



June 29, 2022

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2
Attn: Ellen Devlin, Secretariat

Dear Members of the Toronto and East York Community Council:

**Re: Item TE34.8
University of Toronto St. George Campus Secondary Plan - Official Plan
Amendment Application - Final Report
City of Toronto Ward 11
TCDSB Trustee Ward 9**

The Toronto Catholic District School Board (TCDSB) has reviewed the Official Plan Amendment, University of Toronto Secondary Plan & Urban Design Guidelines, scheduled for consideration at the Toronto and East York Community Council meeting of June 29, 2022.

The TCDSB has engaged with City staff throughout the drafting process of the University of Toronto Secondary Plan – including attendance at the Community consultation meeting where the draft plan was presented to the public on May 19, 2022.

The TCDSB owns and operates St. Joseph's College School located at 74 Wellesley Street West (subject site) within the University of Toronto Secondary Plan. The TCDSB's main concerns with the draft Secondary Plan and Urban Design Guidelines are; that they do not provide for redevelopment of the subject site, in this case, for a tall building element. In addition, the subject site is proposed to retain its existing Institutional designation under the Official Plan which would require an Official Plan Amendment to permit future re-development of the subject site with uses other than institutional.

As part of this submission, please find attached a detailed memorandum prepared by Bousfields on behalf of the TCDSB, outlining in greater detail, the Board's concerns related to the proposed guidelines and policies. This memorandum also provides recommended policy modifications to specific language within the draft Secondary Plan and Urban Design Guidelines to allow for the unencumbered redevelopment potential of the subject site – which could include the schools' integration into a tall and high-density residential building.

Should you require additional information regarding our comments, please contact Erica Pallotta, Senior Coordinator, Development Services at erica.pallotta@tcdsb.org



Regards,

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

Michael Loberto
Superintendent, Planning and Development Services
Toronto Catholic District School Board

Cc: Norm Di Pasquale – Ward 9 TCDSB Trustee
Erica Pallotta – Senior Coordinator, Development Services
Barbara Leporati – Senior Coordinator, Planning Services
Adam Brutto – Senior Manager of Planning & Admissions
Paul Johnson – Senior Planner, Community Planning



June 27, 2022

Mr. Paul Johnson
City of Toronto, City Planning Division
City Hall, 18th Floor, East Tower
100 Queen Street West
Toronto, Ontario M5H 2N2

Dear Mr. Johnson;

**Re: Draft University of Toronto Secondary Plan & Urban Design Guidelines
74 Wellesley Street East**

We are the planning consultants for the Toronto Catholic District School Board (“TCDSB”), the owners of St. Joseph’s College School at 74 Wellesley Street West (the “subject site”). These lands are located within the in-force University of Toronto Secondary Plan boundary, in the southeast part of the Plan. It is important to note the property is owned by TCDSB and not by the University of Toronto.

On behalf of our client, we are writing with respect to the draft of the updated University of Toronto St. George Campus Secondary Plan (the “Secondary Plan”) and draft University of Toronto St. George Campus Urban Design Guidelines (the “Guidelines”). We have reviewed the most recent versions of these two documents, dated June 13, 2022.

We have a number of comments and concerns and have included requested revisions to the draft Secondary Plan and Guidelines. In particular, we are concerned that the Secondary Plan and Guidelines do not provide for redevelopment of the subject site. As discussed in our earlier submission to the City on this matter, it is our opinion that the subject site should be identified as a site for redevelopment that will allow the institution to modernize the facilities while remaining on site.

The subject site is currently designated as *Institutional* in the City of Toronto Official Plan, The *Institutional* designation permits a range of uses including major educational, health and governmental uses with their ancillary uses, cultural, parks and recreational, religious, commercial and institutional residence facilities, including the full range of housing associated with a health institution, as well as utility uses.

The subject site is currently zoned Q T.2.0 by City of Toronto Zoning By-law 438-86, as amended. The Q (Institutional) zoning category is one of the three Mixed Use Districts in the Zoning By-law (CR, MCR, and Q). The permitted uses in the Q zone include a wide range of institutional uses (including colleges and universities), a more limited range of community services, cultural and

arts facilities (including community centres and places of worship), a limited range of retail and service uses (including financial institutions, retail stores (to a maximum of 465 square metres) and restaurants (to a maximum of 465 square metres), government offices and shared housing (including homes for the aged, nursing homes, monasteries, nunneries and university residences).

