. Promoting, on the lower floors of midrise and tall apartment buildings, grade-related units with front gardens, stoops and porches that take direct access from public sidewalks, accessible open spaces and park edges;
- n. Improving pedestrian access to the buildings from public sidewalks and through the site;
- o. Minimizing curb cuts;
- p. Improving waste storage and waste diversion facilities including enclosure of outdoor waste storage areas and enclosed waste storage facilities within a building where achievable;
- q. Providing needed improvements, renovations and retrofits to the existing rental housing to extend the life of the existing building(s) that are to remain; and
- r. Encouraging improved energy and water efficiency in existing buildings through renovations, retrofits and changes to management practices.

## **Chapter 5 - Implementation**

Section 5.6 provides guidance as to the understanding and interpretation of the Official Plan. Policy 1 indicates the Official Plan should be read as a whole to understand its comprehensive and integrative intent as a policy framework for priority setting and



decision making. Further, Section 1.5 – "How to Read the Plan" indicates the Official Plan is a comprehensive and cohesive whole. This proposal has been reviewed against the policies described above as well as the policies of the Official Plan as a whole.

The City of Toronto Official Plan can be found here:

<https://www.toronto.ca/citygovernment/planning-development/official-plan-guidelines/official-plan/>

### **TOcore: Planning Downtown**

Official Plan Amendment (OPA) 406, the Downtown Plan, is now in-force and effect. OPA 406 includes amendments to Section 2.2.1 and Map 6 of the Official Plan, as well as the new Downtown Plan. The Plan – in conjunction with the associated infrastructure strategies that address water, energy, mobility, parks and public realm, and community services and facilities – provides a comprehensive and integrated policy framework to shape growth in Toronto's fast-growing Downtown over the next 25 years. It provides the City with a blueprint to: align growth management with the provision of infrastructure; sustain liveability; achieve complete communities; and ensure there is space for the economy to grow. The Plan area is generally bounded by Lake Ontario to the south, Bathurst Street to the west, the mid-town rail corridor and Rosedale Valley Road to the north and the Don River to the east. This application was deemed complete prior to June 5, 2019 and as such the plan does not currently apply to this application. However, the policies in the plan are informative as to the future direction.

The Downtown Plan can be found here:

<https://www.toronto.ca/legdocs/mmis/2019/cc/bgrd/backgroundfile-135953.pdf>

### **Official Plan Amendment 320**

The Local Planning Appeal Tribunal (LPAT) issued an Order on December 7, 2018 to approve and bring into force Official Plan Amendment 320 (OPA 320). The approved policies reflect the policies endorsed by Council at its meetings of June 26 to 29, 2018 and July 23 to 30, 2018 in response to mediation and settlement offers from OPA 320 Appellants. In its Order that approves OPA 320, the LPAT found that the OPA 320 policies are consistent with the PPS (2014) and conform with the Growth Plan for the Greater Golden Horseshoe (2017).

OPA 320 was adopted as part of the Official Plan Five Year Review and contains new and revised policies on Healthy Neighbourhoods, Neighbourhoods and Apartment Neighbourhoods. The approved amendments uphold the Plan's goals to protect and enhance existing neighbourhoods that are considered stable but not static, allow limited infill on underutilized *Apartment Neighbourhood* sites and help attain Tower Renewal Program goals.

Relevant to this application, OPA 320 provides further direction on when infill development may be appropriate on built up *Apartment Neighbourhood* sites and how

to ensure that infill improves existing site conditions. OPA 320 introduces additional development criteria, including but not limited to: maintaining separation distances between buildings on and adjacent to the site; improving pedestrian access to buildings from the public sidewalks and through the site; improving amenity spaces; providing renovations and retrofits to existing buildings; and improving waste storage areas.

### **North Downtown Yonge Site and Area Specific Policy 382**

At its meeting on November 13, 2013, City Council adopted the North Downtown Yonge Area Specific Policy 382, known as Official Plan Amendment (OPA) 183, and approved the North Downtown Yonge Urban Design Guidelines for the area generally bounded by Charles Street, Bay Street, Church Street and College/Carlton Street. Parts of OPA 183 were adopted by the OMB in a Phase I hearing and are in full force and effect, including the majority of the Isabella Character Area policies and the area-wide policies. Other parts of OPA 183, including the policies related to the Historic Yonge Street HCD, remain under appeal and will be addressed through a Phase II hearing, which is not yet scheduled.

The site is located within the Isabella Character Area which extends from the properties on the south side of Charles Street East to the properties on the north side of Gloucester Street, between the linear park east of Yonge Street and the rear of the properties fronting on Church Street (refer to Attachments No.5: OPA 183 (SASP 382)). The preamble of Section 5.4, the Isabella Character Area, notes that growth will be focused into *Mixed Use Areas* while *Apartment Neighbourhoods* will remain relatively stable. It is also noted that low-scale infill development that respects and reinforces the general physical character, pattern, scale, massing setbacks and height may be permitted in these stable areas.

OPA 183 also contains area-wide policies related to sun and shadows, parks and open spaces, the public realm, and urban design, which will be considered during the review of the application.

The proposal has been reviewed against all policies of the North Downtown Yonge Site and Area Specific Policy 382, which can be accessed at:

<http://www.omb.gov.on.ca/edecisions/pl131355-Aug-25-2017.pdf>

### **Zoning**

The site is currently zoned R(d2.5)(x882) in Zoning By-law 569-2013 and R3 Z2.5 in Zoning By-law 438-86. Both Zoning By-laws permit residential uses in apartment buildings, with a maximum density of 2.5 times the area of the lot and a maximum height of 30.0 metres. The site is also subject to Section 12(1) 232 of the former City of Toronto Zoning By-law 438-86.

Furthermore, the site is subject to site-specific By-laws 188-68 and 310-69 (amendments to the former City of Toronto Zoning By-law 20623) which created a consolidated site for the development of the two-apartment building complexes at 33 Isabella Street and 30 Gloucester Street. The site-specific by-laws identify the heights, setbacks, density, landscaping, and parking requirements for the two combined sites.

## **Design Guidelines**

### **North Downtown Yonge Urban Design Guidelines**

The North Downtown Yonge Urban Design Guidelines provide further direction for implementation of the policies contained in OPA 183. A unique aspect of the Isabella Character Area is its special built form and open space configuration which results in large separation distances from adjacent properties and porosity through the block. The open spaces on these blocks are valuable and contribute to the quality of life for residents.

According to the Guidelines, infill developments on these blocks shall:

- Protect the low-rise built form, heritage buildings and human pedestrian scale; and,
- Maintain the open space network by identifying sites that can complement and enhance the existing public open spaces.

Additionally:

- The height of new developments should create a height transition from Yonge Street to the midrise built form along Church Street;
- There shall be a compatible relationship of potential new developments to the street right-of-way, immediate context, existing heritage buildings, nearby parks and open spaces and *Neighbourhoods*; and,
- The streetscape should provide strong street edges with tree planting, minimum paved sidewalk width and be in conformity with the City of Toronto Streetscape Manual.

The Guidelines also contain a framework for built form and the public realm.

The North Downtown Yonge Urban Design Guidelines have been considered during the review of the proposal. The North Downtown Yonge Urban Design Guidelines are available at:

<https://www.toronto.ca/legdocs/mmis/2013/te/bgrd/backgroundfile61187.pdf>

## **Townhouse and Low-rise Apartment Guidelines**

City Council adopted city-wide Townhouse and Low-Rise Apartment Guidelines and directed City Planning staff to use these Guidelines in the evaluation of townhouse and low-rise apartment development applications. These new Townhouse and Low-Rise Apartment Guidelines replace the Infill Townhouse Guidelines (2003) and are intended to be used in the review of an application when the proposed built form meets the City's Official Plan policies. The new Guidelines identify strategies to enhance the quality of these developments, provide examples of best practices, and improve clarity on various development scenarios.

The link to the Guidelines is here:

<https://www.toronto.ca/city-government/planning-development/official-plan-guidelines/design-guidelines/townhouse-and-low-rise-apartments/>.

## **Growing Up Draft Urban Design Guidelines**

In July 2017, Toronto City Council adopted the Growing Up Draft Urban Design Guidelines, and directed City Planning staff to apply the "Growing Up Guidelines" in the evaluation of new and under review multi-unit residential development proposals. The objective of the Growing Up Draft Urban Design Guidelines is that developments deliver tangible outcomes to increase liveability for larger households, including families with children at the neighbourhood, building and unit scale. The Growing Up Draft Urban Design Guidelines are available at:

<https://www.toronto.ca/legdocs/mmis/2017/pg/bgrd/backgroundfile-103920.pdf>

## **Site Plan Control**

The proposed development is subject to Site Plan Control. A Site Plan Application has not been submitted.

