



UNIVERSITY OF
ST. MICHAEL'S COLLEGE
IN THE UNIVERSITY OF TORONTO

OFFICE OF THE PRESIDENT

June 22, 2022

Toronto and East York Community Council
City of Toronto
100 Queen Street West, 12th Floor
Toronto, ON
M2H 2N2

Dear Members of Council:

**RE: UNIVERSITY OF ST. MICHAEL'S COLLEGE
COMMENTS ON RECOMMENDED UNIVERSITY OF TORONTO ST. GEORGE
CAMPUS SECONDARY PLAN AND URBAN DESIGN GUIDELINES**

The University of St. Michael's College (USMC) has been involved in the University of Toronto's St. George Campus Secondary Plan (the 'Secondary Plan') process since its commencement in 2018. USMC has provided previous comments on the draft Secondary Plan in past letters dated December 7, 2018 and March 25, 2020 (appended to this letter as **Attachment 1**) and attended meetings with staff to discuss our comments. USMC met with City staff on May 16, 2022 to discuss USMC interests and the new draft Secondary Plan. The draft Secondary Plan was also presented to the public on May 19, 2022. Following the community consultation meeting, the updated draft Secondary Plan and draft Urban Design Guidelines were released for public review and comment on May 20, 2022. Our planning consultants provided initial comments and suggested policy revisions and additions to Staff on May 24, 2022 and did receive some responses from staff.

The purpose of this correspondence is to provide our formal comments on the now final Secondary Plan and Urban Design Guidelines for consideration as part of the public record prior to the Statutory Public Meeting and Recommendation Report meeting scheduled for June 29, 2022.

BACKGROUND

As noted in our previous letters, USMC currently has over 5,000 students and close to 200 faculty and staff. USMC believes it is important to allow for the continued evolution of the campus to meet its future growth requirements while, at the same time, respecting its heritage. As part of any expansions to the USMC to accommodate its growth needs, USMC plans to retain ownership of its properties.

The John M. Kelly Library, located at 113 St Joseph Street, is the main library at USMC and one of the busiest libraries in the University of Toronto Libraries system. The Library has not been expanded since its opening nearly 50 years ago. As mentioned in our previous correspondence, USMC remains interested in future opportunities to expand and enhance the John Kelly Library facilities in order to support the important functions it offers. In order for such an expansion to be viable, USMC is exploring options for the inclusion of expanded institutional-related uses including student housing as part of a redevelopment of the site.

In addition to the Library site, there are also other locations on the USMC campus which can provide opportunities to enhance the existing physical space on campus and allow for new and expanded programming and services. For example, Elmsley Hall currently provides student housing on campus but does not reflect a contemporary design or function to optimize services. As stated in our previous letters, it is important that the planning framework for the Secondary Plan remain flexible while respecting the existing and emerging built form of the USMC campus and broader University of Toronto context. This will allow the USMC campus to evolve and meet future demands with certainty.

UNIVERSITY OF TORONTO SECONDARY PLAN

As noted, since the commencement of the Secondary Plan review process in 2018, USMC has monitored and participated in the process, and have reviewed the draft policies prepared to date. USMC remains interested in how the new policies will affect its ability to address its growth needs on the campus.

The following is a summary of how the recommended Secondary Plan policies and Urban Design Guidelines apply to the USMC lands.

The USMC lands have been identified within the Secondary Plan area in **Attachment 2** to this letter for reference.

Vision and Objectives

Overall, USMC continues to support the vision for the Secondary Plan to enhance its rich character, contribute to and improve the public realm and distinctive pattern of landscaped open space, prioritize the movement of pedestrians and cyclists, and provide space to develop a sustainable, lively, inclusive and accessible campus environment that connects with the city.

Public Realm

Institutional Major Open Spaces

Policy 4.6 states that Institutional Major Open Spaces are shown on Map 20-2C and identify existing open spaces on the USMC campus. These spaces will be protected, enhanced and maintained to meet the needs of users by (Policy 48):

*"a) pursuing opportunities to expand and connect these open spaces;
c) removing existing surface parking or relocating a limited supply of vehicle spaces underground in locations that limit impacts on existing mature trees within Institutional Major Open Spaces to enhance the public realm;"*

While the long term objectives of this policy may be desirable for the City, parking on the USMC is limited and serves current important functions and operational needs. Any removal of parking must be assessed based on need and function and should not be required to be removed by policy without justification.

Key Open Spaces

Policy 4.8 states that Key Open Spaces are also shown above on Map 20-2C and identify the existing open spaces on the USMC campus. The boundaries are approximate, and modifications to the location and configuration of Secondary Plan Spaces may be permitted without an amendment to the Secondary Plan.

Policy 4.9 states that minor building elements may be permitted to encroach into or extend above portions of Key Open Spaces, and parking, servicing, building elements and other structures may be permitted below Key Open Spaces if:

*"a) suitable growing conditions for a range of planting including trees, appropriate to the location and use of the space, will be provided;
b) programming appropriate to the use of the space at grade will be provided;
and,*

c) building elements extending above portions of Key Open Spaces are at a sufficient height to allow for the space at grade to be accessible, usable and comfortable.”

Policy 4.11 states that opportunities to expand and connect existing Key Open Spaces and create new Key Open Spaces will be pursued through new development, where appropriate.

While new open space areas are identified to be pursued through new development, where appropriate, “development” is not defined. A definition of “development” for the purposes of facilitating the new open spaces and public realm enhancements should be provided in the implementation section of the Secondary Plan. It is recommended, given the reference to “restorations, renovations and small scale additions” in other parts of the Secondary Plan, that “restorations, renovations and small scale additions” be defined as not constituting new “development” for the purposes of the changes related to open spaces, streets, connections and other defined public realm improvements. It is also requested that staff provide confirmation that “restorations, renovations and small scale additions” are not subject to the open space and public realm enhancement policies.