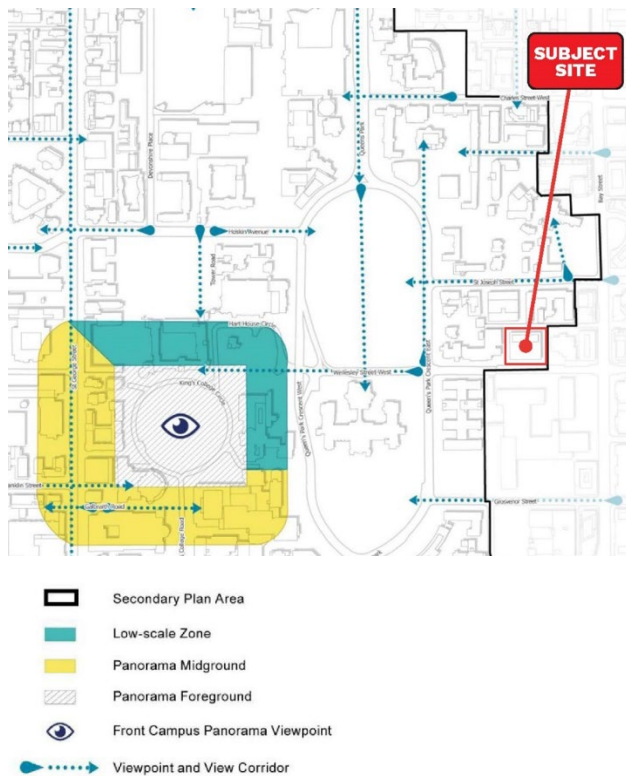
Comments on Draft Secondary Plan and Draft Guidelines

As noted, we have undertaken a review of the draft Secondary Plan and Guidelines as they apply to the subject site. As described below, we have a number of comments on the Plan and have identified proposed revisions.

A. Draft University of Toronto Secondary Plan

- Policy 4.39

There is an inconsistency in the direction provided in Policies 4.39, 4.38 and Map 20-2E with respect to the requirements for a View Study. Policy 4.39 applies to planning applications in the Secondary Plan area and requires a View Study whereas Policy 4.38 and Map 20-2E apply to a more limited area (around the Front Campus).



Map 20-2E – Public Realm, Views and Panorama

As such, we request that Policy 4.39 but revised as follows:

*Planning applications in the **areas identified in Map 20-2E Secondary Plan Area** will demonstrate that they comply with Policy 4.38 by completing a View Study as part of a complete application illustrating panoramic views from the centre of the Front Campus lawn looking toward the proposed development.*

- Policy 5.3 c)

In Policy 5.3 c) the requirement for a 6-metre pedestrian sidewalk area differs from the requirements in the Downtown Secondary Plan, which states that the City may request such a setback as a community benefit. Policy 5.3 c) would remove such a setback from being eligible for community benefit charge credits. Therefore, we request that Policy 5.3 c) be revised, as follows, to be consistent with the Downtown Secondary Plan policy:

To reinforce the Area's diverse physical character, contribute to an architecturally varied and interesting built environment, enhance and expand the public realm with comfortable pedestrian-level conditions, and provide for consideration of institutional uses and programming, development will:

*c) be set back a minimum of 6.0 metres from the curb to the building face along streets **at the City's request as a community benefit**, 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 5.3 e)

This policy is further detailed in the urban design guidelines with angular plane guidelines. We have concerns that requirements for pedestrian-scale base buildings do not take into account the unique needs of institutions and the form that takes in their buildings. Institutional often have requirements for large floorplate, particularly for school sites. This means that a site may require a podium taller than 80% of the right of way, as proposed in the Guidelines. Therefore, we request the following modifications:

