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OFFICE OF THE
CITY CLERK - 13 WEST
2022 AUG 18 P 12:59



File No. 020451.000188

August 17, 2022

Delivered by Courier

City of Toronto – City Clerk
Attention: Ellen Devlin, Administrator, Toronto
and East York Community Council
100 Queen Street West, 2nd Fl W
Toronto, ON
M5H 2N2

Dear Mr. John D. Elvidge:

**Re: City of Toronto File No. 16 221931 STE 20 OZ
Official Plan Amendment 582 - University of Toronto St. George Campus Area
Secondary Plan
Notice of Appeal of the Toronto Catholic District School Board**

Please find enclosed on behalf of our client, the Toronto Catholic District School Board, the following documents for filing with the City's Clerk's Office:

1. Ontario Land Tribunal Appeal Form (A1)
2. Notice of Appeal of OPA 582 and Enclosed Correspondence
3. Filing Fee of \$1,100 via Cheque from Borden Ladner Gervais LLP

Please do not hesitate to contact me should you have any questions on the above.

Yours truly,
BORDEN LADNER GERVAIS LLP

A handwritten signature in blue ink that reads 'Julie Lesage'.

Andrew Baker/Julie Lesage
Encl.



Borden Ladner Gervais LLP

An Ontario Limited Liability Partnership

Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada M5H 4E3

The Bank of Nova Scotia

Scotia Plaza, 44 King St W
Toronto, ON, Canada M5H 1H1

CHEQUE NUMBER **485035**

CHEQUE DATE **08-17-2022**

MM-DD-YYYY

One thousand one hundred and 00/100*****

GEN \$***1,100.00***

Borden Ladner Gervais LLP

PAY
TO THE
ORDER
OF:

Minister of Finance



[Signature]
AUTHORIZED SIGNATURE



⑈ 485035⑈ ⑆ 8000 2000 2⑆ 14 22 100 1 1⑈

Payee: Minister of Finance
Vendor ID: 101557

Check #: 485035
Check Date: Aug 17/22

| Invoice Num | Reference | Invoice Date | Invoice Amount | HST/GST | Payment Amt |
|-------------|---|--------------|----------------|---------|-------------|
| 20220816A | 050032888358 VENDOR: Minister of Finance INVOICE#: 20220816A DATE: 8/16/2022 CRINV PKUP RJ Bantayan Appeal of an OPA with the City of Toronto, Inv#: 20220816A , Inv. date: August 16, 2022 , | Aug 16/22 | 1,100.00 | 0.00 | 1,100.00 |
| Totals: | | | \$1,100.00 | | \$1,100.00 |

Endorsement - Signature or Stamp

BACK/ENDOS



Ontario Land Tribunal

655 Bay Street, Suite 1500, Toronto, ON M5G 1E5

Tel: 416-212-6349 | 1-866-448-2248

Web Site: olt.gov.on.ca

Appeal Form (A1)

| |
|--|
| Municipal/Approval Authority Date Stamp |
| |

| |
|---|
| Receipt Number (OLT Office Use Only) |
| |

| |
|--|
| OLT Case Number (OLT Office Use Only) |
| |

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| Date Stamp – Appeal Received by OLT |
| |

Please complete this Appeal Form by following the instructions in the companion document titled "Appeal Form Instructions". Please read **both** documents carefully to ensure you submit the correct information and complete this form correctly.

There are guides available for review on the Tribunal's [website](#) for different appeal types to assist you in filing an appeal.

Please review the notice of the decision you are appealing to determine the appeal deadline and the specific official with whom the appeal should be filed (e.g. Secretary-Treasurer, Clerk, Minister, Ontario Land Tribunal) prior to completing this Appeal Form. Relevant portions of the applicable legislation should also be reviewed before submitting this form. Your appeal must be filed with the appropriate authority within the appeal period as set out in the notice of the decision and applicable legislation.

Section 1 – Contact Information (Mandatory)

| Applicant/Appellant/Objector/Claimant Information | | | |
|---|----------------|-------------------------------|-----------|
| Last Name: | | First Name: | |
| | | | |
| Company Name or Association Name (Association must be incorporated – include copy of letter of incorporation): Toronto Catholic District School Board | | | |
| | | | |
| Email Address: erica.pallotta@tcdsb.org | | | |
| | | | |
| Daytime Telephone Number: | | Alternative Telephone Number: | |
| 416.222.8282 | ext. | 2793 | |
| Mailing Address | | | |
| Unit Number: | Street Number: | Street Name: | P.O. Box: |
| | 80 | Sheppard Avenue East | |

| City/Town: | Province: | Country: | Postal Code: |
|------------|-----------|----------|--------------|
| Toronto | ON | Canada | M2N 6E8 |

| Representative Information | | | | |
|---|----------------|----------------------|-------------------------------|--------------|
| <input checked="" type="checkbox"/> I hereby authorize the named company and/or individual(s) to represent me | | | | |
| Last Name: | | First Name: | | |
| Lesage | | Julie | | |
| Company Name or Association Name (Association must be incorporated – include copy of letter of incorporation): | | | | |
| Borden Ladner Gervais LLP | | | | |
| Email Address: | | | | |
| jlesage@blg.com | | | | |
| Daytime Telephone Number: | | | Alternative Telephone Number: | |
| 416.367.6276 | ext. | | | |
| Mailing Address | | | | |
| Unit Number: | Street Number: | Street Name: | | P.O. Box: |
| | 22 | Adelaide Street West | | |
| City/Town: | | Province: | Country: | Postal Code: |
| Toronto | | ON | Canada | M5H 4E3 |
| <p>Note: If your representative is not licensed under the <i>Law Society Act</i>, please confirm that they have your written authorization, as required by the <i>OLT Rules of Practice and Procedure</i>, to act on your behalf and that they are also exempt under the Law Society's by-laws to provide legal services. Please confirm this by checking the box below.</p> | | | | |
| <p><input type="checkbox"/> I certify that I understand that my representative is not licensed under the <i>Law Society Act</i> and I have provided my written authorization to my representative to act on my behalf with respect to this matter. I understand that my representative may be asked to produce this authorization at any time along with confirmation of their exemption under the Law Society's by-laws to provide legal services.</p> | | | | |

