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Public Input

City of Toronto
Toronto and East York Community Council
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Subject: Preliminary Planning Assessment
2346120 Ontario Inc. Wittington Planning Application:
19 134851 STE 12 OZ, 19 134877 STE 12 RH and
21 226522 STE 12 SB
1481-1535 Yonge Street, 1-31 Heath Street East,
30-36 Alvin Avenue and 22 St. Clair Avenue East
City of Toronto, Ontario

Attention: Mr. Gregg Lintern, Chief Planner and Executive Director
Mr. John D. Elvidge, City Clerk
Ms. Ellen Devlin, Administrator, City Clerk
Mayor John Tory and Councillor Josh Matlow
Members of Council

To Whom It May Concern:

Gagnon Walker Domes Ltd. has been retained by the Board of Directors and residents of the following Toronto Standard Condominium Corporations (TSCC); namely: TSCC1591, TSCC1478, and TSCC1770. The aforementioned Condominiums are located on Delisle Avenue and known municipally as 10, 33 and 55 Delisle Avenue, in the City of Toronto respectively.

We have been retained to provide planning consulting services in connection with the Wittington Planning Application (Wittington) to amend the City of Toronto Official Plan and Zoning By-law as it applies to 1481-1535 Yonge Street, 1-31 Heath Street East, 30-36 Alvin Avenue and 22 St. Clair Avenue East (subject site). Wittington has proposed to redevelop the subject site with 4-mixed use residential buildings (44, 39, 27 and 13-storeys), containing 1,361 dwelling units and 20,524 m² of retail space.

We have reviewed the proposal in the context of applicable Provincial and City of Toronto land use planning policy documents; including, but not limited to the: Provincial Policy Statement (PPS), Growth Plan, City of Toronto Official Plan, Yonge-St. Clair Secondary

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Plan and Zoning By-law (select Amendments), Tall Building Design Guidelines, '*Planning and Urban Design Rationale Report*' (prepared and filed by Bousfields Inc. on behalf of Wittington), assorted City of Toronto Staff Reports, OMB (now the OLT) Decisions, as well as assorted other development applications located within the immediate vicinity of the subject site.

As part of this Preliminary Planning Assessment, we wish to take this opportunity to submit formal comments to the City of Toronto on the Wittington Application. These comments are intended to form part of the official public record and constitute our Client's position on the proposal. We reserve the right to make additional submissions as may be appropriate and warranted.

EXECUTIVE SUMMARY

The subject site is located northeast of the intersection of Yonge Street and St. Clair Avenue East; measuring approximately 13,683 m² in size. The site is currently occupied by a Toronto Parking Authority (TPA) surface parking lot, a series of 1 to 4-storey commercial buildings, and 36-rental dwelling units. Surrounding land uses include:

- North: Yorkminster Park Baptist Church and Park, Christ Church Deer Park;
- South: 14-storey and 21-storey office buildings;
- East: A series of 2 to 3-storey buildings containing commercial and residential, a low-rise *Neighbourhood* and Deer Park Public School; and
- West: A 2-storey commercial building, a 2-storey commercial plaza, an approved 44-storey mixed-use building currently under construction, an *Apartment Neighbourhood* with residential buildings ranging in height from 11 to 17-storeys and an 18-storey office building.

Yonge Street and St. Clair Avenue East are Major Arterial Roads, while Heath Street East and Alvin Avenue are Local Streets. The subject site has access to two (2) higher order public transit routes; including, the St. Clair Subway Station on the Yonge-University Subway Line and the Route 512 St. Clair Streetcar/LRT.

We are of the opinion that the proposal to redevelop the subject site for 4-residential buildings (including 3-tall buildings) does not represent 'good planning' in the local context. The proposal is not consistent with the Provincial Policy Statement, does not conform with the Growth Plan, nor does it support the intent and purpose of the City of Toronto Official Plan, Yonge-St. Clair Secondary Plan and Zoning By-law, nor the City of Toronto Tall Building Design Guidelines.

More specifically, we note the following major concerns with the proposal:



- Ignores 2009 LPAT Decision: The height of the proposed buildings (the tallest measuring 44 versus 37-storeys), the total number of floors (123 versus 68), and the proposed FSI (9.25 versus 6.28) ignores the 2009 LPAT Decision and as such represents a major departure from what was 'originally' approved. The proposed density is well beyond what was contemplated for the property and is too high in comparison to other buildings which define the neighbourhood context.
- Excessive Building Height, Mass and Scale: The proposal does not respect the character, nor the built form context within which the subject site is located. The proposed building heights, mass and scale is excessive and as such, has the potential to negatively impact and destabilize an otherwise stable *Neighbourhood*, which is characterized by predominantly low and more modestly sized mid-rise and tall buildings.
- Undermines Tall Building Design Guidelines: The proposal does not respect the intent of the Tall Building Design Guidelines and as such undermines the goals and objectives thereof, which are meant to ensure that tall buildings respect the scale of the local built form context. The proposal does not represent an appropriate transition in height and intensity relative to the adjacent community, which differs in built form, height, scale, mass, density and overall intensity.
- Incremental Shadow Impacts: The proposal is considered undesirable due to its cumulative excessive height, scale and mass which will have an impact on access to sunlight and sky view. The Applicant's own consultant has repeatedly stated that the proposal will result in incremental shadow impacts, attributable to the proposed excessive height, scale and mass of the complex.
- Undermines Planning Framework: The proposal undermines the Yonge-St. Clair Planning Framework, which is meant to assist in the evaluation of development applications and clarify the intent of the policies contained within the Yonge-St. Clair Secondary Plan. More specifically, the Planning Framework envisaged that the tallest buildings would be located within the 'Height Peak' coinciding with the intersection of Yonge Street and St. Clair Avenue, with 'Transition Zones' located between the 'Height Peak' and surrounding communities.
- Over-Intensification: The proposal represents over-intensification, which if approved will dwarf the height, scale and mass of adjacent existing buildings which define and characterize the existing stable neighbourhood. The proposed buildings as a composition are too tall and massive in comparison to the community within which the subject site is located.
- Lack of Park/Open Space: The design of the project lacks sufficient park/open space relative to the number of proposed residential units. The surrounding community is characterized by multi-unit buildings served by sufficient park/open space. What the Applicant has proposed is inappropriate and unacceptable to our Clients.



- **Insufficient Transit and Road Network Capacity:** There is insufficient transit and road network capacity to support the approval of the proposed 1,361 residential units and commercial space. The proposal when combined with other approved and proposed residential developments will push the demand for transit services and road capacity beyond what the existing and proposed networks can properly service.