Mid-Block Connections

Policy 4.12 states that existing and potential mid-block connections include those shown on Map 20-2B, and will be secured through new development. The exact location and alignment of each new mid-block connection may be refined through the development review process and an amendment to the Secondary Plan may not be required to alter the mid-block connections, provided the general intent and connectivity as shown on Map 20-2B, is achieved. Mid-block connections will provide continuous, legible and direct public access through blocks (Policy 4.13). Existing mid-block connections will be (Policy 4.14):

- “a) Maintained to ensure they remain walkable, publicly accessible and designed for pedestrian for all ages and abilities;*
- b) Extended to improve the utility and connectivity of the pedestrian network and the permeability of the Area; and*
- c) Considered for relocation or reconfiguration when the modification will maintain or enhance the utility, connectivity and legibility of the pedestrian network in the Area.”*

Open Spaces within Blocks

Map 20-2C identifies ‘Other Open Spaces’ surrounding USMC. Policy 4.17 states that as development occurs, each block will incorporate a combination of existing, new,

expanded, consolidated and/or relocated open spaces appropriate to the context and block conditions, to improve the quality and usability of individual open spaces, and enhance and connect the Area's public realm network. Open spaces within blocks may include the gateways and potential public realm improvement areas as shown on Map 20-2D (Policy 4.18b) Policy 4.19 states that open spaces above ground level, such as terraces and accessible green roofs, are also encouraged to provide a range of gathering places and be publicly accessible.

A confirmation of what the St. Joseph gateway will entail is required to provide certainty of this requirement in the policy.

Streets and Laneways

The policies within this section (Policy 4.20 – 4.27) address pedestrian safety and comfort (Policy 4.20), need for additional building setbacks to accommodate widening sidewalks (Policy 4.21) and bicycle use prioritization and bicycle parking (Policy 4.22 and 4.23).

Shared Streets

Shared Streets are addressed in Policy 4.28 and 4.29. There is a Shared Street identified within the USMC campus lands, Elmsley Place. Policy 4.29 states that the design of Existing Shared Streets shown on Map 20-2A should be enhanced whenever possible to further improve pedestrian and cycling conditions along the streets. Existing Shared Streets are identified adjacent to the USMC campus.

Laneways

There is a Public Laneway identified on St. Basil's Lane. Policy 4.35 states that laneways will be improved to enhance their safety, usability and attractiveness through measures including:

- “ a) Landscape treatments, including pedestrian lighting, green infrastructure, trees and other planting, seating and signatures paving that is designed to lower vehicle speeds;*
- b) Development that includes active ground floor uses, clear gazing and entrances, where appropriate; and*
- c) Maintaining vehicle access and servicing, where necessary.”*

In relation to the Street and Laneway Section policies, it is critical for existing streets and laneways to maintain operations functions. This includes operational functions during construction and for temporary uses. An added policy should be provided in the Streets and Laneways Section to address maintaining existing operational functions.

Views

Policy 4.36 states that development and public works will be oriented and designed to maintain, frame and enhance views and vistas from the public realm to important natural and human-made features shown on Map 20-2E.

Managing Growth

Policy 5.1 states that not all parts of the Secondary Plan Area will experience the same level of intensification and change. The location, scale and intensity of development will be determined through the balanced consideration of:

- “a) the provision of community service facilities, affordable institutional residences, parkland, open spaces, green infrastructure and physical infrastructure to support complete communities and enhanced climate resilience measures that significantly exceed minimum standards;*
- b) land use designations as identified in the Downtown Plan or Official Plan;*
- c) whether the proposed development site has the appropriate characteristics to accommodate a mid-scale institutional building and/or taller institutional element, including site size, orientation, configuration and location, and the ability of the development to provide the appropriate setbacks, stepbacks and separation distance from other buildings and from all property lines;*
- d) local character, immediate surrounding context and individual site characteristics, including cultural heritage resources; and*
- e) the proximity of development to existing or planned and funded higher-order transit stations.”*

Policy 5.2 states that development will include a diverse range of institutional building types and mixed-use buildings with a majority of institutional uses:

- “a) Low-scale institutional buildings that are up to approximately 24 metres, not including the mechanical penthouse;*
- b) Mid-scale institutional buildings that are up to approximately 48 metres, not including the mechanical penthouse; and*
- c) Taller institutional elements that are above approximately 48 metres, not including the mechanical penthouse.”*

Built Form Considerations

Policy 5.3 on Built Form Considerations include a variety of considerations to reinforce the area's diverse physical character, create an interesting built environment, enhance the public realm and create a comfortable pedestrian environment. Policy 5.3 c) states that development will be set back a minimum of 6.0 metres from the curb to the building face along streets, except where in

situ conservation of cultural heritage resources prevents sidewalk widening, to accommodate existing and anticipated high pedestrian volumes and provide enhanced streetscaping.

Policy 5.4 states that where permitted, taller institutional elements will:

*"a) be seamlessly integrated with the mid-scale institutional building component;
b) limit institutional floorplates to minimize the perception of building mass from the street level and minimize shadowing on the public realm and surrounding properties; and
c) generally provide a minimum separation distance of 25 metres between taller institutional elements to limit potential impacts on the public realm, and ensure privacy, sky-view and light penetration into buildings."*

USMC support the policies in Section 5.1 to 5.3 as they provide opportunities for a diverse range of institutional building types, heights and mixed-use buildings with a majority of institutional uses. The proposed separation distances required between taller elements should be maintained to protect the future redevelopment of the John Kelly Library site.

Heritage

The Heritage section of the plan is brief and contains only two policies that state that ongoing growth and development of the Secondary Plan will respect the significance and the history of the Area and will reinforce and enhance its sense of place and distinct Character Areas (Policy 5.5). Design responses (i.e. setbacks, stepbacks and stepping) additional to the built form and urban design standards identified in the Secondary Plan and urban design guidelines may be required to conserve the scale and character of a property included on the City's Heritage Register (Policy 5.6).