## **COMMUNITY CONSULTATION**

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### **Community Consultation Meeting**

A community consultation meeting was held on May 8, 2019 at The 519. The meeting was attended by staff from the Ward Councillor's office, City Planning staff, the applicant, and 15 members of the public.

Issues raised by area residents which have been considered in the review of the application were generally related to the following matters:

- Separation distances between the proposed building on 33 Isabella Street and the existing apartment building at 30 Gloucester Street to the south;

- Height of the proposed building and the pitch of the roof;
- Privacy and overlook conditions;
- Current conditions and maintenance of the existing apartment building at 33 Isabella Street; and,
- Preservation of trees and landscaping on site.

## **COMMENTS**

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### **Planning Act**

It is staff's opinion that the proposed development has regard for the relevant matters of provincial interest, including: the orderly development of safe and healthy communities; the adequate provision of a full range of housing; the appropriate location of growth and development; the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems; and the promotion of a built form that is well designed, encourages a sense of place, and provides for public spaces that are of high quality, safe, accessible, attractive and vibrant. These provincial interests are further articulated through the PPS and the Growth Plan (2019).

### **Provincial Policy Statement (2014)**

The PPS came into effect on April 30, 2014 and provides policy direction on matters of provincial interest related to land use planning and development. City Council's planning decisions are required to be consistent with the PPS.

The PPS is to be read in its entirety. The language in each policy, including the Implementation and Interpretation policies assists decision makers in understanding how the policies are to be implemented. The PPS contains minimum standards and municipalities can go beyond these standards unless doing so would conflict with other policies of the PPS.

Key policies applicable to this application include:

Policy 1.1.1 states that healthy, livable and safe communities are sustained by: promoting efficient development and land use patterns; and accommodating an appropriate range and mix of residential uses, including second units, affordable housing and housing for older persons.

Policy 1.1.3.1 states that settlement areas shall be the focus of growth and development, and their vitality and regeneration shall be promoted.

Policy 1.1.3.2 states that land use patterns within settlement areas shall be based on densities and a mix of land uses which: efficiently use land and resources; are

appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available; support active transportation; and are transit-supportive.

Policy 1.1.3.3 states that planning authorities shall identify appropriate locations and promote opportunities for intensification and redevelopment.

Policy 1.1.3.4 states that development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety.

Policy 1.4.3 outlines that one of the ways planning authorities shall provide for an appropriate range and mix of housing types and densities to meet projected requirements of current and future residents is by directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs.

Policy 1.6.7.4 promotes a land use pattern, density and mix of uses that minimizes the length and number of vehicle trips and supports current and future use of transit and active transportation.

Policy 4.7 of the PPS refers to the Official Plan as the most important vehicle for implementing the PPS and as such the development standards in the Toronto Official Plan have particular relevance. The Toronto Official Plan section of this Report evaluates the appropriateness of the subject site for intensification.

The proposed development is consistent with the above noted intensification, land use and built form policies (Policies 1.1.1, 1.1.3.1, 1.1.3.2, 1.1.3.3, 1.1.3.4, 1.4.3, and 1.6.7.4) as it provides intensification and redevelopment in an appropriate location which supports the use of transit, it promotes active transportation through the provisions of new bicycle infrastructure, offers a mix of land uses including both office and residential, and is a well-designed built form that has respect for its local context. Further, the proposal is consistent with the policy that states the Official Plan is the most important vehicle for the implementation of the PPS Policy 4.7 as the proposal conforms with all applicable Official Plan policies including those regarding built form and development within *Apartment Neighbourhoods*.

Based on the analysis of the policies, it is City Planning staff's opinion that the application and the Zoning By-law Amendments are consistent with the PPS.

### **Growth Plan (2019)**

The Growth Plan provides a framework for managing growth in the Greater Golden Horseshoe. City Council's planning decisions are required to conform with the Growth Plan (2019).

The key Growth Plan policies applicable to this application are:

Policy 2.2.1.2 of the Growth Plan directs the vast majority of growth to occur within settlement areas that have a delineated built boundary, have existing or planned municipal infrastructure including water and waste water systems, and that can support the achievement of complete communities.

Policy 2.2.1.3 c) directs municipalities to undertake integrated planning to manage forecasted growth which will provide for an urban form that will optimize infrastructure, particularly along transit and transportation corridors, to support the achievement of complete communities through a more compact built form.

Policy 2.2.1.4 a), c) and e) of the Growth Plan (2019) provides further direction on the achievement of complete communities. It articulates a set of objectives including a diverse mix of land uses, and range and mix of housing options to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes. Furthermore, this section directs that complete communities provide for a compact built form and a vibrant public realm.

Policy 2.2.2.3 c) states that all municipalities will develop a strategy to achieve the minimum intensification target and intensification throughout delineated built-up areas, which will encourage intensification generally throughout the delineated built-up area.

Policy 2.2.5.3 states that retail and office uses will be directed to locations that support active transportation and have existing or planned transit.

Policy 2.2.6.3 states that to support the achievement of complete communities, municipalities will consider the use of available tools to require that multi-unit residential developments incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes.

The proposed development conforms with the above noted policies (Policies 2.2.1.2, 2.2.1.3, 2.2.1.4, 2.2.2.3, 2.2.5.3, 2.2.6.3) by: promoting sensitive intensification within a built-up area; contributing to a range of housing options; providing for a compact built form and a vibrant public realm within a settlement area with convenient access to a range of transportation options; creating retail and office uses which can be supported by active transportation and public transit; and contributing to the overall achievement of a complete community.

It is City Planning staff's opinion that the application, and the Zoning By-law Amendments, conform to the Growth Plan (2019).

### **Conformity with Growth Targets and Density Targets**

The most recent Official Plan update was undertaken when the City's Official Plan was approved by the Ontario Municipal Board in 2006 and considered further through the statutory five-year review of the Official Plan that commenced in 2011. The five-year

review resulted in a number of Official Plan amendments that were approved by the province on various dates. The Official Plan sets out areas for future growth while at the same time establishing policies that are appropriate and considerate of the surrounding context.

The site is within the Urban Growth Centre of the built-up area boundary as identified in the Growth Plan, where a significant share of population and employment growth is anticipated. The City of Toronto is required through its Official Plan to plan for a future population of 3,190,000 people by the year 2041. Additional density targets are provided for the various urban growth centres in the City at a rate of 400 ppl/jobs per hectare to help achieve this overall population. The City is presently on track to meet these overall 2041 Growth Plan forecasts based on Census data, current development proposals and future trends that are currently being considered by the City.

The density of the Downtown Toronto Urban Growth Centre area in 2016 is 354 people and jobs per hectare, based on the 2016 Census population and the 2016 Toronto Employment Survey results. From 2011 to 2016, the population increased by 41,668 people. Employment increased by 69,280 jobs over the same period. The increase in density as a result of this growth is an additional 52 people and jobs per hectare over the 2011-2016 period. This demonstrates the growth and growth in density of the Urban Growth Centre.

Table 3: Downtown Urban Growth Centre

Year	Census Population	TES Employment	Area (hectares)	Density (people & jobs)
2011	205,888	441,920	2,143	302
2016	247,556	511,200	2,143	354
2011-2016	41,668	69,280	2,143	52

Sources: 2011 and 2016 Census, Statistics Canada, 2011 and 2016 Toronto Employment Survey, City of Toronto

In the Downtown Toronto Urban Growth Centre area, the 2016 Q4 Development Pipeline contained 42,556 units in projects that were built between 2012 and 2016, and a further 45,236 units in projects which are active and thus which have at least one Planning approval, for which Building Permits have been applied for or have been issued, and/or those which are under construction, but are not yet built (see Profile Toronto: How Does the City Grow? April 2017). The number of units in the area that are in active projects is greater than the number of units which have been built over the past five years.

If a similar number of units in active projects were realized in the near term as were built in the previous five years, and if the same population and employment growth occurred



in the Downtown Toronto Urban Growth Centre over the near term from 2016 as occurred over the past five years from 2011 to 2016, the resulting density would be 406 people and jobs per hectare. Thus if the current trends continued, the resulting density would be above the minimum Urban Growth Centre density target of the Growth Plan for the Greater Golden Horseshoe (2019). In addition, there would remain an additional ten years for additional approved development to occur.

The proposed development is not required for the City to meet the density target of 400 people and jobs/hectare in the Downtown Urban Growth Centre. The density target is to be measured across the whole of the Downtown Urban Growth Centre (Policy 5.2.5.4 of Growth Plan).

## **Official Plan**

This application has been reviewed against the Official Plan policies, Secondary Plans, Site Specific policies, and planning studies described in the Policy Considerations of the Report as well as the policies of the Toronto Official Plan as a whole.

## **Land Use**

The subject site is in an area designated as *Apartment Neighbourhoods* on Map 18 of the Official Plan. According to Policy 4.2.1, *Apartment Neighbourhoods* are made up of apartment buildings, parks, local institutions, cultural and recreational facilities, and small-scale retail, service and office uses that serve the needs of area residents.