We recommend that the Applicant revise the proposal to reflect the building heights and density which were established by the 2009 LPAT Decision. Toward this end, the Applicant should consult with City staff, Council and members of the local community with the view to revising the proposal to reflect and implement the policy direction provided by applicable Provincial and City of Toronto planning documents, as well as the existing character and neighbourhood context within which the subject site is located.

REVISED AMENDMENT APPLICATION

On January 14, 2022, Bousfields revised the Amendment Application in response to circulation comments. Table 1 below is a Statistical Comparison.

Table 1 – Statistical Comparison

	1st Submission (April 2019)	Resubmission (January 2020)	Resubmission (January 2022)
Site Area	13,683 sm (1.37ha)	13,683 sm (1.37ha)	13,683 sm (1.37ha)
Building Height (Inc. MPH)			
Northwest Tower	39 storeys (136.3m)	39 storeys (137.0m)	27 storeys (100.0 m)
Southwest Tower	59 storeys (196.9m)	59 storeys (197.5m)	44 storeys (155.0m)
Southeast Tower	34 storeys (121.3m)	34 storeys (122.0m)	39 storeys (137.8m)
Alvin Mid-Rise	N/A	9 storeys (40.1m)	13 storeys (57.9 m)
Total Units	1,357	1,372	1,361
Gross Floor Area			
Total GFA	139,272 sm	141,607 sm	126,625 sm
Residential	111,560 sm	116,644sm	106,101 sm
Non-Residential	27,712 sm	24,963 sm	20,524 sm
Density	10.18 FSI	10.35 FSI	9.25 FSI
Amenity Space			
Indoor	2,625 sm	2,744 sm	2,722 sm
Outdoor	3,230 sm	1,372 sm	1,361 sm
Vehicle Parking	677 spaces	514 spaces	500 spaces
Bicycle Parking			
Total Spaces	1,747 spaces	2,071 spaces	1,741 spaces
Short Term	235 spaces	247 spaces	228 spaces
Long Term	1,512 spaces	1,824 spaces	1,512 spaces

In regards to the revised proposal, while the density has fluctuated from 10.18 to 10.35 and 9.25 FSI, the total number of units proposed has actually increased by 4-units from 1,357 to 1,361.



2009 LPAT DECISION

On July 21, 2009 the Local Planning Appeal Tribunal (LPAT - formerly the OMB, now the OLT) approved an Official Plan and Zoning By-law Amendment for 1481, 1491, and 1501 Yonge Street, 25-29 Heath Street East, and 30 Alvin Avenue for a mixed-use development having an FSI of 6.28 within three (3) buildings having heights of 37, 16 and 15-storeys, as well as 2-blocks of townhouses.

The LPAT approved heights are a significant reference point in assessing the current proposal. Whereas in 2009 the total number of proposed floors was 68, the current proposal is for 123 floors; almost twice as many floors and an almost 50% increase in FSI, resulting in almost twice as much building mass. An undisputable significant increase, resulting in a project which bears little to no resemblance to the previous approval.

CITY of TORONTO 'PRELIMINARY REPORT'

The City of Toronto Planning Department Preliminary Planning Report dated May 24, 2019 summarizes the proposal, applicable policy framework and preliminary issues identified by municipal staff.

Official Plan and Zoning By-law

According to the Staff Report, the Official Plan designates the subject site as *Mixed-Use Areas, Apartment Neighbourhoods, Neighbourhoods, and Parks* (there is some debate regarding this, however it is not material). The subject site is located within the Yonge-St. Clair Secondary Plan.

The following is a summary of Zoning By-law provisions which apply to the subject site:

- 1481, 1491, and 1501 Yonge Street, 25-29 Heath Street East, and 30 Alvin Avenue is subject to site specific By-law 810-2008, which amended Zoning By-law 438-86. These properties are not subject to Zoning Bylaw 569-2013. The site-specific zoning permits a mixed-use development consisting of 3-buildings with heights of 37, 16, and 15 storeys, and 2-blocks of townhouses. The maximum permitted density is 6.28 FSI.
- 1495-1499 Yonge Street are zoned CR T4.25 C2.0 R3.0 under Zoning By-law 438-86, and CR4.25 (c2.0; r3.0) SS2 (x2539) under Zoning By-law 569-2013. The properties at 1519-1535 Yonge Street are zoned CR T4.25 C2.0 R3.0 under Zoning By-law 438-86, and CR4.25 (c2.0; r3.0) SS2 (x2250) under Zoning By-law 569-2013. The maximum permitted density is 4.25 FSI.
- 7 Heath Street East and 36 Alvin Avenue are zoned R2 Z0.6 under Zoning By-law 438-86, and R (d0.6) (x922) under Zoning By-law 569-2013. These zones permit a range of residential units; including, apartments, fourplex, triplex, duplex, townhouse, semi-detached, and detached dwellings. The maximum permitted density is 0.6 FSI.



The aforementioned summary of Zoning By-law provisions clearly indicates that the total maximum permitted density has increased significantly from 6.28 to 9.25 FSI.

Policies and Issues

The Preliminary Report references the Provincial Policy Statement (PPS) and the Growth Plan. In regards to the Growth Plan, policies regarding the efficient use of land, resources and infrastructure are referenced, as well as the need to connect transit to where people live and work. No reference is made to whether or not the transit system is operating at capacity. While it is envisaged that the proposed buildings will have direct access to the St. Clair Subway Station, the fact remains that the demand for subway service exceeds capacity, resulting in a less than desirable transit experience.

In the Preliminary Report, planning staff identified relevant planning issues which needed to be addressed; including, but not limited to:

- Built form, planned and built context;
- Appropriateness of building heights for the planned context;
- Transition in built form to adjacent low-rise *Neighbourhoods*;
- Maximum tower floorplate size (what is proposed exceeds the maximum recommended 750 m² from the Tall Building Design Guidelines);
- Shadow impacts on surrounding *Neighbourhoods*, heritage buildings and the public realm;
- Appropriateness of the proposal in the context of the then ongoing 'Yonge-St. Clair Avenue Planning Framework Study';
- Transportation impacts and needed intersection improvements; and
- Heritage impact and conservation (City Staff stated that the Heritage Impact Assessment (HIA) was incomplete).

Attachments 1 and 2 are copies of the '3-D' model which was included in the Preliminary Report, meant to illustrate the proposal in the existing built form context. We are of the opinion that the '3-D' model clearly illustrates that from a height, built form, scale and massing perspective, the proposal is massive and incongruent with the host neighbourhood context.