The majority of the properties within the USMC campus are currently designated or listed on the City's Heritage Registry. The Urban Design Guidelines introduce four properties with "potential" to be added to the Heritage Registry. They include:

- **John Kelly Library**
- **Brennan Hall**
- **Elmsley Hall**
- **Carr Hall**

USMC has commented previously that it has been a strong steward of its heritage properties and remains committed to protecting those that are currently on campus. Further restrictions for future redevelopment through the addition of the "potential" properties identified above is not supported by USMC. It is inappropriate and premature for these properties to be identified as having heritage potential without further assessment.

Character Areas

The biggest change in the Secondary Plan are the Character Areas. New Character Areas have been named and defined. On Map 20-3, the Subject lands are identified

as majority East Campus and Queen's Park to the west. Policy 5.8 applies to the USMC Campus lands:

"Development on sites that are subject to two or more Character Areas will respect each Character Area's respective characteristics. Minor adjustments to the boundaries of Character Areas on such sites may be permitted without an amendment to this Plan where the general intent of this Plan is maintained."

East Campus Character Area

East Campus Character Area is identified as the red colour on Map 20-3. Policy 5.15 outlines the development policies for the East Campus Character Area:

- a) Enhance and extend the public realm, which is characterized by interconnected open spaces, such as quadrangles, gardens, and courtyards, punctuated by informally sited buildings;*
- b) Enhance and extend connections between Institutional Major Open Spaces in the Character Area to Queen's Park and the Civic Precinct to the south of the Secondary Plan Area;*
- c) Respect the existing institutional forms including the former mansion lots and residences, and the monumental and pavilion-like siting of buildings within a green and open landscape, which allows buildings to be experienced from many sides and with multiple points of entry;*
- d) Maintain and enhance the visual prominence of the Victoria College building, and St. Basil's Church and Odette Hall, and views of the Legislative Building's towers and rooflines;*
- e) South of Charles Street West, west of Upper Burwash Hall, south of St. Mary Street and north of St. Joseph Street, be limited to restoration, renovation, and small-scale additions to existing buildings to enhance their usability and accessibility, or new, complementary low-scale institutional buildings. Taller institutional elements are not permitted in this part of the Character Area;*
- f) South of St. Joseph Street, include a mix of low-scale institutional buildings, mid-scale institutional buildings and taller institutional elements, which will be designed and massed to provide noticeable and discernable built form transition in scale from the eastern edges of the Character Area to the lower scale Queen's Park Character Area to the west and the interior portion of the Character Area north of St. Joseph Street;*
- g) North of Charles Street West, include a mix of low-scale institutional buildings and taller institutional elements, which will be designed and massed to provide noticeable and discernable built form transition in scale from Bloor Street West to the lower scale interior portion of the Character Area to the south; and*
- h) East of Upper Burwash Hall on the north side of St. Mary Street, include a mix of low-scale institutional buildings, mid-scale institutional buildings and*

taller institutional elements, which will be designed and massed to provide noticeable and discernable built form transition in scale from the eastern edges of the Character Area to the lower scale interior portion of the Character Area to the west and south.”

The East Campus Character Area policies state that for the area south of St. Joseph Street, a mix of low-scale institutional buildings, mid-scale institutional buildings and taller institutional buildings are permitted. USMC support the opportunities presented by these policies.

Queen’s Park Character Area

Queen’s Park Character Area is identified as the orange colour on Map 20-3. Policy 5.16 outlines the development policies for the Queen’s Park Character Area:

- “a) Maintain the visual prominence and monumentality of the Legislative Building;*
- b) Enhance and maintain the picturesque character of Queen’s Park and its physical and visual connections with the University of Toronto, Provincial buildings and nearby cultural institutions;*
- c) Enhance and maintain the generous landscaped setback along Queen’s Park/Queen’s Park Crescent East and West;*
- d) Enhance the Character Area’s role as the symbolic and ceremonial heart of government in Ontario and a place for public assembly;*
- e) Enhance and extent the connections between Queen’s Park and Institutional Major Open Spaces in the Central and East Campus Character Areas and the Civic Precinct to the south of the Secondary Plan Area;*
- f) Enhance the public realm immediately surrounding the Legislative Building with a cohesively designed landscape that provides a complementary setting for the Legislative Building appropriate to its landmark location;*
- g) Reduce and screen existing servicing and loading areas along Queen’s Park Crescent West;*
- h) Be generally limited to restoration, renovation, and small-scale additions to existing buildings to enhance their usability and accessibility, and maintain the predominant low scale of the area, with limited new, complementary low-scale and mid-scale institutional buildings. Taller institutional elements are not permitted;*
- i) Address Queen’s Park Crescent West with broad building frontages, entrances and wide formal landscaped setbacks to enhance the institutional presence along the street; and*
- j) Reinforce the circular streetscape form of Queen’s Park Crescent East and West through building massing and setbacks.”*

The recognition of the area south of St. Joseph Street for development with taller building elements is supportive for the redevelopment of the John Kelly library. USMC suggest that its interests for future redevelopment at Elmsley Hall (as mentioned in previous correspondence) be acknowledged through a revised policy 5.25 e) to allow for a potential mid-scale institutional building or taller institutional elements.

Housing

Policy 7.1 states that a range of institutional residences (i.e. form, tenure, affordability) will be provided to meet the needs of students, faculty, staff and other potential residents of institutional buildings in the Secondary Plan Area, in accordance with underlying land use designations.

USMC are supportive of the housing policies.

Implementation

Policy 8.2 states that as part of a complete application for any future Zoning By-law application, Area institutions and other landowners within the Secondary Plan will prepare block-specific urban guidelines to be considered for inclusion in the University of Toronto St. George Campus Urban Design Guidelines until City Council adopts block-specific urban design guidelines for the Area.

The block areas are not defined and these will be important to define should block area design guidelines be required. If the block design guidelines are to be provided by applicants as part of a redevelopment proposal, a clear direction on the areas and terms of reference will be required.

The implementation policies should also define new development for the purpose of the open space and public realm enhancements.