| Location Information | |
|--|--|
| Are you the current owner of the subject property? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| Address and/or Legal Description of property subject to the appeal: | |
| 74 Wellesley Street West | |
| Municipality: | |
| Toronto | |
| Upper Tier (Example: county, district, region): | |
| | |

| Language Requirements |
|-----------------------|
|-----------------------|

Do you require services in French? Yes No

To file an appeal, please complete the section below. Complete one line for each appeal type

| Subject of Appeal | | Type of Appeal (Act/Legislation Name) | Reference (Section Number) |
|-------------------|-------------------------|--|-------------------------------|
| Example | Minor Variance | <i>Planning Act</i> | 45(12) |
| 1 | Official Plan Amendment | <i>Planning Act</i> | 17(24) |
| 2 | | | |
| 3 | | | |
| 4 | | | |
| 5 | | | |

Section 2 – Appeal Type (Mandatory)

Please select the applicable type of matter

| Select | Legislation associated with your matter | Complete Only the Section(s) Below |
|-------------------------------------|---|------------------------------------|
| <input checked="" type="checkbox"/> | Appeal of <i>Planning Act</i> matters for Official Plans and amendments, Zoning By-Laws and amendments and Plans of Subdivision, Interim Control By-laws, Site Plans, Minor Variances, Consents and Severances | 3A |
| <input type="checkbox"/> | Appeal of <i>Development Charges Act, Education Act, Aggregate Resources Act, Municipal Act</i> matters | 3A |
| <input type="checkbox"/> | Appeal of or objection to <i>Ontario Heritage Act</i> matters under subsections 29, 30.1, 31, 32, 33, 40.1 and 41 | 3A |
| <input type="checkbox"/> | Appeal of <i>Planning Act</i> (subsections 33(4), 33(10), 33(15), 36(3)), <i>Municipal Act</i> (subsection 223(4)), <i>City of Toronto Act</i> (subsection 129(4)) and <i>Ontario Heritage Act</i> (subsections 34.1(1), 42(6)) matters | 3A & 3B |
| <input type="checkbox"/> | Appeal of <i>Clean Water Act, Environmental Protection Act, Nutrient Management Act, Ontario Water Resources Act, Pesticides Act, Resource Recovery and Circular Economy Act, Safe Drinking Water Act, Toxics Reduction Act, and Waste Diversion Transition Act</i> matters | 4A |
| <input type="checkbox"/> | Application for Leave to Appeal under the <i>Environmental Bill of Rights, 1993</i> | 4B |
| <input type="checkbox"/> | Appeal under the <i>Niagara Escarpment Planning and Development Act (NEPDA)</i> | 5 |
| <input type="checkbox"/> | Appeal of <i>Conservation Authorities Act, Mining Act, Lakes and Rivers Improvement Act, Assessment Act, and Oil, Gas and Salt Resources Act</i> matters | 6 |

| | | |
|--------------------------|------------------------------|--|
| <input type="checkbox"/> | Legislation not listed above | Contact OLT before filing your appeal |
|--------------------------|------------------------------|--|

Section 3A – Planning Matters

Appeal Reasons and Specific Information

Number of new residential units proposed:

N/A

Municipal Reference Number(s):

16 221931 STE 20 OZ

List the reasons for your appeal:

Please see attached letter.

Has a public meeting been held by the municipality? Yes No

For appeals of Official Plans, Official Plan Amendments, Zoning By-laws and Zoning By-law Amendments, please indicate if you will rely on one or more of the following grounds:

A: A decision of a Council or Approval Authority is:

- Inconsistent with the Provincial Policy Statement issued under subsection 3(1) of the *Planning Act*
- Fails to conform with or conflicts with a provincial plan
- Fails to conform with an applicable Official Plan

And

B: For a non-decision or decision to refuse by council:

- Consistency with the provincial policy statement, issued under subsection 3(1) of the *Planning Act*
- Conformity with a provincial plan
- Conformity with the upper-tier municipality's Official Plan or an applicable Official Plan

If it is your intention to argue one or more of the above grounds, please explain your reasons:

Please see attached letter.

Oral/Written submissions to council

Did you make your opinions regarding this matter known to council?

Oral submissions at a public meeting of council

Written submissions to council

Not applicable

Related Matters

Are there other appeals not yet filed with the Municipality?

Yes No

Are there other matters related to this appeal? (For example: A consent application connected to a variance application).

Yes No

If yes, please provide the Ontario Land Tribunal Case Number(s) and/or Municipal File Number(s) for the related matters:

Section 3B – Other Planning Matters

Appeal Specific Information (Continued)

Date application submitted to municipality if known (yyyy/mm/dd):

Date municipality deemed the application complete if known (yyyy/mm/dd):

Please briefly explain the proposal and describe the lands under appeal:

There are required documents and materials to be submitted to the Ontario Land Tribunal (OLT) based on the type of legislation and section you are filing under. Please see the [Section 3B Checklist\(s\)](#) located [here](#) and submit all documents listed.

Section 4A – Appeals under Environmental Legislation

Appeal Specific Information

Outline the grounds for the appeal and the relief requested:

Reference Number of the decision under appeal:

Portions of the decision in dispute:

Date of receipt of Decision or Director's Order (yyyy/mm/dd):

Applying for Stay? Yes No

If Yes, outline the reasons for requesting a stay: (Tribunal's Guide to Stays can be viewed [here](#))

There are required documents and materials to be submitted to the Ontario Land Tribunal (OLT) based on the type of legislation and section you are filing under. Please see the [Section 4A Checklist\(s\)](#) located [here](#) and submit all documents listed on the checklist.