*e) generally include a pedestrian-scale building base component that relates to the scale and proportion of adjacent streets, parks and open spaces, with upper storeys stepped back or contained within an angular plane. Consideration will be given for designs of extraordinary quality without a pedestrian-scale base building where the development will enhance the pedestrian experience and be compatible with the existing and planned streetwall height context, and incorporate low- or zero-carbon buildings, **as well as buildings or parts of buildings for institutional uses which may require larger building bases components to accommodate the desired programmatic requirements of the institution;***

- Policy 5.15 f)

As proposed, Policy 5.15 f) is not reflective of the existing and planned building heights and densities in the East Campus Character Area south of St. Joseph Street, including the subject site. Policy 5.15 f) describes an area with low-scale, mid-scale and taller institutional elements, however the draft Guidelines for the draft Secondary Plan show tall elements on approximately half of the sites in this area south of St. Joseph Street. The only sites without tall buildings are the TCDSB site and the parts of the University buildings that are only partially in East Campus Character Area to the west. A reworded policy reflecting this potential for higher density development would be more appropriate.

We request to modify to reflect a higher-density vision for the subject site and surrounding block:

Development within the East Campus Character Area will:

- f) south of St. Joseph Street, include a mix of **institutional building scales, predominantly with tall buildings and tall building elements**, ~~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~~, **with the tallest buildings located furthest east, closer to Bay Street, transitioning to low and mid-scale institutional buildings adjacent to the Queen's Character Area to the west and the interior portion of the East Campus Character Area to the north;**

B. Draft St. George Campus Secondary Plan Area Urban Design Guidelines

We have reviewed the draft St. George Campus Secondary Plan Area Urban Design Guidelines, dated June 13, 2022,.

We understand that guidelines are structured to provide guidelines for the full Secondary Plan area and ultimately site-specific direction in separate sections through subsequent development applications, in accordance with Policy 8.2 of the draft Secondary Plan. As provided above with respect to the Secondary Plan, we have provided comments on pertinent guidelines below.

- 2.3.8 East Campus Character Area

Similar to Policy 5.15 f) of the draft Secondary Plan, we believe the description in Section 2.3.8 on the character area fails to address the higher density potential and planned future for the block south of St Joseph Street. We request that the text be revised as follows to better align with a vision for a higher density, taller built form on the block south of St Joseph

Street.

The East Campus Character Area is largely defined by the Victoria University and University of St. Michael's College campuses, as well as a higher density block south of St Joseph Street. The park-like setting of portions of the East Campus are defined by a series of interconnected green spaces with a varied topography and mature tree canopy, and includes landscape features such as gardens, lawns, fountains, forecourts, and formal and informal pathway, while south of St Joseph Street is defined by a variety of higher density institutional uses at the southeast limits of the Secondary Plan area. In contrast to the more monumental landscape of Queen's Park and the feeling of openness experienced within the Central Campus and Queen's Park Character Areas, the East Campus has a more intimate public realm character defined by the design and placement of buildings in closer proximity to one another and enclosing open spaces to form quadrangle-like landscapes. This sense of enclosure created by the varied low-rise buildings of different eras at the core of the University of St. Michael's College and Victoria University lands contributes to the heritage character of the portions of the East Campus. Reminders of the area's early residential history and character include the former houses on Elmsley Place and Charles Street West, which have been adaptively reused for institutional purposes. The park-like character of the core of the East Campus transitions toward a more street-oriented, high density urban character at its edges to the north, east and south and beyond to the surrounding neighbourhoods.

The open space character and low-scale of the core of the East Campus will be maintained, while the area south of St Joseph Street presents an opportunity for intensification of institutional and other uses. A mix of institutional and mixed use typologies will continue to create a transition in scale from the core of the East Campus to the urban grid pattern of the city beyond, particularly to the south. While these parts of the East Campus will continue to differ in scale from the core of the Character Area, they will maintain connections to the core area through institutional land uses, ~~compatible built form~~, transitions in built form, and public realm elements including forecourts, green open spaces and mid-block connections that extend through the area.