UNIVERSITY OF TORONTO ST. GEORGE CAMPUS URBAN DESIGN GUIDELINES

The Urban Design Guidelines reflect the various design elements as set out in the Secondary Plan. These design elements reference the locations for parks, major open spaces and secondary open spaces (which include the conversion of existing parking lots), views, gateway features, mid-block connections, shared streets, laneways and public realm improvement areas.

The Urban Design Guidelines also include guidelines related to parking, servicing and loading. The detail in these guidelines is very specific and appears to go beyond site design and begins to direct functions and operations.

There are additional guidelines related to heritage that speak to transition in height where adjacent to listed properties. It is not clear how these are to be addressed in the context of other design elements that allow for increased height.

The guidelines include a number of directions and policies related to built form, heights and building typologies. While the guidelines note the variation in institutional building designs, there are several references to maximums in relation to stepbacks and floorplate sizes as well as transition conditions to be applied to development. These appear overly prescriptive without context and introduce an additional layer of guidance to be further detailed in block design urban design guidelines.

USMC appreciate that the Urban Design Guidelines now include an indicator for potential taller institutional elements on the John M. Kelly Library building site. USMC would also like to suggest that a similar indicator be added to Elmsley Hall to reflect USMC's desire for future redevelopment of this building as noted above.

Section 1.0 on Interpretation in the Secondary Plan addresses the interpretation of the Urban Design Guidelines which states:

"1.4 - Urban Design Guidelines, as adopted by City Council, will be used as a tool to evaluate proposed development in the area."

It is recommended that wording be added to this section to provide clarity that the Urban Design Guidelines do not form part of the Secondary Plan.

STAFF REPORT RECOMMENDATIONS

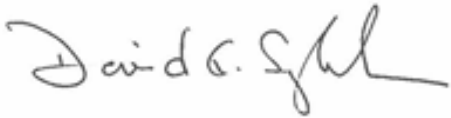
It appears that part of the recommendations in Staff's Report (dated June 13, 2022) is that City Council direct that Heritage Impact Assessments will be required for development applications that affect existing and potential cultural heritage resources identified in the University of Toronto St. George Campus Secondary Plan Area, included as Attachment 9 to the report from the Director, Community Planning, Toronto and East York District. The requirement for Heritage Impact Assessments for potential heritage resources, when they have yet to be confirmed, is not set out in the City's in-force Official Plan.

This recommendation is contrary to the City's Official Plan policies that require Heritage Impact Assessments for properties in the City's Heritage Register, whether listed or designated, or adjacent properties where new development could have an impact on a heritage property. Based on the City's expanded Terms of Reference for Heritage Impact Assessments, the imposition for Heritage Impact Assessments for a "potential" cultural heritage resource is unwarranted and presents a significant and material hardship.

CONCLUSION

USMC appreciate the opportunity to provide comments on the recommended policies and trust our comments will be taken into consideration.

Sincerely,

A handwritten signature in black ink that reads "David C. Sylvester". The signature is written in a cursive style with a large, sweeping initial "D".

David Sylvester, PhD
President and Vice-Chancellor

Attachs.

ATTACHMENT #1
Previous Letters Submitted on University of Toronto St. George Campus
Secondary Plan



UNIVERSITY OF
ST. MICHAEL'S COLLEGE
IN THE UNIVERSITY OF TORONTO

OFFICE OF THE PRESIDENT

December 7, 2018

City of Toronto
City Planning
100 Queen Street West, 12th Floor
Toronto, ON
M2H 2N2

Attention: Paul Johnson
Senior Planner, Community Planning
Toronto and East York District

Dear Mr. Johnson,

RE: The University of St. Michael's College

We would like to thank you for taking the time to meet with us on November 13, 2018 to discuss The University of St. Michael's College (USMC) and its interests in various planning matters that have the potential to affect USMC. As will be discussed below, USMC is particularly interested in the proposed new University of Toronto Secondary Plan and the anticipated redevelopment proposal of the Cardinal Flahiff Centre at 95 St. Joseph Street.

USMC Background

In order to assist with understanding USMC's interests, we felt it would be helpful to provide some background on USMC. USMC was founded in 1852 by the Basilian Fathers and has offered educational services continuously since that time. It has a rich history as an internationally respected Catholic institution where Catholic intellectual life thrives in a context of academic freedom and rigorous debate. USMC currently has over 5,000 students and 200 faculty and staff, which are attracted from around the world. It offers undergraduate programs in the Faculty of Arts, a graduate level Faculty of Theology, and continuing education programs.

USMC became a federated college of the University of Toronto in 1910, but has continued to be governed by its own Collegium and Senate and to own and operate its own properties and facilities. It also has an association with Loretto College and the Basilian Fathers, but both of those entities also own their own property and buildings. A map that illustrates the USMC campus is attached (note that the North arrow points down on the page). The picturesque campus is the heart of USMC and reflects its vision to create a safe, diverse and welcoming environment that supports its mission. In order for it to remain a world-class facility that enhances the community, provide significant jobs and offer important educational opportunities, USMC believes it is important to allow for the continued evolution of the campus to meet its future growth requirements while, at the same time, respecting its heritage. It is important to note that, as part of its future expansion, USMC plans to retain ownership of its land.

The John M. Kelly Library, which is located at 113 St. Joseph Street, is the main library at USMC, and one of the busiest libraries in the University of Toronto Libraries system. It opened almost 50 years ago and has not been expanded since that time. As a result, USMC is considering future opportunities to expand and enhance its Kelly Library facilities in order to continue to support the important functions that it offers. In order for that expansion to be financially viable, USMC may need to explore the inclusion of commercial and/or residential space on this site. We note that the City Council supported the redevelopment of the Loretto College lands at 70 St. Mary Street to permit a 40 storey mixed use residential and institutional building to address the needs of the College. We trust that, with appropriate supporting rationale and technical studies, the City would be willing to consider a similar approach for the Kelly Library site.