Section 4B – Environmental Application for Leave to Appeal

Are you filing an Application for Leave to Appeal under the *Environmental Bill of Rights, 1993*? Yes No

Identify the portions of the instrument you are seeking to appeal:

| |
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| |
| Identify the grounds you are relying on for leave to appeal. Your grounds should include reasons why there is good reason to believe that no reasonable person, having regard to the relevant law and to any government policies developed to guide decisions of that kind could have made the decision; and why the decision could result in significant harm to the environment: |
| |
| Outline the relief requested: |
| |
| There are required documents and materials to be submitted to the Ontario Land Tribunal (OLT) based on the type of legislation and section you are filing under. Please see the Section 4B Checklist(s) located here and submit all documents listed on the checklist. |

Section 5 – Appeal regarding Development Permit Application under the *Niagara Escarpment Planning and Development Act*

| |
|--|
| Appeal Specific Information |
| Development Permit Application File No: |
| |
| Address or legal description of the subject property: |
| |
| Reasons for Appeal: Outline the nature and reasons for your appeal. Specific planning, environmental and/or other reasons are required. (The Niagara Escarpment Plan is available on the Niagara Escarpment Commission's website (www.escarpment.org)) |
| |

Section 6 – Mining Claim and Conservation Matters

Appeal Specific Information

List the subject Mining Claim Number(s) (for unpatented mining claims) and accompanying Townships, Areas and Mining Division(s) where mining claims are situated. List all "Filed Only" Mining Claims, if appropriate: (This is to be completed for *Mining Act* appeals only.)

| |
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List the Parcel and the Property Identifier Numbers (PIN), if rents or taxes apply to mining lands, if appropriate (mining claims only):

| |
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Provide the date of the Decision of the Conservation Authority or the Provincial Mining Recorder, as appropriate:

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Provide a brief outline of the reasons for your application/appeal/review. If other lands/owners are affected, please include that information in the outline being provided below:

| |
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Respondent Information

Conservation Authority:

| |
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Contact Person:

| |
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Email Address:

| |
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| | | | | |
|---------------------------|--|------|--|-------------------------------|
| Daytime Telephone Number: | | ext. | | Alternative Telephone Number: |
| | | | | |

Mailing Address or statement of last known address/general area they were living and name of local newspaper if address is not available

| | | | |
|--------------|----------------|--------------|-----------|
| Unit Number: | Street Number: | Street Name: | P.O. Box: |
| | | | |

| | | | |
|------------|-----------|----------|--------------|
| City/Town: | Province: | Country: | Postal Code: |
| | | | |

There are required documents and materials to be submitted to the Ontario Land Tribunal (OLT) based on the type of legislation and section you are filing under. Please see the [Section 6 Checklist\(s\)](#) located [here](#) and submit all documents listed on the checklist.

Section 7 – Filing Fee

Required Fee

Please see the attached link to view the [OLT Fee Chart](#).

Total Fee Submitted: \$ 1,100

| | | | | | | |
|----------------|--------------------------|------------------|--------------------------|-------------|-------------------------------------|--|
| Payment Method | <input type="checkbox"/> | Certified Cheque | <input type="checkbox"/> | Money Order | <input checked="" type="checkbox"/> | Lawyer's general or trust account cheque |
| | <input type="checkbox"/> | Credit Card | | | | |

If you wish to pay the appeal fee(s) by credit card, please check the box above and OLT staff will contact you by telephone to complete the payment process upon receipt of the appeal form. **DO NOT INCLUDE YOUR CREDIT CARD INFORMATION ON THIS FORM. YOU WILL BE CONTACTED TO COMPLETE YOUR PAYMENT OVER THE PHONE.**

If a request for a fee reduction is being requested, please pay the minimum filing fee for each appeal and complete/submit the [Fee Reduction request form](#).


Request for Fee Reduction form is attached (if applicable – see Appeal Form Guide for more information)

Section 8 – Declaration (Mandatory)

Declaration

I solemnly declare that all the statements and the information provided, as well as any supporting documents, are true, correct and complete.

By signing this appeal form below, I consent to the collection of my personal information.

| Name of Appellant/Representative | Signature of Appellant/Representative | Date (yyyy/mm/dd) |
|----------------------------------|--|-------------------|
| Julie Lesage |  | 2022/08/17 |

Personal information or documentation requested on this form is collected under the authority of the *Ontario Land Tribunal Act* and the legislation under which the proceeding is commenced. All information collected is included in the Ontario Land Tribunal (OLT) case file and the public record in this proceeding. In accordance with the *Freedom of Information and Protection of Privacy Act* and section 9 of the *Statutory Powers Procedure Act*, all information collected is available to the public subject to limited exceptions.

We are committed to providing services as set out in the *Accessibility for Ontarians with Disabilities Act, 2005*. If you have any accessibility needs, please contact our Accessibility Coordinator at OLT.Coordinator@ontario.ca or toll free at 1-866-448-2248 as soon as possible.

Section 9 – Filing Checklists (Mandatory)

Filing/Submitting your form and documentation

You must file your Appeal Form with the appropriate authority(s) by the filing deadline.

| If the completed Section is: | Refer to the relevant checklist and submit all documents listed on the checklist when filing your Appeal Form. |
|------------------------------|--|
| Section 3B | Review the Section 3B Checklist(s) and attach all listed documents. |
| Section 4A | Review the Section 4A Checklist(s) and attach all listed documents. |
| Section 4B | Review the Section 4B Checklist(s) and attach all listed documents. |

| If the completed Section is: | You must file with the following: | |
|---|---|--|
| Section 3A | <p>Municipality or the Approval Authority/School Board</p> <p>*If you are filing under the <i>Ontario Heritage Act</i>, including under s. 34.1(1), please carefully review the specific section of that legislation to determine if your appeal needs to be filed with the Tribunal in addition to the Municipality or Approval Authority.</p> | |
| Section 3A & 3B or Section 4A or Section 4B or Section 6 | <p>Ontario Land Tribunal 655 Bay Street, Suite 1500 Toronto, ON M5G 1E5</p> <p>Phone: 416-212-6349 1-866-448-2248 Website: www.olt.gov.on.ca</p> | |
| Section 5 | <p>For the Areas of:</p> <p>Dufferin County (Mono) Region of Halton Region of Peel Region of Niagara City of Hamilton</p> <p>File with:</p> <p>NIAGARA ESCARPMENT COMMISSION 232 Guelph Street, 3rd Floor Georgetown, ON L7G 4B1</p> | <p>For the Areas of:</p> <p>Bruce County Grey County Simcoe County Dufferin County (Mulmur, Melancthon)</p> <p>File with:</p> <p>NIAGARA ESCARPMENT COMMISSION 1450 7th Avenue Owen Sound, ON N4K 2Z1</p> |

| | | |
|--|---|---|
| | <p>Phone: 905-877-5191</p> <p>Fax: 905-873-7452</p> <p>Website: www.escarpment.org</p> <p>Email: necgeorgetown@ontario.ca</p> | <p>Phone: 519-371-1001</p> <p>Fax: 519-371-1009</p> <p>Website: www.escarpment.org</p> <p>Email: necowensound@ontario.ca</p> |
|--|---|---|