The proposed development meets the requirements set out in Policy 4.2.2 of the Official Plan by: limiting shadow impacts on adjacent properties; locating and massing the development to frame the edge of Isabella Street in good proportion; maintaining sunlight and comfortable wind conditions for pedestrians; including sufficient vehicular and bicycle parking; sufficiently screening service areas, ramps and garbage storage areas; providing adequate indoor and outdoor amenity space; and providing ground floor uses that enhance safety, amenity and animation of adjacent streets and open spaces. The proposed development represents an appropriate and efficient use of the subject lands compatible that is with the surrounding context.

Policy 2.3.1.10 of OPA 320, states that small-scale commercial, community and institutional uses are encouraged at-grade in *Apartment Neighbourhoods*, to better serve area residents, particularly in areas where residents do not have convenient walking access to a wide range of goods, services and community facilities.

The proposed development will include 388 square metres of office space at-grade while the remaining area will be used for residential uses. The proposed land uses are permitted in *Apartment Neighbourhoods* and the application meets the intent of Policies 4.2.1 and 4.2.2 of the Official Plan, Section 2.3.1 of OPA 320, and is generally consistent with the *Apartment Neighbourhoods* policies of the Official Plan.

## **Height and Density**

The existing context features a mix of tall, mid and low-rise buildings with a variety of residential, institutional, and commercial uses. No changes are proposed to the height of the existing apartment building at 33 Isabella Street and the 4-storey infill building (20.65 metres including the mechanical penthouse) is within the as-of-right height permission (30 metres) for the site.

The front elevation of the new building would have a streetwall height of three storeys (11.6 metres) and would step back 1.7 metres at the fourth floor, to create a strong pedestrian scale that reinforces the character and proportion of the adjacent heritage property to the west (Policy 4.2.2 c). The proposed building has a ground level height of 5.2 metres, the residential levels on floors two through four are 3.2 metres, and the mechanical penthouse is 5.55 metres.

With the addition of the infill building, the overall density of the site will increase from 4.6 to 5.06 times the area of the lot.

## **Massing**

Official Plan Built Form Policy 3.1.2.3 requires new development to be massed to fit harmoniously into its existing context, and to limit its impact on neighbouring streets, parks and open spaces by massing new buildings to frame streets in a manner that respects the existing street proportion, and by creating appropriate transitions in scale to neighbouring existing and/or planned buildings. New development should also provide adequate light and privacy, and adequately limit any resulting shadowing of, and uncomfortable wind conditions on, neighbouring streets, properties and open spaces.

The proposed infill building's front yard setback is 5.5 metres from the northern property line, 7.5 metres from the rear property line, 7.5 metres from the western property line, and to the east, the ground floor of the new building is integrated into the base of the existing apartment tower. Between the existing tower and the proposed infill building, above the ground floor, the separation distance between the two buildings ranges from 6.18 metres and 7.49 metres.

According to Guideline 4.2 d) of the Townhouse and Low-Rise Apartment Guidelines, a 4-storey building should generally have a 7.5 metre separation distance between the face of a building containing primary living spaces, such as living and dining rooms, and the side of another building. A separation distance of 7.5 metres is generally achieved between the two-buildings, and where the separation distance is less than desired, there is primarily a blank wall facing condition on the proposed building, so as to protect the privacy and to reduce any overlook conditions between the two buildings.

In this situation, the setback is deemed to be acceptable given that there are a limited number of units (6) that will have a facing distance with primary windows. Further, given that the building is 4-storeys in height, existing units will not be impacted by loss of light and shadows for large parts of the day.

Section 3.1.2.1 and 4.2.2 of the Official Plan requires that new development in *Apartment Neighbourhoods* be organized and massed to fit within its existing and/or planned context by generally locating buildings parallel to the street; locating main building entrances so that they are clearly visible and directly accessible from the public sidewalk; providing ground floor uses that have views into and access to adjacent streets, parks; and preserving existing mature trees wherever possible and incorporating them into landscaping designs.

The proposal will result in an improved built form relationship to Isabella Street and provide a transition to adjacent developments. The proposal fits within its existing and planned context and enhances the design of the site which will assist in activating and animating the frontage on Isabella Street and steps down the building height between the adjacent tower and heritage building (satisfying Policies 4.2.2 a), c), and g)).

While built up *Apartment Neighbourhoods* are stable areas of the City where significant growth is not anticipated on a city-wide basis, opportunities exist for additional townhouses or apartments on underutilized sites, including new rental housing. Policies 4.2.2 and 4.2.3 of the Official Plan set out criteria to evaluate new development and compatible infill development within *Apartment Neighbourhoods*. In Planning staff's opinion, the proposal meets the compatible infill criteria within Policy 4.2.3 and the development criteria within Policy 4.2.2.

## **Sun and Shadow**

The Official Plan requires new development to be massed to fit harmoniously into its existing and/or planned context by adequately limiting any resulting shadowing of neighbouring streets, properties and open spaces.

A Sun and Shadow Study was requested to assess the cumulative effects of the proposed infill building, beyond the shadow impact of the existing apartment building, for the spring and fall equinoxes (March 21st and September 21st) and the summer solstice (June 21st).

The Sun and Shadow Study submitted in support of the application indicates there would be limited net new shadow on Norman Jewison Park between 9:18 and 10:18 am during the spring and fall equinoxes. By 11:18 am, the shadow is limited to the street and sidewalk to the north of the proposed building, and by 3:18 pm the shadow falls almost entirely within the site's property lines. During the summer solstice, except between the hours of 9:18 and 10:18 am, shadows do not extend beyond the property

lines of the 33 Isabella Street site. Based on the above findings, the expected shadow impacts are acceptable and meet the intent of the Official Plan and satisfies Policy 4.2.2 b) of the development criteria in the Apartment Neighbourhoods.

### **Amenity Space**

Zoning By-law No. 438-86 and Zoning By-law No 569-2013 each require a minimum of 2.0 square metres per unit of indoor and outdoor space. There is currently no programmed indoor amenity space on the existing site.

While the new infill building will reduce the overall landscaped open space on site, there will be a number of improvements to the existing landscaped open space, while still maintaining 2 square metres per unit (868 square metres) of outdoor amenity space. The new outdoor amenity space will include landscaping, hardscaping, a play area, outdoor cooking facilities, and seating. The application also proposes 373 square metres of indoor amenity space, which includes a media room, gym, party room, games room, and multi-purpose space.

While below the Zoning By-law standard, the cumulative effect of introducing both indoor and improved outdoor amenity space is appropriate in meeting the needs of new and existing residents and meets the objective of Policies 4.2.2 f) and 4.2.3 d) and e) of the Official Plan.

### **Unit Mix**

The Official Plan states that a full range of housing, in terms of form, tenure and affordability, across the City and within neighbourhoods, will be provided and maintained to meet the current and future needs of residents (Policy 3.2.1.1). The Draft Growing Up Guidelines speak to the need for a diverse unit mix. The Growing Up Guidelines indicate that a minimum of 25% of units in a new building should be large units, and further directs that 10% of the proposed units should be three-bedroom units, and 15% of the units should be two-bedroom units (Guideline 2.1(a)).

The proposed unit mix for the new infill building consists of 2 bachelor units (13%), 6 one-bedroom units (40%), 2 two-bedroom units (13%), and 5 three-bedroom units (34%). The proposed unit mix is consistent with the relevant policies and guidelines with respect to providing a mix of small and large units to accommodate a variety of household sizes.

The Growing Up Guidelines contemplate an ideal unit sizes of 87-90 square metres (969 square feet) for two-bedroom units and 100-106 square metres (1,140 square feet) for three-bedroom units (Guideline 3.0). The proposed two-bedroom units are approximately 87 square metres. The proposed three-bedroom units range in size from 108 to 503 square metres, with a median average size of approximately 118 square metres. As such, the proposal meets the size requirements in the Growing Up Guidelines.

## **Traffic Impact, Access, Parking**

The Official Plan states that new development will locate and organize vehicle parking, vehicular access, service areas and utilities to minimize their impact on the property and on surrounding properties and to improve the safety and attractiveness of adjacent streets (Policy 3.1.2.2).

On *Apartment Neighbourhood* sites where compatible infill development may be permitted, parking and servicing should be improved on site by: consolidating on-site structured shared vehicular parking and servicing areas, minimizing curb cuts, and improving on-site waste storage facilities (Policy 4.2.3 f), g), o) and p)).

Vehicular access to the site for parking and loading will be from Isabella Street using the existing driveway, ramp, and below-grade parking structure. The application proposes the removal of the existing U-shaped driveway that services the existing apartment building, while introducing a new Type G loading and servicing area along with landscaping and additional screening (Policy 4.2.2 e)). A new garbage room will be provided on the first level of the underground garage and a new residential garbage storage bin room will be provided on the ground floor of the new infill building.