USMC also provides over 500 student residence spaces within half a dozen buildings on campus, most of which are older, smaller buildings. The residences provide spaces for both first and upper year students and are an important component of the USMC student experience. USMC also relies on that income to help support its academic pursuits. It is therefore interested in acquiring additional, upgraded residence spaces to meet the needs of its students for on-campus living and to ensure its on-going financial stability. This may include both the creation of new space and the possible expansion of other sites, including Elmsley Hall for further student space.

University of Toronto Secondary Plan

The University of Toronto has initiated a new Secondary Plan and Urban Design Guidelines for the St. George campus in order to update the policy framework, manage change and guide new development within the area. The new Secondary Plan would replace the existing Secondary Plan that was adopted in 1997 and would include all of USMC's campus, although the new Urban Design Guidelines would only apply to the lands owned by the University of Toronto. We understand that the City

will be undertaking a separate study in the future to establish Urban Design Guidelines for the other colleges' campus space.

You also indicated that the City has initiated a review of heritage buildings on campus and will be making recommendations to Council regarding the inclusion of buildings onto the City's Heritage Register. It is not anticipated that the buildings will be designated under Part IV of the Ontario Heritage Act as part of this current process, but that they will be listed on the registry.

Bay Street Corridor Character Area

The latest version of the draft Secondary Plan prepared by the University (February 2018) proposes a Structure Plan that identifies Character Areas. The lands on the south side of St. Joseph Street that include the Cardinal Flahiff Centre and the John M. Kelly Library are included in the Bay Street Corridor Character Area. The draft policies proposed for the Bay Street Corridor Character Area indicate that development will:

- a) Reflect the height and scale of the adjacent context including the taller buildings and urban character of Bay Street;
- b) Mass and orient buildings to provide appropriate transition toward the lower scale institutional buildings of the Historic Campus Character Area; and
- c) Include mid-block connections that contribute to the fine-grained pedestrian network between buildings and through large blocks.

USMC supports an approach that would allow for additional heights on the John M. Kelly Library because, as noted above, this will support USMC's goal to allow for the future expansion and enhancement of the facilities on this site. At the same time, USMC also recognizes that providing for a transition from the higher heights along Bay Street towards existing lower scale institutional buildings near Queen's Park and the historic campus areas needs to be taken into consideration in order to preserve the character of the campus.

Historic Campus Character Area

The remainder of the USMC campus is within the Historic Campus Character Area and the draft policies indicate that development will generally be limited to restoration, renovation and small scale additions to existing buildings. In order to achieve the objective of acquiring additional residence space, USMC is interested in the possible expansion of Elmsley Hall and would like to ensure that the new Secondary Plan policies do not preclude the opportunity to permit that expansion. Another option discussed with Victoria University is to expand the current Burwash Hall residence over the property line to our campus to create a shared residence building.

Cardinal Flahiff Centre, 95 St. Joseph Street

We understand that the Basilian Fathers, who own the property at 95 St. Joseph Street, have entered into an agreement that would allow for redevelopment of the site. The applicant held a pre-submission meeting with City staff during which they discussed plans that would include the retention of parts of the original building and chapel on site. We understand that the proposal is expected to include a 39 storey tower on the west side of the site and a 16 storey tower on the east side. USMC wants to ensure that the implications and impacts on the potential redevelopment of the John M. Kelly Library site are understood and evaluated as part of the development review process. USMC therefore plans to participate in the public consultation process and hopes to be directly consulted during the City's development review.

Conclusion

USMC believes that in order to remain a world-class facility, it must continue to meet the needs of its students and faculty and, in that regard, it is important to allow for the continued evolution of its campus. This includes the possible expansion of the John M. Kelly Library and the creation of additional residence spaces, including the possible expansion of Elmsley Hall and a shared residence with Victoria University. USMC therefore wants to ensure that the new Secondary Plan policies permit those opportunities.

USMC is also interested in ensuring that potential impacts of the redevelopment on the Cardinal Flahiff Centre on the USMC lands are assessed as part of its review process and to ensure it does not preclude expansion opportunities for the John M. Kelly Library site.

We appreciate the opportunity to identify our interests and we look forward to continued discussions during these planning processes. If you have any questions regarding our submission, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'D G Sylvester', written in a cursive style.

David G. Sylvester, Ph.D.
President and Vice-Chancellor



UNIVERSITY OF
ST. MICHAEL'S COLLEGE
IN THE UNIVERSITY OF TORONTO
OFFICE OF THE PRESIDENT

June 3, 2020

Paul Johnson
City of Toronto
City Planning
100 Queen Street West
Toronto, ON
M2H 2N2

Dear Mr. Johnson,

**RE: UNIVERSITY OF ST. MICHAEL'S COLLEGE
COMMENTS ON THE DRAFT UNIVERSITY OF TORONTO ST. GEORGE CAMPUS
SECONDARY PLAN**

As you are aware, the University of St. Michael's College (USMC) has an ongoing interest in the University of Toronto St. George Campus Secondary Plan (the 'Secondary Plan') process and related planning matters.

Following a meeting in November of 2018, USMC provided comments, in a letter dated December 7, 2018, on the Secondary Plan process to date. Since that time, the planning processes for the Secondary Plan have advanced and USMC has sought the input from a consulting team to assess the potential impact of the Secondary Plan. You will recall that following the above-mentioned correspondence representatives of USMC met with City staff on July 29, 2019 to discuss USMC comments on the new Secondary Plan. USMC also submitted written comments related to the Draft Cultural Heritage Thematic Framework (the 'Framework') on August 16, 2019.

Since that time we understand planning staff have been working on an updated Secondary Plan and policies to present to the public. These were to have been presented this summer but we understand now that the process may be further delayed. The purpose of this correspondence is to provide you with further comments on the Secondary Plan process and to seek an opportunity to meet with staff to discuss these matters.