NOTE: Please review the notice of the decision you are appealing to determine the appeal deadline and the specific official with whom the appeal should be filed (e.g. Secretary-Treasurer, Clerk, Minister, Ontario Land Tribunal).

NOTE: Relevant portions of the applicable legislation should be reviewed before submitting this form. Please ensure that a copy of this Appeal Form is served in accordance with the requirements of the applicable legislation.

Andrew Baker
T 416.367.6250
abaker@blg.com

Julie Lesage
T 416.367.6276
jlesage@blg.com

Borden Ladner Gervais LLP
Bay Adelaide Centre, East Tower
22 Adelaide Street West
Suite 3400
Toronto, ON, Canada M5H 4E3
T 416.367.6000
F 416.367.6749
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File No. 020451.000188

August 17, 2022

Delivered by Courier

City of Toronto – City Clerk
Attention: Ellen Devlin, Administrator, Toronto
and East York Community Council
100 Queen Street West, 2nd Fl W
Toronto, ON
M5H 2N2

Dear Mr. John D. Elvidge:

**Re: City of Toronto File No. 16 221931 STE 20 OZ
Official Plan Amendment 582 - University of Toronto St. George Campus Area
Secondary Plan
Notice of Appeal of the Toronto Catholic District School Board**

We are legal counsel to the Toronto Catholic District School Board (“**TCDSB**”). The TCDSB is the fee simple owner of St. Joseph’s College School at 74 Wellesley Street West (the “**Subject Site**”).

Please accept this letter as our client’s Notice of Appeal, pursuant to s. 17(24) of the *Planning Act*, RSO 1990, c P.13., in respect of the City’s decision to adopt Official Plan Amendment No. 582 (“**OPA 582**”), which creates a new Secondary Plan for the University of Toronto St. George Campus Area (the “**Secondary Plan**”) and incorporates the St. George Campus Urban Design Guidelines (the “**Guidelines**”), which were approved by City Council at the same time as the Secondary Plan. The reasons for the appeal are set out below.

Background to the Appeal

The Subject Site

The Subject Site, although located within the University of Toronto St. George Campus Secondary Plan boundary, is owned and operated by the TCDSB. The Subject Site is improved with a 4-storey modernist building constructed in 1961, which houses St. Joseph’s College School.

The Subject Site is located approximately 400 metres from the Wellesley TTC station, and is therefore within a Major Transit Station Area as defined in the Growth Plan for the Greater Golden Horseshoe, 2020 (the “**Growth Plan**”). The Subject Site is also within an area identified as a Protected Major Transit Station Area (SASP 602) in OPA 524, adopted by the City on February 2, 2022, but not yet approved by the Province.

The subject site is currently designated as *Institutional Areas* in the City of Toronto Official Plan. The *Institutional Areas* 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).

The Subject Site is surrounded by lands with a variety of uses, designations, and building heights:

- To the west of the Subject Site is a predominantly low- to mid-rise institutional precinct including institutional use buildings owned by the University of Toronto and the Provincial Legislature. A number of buildings in this area are listed or designated on the City's Heritage Registry. These lands are within the Secondary Plan area;
- To the east of the Subject Site is the high-rise Bay Street corridor, a major commercial and residential high-rise street in Toronto's downtown, with building heights reaching 55 storeys. The Secondary Plan area ends immediately to the east of the Subject Site, and many of the sites in the Bay Street corridor are designated "Mixed Use Areas" under the City of Toronto Official Plan;
- To the south of the Subject Site is the Ontario Government Building Complex, which includes four towers ranging in height between 10 and 24 storeys. The Secondary Plan area ends immediately to the south of the Subject Site, and the sites in the Ontario Government Building Complex are designated "Institutional Areas" under the City of Toronto Official Plan;
- To the north of the Subject Property is the University of St. Michael's college, which contains a number of properties listed or designated in the City's Heritage Registry and is within the Secondary Plan area. These properties are designated "Institutional Areas" under the City of Toronto Official Plan. Further north and outside the Secondary Plan area, at the northwest corner of St. Mary Street and Bay Street (1080 Bay Street and 65 St. Mary Street) is the "U Condominium" Development comprised of two 45 and 55-storey towers. At 70 St. Mary Street is a proposed 40-storey mixed-use residential condominium and institutional tower that was approved by City Council in July 2022. Directly north of the Subject Site, a proposal for a 39-storey mixed use building with a 12-storey podium at 95 St. Joseph, a site that is located in the Secondary Plan area, was approved by City Council in July 2022.

The Subject Site is within the area of the City of Toronto subject to OPA 352, which provides a policy and regulatory framework to establish specific standards for tall buildings within the City's downtown, subject to certain exemptions. OPA 352 provides that:

Buildings or parts of buildings for institutional uses make unique contributions to building strong and healthy communities and typically have programmatic requirements that result in different tall building typologies and setbacks. When establishing new zoning by-law provisions and when considering site specific development applications for institutional uses, Policies (i) through (v) shall be interpreted and applied to ensure the continued growth and sustainability of institutional uses, and to recognize the programmatic requirements of institutional uses and related built form requirements, including but not limited to, larger floorplate sizes, taller floor to ceiling heights, mechanical requirements, and physical connections to adjacent institutional buildings.