CITY of TORONTO 'FINAL REPORT'

The City of Toronto Planning Department has issued their Final Report dated June 13, 2022 recommending Approval of the revised proposal; summarized below:



- 4-residential buildings at 44, 39, 27 and 13-storeys (123 floors versus 68 floors as approved by the LPAT in 2009);
- 1,361 dwelling units;
- 20,524 m² of retail space; and
- An FSI of 9.25 versus 6.28 FSI (permitted as-of-right).

Attachments 3 and 4 are copies of the '3-D' model which was included in the Final Report, meant to illustrate the proposal in the existing built form context. We are of the opinion that the '3-D' model clearly illustrates that the proposal is as stated previously incongruent with the host neighbourhood context.

Similar to Attachments 1 and 2 from the Preliminary Report, the proposed buildings if approved and built will stand in stark contrast to the predominant built forms which define the character of the local community.

What is also disconcerting is that the proposed buildings will be taller than the existing buildings which are located at the immediate intersection of Yonge Street and St. Clair Avenue East; the area which is meant to accommodate the greatest density and the tallest buildings.

Community Consultation

The Final Report references a Community Consultation Meeting held on October 22, 2019 and in particular what meeting participants did not like about the proposal. We have reviewed the list of concerns as summarized in the Final Report, and based on our review and discussions with our Clients, we wish to confirm that the following are major ongoing concerns with the proposal which have not been sufficiently addressed to date:

- *"The buildings are too tall and are not appropriate for the area;*
- *Concerns regarding subway capacity;*
- *Concerns regarding the shadow impacts on the church and park to the north, and surrounding neighbourhoods;*
- *Insufficient green space within the development site;*
- *Concerns regarding traffic on Heath Street (East) and Alvin Avenue, and that the consolidated loading will not work;*
- *The proposed park is not large enough;*
- *The density of the development is too high for the area; and*



- *Impacts on servicing and local infrastructure”.*

In response to the concerns raised by the community, while there were a series of working group meetings, at the second Community Consultation Meeting held on May 11, 2022 attendees continued to express concerns with the proposal.

Based on our review of the revised proposal, we are of the opinion that the following concerns as summarized in the Final Report are still valid:

- *“The appropriateness of the heights and massing of the buildings;*
- *The density of the development is too high;*
- *Concerns regarding sky views of residents on Delisle Avenue;*
- *Concerns regarding the shadow impacts on surrounding properties;*
- *The appropriateness of the park design;*
- *Encouraging more green landscaping in the park;*
- *Traffic impacts; and*
- *Subway capacity”.*

City Staff Comments and Concerns

We have reviewed City Staff comments and offer the following opinions which highlight our concerns with the revised proposal.

- We are of the opinion that the proposed scale, mass and height of the individual buildings and composition thereof as a whole are not appropriate, nor compatible with the local area-built form context, which is characterized by more modest sized mid-rise and tall buildings.
- We do not believe that the proposal is contextually appropriate, nor does it incorporate proper transition to the surrounding neighbourhood.
- The proposal does not conform with applicable Official Plan policies respecting built form, massing and transition, nor does it meet the intent of the Yonge-St. Clair Planning Framework and the Tall Building Design Guidelines.
- As a composition, the height, scale and mass of the buildings is excessive (as clearly illustrated by Attachments 1 through 4).
- A total of 3-tall buildings are proposed, whereas according to the Yonge-St. Clair Planning Framework the intent was for 1- tall building to be located on the subject site.



- While the Applicant has submitted a Transportation Impact Study and an Addendum, one has to seriously question whether or not traditional means of assessing mid-rise and high-rise residential applications is appropriate. In this respect, the question is not whether the transportation and transit network exist, but whether the network is capable of properly accommodating the demands being placed on it – we think not.
- While the proposal is described as being transit-supportive, is the existing, planned and financed transportation and transit network capable of supporting, not only the Applicant's proposal (1,361 residential units, plus commercial space), but the demands being placed on it by all of the other existing and proposed developments within the neighbourhood? What does it matter if the subway exists if it is already operating at or above capacity and providing an inferior transit service/experience?
- City staff have been engaged for some time in a major traffic study/plan for the Yonge and St. Clair area. That study/plan is not yet finished. It is hard to understand how this application, with obvious and substantial traffic impact, could be brought to City Council for approval prior to this critical study/plan being finalized and considered.
- Concerns have been raised regarding the shadow impacts associated with the proposal. It stands to reason that the current proposal which consists of 123 floors as compared to the 68 floors approved in 2009 by the OLT will cast greater shadows on both private and public spaces. As City Staff stated, the Tall Building Design Guidelines require that every effort be made to design and orient tall buildings to minimize shadow impacts. In the case of the subject site, one of the easiest ways of minimizing shadow impacts is to insist that the proposal be developed in accordance with the building heights and FSI approved by the OLT in 2009.

HISTORIC PUBLIC INPUT

Our Clients have actively participated in the Amendment Application process; including, filing formal written correspondence; as summarized below:

May 5, 2022

On May 5, 2022 the Board of Directors of TSCC 1478, 1591 and 1770 filed correspondence addressed to the City of Toronto Planning Department and Councillor Josh Matlow, Ward 12 Councillor. The following is a summary of the highlights of their legitimate and strong opposition to the Wittington Amendment Application:

- **Radical Neighbourhood Transformation:** The concern is with the cumulative impact that the subject application, in concert with no less than a dozen other redevelopment projects within the neighbourhood, will have based on the addition of in excess of 4,000 dwelling units to the existing housing supply.