A total of 95 parking spaces will be maintained in the existing underground parking garage, supplying 74 parking spaces for residents, 14 spaces for visitors, and 7 spaces for office users. Given the submitted parking justification and parking utilization surveys, the proposed parking supply is considered acceptable by Transportation Services. In support of the subject proposal, the applicant's transportation consultant, LEA Consulting Ltd., prepared a Transportation Impact Assessment Report, dated March 18, 2019. In this study, the consultant estimates that the proposed mixed-use development will generate an additional 7 two-way vehicular trips during AM and PM peak hours, respectively. The consultant concludes that no significant traffic impact on the surrounding transportation network is expected. Based on a review of the study, Transportation Services have no objection to the traffic impact related to the proposed development.

Bicycle parking spaces will be provided for residents in both the new and existing buildings, with 390 parking spaces and 40 visitor spaces located in the first underground level of the parking garage, with an additional 4 visitors spaces located at grade.

## **Streetscape and Public Realm**

The Official Plan states that new development will provide amenity for adjacent streets and open spaces to make these areas attractive, interesting, comfortable and functional for pedestrians by providing improvements to adjacent boulevards and sidewalks and co-ordinated landscape improvements in setbacks (Policy 3.1.2.5).

The streetscape on Isabella Street is characterized by generous landscaped front yards. The front yard setback for the proposed development is 5.5 metres from the property line to the residential entrance, and 7.2 metres to the office entranceway; resulting in a

total setback of 11.9 metres from the curb to the residential entrance and 13.6 metres from the curb to the office entrance, providing a generous public realm adjacent to Isabella Street (Policy 4.2.3 I)).

A detailed landscape design for the front yard which is consistent with the overall streetscape design for Isabella Street will be secured through Site Plan Approval.

## **Housing Issues**

According to the Housing Issues Report, the existing rental building contains a total of 79 affordable, 338 mid-range and 2 superintendent-occupied rental dwelling units. The applicant proposes to maintain all of the 419 rental dwelling units within the existing rental building located at 33 Isabella Street, in accordance with Policy 3.2.1.5(a) of the Official Plan, with no application for demolition or conversion to condominium or any non-residential rental use, for a period of twenty (20) years. Staff will secure the rental tenure through the Section 37 Agreement and the Zoning By-law Amendments.

New amenity space and needed improvements on the subject site will also be secured with no pass-through cost to the existing tenants. New amenity spaces and improved building facilities will be accessible to residents of both the existing building and the new building. The applicant has proposed a total of 373 square metres of indoor amenity space and 868 square metres of outdoor amenity space. The amenity space and building improvements will include:

- 434 long-term and short-term bicycle parking spaces, including 430 spaces within the underground parking garage and 4 outdoor spaces located at-grade;
- Indoor storage of garbage, recycling and composting located at the P1 Parking Level and at the ground floor of the new building;
- 373 square metres of indoor amenity space with a theatre/media room, gymnasium, multi-purpose space, party room and games room, located at the ground floor of both the retained rental building and the proposed building;
- Universal washrooms at the ground floor of the retained building; and
- 838 square metres of outdoor amenity spaces with outdoor seating and tables, outdoor cooking appliances, landscaping and play structure/equipment, with a new direct connection to the new indoor amenity space.

City staff are satisfied that the proposed new indoor and outdoor amenity spaces on the subject site and the improvements to the existing building conform to Official Plan Policy 3.2.1.5(b). These will be secured through the Section 37 Agreement as a legal convenience.

The applicant has also proposed to provide any existing tenants occupying a rental dwelling unit in that portion of the existing (retained) building which will directly face the proposed infill building an opportunity to relocate to a unit of a comparable size and comparable rent elsewhere within the existing building, should such a unit become vacant and available. For greater clarity, this option will be available to existing tenants

of the bachelor units located on the second through seventh floor, inclusive, on the west side of the existing building. These units are typically identified as "Unit 5" on the Typical Floor Plans submitted as part of the Existing Architectural Plans. The unit number will vary depending on the floor on which it is located. Eligibility for relocation will be based on seniority of tenancy. This possible relocation opportunity will be secured through the Section 37 Agreement as a legal convenience.

### **Construction Mitigation and Tenant Communication Strategy**

Planning Staff will continue to work with the applicant to develop an appropriate Construction Mitigation Strategy and Tenant Communication Plan in order to minimize the impacts and disruptions that this redevelopment will have on tenants living within the retained rental dwelling units. Issues that would need to be addressed within these documents include, but are not limited to, the following: noise; dust; vibration; construction hours; access; parking; power/water disruptions; and security/safety. The Construction Mitigation Strategy and Tenant Communication Plan must be to the satisfaction of the Chief Planner and Executive Director, City Planning in consultation with the Ward Councillor, and will be secured in the Section 37 Agreement, and must be finalized prior to the issuance of any below grade building permit for the subject site.

### **Parkland**

The Official Plan contains policies to ensure that Toronto's systems of parks and open spaces are maintained, enhanced and expanded. Map 8B of the City of Toronto Official Plan shows local parkland provisions across the City. The lands which are the subject of this application are in an area with 0 to 0.42 hectares of local parkland per 1,000 people. The site is in the lowest quintile of current provision of parkland. The site is in a parkland acquisition priority area, as per Chapter 415, Article III, of the Toronto Municipal Code.

The proposal is for the development of a 4-storey infill building with 388 square metres of non-residential gross floor area and 2,082 square metres of residential gross floor area comprising of 15 residential units. The developable site area calculated for this infill development is 1,625 square metres.

In accordance with Chapter 415, Article III of the Toronto Municipal Code, the applicant is required to satisfy the parkland dedication requirement through cash-in-lieu. The residential component of this proposal is subject to a cap of 10% parkland dedication while the non-residential component is subject to a 2% parkland dedication. The value of the cash-in-lieu of parkland dedication will be appraised through Real Estate Services. The appraisal will be conducted upon the submission of an application for the first above grade building permit and is valid for six months. Payment will be required prior to the issuance of the first above grade permit.

## **Heritage Impact**

The Official Plan states that proposed development on or adjacent to a property on the Heritage Register will ensure that the integrity of the heritage property's cultural heritage value and attributes will be retained, and will be designed to conserve the cultural heritage values, attributes and character of that property and to mitigate visual and physical impact on it (Policies 3.1.5.5 and 3.1.5.26).

The adjacent property at 34 Isabella Street is designated under Part IV of the *Ontario Heritage Act*, and 17, 38, and 40-42 Isabella Street are listed on the City's Heritage Register. Heritage Preservation Services staff have reviewed the Heritage Impact Assessment submitted with the application and do not have any concerns with the proposal with respect to its impacts on adjacent heritage properties.

In keeping with the PPS Policy 2.6.3 and the City of Toronto Official Plan Policy 3.1.5.26, the proposed development will conserve the cultural heritage value of the adjacent heritage properties. The impact of the proposed building on the adjacent heritage resources has been mitigated through design considerations including a setback consistent with the adjacent heritage resources and scale and massing that is respectful of adjacent low-rise heritage resources.

## **Tree Preservation**

The applicant submitted an Arborist Report, prepared by Ferris + Associates Inc., dated June 21, 2018, in support of their application.

The report indicates that there are 12 trees that meet the criteria for protection under the City of Toronto Municipal Code, Chapter 813 Articles III (Private Tree by-law). The development proposes the removal of 2 privately-owned trees that meet the criteria for protection under the City of Toronto's Private Tree By-law with the remaining 10 trees retained and protected. Urban Forestry staff require the planting of 6 new trees to replace the 2 private trees proposed for removal.

The report indicates that there are 3 City-owned street trees which are protected under the provisions of the City of Toronto Municipal Code, Chapter 813 Articles II (Street Trees by-law). The development proposes to retain all 3 City-owned street trees.

## **Toronto Green Standard**

City Council has adopted the four-tier Toronto Green Standard (TGS). The TGS is a set of performance measures for green development. Applications for Zoning Bylaw Amendments, Draft Plans of Subdivision and Site Plan Control are required to meet and demonstrate compliance with Tier 1 of the TGS. Tiers 2, 3 and 4 are voluntary, higher levels of performance with financial incentives. Tier 1 performance measures are secured on site plan drawings and through a Site Plan Agreement or Registered Plan of Subdivision.



The applicant is required to meet Tier 1 of the TGS. The site specific Zoning By-laws will secure performance measures for the Tier 1 development features including bicycle parking spaces at and below grade, restricted access areas for bicycle parking and visible and publicly accessible visitor bicycle parking locations.