City of Toronto Zoning By-law 1106-2016, which provides specific setbacks for tall buildings within the OPA 352 area, further states that lands in the "Q Zone Category" in Zoning By-law 438-86 are exempt from the provisions of the By-law, provided the use of the building or structure is a use identified as permitted in the Q district as of November 9, 2016.

Given its location, size, and relationship to adjacent sites with existing or planned developments, the Subject Site is a good candidate for eventual redevelopment and intensification with a tall building incorporating multiple uses, with the St. Joseph's College School in the podium and a residential or office use in the tall building portion. As of the date of this letter, no development application has been advanced by the TCDSB for the Subject Site.

The TCDSB's Involvement in the Public Process Prior to the Adoption of OPA 582

The TCDSB has engaged with City Staff throughout the drafting process of OPA 582, including attending the Community Consultation meeting on May 19, 2022 where the draft plan was presented to the public.

Prior to the adoption of OPA 582 by City Council, the TCDSB made the following written submissions to the City:

- A letter to Paul Johnson, City Planning Division dated November 16, 2017 from the TCDSB's planning consultants, Bousfields Inc., providing comments on the draft Secondary Plan and draft Guidelines;
- A further letter to Paul Johnson, City Planning Division dated April 11, 2018 from the TCDSB's planning consultants, Bousfields Inc., providing comments on the draft Secondary Plan and draft Guidelines;
- A letter to Toronto and East York Community Council dated June 29, 2022, from Michael Loberto, Superintendent, Planning and Development Services at TCDSB. This letter was provided to Toronto and East York Community Council ahead of their consideration of OPA 582 and the Guidelines on June 29, 2022. The letter from Mr. Loberto attached a memorandum from the TCDSB's planning consultants, Boufields Inc., dated June 27, 2022.

This memorandum outlined the TCDSB's specific comments and concerns with the Secondary Plan and the Guidelines, and provided suggestions for changes to the policy language that would resolve the TCDSB's issues with the Secondary Plan and Guidelines;

- A letter to Toronto City Council dated July 6, 2022 from the TCDSB's planning consultants, Bousfields Inc. This letter was provided ahead of City Council's consideration of OPA 582 and the Guidelines on July 19, 2022. The letter included the previous correspondence to Toronto and East York Community Council and the Bousfields Inc. memorandum.

Copies of these correspondences are enclosed with this Notice of Appeal.

The TCDSB has therefore satisfied the requirements to appeal the Secondary Plan pursuant to Section 17(24) of the *Planning Act*, RSO 1990, c P.13.

City Council approved the Secondary Plan and the Guidelines on July 22, 2022.

The TCDSB's Appeal of the Secondary Plan

The TCDSB's overriding issue with the Secondary Plan and the Guidelines is that they do not provide for the redevelopment of the Subject Site with a tall building element. It is our position that the Subject Site should be identified in the Secondary Plan as a site for redevelopment with a tall building that will allow the TCDSB to modernize the facilities while keeping the existing school use on site.

The TCDSB's previous correspondence to the City provided policy modifications to specific language within the draft Secondary Plan and Guidelines to allow for the redevelopment potential of the Subject Site to be realized in the future. While some of these comments were addressed in subsequent drafts of the Secondary Plan and Guidelines, others have gone unaddressed.

The TCDSB appeals the entirety of the Secondary Plan and City Council's decision to adopt OPA 582. The appeal is not limited to the Subject Site, as modifications to the Secondary Plan in one area may affect policies in another area, and have impacts on the Subject Site.

Comments on Specific Policies

- **Policies 1.4 and 8.4:** these policies incorporate by reference the Guidelines into the Secondary Plan. The issues the TCDSB has identified in the Policies of the Secondary Plan are also present in corresponding sections of the Guidelines. Therefore, this Notice of Appeal addresses relevant sections of the Guidelines, which, although not appealable to the Tribunal, should be modified along with the relevant Policies for consistency and to promote good planning.
- **Policy 4.39:** this policy requires all development applications to complete a View Study regardless of location or potential impact on the panoramic views protected in Policy 4.38 and identified in Map 20-2E of the Secondary Plan. This is inconsistent with Policies 1.1.3.2 and 1.1.3.4 of the PPS and does not conform with Policies 2.2.4.2 and 2.2.3.2(a) of the Growth Plan, which direct that appropriate development standards be used to facilitate intensification, and that intensification be directed to urban growth centres and close to public transit and existing services. A View Study should not be required for development

applications well outside of the view shed area identified on Map 20-2E. Policy 4.39 should be revised to specify that only planning applications in the areas identified in Map 20-2E will be required to complete a View Study as part of a complete application.

- **Policy 5.3(c):** the requirement for a 6-metre pedestrian sidewalk area along public streets in this policy differs from the requirements in the Downtown Secondary Plan (in particular Policy 9.5), 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 in the Secondary Plan area, and is therefore inconsistent with Policy 1.2.1 of the PPS, which directs that a coordinated, integrated, and comprehensive approach should be used when dealing with planning matters. The policy should be revised to specify that development will 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.
- **Policy 5.3(e):** the requirements for pedestrian-scale base building components in this policy do not take into account the unique needs of institutions and the form that takes in institutional buildings. Institutional building often have requirements for large floorplates, particularly for school sites. This is inconsistent with Policies 1.1.1, 1.1.3.2, 1.1.3.3, 1.6.1, 1.6.3, and 1.7.1 of the PPS, which generally direct that public service facilities be provided in an efficient manner and optimize the use of land. It is additionally not in conformity with Policies 2.2.1.4, 2.2.4.9, and 3.2.8.1 of the Growth Plan, which direct for the creation of complete communities, and the coordination of planning for public service facilities with land use planning. Policy 5.3(e) should provide that buildings or parts of buildings for institutional uses may require larger base building components to accommodate the programmatic requirements of an institution.