- Too Much "Mass": The proposed 4-towers are advancing 123 floors of condominium units, in towers which are not sufficiently separated, resulting in a project mass which is physically imposing.
- Excessive Shadow Impact: If approved, once built the project will result in additional shadow impacts, including incidents where some areas of the neighbourhood will be in shadow most of the day.
- Traffic Gridlock: Traffic volumes in the vicinity of Yonge Street and St. Clair Avenue are, according to the residents, at a crisis. The situation will only be exacerbated with the construction of the 1,361 additional units.
- Ignores Lack of Subway Capacity: Our Clients referenced *"...current conventional thinking in the city planning process that it is not appropriate to consider whether the subway has capacity to serve the residents in these proposed 1,361 units and in all the other 4,113 being planned."* At issue is that Line 1 north of Bloor Street is already beyond capacity, and there are no specific infrastructure projects that will increase capacity within any reasonable planning horizon.
- No Real Green Space: The proposal does not contain substantial green space, and that which is proposed at the intersection of Yonge Street and Heath Street East is *"concrete"*. Our Clients are of the opinion that *"... a project of this size must provide for substantial natural green space, not an urban area that pretends to be a park."*

June 27, 2022

On June 27, 2022 TSCC 1478 submitted to Councillor Matlow an email registering their opposition to the Wittington proposal and requesting that consideration of the Amendment Application by the Toronto and East York Community Council on June 29, 2022 be deferred. It is important to understand that in making the deferral request, TSCC 1478 stated that:

- *"We are not anti-development, we just wish for our voices to be heard by Council in respect of what we believe are significant concerns for the community regarding this application, and feel it is premature to have this hearing until we have retained our advisors and they have had the opportunity to make representations on our behalf to the applicant and if necessary, to Council."*

Attached to the June 27, 2022 correspondence was a presentation entitled: *"Position of the Boards of 10, 33, and 55 Delisle on the Wittington Planning Application"*; see Attachment 5. This presentation was made to the Working Group Meeting on June 22, 2022 attended by Planning Staff, numerous representatives of the Applicant, Councillor Matlow and his staff with members of the local community. The presentation clearly outlines our Clients concerns; including, but not limited to:



- Over-Intensification: The concern being that *"We understand the concept of intensification and have no objection to proper coordinated development of the area but over-intensification will effectively destroy the charm and character of many Toronto neighbourhoods, including Yonge and St. Clair."* This concern is with the cumulative impact that the Wittington Application will have on the neighbourhood when considered with the context of the other proposed 4,000-plus residential units.
- Traffic: The configuration of the road network, existing surrounding development and the site itself is such that the only access points are at the northwest and southeast corners of the site. Our Clients concern is that the proposal represents too much density in the context of *"inherent traffic challenges"*. This concern needs to be understood in the context of *"... the cumulative effect of all of the 16 towers currently (in) approved or in the planning process"*.

June 29, 2022

On June 29, 2022 there was a Toronto and East York Community Council (TEYCC) Meeting where the proposal was discussed. At the Meeting, Members of the public, including representatives of our Clients made both written submissions and verbal presentations.

Attachment 6 illustrates with a 'red' line overlay the height of existing residential towers on Delisle Avenue relative to the Applicant's proposal. The presentation summarized our Clients ongoing concerns with the proposal; including:

- The radical neighbourhood transformation associated with the cumulative effect of all of the approved and/or proposed residential developments;
- The impact of over-intensification on the character of the neighbourhood;
- The cumulative traffic impact associated with proposed densities relative to the ability of the transportation network to accommodate existing and proposed demand;
- The outstanding Traffic Study for the Yonge and St. Clair area; and
- Frustrations with the planning process and in particular delays attributable to the applicant.

COMMENTS, OBSERVATIONS and RECOMMENDATIONS

We have reviewed the April 2019 *'Planning and Urban Design Rationale Report'* prepared by Bousfields Inc. on behalf of Wittington in support of the 'original' Amendment Application. The 'original' proposal contemplated 3-residential buildings having heights of 59, 39, and 34-storeys, containing a total of 1,357 residential units, with an FSI of 10.18.



According to the Bousfields Inc. Report the proposal requires amendments to the Official Plan and the Yonge-St. Clair Secondary Plan to redesignate portions of the subject site from "*Apartment Neighbourhoods*" and "*Parks*" to "*Mixed Use Areas*". The proposal also requires an Amendment to City of Toronto Zoning By-law 438-86, as amended by By-law 810-2008, and to the new City-wide Zoning By-law No. 569-2013, as amended, in order to increase the permitted height and density, and to revise other development regulations.

We note for the record that Bousfields Inc. has stated that the opinions expressed in their April 2019 '*Planning and Urban Design Rationale Report*' are still relevant in support of the revised proposal. The following is a summary of our comments, observations and recommendations based on our review of the Bousfields Inc. Report and other relevant planning documents.

While the Applicant and its consultant believe that the proposal adequately addresses the Provincial and municipal policy framework, we are of the opinion that the revised proposal fails to adequately deal with relevant policy; including, the Tall Building Design Guidelines. Our Clients believe that there are major transportation and transit issues which remain unresolved, which will only be exacerbated by approving the proposal.

The Bousfields Inc. Report states that the previous approval granted by the OLT recognized the northeast quadrant of Yonge Street and St. Clair Avenue East as a landmark development site. They also state that the Applicant's previous plans were constrained by the fact that they did not include portions of the Yonge Street and Heath Street East frontages. They believe that with the assembly of the entire block, there is now an opportunity to redesign the plan. We fail to understand how this makes any difference regarding how much density is appropriate to apply across the whole of the block.

While the subject site is located within a "*Major Transit Station Area*" and a "*Strategic Growth Area*" as defined by the Growth Plan and an "*Avenue*" by the Official Plan, this does not negate the fact that the level and intensity of development may have to be restrained if the local built form context and the level of transit service is operating at or beyond capacity. The Growth Plan does not support intensification at the expense of all other considerations; including, the character of the host community, and available infrastructure.

The Bousfields Inc. Report advances the proposition that the Wittington proposal includes a variety of building heights and forms, meant to integrate the proposal into the surrounding context. Contrary to the position advanced by Bousfields Inc., we are of the opinion that the inclusion of 3-tall buildings and a fourth mid-rise building on the site fails to adequately limit shadow impacts, diminishes views, and stands in stark contrast to the established height, mass and scale of existing buildings located within the neighbourhood.

It is worth noting for the record that in the Bousfields Inc. Report, within the section dealing with shadow impacts, repeated references are made to incremental shadow impacts on adjacent properties, streets and open spaces attributable to the proposed development. In our opinion, these shadow impacts are material to the community.



Provincial Policy Statement (PPS)

The proposal has been reviewed in the context of the PPS (2020) (Policies 1.1.1, 1.1.3.2, 1.1.3.3, 1.1.3.4, 1.3.1, 1.4.3, 1.6, 1.6.3, 1.6.7.4, 1.7.1, 1.8.1) and we are of the opinion that the proposal is not consistent with the PPS. We note the following regarding the PPS:

- While the PPS promotes efficient development and land use patterns, as well as the accommodation of residential and employment land uses, it does not promote doing so at the expense of other relevant planning considerations.
- The application of PPS policies has to take into consideration whether or not existing and planned infrastructure is capable of supporting the proposed development.
- The policies of the PPS do not suggest that densities should be maximized irrespective of whether or not what is proposed is 'contextually' appropriate.
- While the PPS supports increased density, it requires that planning authorities identify locations and the intensity of development appropriate for the level of existing and planned infrastructure and community facilities; which in our respectful submission, in the case of the subject site is inextricably tied to transit services.