BACKGROUND

As noted in our letter dated December 7, 2018, USMC currently has over 5,000 students and close to 200 faculty and staff. USMC believes it is important to allow for the continued evolution of the campus to meet its future growth requirements while, at the same time, respecting its heritage. As part of any expansions to the USMC to accommodate its growth needs, USMC plans to retain ownership of its properties. The enclosed map (Figure 1) illustrates the location of the USMC campus and identifies its properties in relation to the Secondary Plan.

The John M. Kelly Library, located at 113 St Joseph Street, is the main library at USMC and one of the busiest libraries in the University of Toronto Libraries system. The Library has not been expanded since its opening nearly 50 years ago. As mentioned in our previous correspondence, USMC remains interested in future opportunities to expand and enhance the John Kelly Library facilities in order to support the important functions it offers. In order for such an expansion to be viable, USMC is exploring options for the inclusion of expanded institutional-related uses including student housing as part of a redevelopment of the site.

In addition to the Library site, there are also other locations on the USMC campus which could provide opportunities to enhance the existing physical space and allow for new and expanded programming and services. For example, Elmsley Hall currently provides student housing on campus but does not reflect more contemporary design and services. It is important that the planning framework for the Secondary Plan remain flexible while respecting the existing and emerging built form of the USMC campus and broader University of Toronto context. This will allow the USMC campus to evolve and meet future demands with certainty.

UNIVERSITY OF TORONTO SECONDARY PLAN

Since the commencement of the Secondary Plan in 2018, USMC has monitored and participated in the process and has reviewed the draft plan and policies prepared to date. In our meeting with City staff in July of 2019, USMC restated its interests in the policies of the plan as stated above, and referred to the initial comments provided in our December 7, 2018 letter.

Based on discussions with City staff on March 10, 2020, USMC understands the City was planning to release updated draft policies and material for the new Secondary Plan for public review and comment later this summer. We understand that once these materials are released, the City expects to hold further public consultation to discuss the proposed revisions. We further understand that detailed design guidelines for institutional buildings will be developed after the Secondary Plan has been completed. We look forward to the release of these updated policies and to participating in the next phase of the planning process for the Secondary Plan.

As noted in past correspondence, USMC remains concerned about how new policies will affect its ability to address its growth needs on the campus.

Vision and Objectives

Overall, USMC supports the vision for the Secondary Plan to respond to the emerging needs of the University as it intensifies through renovation, infill and redevelopment. Through these changes heritage resources are to be carefully considered and conserved and/or sensitively

integrated into the growth on campus. The objectives of adaptively re-using heritage buildings and introducing new development and providing flexibility for growth to accommodate campus needs are important to USMC.

Public Realm

USMC is also supportive of the public realm objectives of the Secondary Plan given the importance of connecting students through a network of walkways on campus and providing open spaces for a full range of activities. The provision of new and enhanced public spaces must however be balanced with the need to maintain laneways and driveways for functional day to day activities to service the campus including parking, deliveries and operational maintenance activities.

Built Form

While we understand more detailed design guidelines will be provided for institutional form buildings, it will be important for built form guidelines to not prescribe building design given the unique nature and functional needs of institutional buildings which contain several uses and require flexible policies that consider context and the needs and function of the form of development.

Bay Street Corridor Character Area

The latest version of the new Secondary Plan proposes a Structure Plan that identifies Character Areas. These are shown on Figure 1 in relation to USMC properties. The lands on the south side of St. Joseph Street include the Cardinal Flahiff Centre (95 St Joseph) and the John M. Kelly Library which remain within the *Bay Street Corridor Character Area*. The current draft policies proposed for the Bay Street Corridor Character Area state that development will:

- a) Reflect the height and scale of the adjacent context including the taller buildings and urban character of Bay Street;
- b) Mass and orient buildings to provide appropriate transition toward the lower scale institutional buildings of the Historic Campus Character Area; and
- c) Include mid-block connections that contribute to the fine-grained pedestrian network between buildings and through large blocks.

The Bay Street Corridor policies provide for development of a mid-scale institutional form generally up to 12 institutional storeys and provide that development may occur where individual building sites meet the policies of the new Secondary Plan with respect to heritage conservation, provision of open space and mid-block connections. New taller elements greater than 12 institutional storeys in height are generally appropriate in context-appropriate locations that have limited impact on adjacent historic buildings, the Historic Campus Character Area and the Huron Sussex Character Area.

USMC continues to support an approach to the policies that would allow for additional building height for institutional uses in appropriate locations on its campus, including on the John M. Kelly Library site. At the same time, USMC recognizes that providing for a transition in height from higher heights along Bay Street towards existing lower scale institutional buildings near Queen's Park and the historic campus areas, needs to be taken into consideration in order to preserve the

character of the campus. Given the surrounding physical context and emerging developing activity in the area, the John M. Kelly Library is an appropriate site for redevelopment and the opportunity for its redevelopment should be appropriately framed in the Secondary Plan.

Historic Campus Character Area

The remainder of the USMC campus is within the *Historic Campus Character Area* and the draft policies indicate that development will generally be limited to restoration, renovation and small scale additions to existing buildings. Tall elements are not permitted. Any development that does occur is required to respect the scale and character of adjacent heritage buildings, enhance and extend the public realm, frame open spaces with broad building frontages.

In order to achieve the objective of acquiring additional residential space, USMC is interested in the possible redevelopment and expansion of Elmsley Hall and would like to ensure that the new Secondary Plan policies do not preclude the opportunity to permit that expansion.

Draft Cultural Heritage Thematic Framework

It should be noted that USMC has been a strong steward of its heritage properties and remains committed to protecting those that are currently designated on the campus. A map of the current listed and designated properties is provided in Figure 2.

The City released a draft Cultural Heritage Thematic Framework in July 2019 as part of an assessment of potential cultural heritage resources for the new Secondary Plan which also identified the inclusion of buildings within the Secondary Plan area to be added onto the City's Heritage Register through the application of the evaluation framework. The framework identified the John M. Kelly Library under the 'Post War Expansion (1940-1970)' theme and describes it as being a pavilion in the landscape form of monumental building.