Similarly, Section 2.4.2.2 of the Guidelines provide angular plane guidelines that are not sufficiently flexible to accommodate institutional buildings. According to Figure 2.18, the angular plane applicable to the Subject Site is "Maximum Base Height of 80% of the (ROW + Setback) Width with Angular Plan Transition." This angular plane is overly-burdensome, given that the south side of Wellesley Street East is occupied by the Ontario Government Building Complex, with significant setbacks from Wellesley Street East. Additional base height on the Subject Site upon redevelopment would be appropriate to properly frame the public realm, and therefore the angular plane should be measured from the scale of the adjacent open space, not just the right-of-way.

- **Policy 5.15(f):** this policy 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. The policy describes an area with low-scale, mid-scale and taller institutional elements, however the draft Guidelines show tall building elements on approximately half of the sites in this area south of St. Joseph Street. The only sites without tall buildings are the Subject Site and the parts of the University buildings that are only partially in East Campus Character Area to the west. This is inconsistent with the PPS with regards to Policies 1.1.1, 1.1.3.2, 1.1.3.3, 1.1.3.4, 1.3.1, 1.6.1, 1.6.3, 1.6.5, 1.6.7.4, 1.7.1, and 1.8.1, which generally direct for efficient development which reduces greenhouse gas emissions by intensifying close to transit, optimizing land use, and provide public service facilities in an efficient manner. Further, it does not conform to Policies 2.2.1(2)(a) and (c), 2.2.1.4, 2.2.3.1, 2.2.4.10, 3.2.8.1, and 3.2.8.6 of the Growth Plan, which generally direct

intensification to Urban Growth Centres and Major Transit Station Areas including a transit-supportive mix of uses, the integration of public service facilities, and locating new public service facilities close to areas accessible by transit. As noted above, the Subject Site is located in an area identified by the City as a Protected Major Transit Station Area in OPA 524, although Provincial approval is still outstanding. Policy 5.15(f) should reflect the East Campus Character Area's potential for higher density development, including on the Subject Site.

Section 2.3.8 of the Guidelines defines the East Campus Character Area and similarly fails to address the higher density potential and planned future for the block south of St Joseph Street. The text of the Guideline should be revised to better align with a vision for a higher density, taller built form on the block south of St. Joseph Street.

Section 2.4.2.4 of the Guidelines provides guidance on the location of Taller Elements within the Secondary Plan area, providing that certain sites and blocks can accommodate additional height and density in the form of taller elements. Figure 2.21 shows a 'Potential Taller Institutional Element' on the sites directly west and northwest of the Subject Site and a 'Proposed Tall Building' on the Subject Site to the northeast. Given the size and configuration of the Subject Site, and for the reasons set out in this letter, the Subject Site should be identified as 'Potential Tall Building', to provide for appropriate redevelopment of the Subject site in the future.

Conclusion

The TCDSB appeals the City's decision to adopt the Secondary Plan on the basis that the decision does not have regard for matters of provincial interest set out in Section 2 of the *Planning Act*, RSO 1990, c P.13., is inconsistent with the PPS, does not conform with the Growth Plan, and does not conform with the City of Toronto Official Plan. Further, for the reasons set out in this letter, the Secondary Plan, as adopted by City Council does not represent good planning and is not in the public interest.

For the foregoing reasons, the reasons set out in the attached letters, as well as others that may be identified prior to the hearing of the appeal, the TCDSB appeals City Council's decision to adopt the Secondary Plan to the Ontario Land Tribunal.

We enclose a completed Appellant Form A1 and a solicitor's cheque payable to the Minister of Finance in the amount of \$1,100 in satisfaction of the filing fee.

Yours truly,

BORDEN LADNER GERVAIS LLP



Andrew Baker/Julie Lesage
Encl.



November 16, 2017

Project No. 17173

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: Updated University of Toronto St. George Campus Secondary Plan
Proposed Amendments**

We are the planning consultants for the owners of St. Joseph's College School at 74 Wellesley Street West, the Cardinal Flahiff Basilian Centre at 95 St. Joseph Street, and the John M. Kelly Library at 113 St. Joseph Street (the "Subject Lands"); known collectively as the Catholic Education Commons.

Although these lands are located within the in-force University of Toronto Secondary Plan Boundary along the eastern edge of the Secondary Plan area, it is important to note they are not owned by the University of Toronto.

On behalf of our clients, 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") and the draft St. George Campus Zoning By-law (the "Zoning By-law Amendment") that were prepared by the University of Toronto with their planning consultant Urban Strategies Inc. ("USI"). These documents were released for comment in 2016 and will be an Official Plan Amendment to the City's in-force Secondary Plan and an update to the Urban Design Guidelines. The in-force University of Toronto Secondary Plan was adopted in 1997 to guide planning and development within the Secondary Plan area.

We have reviewed the draft Secondary Plan, draft Urban Design Guidelines and draft Zoning By-law Amendment, as they apply to the Subject Lands, and have a number of comments including proposed revisions to the draft Plan, Guidelines and Zoning By-law Amendment. In our opinion, these revisions will:

- (1) more accurately describe the characteristics of Subject Lands, particularly in relation to the adjacent Bay Street and Wellesley Street West corridors; and,

- (2) provide a more flexible framework that will permit the existing institutions on the Subject Lands to grow, modernize, and adapt in response to changing economic and programmatic needs, while responding to alternative funding opportunities as they arise.

Subject Lands

As illustrated in **Figure 1**, the Subject Lands are comprised of three independently owned, adjacent properties that are located along the eastern edge of the Secondary Plan area. The properties are situated on a downtown city block that is bound by Bay Street to the east, Wellesley Street to the south, Queens Park Crescent to the west, and St. Joseph Street to the north. The three properties include:

- 74 Wellesley Street West, which is occupied by St. Joseph's College School, a 4-storey modernist building that was constructed in 1961 and is owned and operated by the Toronto Catholic District School Board.
- 95 St. Joseph Street, which is occupied by the Cardinal Flahiff Basilian Centre, a 4-storey "E-shaped" building owned by the Basilian Fathers of Toronto. The existing building was originally constructed in 1949 as the St. Basil's Seminary, but was altered in 1979 with the construction of a 4th floor addition. Today, the building provides housing for retired Basilian fathers, and also houses the Basilian Father's Curial Offices.
- 113 St. Joseph Street, which is occupied by the John M. Kelly Library, a 4-storey modernist concrete building that was constructed in 1969. The library is owned by the University of St. Michael's College, a University of Toronto affiliated College. The lands for the library were purchased from the Sisters Adorers of Precious Blood site on St. Joseph in 1967.