There is nothing to be gained by proposing and approving developments which place unreasonable demands on a municipality's infrastructure capabilities. There is nothing to be gained by proposing and approving developments which serve to undermine the character of the host neighbourhood.

Growth Plan

The proposal has been reviewed in the context of the Growth Plan (2020) (Policies 1.2.3, 2.1, 2.2.1(2)(c), 2.2.1(3)(c), Schedule 3, 2.2.1(4), 2.2.2(3), 2.2.4(1), 2.2.4(2), 2.2.4(3)(c), 2.2.4(6), 2.2.4(9), 2.2.5(2), 2.2.5(3), 2.2.6, 2.2.6(1), 2.2.6(2), 3.1, 3.2.3(1), 3.2.3(2), 5.2.5(6)) and we are of the opinion that the proposal does not conform with the Growth Plan. We note the following regarding the Growth Plan:

- While it is admirable and required that development support the achievement of complete communities, and the Growth Plan has established minimum intensification and density targets, it cannot be ignored that the Growth Plan clearly states:
 - *"Some larger urban centres, such as Toronto have already met some of the minimum targets established in this (Growth) Plan, while other communities are growing and intensifying at a different pace that reflects their local context."*
- With the aforementioned in mind, it must be acknowledged that the subject site was already the subject of a previous Application (which the OLT approved)



which sought to increase permitted density in pursuit of supporting Provincial and City of Toronto residential and commercial intensification goals and objectives.

- In regards to Growth Plan settlement area policies, we are not suggesting that growth should not take place within the City of Toronto in a *delineated built-up area*, or in a *strategic growth area*, to the contrary, we are suggesting that the property should be redeveloped respecting the previous OLT Decision which established a development framework, which included an FSI of 6.28. Utilizing this as a basis for moving forward, it would be appropriate to reimagine how the subject site could be redeveloped incorporating the additional lands.
- In accordance with the Growth Plan, we are of the opinion that the current approved Official Plan designation and Zoning By-law provisions provide more than adequate direction regarding the level of intensity which should be applied to the redevelopment of the whole of the site.
- We are of the opinion that it is reasonable to support the achievement of Growth Plan '*complete communities*' goals and objectives, while not proposing excessive amounts of density. This is critical when it is evident that existing and planned infrastructure is not capable of accommodating current and future demand.
- The City of Toronto has and is being planned to accommodate development through compact built forms and intensification throughout the delineated built-up area. The Growth Plan does not specifically require the subject site to achieve all of the City's aspirations associated with the accommodation of projected growth. There are other opportunities located throughout the Municipality's delineated built-up area which can be redeveloped at increased densities.
- In regards to priority transit corridors and major transit station areas, while the subject site is a candidate for intensification, the question that must be answered is: '*How much is appropriate?*' We are of the opinion that it would have been appropriate for the Municipality to suggest that the entire site be redeveloped at an FSI of 6.28. We are also of the opinion that doing so would conform with the Growth Plan.
- We are of the opinion that a more modest redevelopment proposal, predicated on an FSI and maximum building heights as previously approved by the OLT, would achieve the Growth Plan transit corridor and major transit station area goals and objectives. Doing so would contribute to meeting area-wide density targets, while at the same time being mindful of transit capacity limitations and resulting in a development which would be contextually appropriate.

We are not taking issue with the proposed range and mix of residential units, nor the provision of commercial space. We are taking issue with the total number of units, the



built form, height, scale and mass of the proposal in the context of limited transit services and community facilities, as well as the character of the neighbourhood.

Official Plan

According to Map 2 of the Official Plan, the subject site is designated as being located along an “Avenue” that extends along Yonge Street, between the Downtown and Central Waterfront and the Yonge-Eglinton Centre. Policy 2.2(2) of the Official Plan directs growth to “Avenues”. In the evaluation of the Wittington proposal, the following objectives are applicable:

- concentrating jobs and people in areas well served by surface transit and rapid transit stations; and
- protecting neighbourhoods and green spaces from the effects of nearby development.

We are of the opinion that while the proposed density may be transit-supportive, the existing transit network is operating at capacity and as such is not capable of adequately servicing the thousands of additional residents which the proposal will bring to the neighbourhood. With this and neighbourhood context in mind, we offer the following Official Plan related comments, observations and recommendations:

- Policy 2.2.3(3)(b) is a cause for concern insofar as it indicates that development in *Mixed Use Areas* on *Avenues* has the potential to set a precedent for the form and scale of re-urbanization. The concern is that if the proposal is approved at an excessive FSI, with building heights that are significantly greater than the dominant building heights in the neighbourhood this may encourage other landowners to advance proposals which are clearly out of character with the neighbourhood context.
- According to the Bousfields Inc. Report the subject site is located on an *Avenue* that has not yet been the subject of an ‘*Avenue Study*’. According to Policy 2.2.3(3)(c) development in *Mixed Use Areas* on an *Avenue* may proceed provided that it supports and promotes the use of transit (which is not necessarily desirable if the level of transit service is not capable of adequately accommodating demand. The same applies to the adequacy of parks, community services, etc. – all of which our Clients feel are inadequate.
- In the context of Policy 2.3.1(1) our Clients are concerned with the impact that the proposed height, scale and mass of development may have on the stability of the neighbourhood. There is also a concern that due to the sheer size of the proposed development, it is not consistent and sympathetic to the existing physical character of the majority of buildings in the community.
- There is a very real concern that the scale of the proposal threatens to undermine the goals and objectives of the Official Plan pertaining to *Apartment*



Neighbourhoods and the need for developments to be compatible and provide for adequate and gradual transition of scale and density. The objective is to minimize the impact on adjacent neighbourhoods; all in accordance with Policy 2.3.1(3).