Other applicable TGS performance measures will be secured through the Site Plan Approval process, including the provision of on-site tree planting and minimum required soil volumes, a widened public sidewalk, covered outdoor waiting areas, urban heat island reduction measures, minimum building efficiency improvement of 15% over the current *Ontario Building Code* requirements, inclusion of bird-friendly glazing, inclusion of a green roof, stormwater retention measures on-site and meeting water quality targets for stormwater leaving the site. Through the Site Plan Approval process, City Planning will encourage the applicant to achieve Tier 2 or higher on this project.

### **Community Services Assessment**

Community Services and Facilities (CS&F) are an essential part of vibrant, strong and complete communities. CS&F are the lands, buildings and structures for the provision of programs and services provided or subsidized by the City or other public agencies, boards and commissions, such as recreation, libraries, childcare, schools, public health, human services, cultural services and employment services.

The timely provision of community services and facilities is as important to the livability of the City's neighbourhoods as "hard" services like sewer, water, roads and transit. The City's Official Plan states that the City's ability to grow wisely depends on responding in a timely way to the demand for new or additional services and facilities generated as the population grows. To ensure this kind of timely response, a standard component of local community planning must be a strategy setting out the facilities required to expand the capacity of local service providers (Section 3.2.2).

City Planning has recently completed a three-year study called TOcore: Planning Downtown which included the Downtown Plan and five supporting infrastructure strategies, including a Downtown CS&F Strategy, which were approved by City Council at its meeting of May 22-25, 2018. The Downtown CS&F Strategy identifies community space and facility needs, and sets out priorities to support future growth for recreation, child care, libraries, public schools and human services. Due to the limited increase in density of this infill project, no additional community facilities are required.

### **Rental Housing Intensification and Section 37**

The Official Plan provides for the provision of Section 37 contributions. As per Official Plan Policy 5.1.1.5, Section 37 may be used, irrespective of the size of the project or the increase in height and/or density to conserve rental housing and to secure improvements to the existing rental building.

Rental tenure and any improvements and renovations to the existing building will be secured through an agreement under Section 37 of the *Planning Act*.

The following matters are recommended to be secured in the Section 37 Agreement as a legal convenience as follows:

- The owner shall continue to provide and maintain the 419 existing rental dwelling units at 33 Isabella Street as rental dwelling units, together with the new and retained associated facilities and amenities, for a period of at least twenty (20) years from the date of the Zoning By-law Amendments coming into full force and effect, with no applications for demolition or conversion from residential rental use made during such twenty (20) year period, to the satisfaction of the Chief Planner and Executive Director, City Planning and the City Solicitor;
- Prior to the earlier of either two years after issuance of the first above grade building permit for the subject site or occupancy of the new building at 33 Isabella Street, the owner shall provide, repair, operate, or maintain at its sole expense the following facilities, amenities and improvements on the subject site as illustrated in the architectural plans and landscape plans dated December 16, 2019, with no pass-through of the costs to the existing tenants, to the satisfaction of the Chief Planner and Executive Director, City Planning and the City Solicitor:
  - i. 434 Bicycle Parking Spaces, including 430 spaces within the underground parking, and 4 spaces at-grade;
  - ii. Indoor storage of garbage, recycling and composting, located at the P1 Parking Level and the ground floor of the new building;
  - iii. New Indoor amenity space of 373 square metres which shall include, but are not limited to: theatre/media room; gymnasium which shall include, nine cardiovascular and six weight machines, and space for stretching exercises; communal/multi-purpose space which shall include, lockers, seating and tables; party room which shall include, a kitchen, tables and chairs, and a direct connection to the adjacent outdoor amenity area; and a games room which shall include, a kitchen, table, seating and pool table;
  - iv. Two universal washrooms located on the ground floor of the retained building;
  - v. New outdoor amenity space of 868 square metres which shall include: outdoor seating, dining tables and five picnic tables; two outdoor cooking appliances, and associated food preparation surfaces and sinks; planting and landscape treatments; and play structure/equipment; and

vi. A total of 285 storage lockers accessible to tenants of the retained rental building and located within the three underground levels of the retained rental building, to the satisfaction of the Chief Planner and Executive Director, City Planning.

- The owner shall provide residents of the existing residential rental units with access to the new indoor and outdoor amenity spaces of the new and retained building at 33 Isabella Street at no extra charge to the tenants and with no pass-through cost to the tenants of the existing building. Access and the use of these amenities shall be on the same terms and conditions as any other resident on the subject site;
- Prior to the issuance of any below grade building permit for the subject site, the owner shall develop a Construction Mitigation Strategy and a Tenant Communication Plan to mitigate the impacts of construction on existing tenants, all to the satisfaction of the Chief Planner and Executive Director, City Planning in consultation with the Ward Councillor; and
- The owner shall provide existing tenants occupying the retained rental units which will directly face the new mixed-use building with the option to relocate to a comparable rental dwelling unit elsewhere in the retained building, should such a comparable rental dwelling unit become vacant and should the existing tenant choose the option to relocate within the retained rental building. The tenant's rent for such comparable rental dwelling unit shall not exceed the rent last paid by the tenant.
- The retained rental units identified above include the bachelor units located on the west side of the retained rental building, from the second floor to the seventh floor, inclusive. These studio units are typically identified as Unit 5 on the Typical Floor Plans submitted as part of the Existing Architectural Plans. The unit number will vary depending on the floor on which it is located. The order of priority for consideration for relocation shall be based on tenant seniority.

## **Conclusion**

The proposal has been reviewed against the policies of the PPS, the Growth Plan (2019), and the Toronto Official Plan. Staff are of the opinion that the proposal is consistent with the PPS and conforms to the Growth Plan (2019). Furthermore, the proposal conforms with the policies of Toronto's Official Plan, particularly as it relates to *Apartment Neighbourhoods* and Built Form. Staff worked with the applicant to address and resolve the following key concerns that were identified by City Staff during the community consultation meeting: reduced building height; improved separation distances; adding additional indoor and outdoor amenity space; new bike parking facilities; and relocating garbage storage to an internal location.

Accordingly, Staff find that this proposal fits in with the existing and planned context of the neighbourhood and that the proposal is appropriate. City Planning recommends that Council approve the Zoning By-law Amendment application.

## **CONTACT**

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E-mail: Megan.Rolph@toronto.ca

## **SIGNATURE**

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Lynda H. Macdonald, MCIP, RPP, OALA, FCSLA  
Director Community Planning, Toronto and East York District

## **ATTACHMENTS**

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### **City of Toronto Data/Drawings**

Attachment 1: Application Data Sheet  
Attachment 2: Location Map  
Attachment 3: Official Plan Land Use Map  
Attachment 4: Existing Zoning By-law Map  
Attachment 5: OPA 183  
Attachment 6: Draft Zoning By-law Amendment, City of Toronto By-law 438-86  
Attachment 7: Draft Zoning By-law Amendment, City-Wide Zoning By-law 569-2013

### **Applicant Submitted Drawings**

Attachment 8: Site Plan  
Attachment 9: Elevations

## Attachment 1: Application Data Sheet

### APPLICATION DATA SHEET

Municipal Address: 33 ISABELLA ST Date Received: July 17, 2018

Application Number: 18 195494 STE 27 OZ

Application Type: OPA / Rezoning, Rezoning

Project Description: A proposed Zoning By-law Amendment application to develop a 4-storey (21.65 metres, including mechanical penthouse) infill residential building with office space at-grade.

Applicant	Agent	Architect	Owner
WND ASSOCIATES LTD		IBI Group	SALFORD INVESTMENTS LIMITED

### EXISTING PLANNING CONTROLS

Official Plan Designation:	Apartment Neighbourhood	Site Specific Provision:	310-69, 188-68
Zoning:	R (d2.5)(x882)	Heritage Designation:	N
Height Limit (m):	30	Site Plan Control Area:	Y

### PROJECT INFORMATION

Site Area (sq m):	4,861	Frontage (m):	88	Depth (m):	88
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Building Data	Existing	Retained	Proposed	Total
Ground Floor Area (sq m):	1,237	1,237	647	1,884
Residential GFA (sq m):	22,118	22,118	2,082	24,200
Non-Residential GFA (sq m):	238		388	388
Total GFA (sq m):	22,356	22,118	2,470	24,588
Height - Storeys:	27	27	4	27
Height - Metres:	79	79	16	79

Lot Coverage Ratio (%)	38.75	Floor Space Index:	5.06
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Floor Area Breakdown	Above Grade (sq m)	Below Grade (sq m)
Residential GFA:	24,200	
Retail GFA:		
Office GFA:	388	
Industrial GFA:		
Institutional/Other GFA:		

Residential Units by Tenure	Existing	Retained	Proposed	Total
Rental:	419	419	15	434
Freehold:				
Condominium:				
Other:				
Total Units:	419	419	15	434

#### Total Residential Units by Size

	Rooms	Bachelor	1 Bedroom	2 Bedroom	3+ Bedroom
Retained:		209	207	3	
Proposed:		2	6	2	5
Total Units:		211	213	5	5