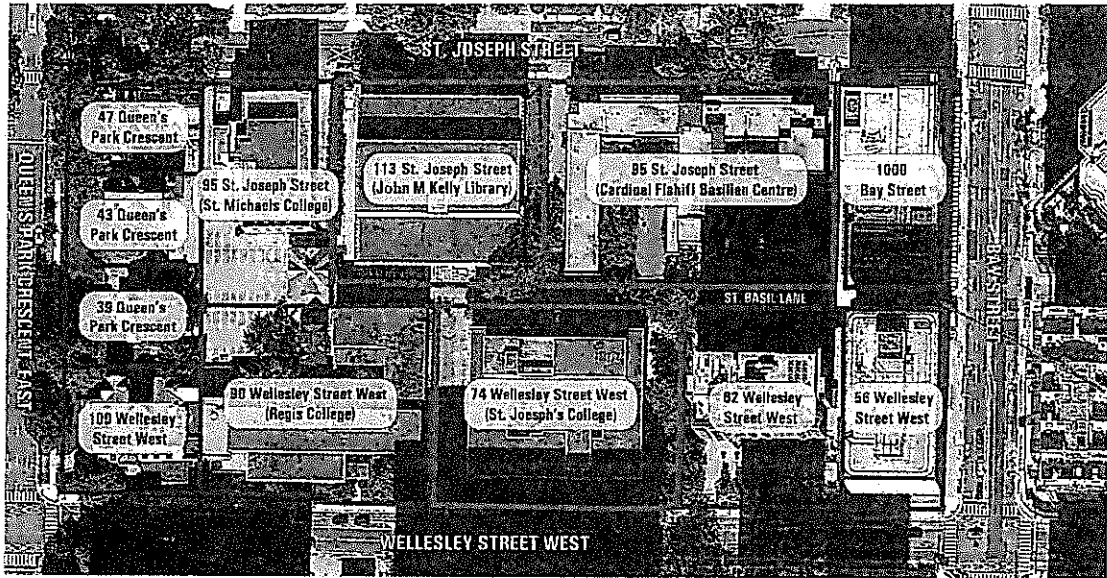


Figure 1. Subject Lands

The City of Toronto Official Plan (Land Use Plan, Map 18) designates the Subject Lands *Institutional Areas*. The Subject Lands are on the edge of this *Institutional Area* and are immediately adjacent to properties which front onto Bay Street that are designated *Mixed Use Areas*. The *Mixed Use Areas* designation generally extends along the Bay Street corridor, as illustrated in **Figure 2**.

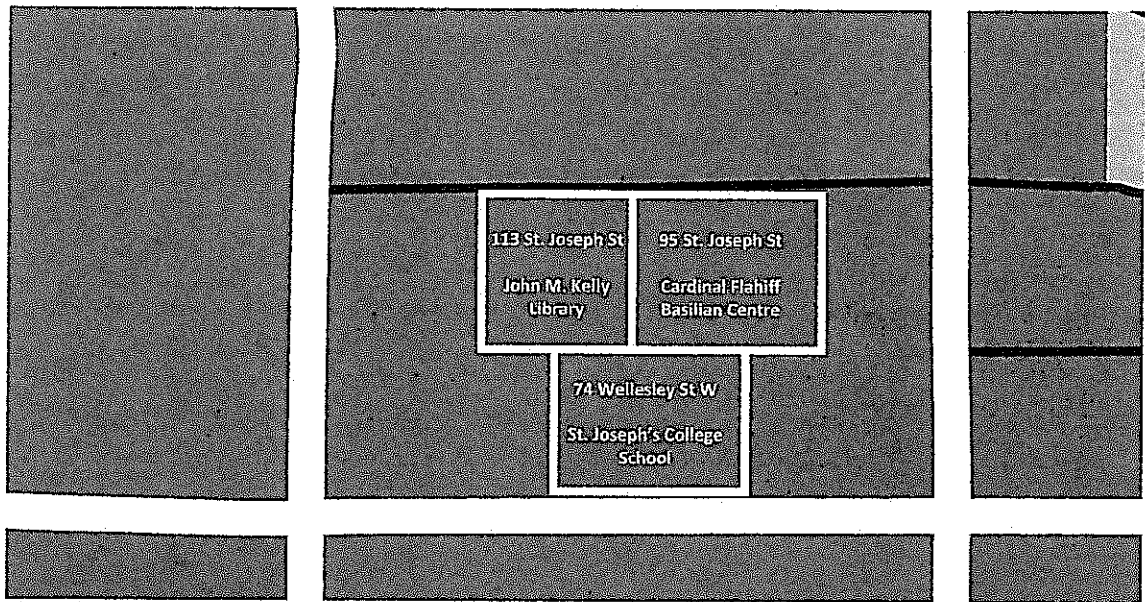


Figure 2 – Official Plan, Land Use Map 18

Surroundings

The Subject Lands are located at the interface between a predominantly low- to mid-rise institutional precinct to the west, which is comprised of a number of institutional uses (including University of Toronto and Provincial Legislative buildings), and the high-rise Bay Street corridor to the east with heights reaching 55-storeys.

Within the context of the City's Downtown Tall Buildings: Vision and Supplementary Guidelines, although the Subject Lands are excluded from these downtown tall building guidelines, the guidelines do apply to the surrounding area. Bay Street and the portion of Wellesley Street West to the south of the Subject Lands are both identified as a High Streets with a height range of 92 to 152 metres (30 to 50 storeys) in a Tower-Base Form along Bay Street and 62 to 107 metres (20 storeys to 35 storeys) in a Tower-Base Form on Wellesley Street West in the Tall Building Design Guidelines. St. Joseph is identified as a Secondary High Street in these guidelines.