- Taking into consideration Official Plan Policy 4.5(2) there is a concern that what is envisaged within *Mixed Use Areas* is not being respected by the Applicant. More specifically, in accordance with the aforementioned Policy when locating and massing new buildings the objective is to provide a transition between areas of different development intensity and scale, through means such as providing appropriate setbacks and/or a stepping down of heights, particularly toward lower scale *Neighbourhoods*. New buildings are to be designed and located to adequately limit shadow impacts on adjacent *Neighbourhoods*.
- Criteria for development in *Apartment Neighbourhoods* is set out in Policy 4.2(2). In this regard, the following is a relevant concern as it relates to the Wittington proposal:
 - *"locating and massing new buildings to provide a transition between areas of different development intensity and scale, through means such as providing appropriate setbacks and/or a stepping down of heights, particularly towards lower scale Neighbourhoods"*.
- The Official Plan is deliberate in its use of language and specific policies that reference the need for buildings to fit within the context of the *Neighbourhood* they are located in. Policy 3.1.2(1) states that new development will be located and organized to fit within its existing and or planned context. Continuing with this theme, Policy 3.1.2(3) sets out policies that are meant to ensure that new development will be massed to fit harmoniously into the local existing and or planned context, limiting impact on neighbouring streets, parks, open spaces and properties by a number of means; including, creating appropriate transitions in scale to neighbouring and/or planned buildings.
- Policy 3.1.3(2) references tall building proposals and the need for them to address key urban design considerations; including:
 - *"meeting the built form principles of the Plan; demonstrating how the proposed building and site design will contribute to and reinforce the overall city structure; demonstrating how the proposed building and site design relate to the existing and/or planned context; and taking into account the relationship of the site to topography and other tall buildings."*

Our concern is that the proposal has largely ignored the context within which it is located. Care and caution must be exhibited when assessing proposals for redevelopment and intensification to avoid destabilizing existing communities, their identity and character.

The Wittington proposal will dwarf the majority of existing buildings located within the surrounding *Neighbourhood*, and as such does not represent an appropriate transition.



We are of the opinion that the proposal does not fit in with the existing and planned neighbourhood context, nor character, and as such it unnecessarily diminishes potential access to sunlight, and fails to adequately transition the scale between buildings of varying heights and intensity. It is imperative to acknowledge that the Tower at 1 Delisle Avenue is an aberration; not the rule and certainly not typical of building heights in the *Neighbourhood*.

YONGE-ST. CLAIR SECONDARY PLAN

The subject site is located within the Yonge-St. Clair Secondary Plan. Section 2.2 states that the purpose of the Secondary Plan is to:

- protect, promote and enhance the existing type and quality of *Neighbourhoods* and *Apartment Neighbourhoods* and maintain their stability; and
- require that redevelopment in the *Mixed Use Areas* is compatible with the maintenance of adjacent *Neighbourhoods* and *Apartment Neighbourhoods*.

According to the Secondary Plan, lands located at the intersection of Yonge Street and St. Clair Avenue may be developed in accordance with Policy 3.1.1 at a higher density and scale. This is in contrast to what is permitted within *Apartment Neighbourhoods* and *Mixed Use Areas* located further from the aforementioned intersection.

We are concerned that the proposal does not comply with Policy 3.2(b) which directs that:

- buildings will achieve a harmonious relationship to their built form context through building height, massing, setback, stepbacks, roof line and profile.

On the basis that it is our understanding that this Policy applies to the entire Secondary Plan, we are justified in raising a concern with how the development relates to adjacent *Neighbourhoods*.

Policy 5.1 requires that *Mixed Use Areas* in the Yonge-St. Clair area be well integrated with development in adjacent *Neighbourhoods*. This is to be achieved by ensuring appropriate transitions in building height and separation. The proposed scale, height and mass of the Wittington proposal as depicted on the attached 3-D models clearly illustrates that the development stands in stark contrast to the rest of the *Neighbourhood*. It fails to accomplish what Policy 5.4 calls for, which is the minimization of visual impacts when viewed from adjacent *Neighbourhoods*.

Repeatedly the Secondary Plan includes policies which reference the need for massing, transition and the stepping of building heights in order to limit the impact of new buildings on existing *Neighbourhoods*. Case in point is the *Site and Area Specific 1 (SASP 1)* policies which apply to the entire area of the subject site. According to *SASP 1*, there is meant to be a transition in scale and land use. *SASP 1* includes the following criteria which we believe the Wittington proposal has failed to adhere to:



- “any development or redevelopment will complement the existing built form context of the area and new buildings will be physically compatible with surrounding areas.”

YONGE-ST. CLAIR ‘PLANNING FRAMEWORK’

We have reviewed a December 2019 City of Toronto Report entitled: ‘*City-initiated Yonge-St. Clair Planning Framework – Final Report*’ (YSCPF Report). The YSCPF Report recommended that City Council endorse a Planning Framework for the area surrounding the Yonge-St. Clair intersection. The Planning Framework is intended to be used to evaluate development applications and it supplements and builds on policies contained in the City of Toronto Official Plan and the Yonge-St. Clair Secondary Plan.

The Yonge-St. Clair Secondary Plan regulates development within this area of the City of Toronto; which is described as a node of mixed-use development. The area is not a homogeneous collection of built forms, but rather one characterized by a board range of low, medium and higher-density development. This is important in assessing the Wittington proposal, so much so that within the YSCPF Report it referenced the Application along with other active Applications.

Policy Considerations

The YSCPF Report outlines numerous Provincial and City of Toronto governing planning policy documents and design guidelines. It confirms that the Planning Framework is located within the Yonge-St. Clair Secondary Plan area; generally bounded by Avenue Road, Mount Pleasant Cemetery/Kay Gardiner Beltline, The Moore Park Ravine/Beltline Trail and the CP Rail Corridor. According to the YSCPF Report the purpose of the Secondary Plan is to:

- Protect, promote and enhance the existing type of quality of *Neighbourhoods* and *Apartment Neighbourhoods* and maintain their stability;
- Require that redevelopment in *Mixed Use Areas* on Yonge Street and St. Clair Avenue be compatible with the maintenance of adjacent *Neighbourhoods* and *Apartment Neighbourhoods*, as well as seek to improve Yonge Street and St. Clair Avenue as public spaces;
- Retain, protect and enhance the special physical character and public spaces of the Yonge-St. Clair Secondary Plan area; and
- Ensure that new development meets high urban design standards which contribute to achieving public areas which are attractive, inviting, comfortable and safe.

Of particular interest in the assessment of the Wittington proposal is Section 3.2(b-c), Built Form and Public Amenity, which states that buildings will achieve a harmonious relationship to their built form context through building height, massing, setback,



stepbacks, roof line, profile, architectural expression, as well as vehicle access and loading.

