



BOUSFIELDS INC.

Project No. 20183

May 5, 2021

Via Email: teycc@toronto.ca & clerk@toronto.ca

Mayor and Members of Council
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, ON, M5H 2N2

Toronto and East York Community Council
City of Toronto
2nd Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Ellen Devlin, Committee Administrator

Dear Sirs/Mesdames:

**Re: \$ *Item TE24.11 – King-Parliament Secondary Plan Review – Final Report
Secondary Plan and Zoning By-law Amendments***

We are the planning consultants for The Rekai Centres (“Rekai”) with respect to the property municipally known as 55 Eastern Avenue (“the subject site”). The subject site is located on the west side of Cherry Street, bound by Eastern Avenue to the north and Front Street East to the south. The subject site has an area of approximately 3,305 square metres and is currently vacant.

Our client has been in ongoing discussions with the City and Waterfront Toronto over the past few years with respect to the redevelopment of the subject site to permit a new 13-storey non-profit long-term care facility, comprised of 348 long-term care beds in combination with a Seniors Assessment Centre, a Dialysis Clinic, a Personal Support Worker (“PSW”) College program and a café/bistro at Cherry and Front Streets (“the Proposal”), including a presentation to the Waterfront Toronto Design Review Panel on September 23, 2020.

A Site Plan Control application has been filed this week for this Proposal. In this regard, the design of the proposed building has been advanced, in consultation with City and Waterfront Toronto staff to include details regarding building location, setbacks, stepbacks, cantilevers, height, etc. The expectation is that site-specific zoning regulations will be required to accommodate for the proposal, achieved through either a minor variance application or a rezoning, to permit the development, which will be resolved at a subsequent stage in the development approval process.

On behalf of Rekai, and in the context of the proposal noted above, we have reviewed the proposed Official Plan Amendment No. 525 (the draft King-Parliament Secondary Plan) and the accompanying Zoning By-law Amendments. We are writing to provide our client's initial concerns in respect to the draft King-Parliament Secondary Plan (the "Secondary Plan") and the draft Zoning By-law Amendment, pursuant to the requirements of the *Planning Act*.

Our concerns with the draft King-Parliament Secondary Plan include, but are not limited to, **Policy 10.1**, **10.4.2** and **Policy 10.5.2**, which require setbacks from Eastern Avenue and Front Street East, respectively, without any encumbrances through cantilevers.

The design of the Proposal includes cantilevers towards both Eastern Avenue and Front Street East. This design strategy supports the intent of this policy by securing wider sidewalks, enabling streetscaping and animating the public realm, while also creating floorplates that can appropriately accommodate for the proposed long-term care use. In our opinion, the inclusion of these requirements in the Secondary Plan are overly prescriptive and should more appropriately be addressed through the evaluation for site-specific development applications, without a requirement for an Official Plan amendment. **We respectfully request that this language be modified to ensure greater flexibility.**

With respect to the draft Zoning By-law Amendment, the subject site will be included in the City-wide Zoning By-law No. 569-2013 (as CR(H) SS2 (x346)), as it was previously a "hole". However, the proposed regulations for the subject site would not permit the Proposal, including the proposed overall height, streetwall height, and setbacks and stepbacks. **Nothing should limit the ability to establish site-specific regulations through the review of a development application.**

The Proposal offers an important opportunity to integrate this important institutional uses into the West Don Lands neighbourhood. It is imperative that the proposed amendments do not limit Rekai's ability to achieve their desired outcomes. In this regard, we request that City Council defer consideration of this matter until Rekai has had sufficient discussion with City staff to see if their concerns can be addressed.

Further, we would appreciate this letter being treated as our client's request for notice of any decision made in respect of both the draft Secondary Plan and draft Zoning By-law Amendments. We trust that the foregoing is satisfactory. However, if you have any questions or require additional information, please do not hesitate to contact the undersigned or at 416-947-9744.

Sincerely,
Bousfields Inc.



Emma West, MCIP RPP

cc. ' Sue Graham-Nutter, *The Re kai Centres*
Robert Davies & Dustin Hooper, *Montgomery Sisam Architects*