USMC submitted comments to the City regarding the framework on August 16, 2019 and disagreed with this aspect of the framework. In particular, the Library is not within a landscaped area nor does it represent a "pavilion in the landscaped form". The landscaped areas surrounding the Library site are not contiguous and are interrupted with building access areas, parking and loading spaces. In those comments, USMC also requested that the City provide the information that it intends to rely on to include the John M. Kelly Library as a listed property in association under the Post War Expansion theme prior to any further consideration of listing the property through the Secondary Plan process. We continue to seek confirmation from the City that buildings identified through the Framework will not be included on the City's Heritage Register or designated pursuant to the *Ontario Heritage Act* through the Secondary Plan process or a collateral municipal process.

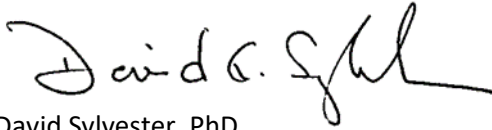
CONCLUSION

The Secondary Plan must ensure sufficient flexibility for USMC to meet the needs of its students and faculty and allow for the continued evolution of its campus, including the possible expansion of the John M. Kelly Library and the creation of additional institutional and student residence spaces. USMC continues to seek confirmation that the new Secondary Plan policies permit those

opportunities and is not overly restrictive or prescriptive given the nature of redevelopment which must occur in order for USMC to remain a leader in post-secondary education.

We appreciate the opportunity for continued discussions throughout these planning processes.

Sincerely,

A handwritten signature in black ink that reads "David C. Sylvester". The signature is fluid and cursive, with the first name being the most prominent.

David Sylvester, PhD
President and Vice-Chancellor

CC: Scott Mabury, Vice-President, Operations and Real Estate Partnerships
University of Toronto

Christine Burke, Director, Campus and Facilities Planning
University of Toronto

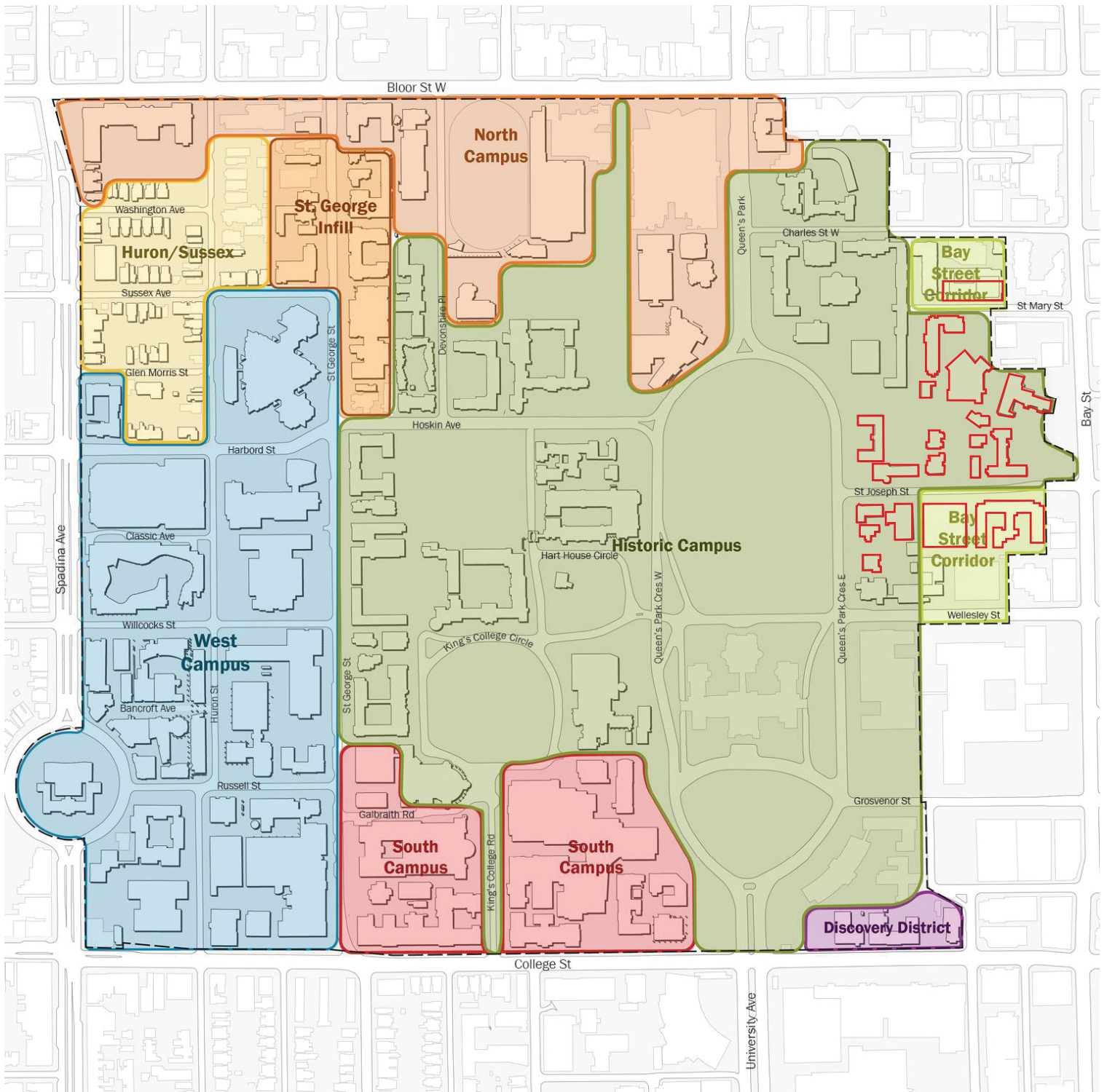
Eileen Costello
Aird & Berlis LLP

Dana Anderson
MHBC Planning Limited

Effie Slapnicar, Bursar and Chief Administrative Officer
University of St. Michael's College in the University of Toronto

Lisa Rae, Director, Office of the President
University of St. Michael's College in the University of Toronto