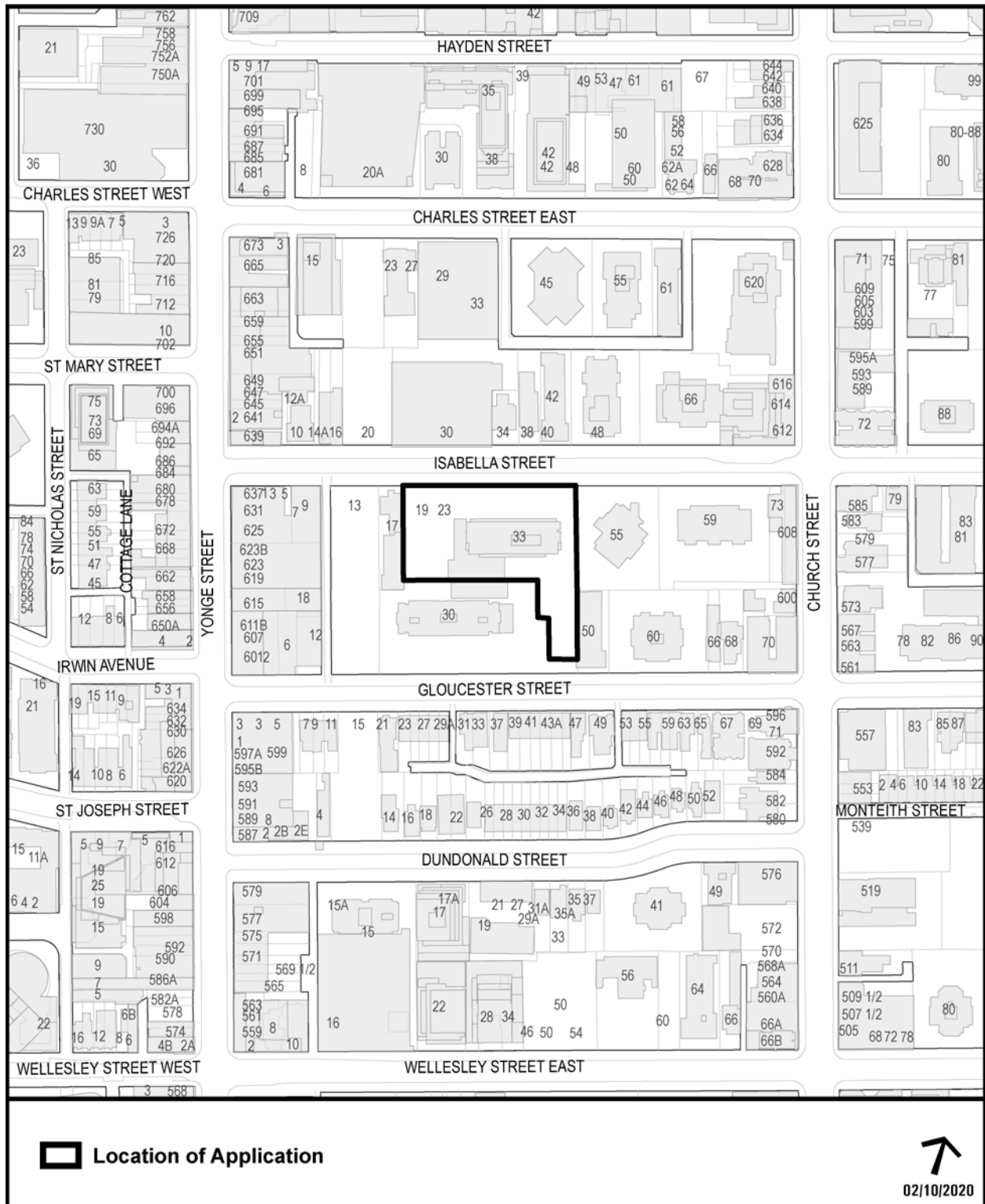
#### Parking and Loading

Parking Spaces:	95	Bicycle Parking Spaces:	434	Loading Docks:	1
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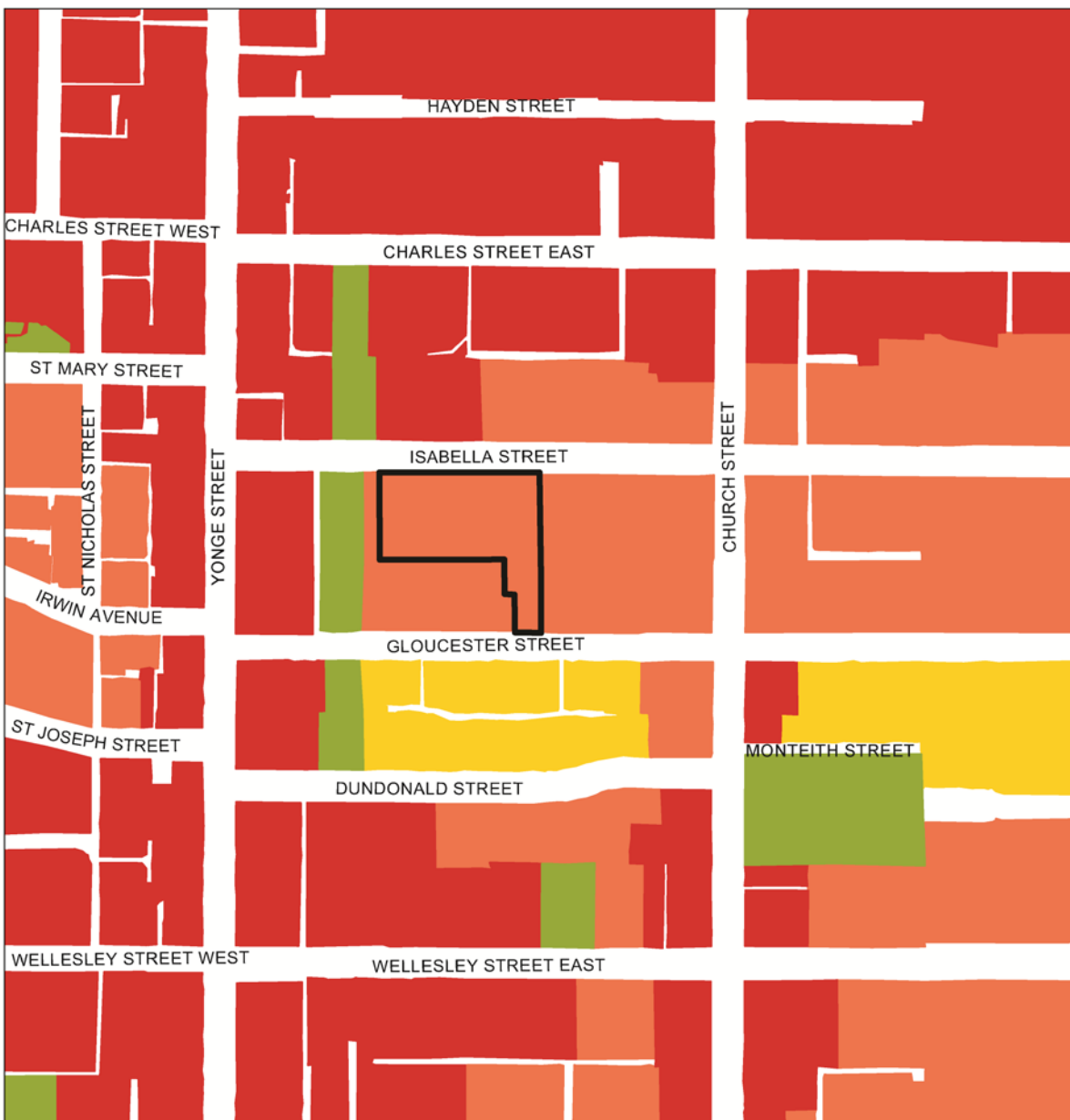
#### CONTACT:

