

June 23, 2022

Mr. John D. Elvidge
City Clerk
City Clerk's Office
Etobicoke York Community Council
Etobicoke Civic Centre
399 The West Mall
Toronto, ON M9C 2Y2

Dear Mayor and Members of City Council,

Re: *Comments Regarding Draft Official Plan Amendment No. 571 (Mount Dennis Secondary Plan)*
11-23 Hollis Street

We are the planning consultants for Hollis Dev LP, the owners of the above-noted lands, located on the east side of Hollis Street, approximately 85 metres north of the intersection of Eglinton Avenue West and Weston Road ("the subject site"). The owners submitted an Official Plan Amendment and Rezoning application on June 28, 2021 in order to permit a 34-storey building on 15-23 Hollis Street. Subsequently, the owners purchased 11 and 13 Hollis Street and resubmitted a revised application on May 10, 2022 for a 45-storey residential building comprising of a 4-storey base building with a 41-storey tower on the subject site.

Over the past several months, we have been monitoring the Mount Dennis Planning Framework Study and have participated in various community consultation meetings and workshops. We have reviewed draft Official Plan Amendment 571 regarding the Mount Dennis Secondary Plan and agree with the inclusion of the subject site within the *Mixed Use Growth District* and that it will accommodate the majority of new growth in the Plan area including a mix of tall and mid-rise buildings with maximum heights of 45-stories and the tallest buildings located closest to the rail corridor and Mount Dennis Station.

However, we have concerns regarding a number of the potential built form directions, including but not limited to:

- The prescriptive nature of proposed Policies 6.23, 8.14.3, 8.14.4, 8.14.5 and 8.47.6.

As a matter of basic planning principles, Official Plans (and Secondary Plans) should consist of policies that provide a land use planning framework and high-level vision for how areas should grow and develop over time, including land use designations,

compatibility, transition and character, among other matters. They should not consist of specific prescriptive, mandatory or numerical regulations – that is the purpose of the zoning by-law.

- Proposed Policies 5.3, 6.14.8 and 8.18 should be consistent with the Official Plan.

The current wording to “maximize” sunlight in proposed Policies 6.14.8 and 8.18 should reflect the “adequately limit” language within the Official Plan. In addition, proposed Policy 5.3 as currently worded is unclear if lands within *Mixed Use Areas* require both residential and non-residential uses. In our opinion, it should be consistent with the Official Plan for *Mixed Use Areas* which provides for a potential range of uses (not a requirement).

- Proposed Policy 12.7 is premature.

The Secondary Plan should not seek to elevate non-statutory documents that provide guidance on matters of building design and are not determinative (i.e. Urban Design Guidelines), to the level of policy. In our opinion, it is not appropriate for the proposed Mount Dennis Secondary Plan to contain policies that reference Urban Design Guidelines when the non-statutory document has not yet been adopted by City Council; or to specify that development will be evaluated in accordance with such guidelines.

- Proposed Policy 8.25 is unnecessary and burdensome.

Underground parking located outside of the building footprint and beneath landscaped areas is a long-standing and widely accepted condition across the City. There are several methods used to ensure tree growth and longevity, including the use of planters and soil volume plans. In our opinion, requiring unencumbered landscaped areas unnecessarily impacts the potential functionality and size of underground parking areas and may inadvertently limit redevelopment potential.

Thank you for your consideration of these comments. If you have any questions or would like to discuss these matters further, please do not hesitate to contact the undersigned.

Yours truly,

Bousfields Inc.



Alex Savanyu, MCIP, RPP

*cc: Bill Gairdner, Hollis Dev LP
Andrew Woods, Hollis Dev LP
Rory McNeil, City of Toronto*