Attached: U of T Secondary Plan Character Areas Map – Figure 1
USMC Heritage Buildings Map – Figure 2



Data Source: University of Toronto Secondary Plan, 2018

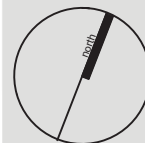
Figure 1
University of Toronto
Secondary Plan
Character Areas

LEGEND

 University of St. Michael's College Campus

DATE: May 4, 2020

SCALE: Not to Scale



University of Toronto
 St. George Campus
 Toronto, ON

MHBC PLANNING
 URBAN DESIGN
 & LANDSCAPE
 ARCHITECTURE
 230-7050 WESTON ROAD WOODBRIDGE, ON, L4L 8G7
 P: 905 761 5588 F: 905 761 5589 | WWW.MHBCPLAN.COM



Data Source: University of St. Michael's College Master Plan, 2014
and City of Toronto Online Heritage Register Search

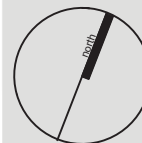
Figure 2
University of St. Michael's College
Designated and Listed
Heritage Properties

LEGEND

- Listed Property
- Designated Property Under Part IV of the Heritage Act
- Non-listed or designated USMC Properties

DATE: May 4, 2020

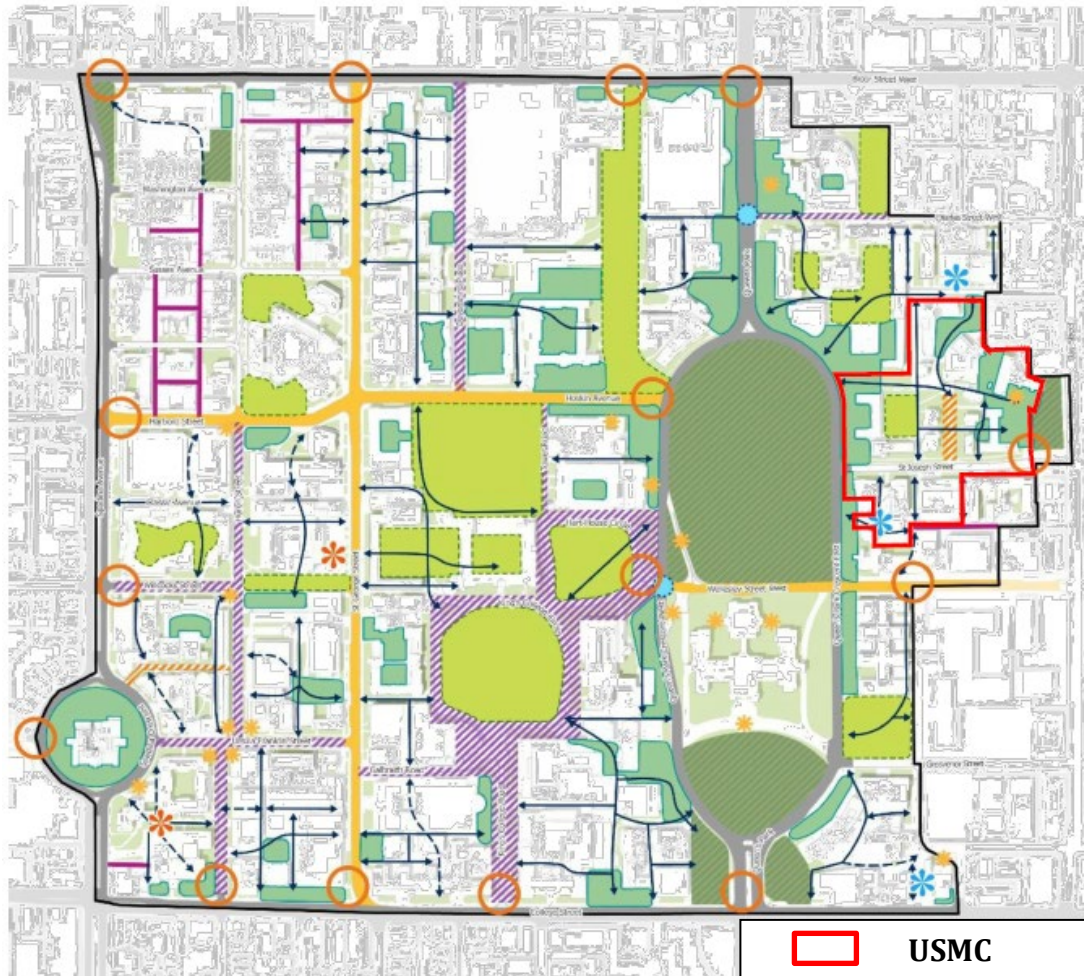
SCALE: Not to Scale



**University of St. Michael's
College Campus
Toronto, ON**

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URBAN DESIGN
& LANDSCAPE
ARCHITECTURE
230-7050 WESTON ROAD WOODBRIDGE, ON, L4L 8G7
P: 905 761 5588 F: 905 761 5589 | WWW.MHBCPLAN.COM

ATTACHMENT #2
University of Toronto St. George Campus Secondary Plan
Map 20-2F Public Realm Components



University of Toronto St. George Campus
Secondary Plan

MAP 20-2F Public Realm Components

- | | | |
|--------------------------|--|--|
| Secondary Plan Area | Existing Institutional Major Open Spaces | Gateways |
| Great Streets | Existing Key Open Spaces | Potential At-Grade Pedestrian Crossings |
| Main Internal Streets | Parks and Legislative Grounds | Potential Public Realm Improvement Areas |
| Existing Shared Streets | Other Open Spaces
(e.g. Courtyards, Lawns, Forecourts, Plazas and Fields) | Existing Mid-Block Connections |
| Potential Shared Streets | Potential Institutional Major Open Spaces | Potential Mid-Block Connections |
| Public Laneways | Potential Key Open Spaces | |

Draft map



Not to Scale

Date Expired: 05/17/2022