Section 5.1, *Mixed Use Areas*, states that in addition to the development criteria in the Official Plan, the following objectives will be met:

- Provide animated, landscaped and comfortable publicly-accessible spaces on properties fronting Yonge Street and St. Clair Avenue;
- Create a visual impression of Yonge Street and St. Clair Avenue as comfortable and spacious, not crowded and cramped, through the location and massing of buildings;
- Integrate development well, with adjacent *Neighbourhoods* by ensuring appropriate transitions in building height and separation distances; and
- Encourage and support healthy retail businesses, especially on Yonge Street.

Section 5.7 explains that in *Mixed Use Areas 'B' and 'C'* (the subject site being located within the limits of *Area 'B'*) there may be potential to redevelop properties in excess of existing permitted height and/or density limits. The operative words are '*there may be potential*', not that development in excess of existing permitted height and/or density limits will be approved.

Consultation – Planning Framework

Throughout the Study, City Staff engaged with community members and led consultation sessions, during which the public consistently raised specific concerns, comments and recommendations; including, but not limited to the following which are now echoed in connection with the Wittington proposal:

- Existing traffic and congestion along Yonge Street, at key intersections and on side streets;
- New development needs to be thoughtfully planned to help improve traffic flow;
- Building heights and massing should respond to the existing built form context;
- Development in close proximity to low-rise areas should provide adequate transition;
- Yonge Street serves as the commercial "village" for the community and its human scale character should be preserved; and
- Existing infrastructure capacity should be reviewed to ensure that the area can accommodate future growth.



Vision, Goals, Urban Structure, and Transportation

Within the YSCPF Report reference is made to the vision and goals of the Planning Framework. In this regard, the following statements are important to keep in mind while reviewing the Wittington proposal; namely:

- *"The Yonge-St. Clair area consists of a dense core at the intersection of two major streets, each with a distinct character, and buildings that transition down at the intersection to lower scale Neighbourhoods."*
- *"New buildings will respect the surrounding area context, limit shadow impact, preserve sky views, protect views to local landmarks, and contribute to the creation of new open spaces."*

The Planning Framework appropriately articulates a number of key goals which we believe should be respected by the Applicant; including:

- Accommodating future growth in a form that is compatible with and respects the unique character of the area;
- Ensuring all existing, approved, and proposed buildings are sited, massed and designed to provide open space and public realm improvements, maximize pedestrian comfort, minimize shadow and wind impacts, and protect privacy and sky view; and
- Appropriately transitioning tall building heights from a 'Height Peak' around the intersection of Yonge Street and St. Clair Avenue, beyond which building heights are limited and reduced to appropriately transition to lower-scaled areas, designated *Neighbourhoods, Parks and Other Open Space Areas*.

We cannot stress enough that the scale and mass of what is being proposed appears to consciously ignore the urban structure which the Planning Framework envisaged for the Yonge-St. Clair Secondary Plan. The following quote taken directly from the YSCPF Report reflects what our Clients had hoped would be accomplished through the redevelopment of the subject site, but sadly which has not come to pass:

- *"The Framework ensures that new development provides a stronger sense of identity and allows for higher-density areas close to the Yonge-St. Clair intersection while sensitively integrating with the scale and character of surrounding neighbourhoods."*

Continuing with the YSCPF Report and our assessment of the Wittington proposal, we are of the opinion that the 'revised' proposal fails to adequately transition proposed height, scale, mass and density. In accordance with the Planning Framework, the proposal needs to be further revised to take into consideration the proximity of the property to low-rise, *Neighbourhoods, Parks, and Apartment Neighbourhoods*. The following quotations



from the YSCPF Report need to be taken into consideration in the evaluation of the Wittington proposal:

- *"The tallest buildings will be located around the intersection of Yonge Street and St. Clair Avenue with heights, scale, and density decreasing as distance from the intersection increases."*
- *"'Transition Zones' are located around the 'Height Peak' and will see a clear step down of heights from the 'Height Peak'. New development within the 'Transition Zone' will show clear transition down to the surrounding context."*

We note that the area at the intersection of Yonge Street and St. Clair Avenue is located within *Mixed-Use Area 'A'*, which in our opinion does not include the subject site.

It is acknowledged that the Growth Plan requires that plans adjacent to or near frequent transit facilities should be planned to be transit-supportive and supportive of active transportation. At this stage in the ongoing growth and evolution of the City of Toronto, the real issue is not whether the proposal is transit-supportive, but whether the existing, available and planned level of transit service is capable of supporting the proposal, as well as all other existing and planned development. If the demand for transit services far exceeds the capacity of the network, then our Client has just cause for concern regarding the intensity of what is being proposed.

Adopted Planning Framework

The process the City of Toronto engaged in resulted in the adoption of the Yonge-St. Clair Planning Framework. In this regard, the Planning Framework clearly indicates that new buildings will respect the surrounding area context, limit shadows, and protect sky views. The Planning Framework includes numerous goals of which the following three (3) from Section 2 are amongst the most important in assessing the proposal:

- *"Accommodate future growth for the area in a form that is compatible with, and respects the unique character of the Yonge-St. Clair area."*
- *"Ensure all existing, approved, and proposed buildings are sited, massed and designed to provide open space and public realm improvements, maximize pedestrian comfort, minimize shadow and wind impacts, and protect privacy and sky view."*
- *"Appropriately transition tall building heights from a 'Height Peak' around the Yonge-St. Clair intersection downward to lower-scaled areas."*

Based on the YSCPF Report prepared in support of the Planning Framework and the text of the document itself, it is evident that the tallest buildings are meant to be located around the intersection of Yonge Street and St. Clair Avenue; with this area comprising the 'Height Peak'. This area is surrounded by 'Transition Zones' which are generally located between the 'Height Peak' and surrounding areas.



We are of the opinion that the Wittington proposal which includes three (3) tall and one (1) mid-rise building does not comply, nor properly interpret and implement the built form objectives from the Planning Framework. Map 1 from the Planning Framework illustrated that only one (1) tall building is envisaged to be located on the subject site opposite the intersection of Yonge Street and Delisle Avenue; not four (4) as is proposed (see Attachment 7).

TALL BUILDING DESIGN GUIDELINES

The Wittington proposal has been reviewed in the context of the City of Toronto Tall Building Design Guidelines. We are of the opinion that the Applicants consultant has exaggerated the built form context which exists in the vicinity of the subject site. Attachment 8 is a Height Map extracted from the Bousfields Inc. Report which clearly indicates that the majority of buildings, save and except for a select few are considerably lower in height and stature than what Wittington is proposing.