- 2.4.2.2 Pedestrian Scale Base Building and Transition

With respect to the angular plane, we note that it is unclear in Figure 2.13 of the Guidelines what the angular plane would be for the subject site. While the subject site is identified in the legend as angular plane #2, the line pattern aligns with angular plane #4, and similarly “Maximum Base Height of 80% of Right-of-Way + Setback Width with Stepback Transition” is not identified on Figure 2.13 in the legend, while “Maximum Base Height of 80% of Right-of-Way + Setback Width with Angular Plane Transition” is identified twice. We anticipate that this is an error and would request that the guidelines be amended to address it.

Assuming angular plane #4 is intended to apply to the subject site, it is our opinion that it should be measured from the scale of the adjacent open space, not just the right-of-way. Given that the south side of Wellesley Street East is occupied by the McDonald Block office complex, with

significant setbacks from Wellesley Street East, that additional base height would be appropriate to properly frame the public realm.

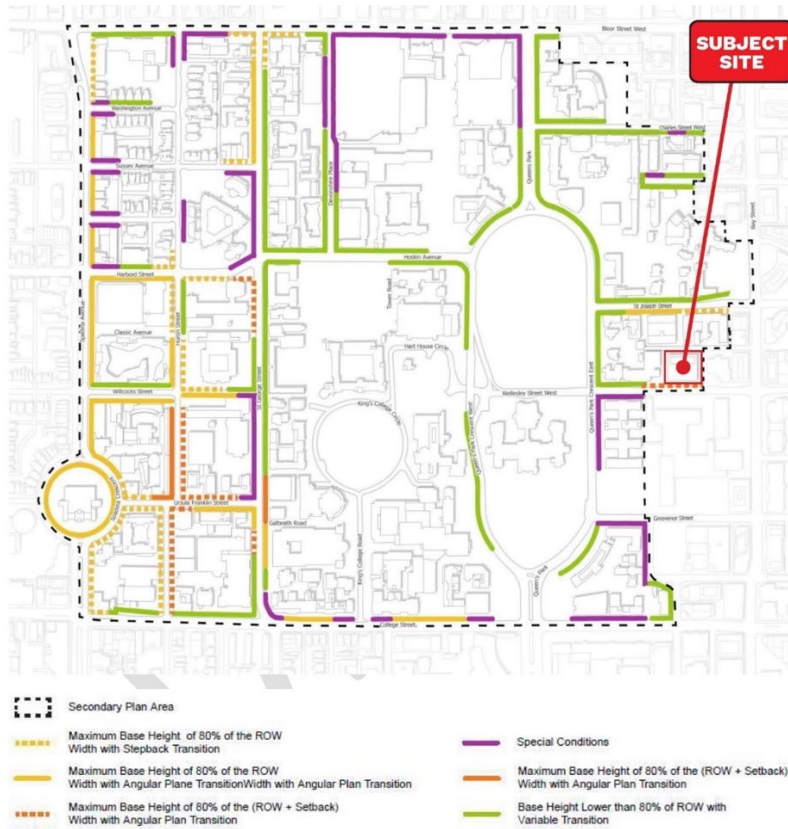


Figure 2.18

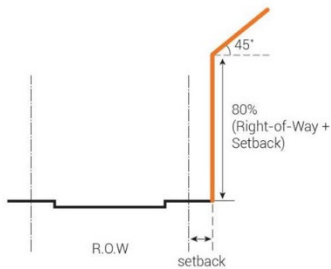


Figure 2.13

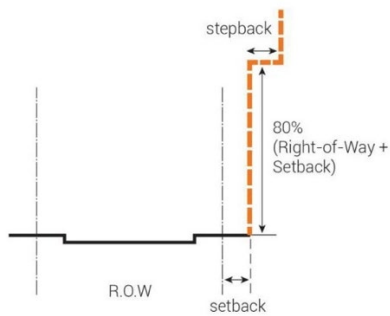


Figure 2.15

Therefore, the following modification is requested:

4. Maximum Base Height of 80% of Right-of-Way + Setback Width adjacent public realm with Stepback Transition

A pedestrian-scale base building no taller than 80% of the existing width of the right-of-way plus the front setback dimension adjacent public realm, including any applicable building setbacks on both sides of the street and the right-of-way width, with a minimum 3 metre stepback transition to the mid-scale institutional storeys (see Figure 2.15).