Megan Rolph, Planner  
(416) 392-3479  
Megan.Rolph@toronto.ca

## Attachment 2: Location Map



### Attachment 3: Official Plan Land Use Map



33 Isabella Street

### Official Plan Land Use Map #18

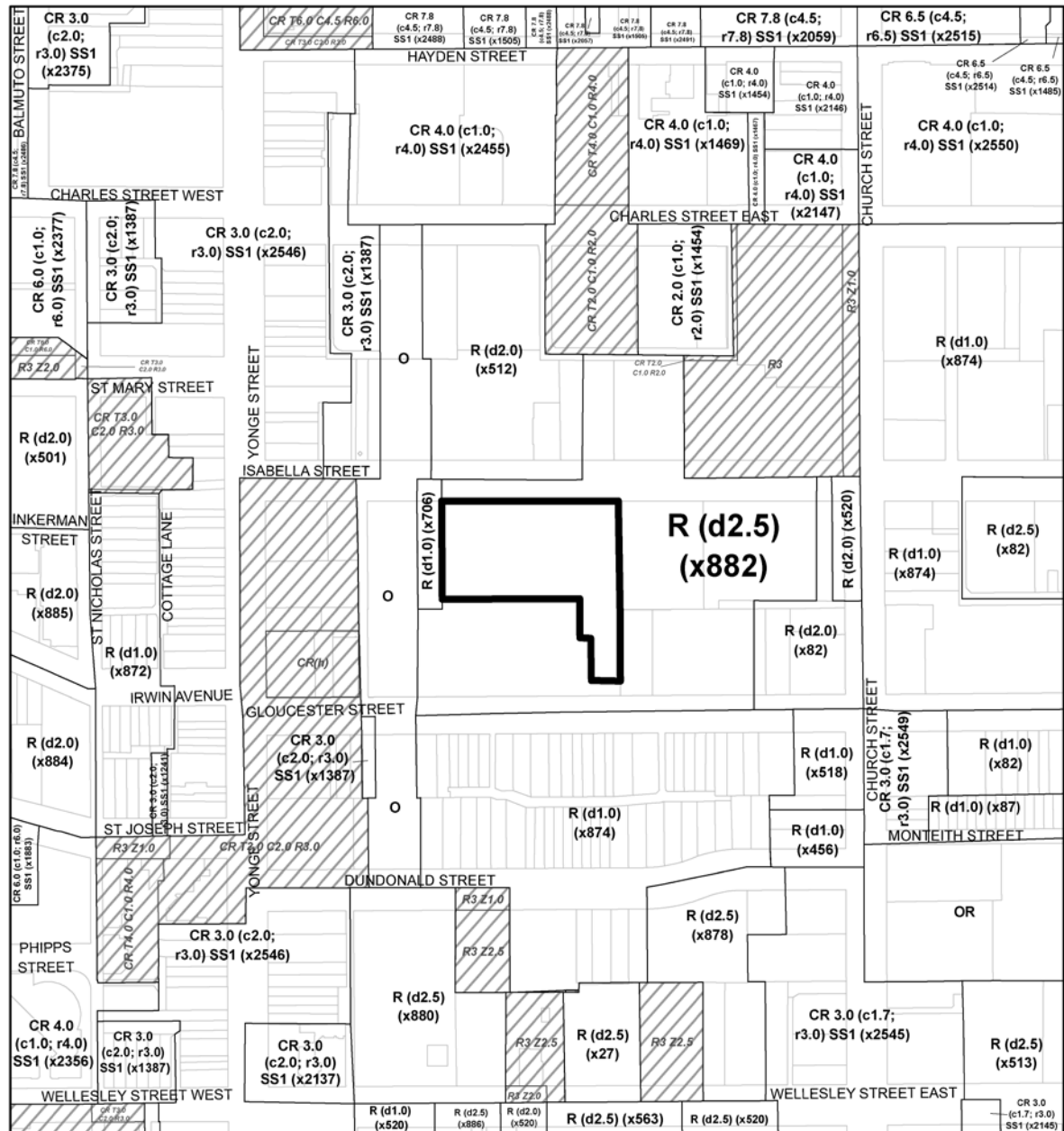
File # 18 195494 STE 27 0Z



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Not to Scale  
02/10/2020



## Final Report - Zoning By-law Amendment - 33 Isabella Street



## Zoning By-law 569-2013

**33 Isabella Street**

File # 18 195494 STE 27 OZ



### Location of Application

**R** Residential  
**CR** Commercial Residential

**O** Open Space  
**OR** Open Space Recreation

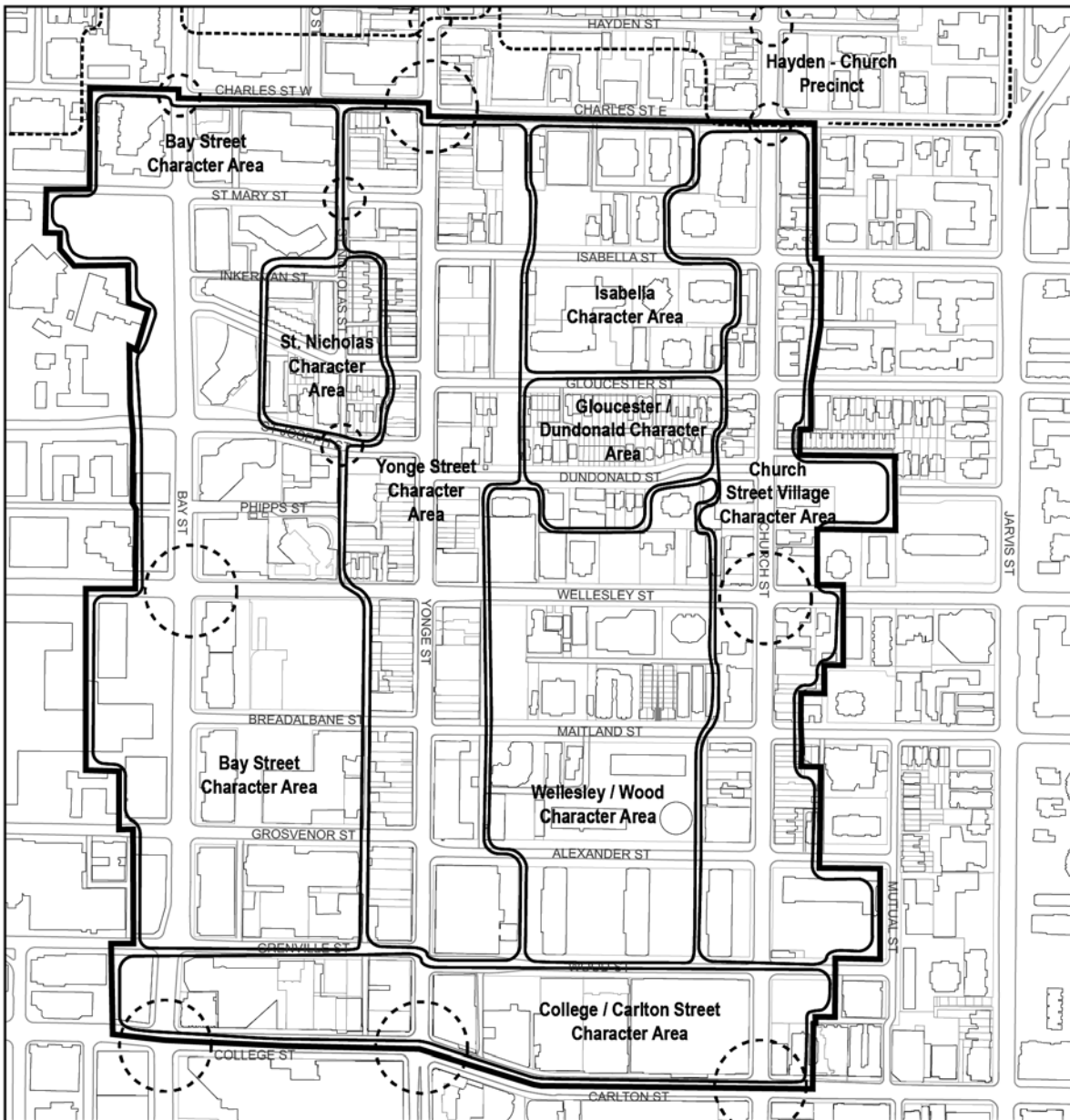


See Former City of Toronto By-law No. 438-86

**R3** Residential District  
**CR** Mixed-Use District



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Extracted: 02/10/2020



**Toronto** City Planning  
 Official Plan Amendment #183  