The proposal does not respond appropriately to the built form character and context of the surrounding *Neighbourhood* which consists largely of multi-unit residential buildings ranging in height from less than 10-storeys to 20-storeys; with only a few buildings exceeding 30-storeys. The proposal fails to properly transition between the subject site and neighbouring developments. If approved, the southernmost proposed building would stand in stark contrast to the majority of the buildings in the *Neighbourhood*.

Contrary to the Bousfields Inc. Report, we believe that the proposed building does not conform with the intent of the Tall Building Design Guidelines and in particular Guidelines: 1.3 – Fit and Transition in Scale, 1.4 – Sunlight and Skyview, 3.2.1 – Floor Plate Size and Shape, and 3.2.2 – Tower Placement. We note the following:

- The height of the proposed towers is not contextually appropriate;
- The design of the proposed buildings does not represent a “*logical transition in height*”;
- There is no basis for one (1) of the proposed buildings to serve a ‘Height Peak’ function; recognizing that the subject site is geographically removed from the immediate intersection of Yonge Street and St. Clair Avenue, being the area where the tallest buildings are envisaged to be located; and
- No acceptable justification in support of the larger tower floorplate sizes has been advanced.

The proposed buildings as a composition represent far too much development and as such does not fit in or transition with the predominant built forms which characterize the *Neighbourhood*. The proposed buildings are oversized, do not respect or reflect the existing and/or planned height context, and fail to meet the intent of the City of Toronto Tall Building Design Guidelines.



CLOSING REMARKS

In our respectful submission, if the proposal is approved it will dramatically alter the character of the Yonge Street and St. Clair Avenue *Neighbourhood*. The height of the proposed buildings as a composition represents a major departure from what was 'originally' approved by the OLT in 2009.

The proposal does not resemble the character, nor the built form context within which the subject site is located. The proposal ignores the fact that the subject site is not located at the immediate intersection of Yonge Street and St. Clair Avenue; the location where the tallest buildings are contemplated. A failure to recognize this and respect the geography of the area is in fact an invitation for even taller buildings to be proposed at the aforementioned intersection and beyond; a fate which would potentially negatively impact and destabilize an otherwise stable *Neighbourhood*.

The direction provided by the Official Plan is also significant, and in the case of the subject site, it would appear that the Applicant has lost sight of the fact that the property is located abutting *Neighbourhoods* which are characterized by predominantly low and more modestly sized mid-rise and tall buildings.

The Tall Building Design Guidelines include a clear statement related to 'rationale' when it comes to fit and transition; namely that:

- *"Tall buildings should respect the scale of the local context and display an appropriate transition in height and intensity especially when adjacent to areas of differing land use, lower-scale built form, and heritage properties."*

Based on our preliminary planning assessment of the proposal, we are of the opinion that it is not appropriate, not consistent with the PPS, does not conform with the Growth Plan, nor does it support the general intent and purpose of the City of Toronto Official Plan, the Yonge-St. Clair Secondary Plan (and the adopted Framework Plan), the Zoning By-law and the Tall Building Design Guidelines.

The proposal is not considered desirable for the redevelopment of the subject site in the local context. The proposed buildings are too tall and as a result does not fit in or transition with other existing buildings located within the neighbourhood. The majority of buildings range in height from less than 10-storeys to 20-storeys; with only a few buildings exceeding 30-storeys. which are substantially shorter and, in most cases, less than 30-storeys tall (many being less than 20-storeys in height).

The governing policy and design framework is intended to provide appropriate access to sunlight and sky view, while limiting shadow impacts. On this last point, the Bousfields Inc. Report admits repeatedly that there are incremental shadow impacts associated with the proposal.

In regards to the proposed three (3) tall buildings and the one (1) mid-rise building, we note that the Planning Framework which was prepared by the Planning Department was specifically intended to provide clarity in regards to development intentions within the



limits of the Secondary Plan area; including, but not limited to where tall buildings would potentially be located. According to the Municipality's own Report and the figures contained therein, the subject site appears to have been contemplated for one (1) tall building, not three (3).

We can state with a great deal of confidence that not every site in the City of Toronto, along an *Avenue*, is intended nor capable of supporting a tall building (let alone three (3) and a mid-rise). In the case of the subject site, the scale of the proposal and the sheer number of floors (123 versus 68 as 'originally' approved in 2009) fails to successfully achieve an appropriate transition with the adjacent built form context. If approved, the development may give rise to an unfortunate trend along this segment of Yonge Street. More specifically, the community may be faced with numerous proposals seeking to redevelop lands in the *Neighbourhood* with contextually inappropriate tall buildings which would stand in stark contrast to the character of the community.

The proposal if approved will dwarf existing adjacent buildings and *Neighbourhoods*. In our opinion the proposal threatens to destabilize the communities which border Yonge Street and St. Clair Avenue. The development may set a dangerous precedent which could lead to an exacerbation of shadow impacts (already referenced by the Bousfields Inc. Report) and diminished sky view. There is a real potential for impacting privacy and the enjoyment of public spaces.

One of the most troubling aspects of the proposal, given its sheer size and the plethora of other Applications in the vicinity of the subject site, is the impact the addition of the proposed residential units will have on the ability of the transit network to adequately accommodate riders and provide them with a pleasant and enjoyable transit experience.

Our Clients have repeatedly raised concerns regarding the impact that the proposal may have on transit. We recommend that an equal amount of energy and enthusiasm be poured into ensuring that the transit network is development-supportive; as opposed to development being transit-supportive. In simple terms, every development in the City of Toronto is transit supportive to one degree or another.

In closing, we recommend that if the City of Toronto wishes to support the redevelopment of the subject site, that they approve the development of four (4) buildings of which one (1) could be a tall building not exceeding the median height of existing buildings located in neighbourhoods located to the east and west side of Yonge Street, north and south of St. Clair Avenue as illustrated in the Bousfields Inc. Report (Attachment 8). In regards to the FSI, we recommend that it be limited to 6.28; reflecting what was approved by the OLT in 2009 and permitted as-of-right in the Zoning By-law.

Thank you for this opportunity to provide input in connection with the proposed Wittington Official Plan and Zoning By-law Amendment Application. We wish to be informed of all future Planning Committee, Toronto-East York Community Council, and City of Toronto Council meeting and Decisions. We reserve the right of make additional submissions. We would welcome an opportunity to meet with the Applicant, their Consultant, the Mayor, Councillors and City Staff to discuss our Client's legitimate, reasonable and justified concerns.



Yours truly,

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