- **2.4.2.4 Taller Institutional Elements**

Section 2.4.2.4 provides guidance on the location of Taller Elements, providing that certain sites and blocks can accommodate additional height and density in the form of taller elements, with the taller institutional element building component generally begins above a height of 48 metres or approximately 13 storeys. Figure 2.21 shows a 'Potential Taller Institutional Element' on the sites directly west and northwest of the subject site and a 'Potential Tall Building' on the site to the northeast.

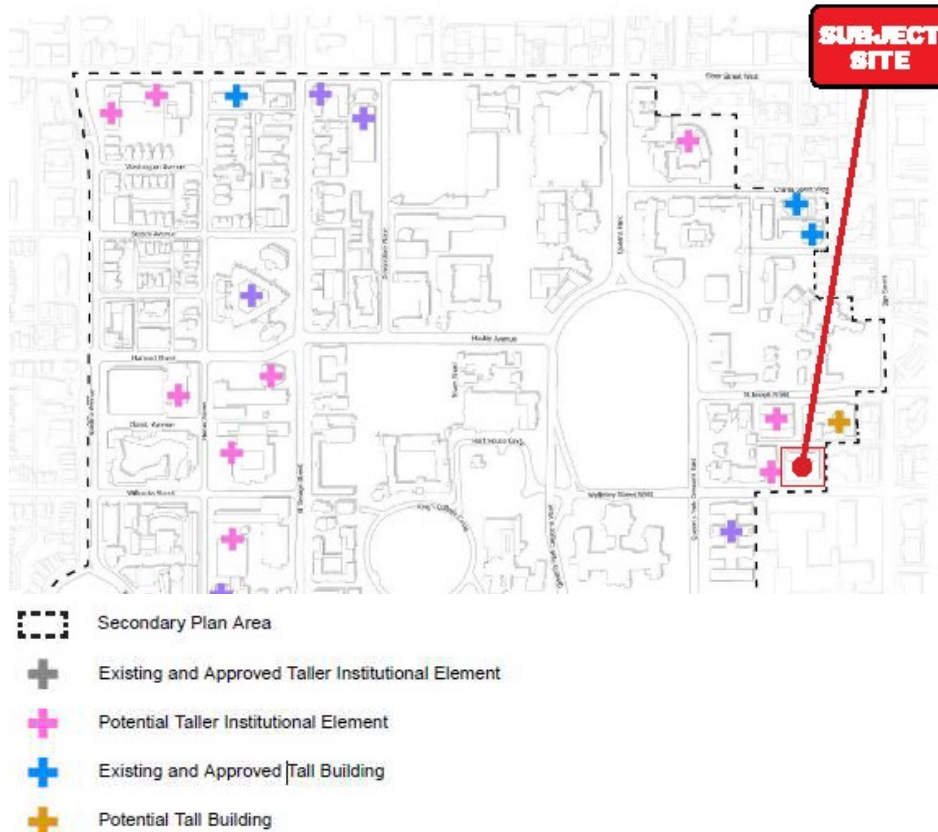


Figure 2.21

Given the size and configuration of the subject site, the subject site should be identified as 'Potential Tall Building', to provide appropriate flexibility for redevelopment of the subject site. Given that the guidelines provide that more detail regarding taller elements will be provided on a block specific basis, confirmation of and specific matters such as the location of the taller element, maximum floorplate size, separation distances and setbacks can be determined at subsequent stages of the process through a planning application for the subject site.

Conclusion

Generally, we have concerns that the draft Secondary Plan and Urban Design Guidelines do not adequately provide for potential redevelopment of the subject site, in particular, for a tall building element on the site. Several other policies issues have also been identified related to policy interpretation.

If the proposed modifications to the draft Secondary Plan as presented in this memorandum are implemented, the TCDSB would be satisfied and supportive of the implementation of the new Secondary Plan and Urban Design Guidelines for the wider University of Toronto area.

We trust that this letter is satisfactory. However, should you have any questions or comments, please do not hesitate the contact the undersigned.

Yours very truly,

Bousfields Inc.



Emma West, MCIP, RPP