 Map 1: Character Areas

**North Downtown Yonge  
 Planning Framework Study**

File # 11 247686



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 08/22/2013

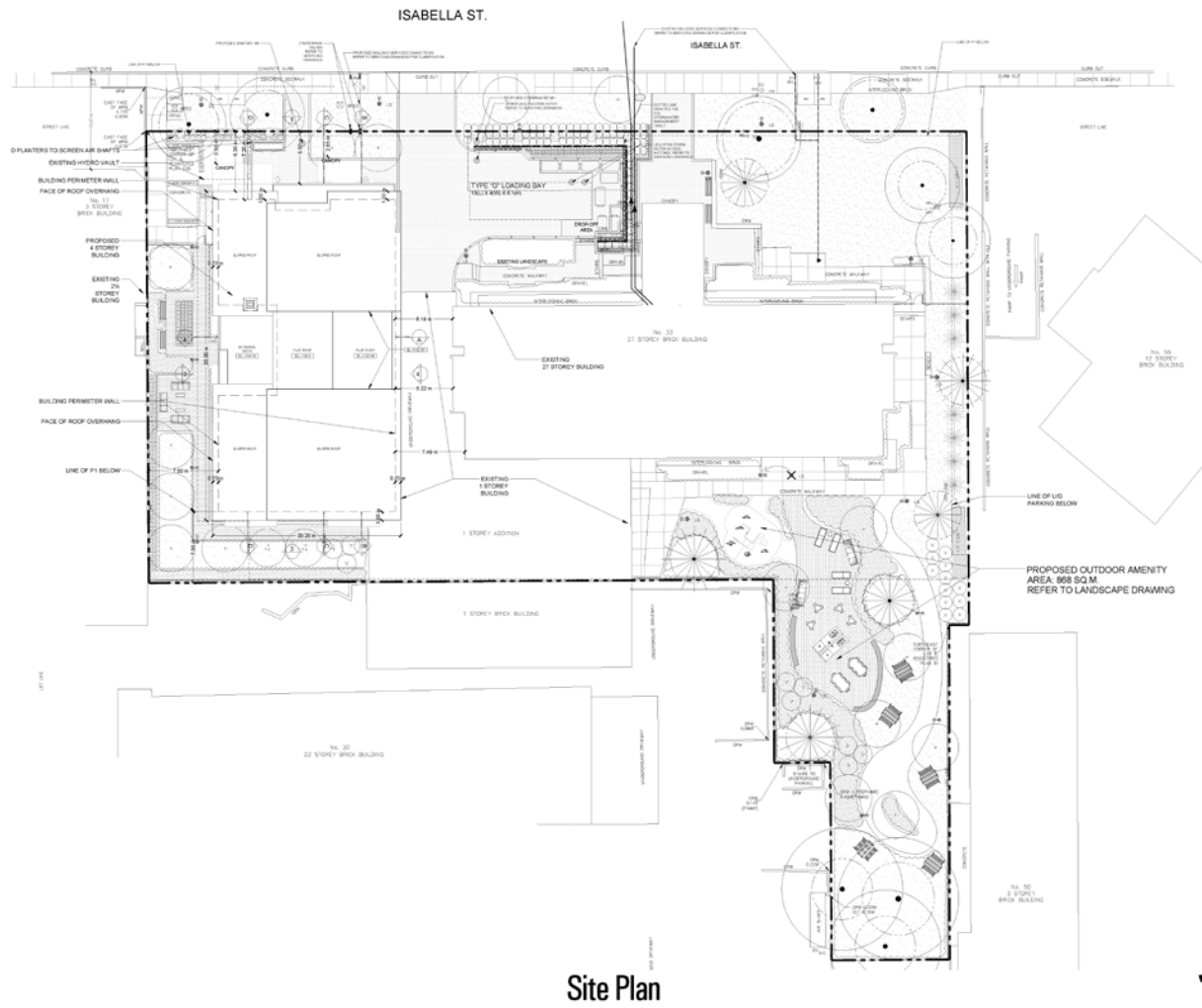
## Attachment 6: Draft Zoning By-law Amendment, City of Toronto Zoning By-law 438-86

Draft By-law will be available at the March 12, 2020 Toronto and East York Community Council meeting.

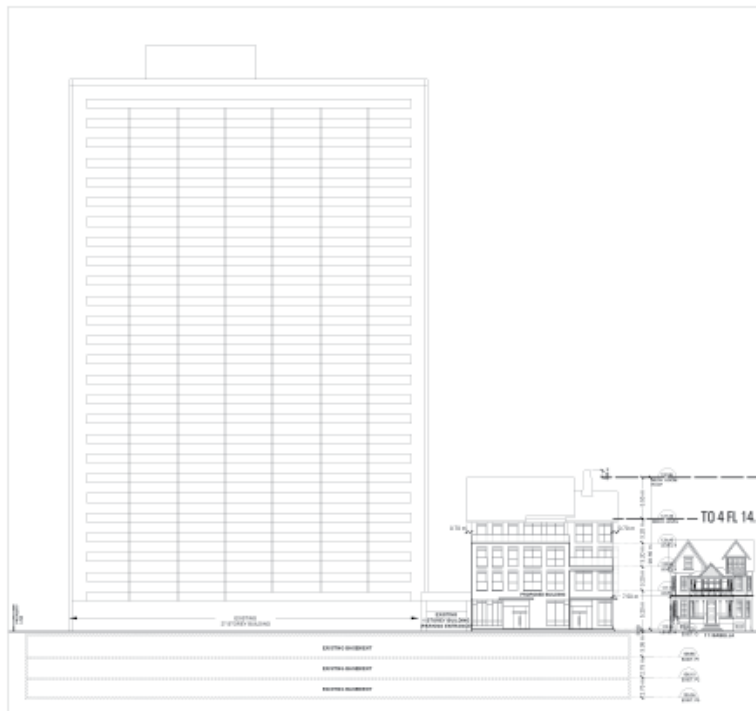
## Attachment 7: Draft Zoning By-law Amendment, City-Wide Zoning By-law 569-2013

Draft By-law will be available at the March 12, 2020 Toronto and East York Community Council meeting.

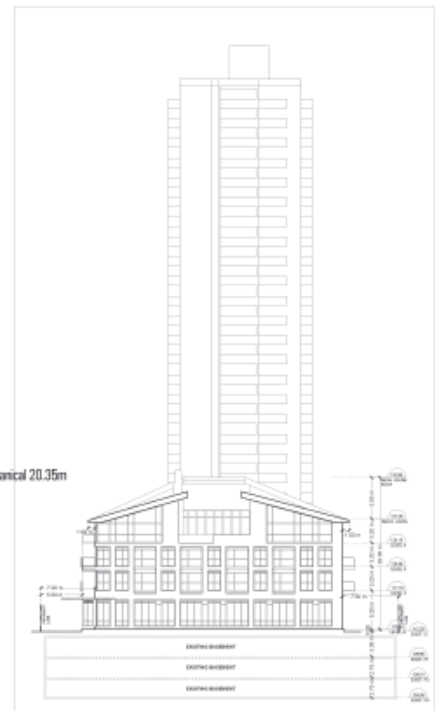
## Final Report - Zoning By-law Amendment - 33 Isabella Street



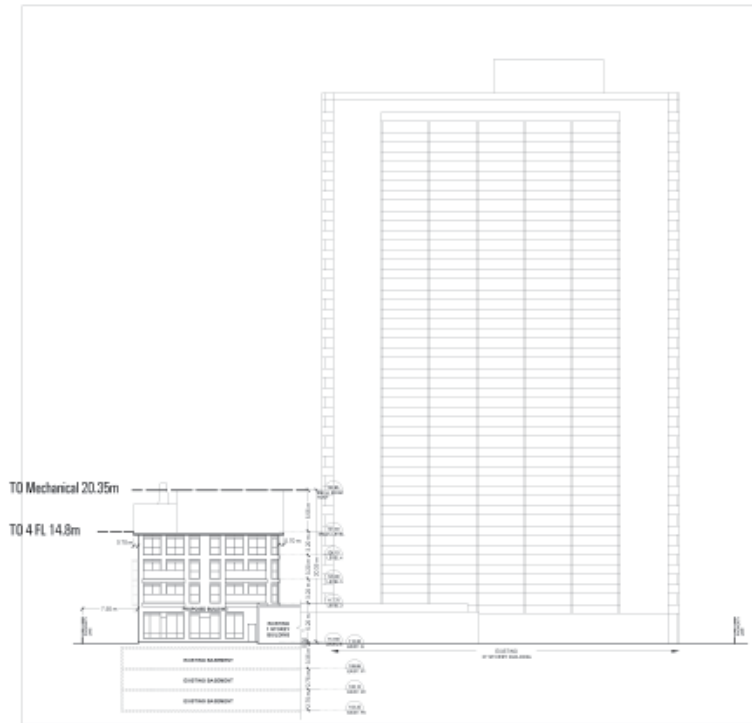
## Attachment 9: Elevations



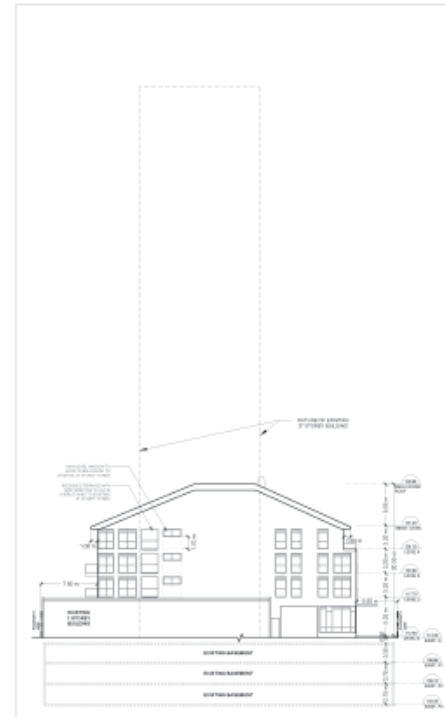
North Elevation



West Elevation



### South Elevation



East Elevation