The Bay Street corridor is a major commercial and residential high-rise street in the *Downtown*, extending north from Queens Quay at the waterfront through the central business district to Davenport Road in the Midtown area. Although the west side of Bay Street, between Bloor Street and Wellesley Street, has traditionally been perceived as the easterly edge of the University of Toronto and the affiliated Victoria University and St. Michael's College, the actual boundary between the University of Toronto campus and the surrounding city fabric is generally set back west from Bay Street.

To the immediate east of the Subject Lands, is 62 Wellesley Street West, an 18-storey condominium building known as Queen's Park Place. Further west, fronting onto the southwest corner of Wellesley Street West and Bay Street, is 56 Wellesley Street West, a 17-storey commercial office building. To the north of 56 Wellesley, fronting onto the northwest corner of Bay Street and St. Joseph Street is 1000 Bay Street, a recently completed 32-storey condominium building known as "1 Thousand Bay". These properties are all designated *Mixed Use Areas* under the City of Toronto Official Plan and fall immediately outside of the Secondary Plan Area boundary.

To the immediate south of the Subject Lands, is the Ontario Government Building complex, which generally spans from Queens Park Crescent to Bay Street and houses Provincial ministerial offices. Constructed in 1969, the four tower complex ranges in height between 10- and 24-storeys. The lands are designated *Institutional Areas* under the City of Toronto Official Plan, but fall just outside the Secondary Plan Area.

To the immediate west of the Subject Lands, are a series of University of Toronto and affiliated college buildings that range between 3- and 4-storeys, which includes Regis College. Fronting onto Queens Park Crescent, are four converted mansions that are either listed or designated on the City's Heritage Registry. These properties are all designated *Institutional Areas* under the City of Toronto Official Plan and fall within the Secondary Plan Area.

To the immediate north of the Subject Lands, is the University of St. Michael's College, a park-like campus, which is characterized by a combination of varied institutional built forms and mansions on former estate lots, many of which are either 'listed' or 'designated' properties on the City's Heritage Registry. St. Basil's Church and Odette Hall are two of the most prominent buildings. These properties are all designated *Institutional Areas* under the City of Toronto Official Plan and fall within the Secondary Plan Area. Further north, at the northwest corner of St. Mary Street and Bay Street (1080 Bay Street and 65 St. Mary Street) is the recently complete "U Condominium" redevelopment comprised of two 45 and 55-storey towers. And, at 70 St. Mary Street, is a proposed 40-storey mixed-use residential condominium and institutional tower that has been approved by the City in principle that will integrate the Loretto College Residence currently situated on-site with this new development.

Draft Secondary Plan

As noted, we have undertaken a review of the draft Secondary Plan as it applies to the Subject Lands and the surrounding area with respect to built form and the policy context. As described below, we have a number of comments on the Plan and have identified proposed revisions. An edited draft of these proposed revisions to the draft Secondary Plan text is provided in **Appendix A**.

The draft Secondary Plan divides the Plan area into separate Character Areas. According to the Secondary Plan (Section 1, page 4 paragraph 2), these Character Areas have '...distinct attributes and patterns of development, resulting in definable urban landscapes of built and natural features'. As illustrated on Schedule 2 of the draft Secondary Plan, the Subject Lands are identified as part of the "Historic Campus and Subareas" Character Area and are therefore subject to the associated "Historic Campus Character Area" policies.

The characteristics and attributes of "The Historic Campus Character Area" outlined in the Secondary Plan correspond with the original historic elements of the King's College, Queen's Park, Victoria University and St. Michael's College properties. The draft Secondary Plan identifies the "Historic Campus Character Area" as the main concentration of low-scale institutional buildings on the campus that are not anticipated to experience any form of significant growth or redevelopment, where low-scale buildings will be maintained, and taller elements are not anticipated.

The characteristics of 'The Historic Campus Character Area' are described in Policy 3.1.5:

- a) *Buildings sited in a landscape allowing them to be seen from many sides and providing for multiple points of entry.*

- b) *Interconnected open spaces, punctuated by informally sited buildings, paths, roadways, trees and shrubs together forming a cohesive precinct derived from the original University grounds.*
- c) *The monumental character of buildings and complexes, many of which are significant heritage resources.*
- d) *A variety of building styles and materials.*
- e) *The relationship between buildings and designed landscapes, which include formal ceremonial spaces, quadrangles, gardens and park-like spaces.*

In our opinion, the Subject Lands are not consistent with the described character of the "Historic Campus Character Area" as described above. Although the Kelly Library is a part of St. Michael's College, the design of the building and its surrounding landscape differs from the main part of the historic St. Michael College on the north side of St. Joseph Street. The three properties that make up the Subject Lands are currently developed with modernist 4-storey institutional buildings that were constructed or sustainably renovated throughout the late 1960's and early 1970's. Unlike the rest of the Historic Campus, these buildings are almost entirely built out to the edges of their sites and are not '*sited in a landscape allowing them to be seen from many sides...*' nor do they have '*interconnected open spaces, punctuated by informally sites buildings, paths, roadways, trees and shrubs...*'.

Further, the Subject Lands, located along the eastern edge of the Secondary Plan area, are characterized by their unique interface in both built form and architectural style between the adjacent low to mid-rise institutional historic University and Government style, and the adjacent high-rise Bay Street corridor, located outside of the Secondary Plan area. To the north and west of the Subject Lands, there are a series of University of Toronto affiliated low- to mid-rise buildings, including the University of St. Michaels College to the north and Regis College to the west. Many of these buildings are designated or listed heritage buildings and demonstrate the characteristics of the Historical Campus.

In contrast to these low and mid-rise buildings on the campus, there are a range of taller commercial, residential, and institutional buildings generally to the north, east, and south of the Subject Lands along the Bay Street corridor, outside the Secondary Plan area. Most of these buildings have been constructed over the last 50 years. Notably, to the immediate south of the Subject Lands, is the four tower Ontario Provincial Government office complex, dating from the late 1960's, with heights ranging between 10- and 24-storeys. To the immediate east of the Subject Lands are two residential towers (62 Wellesley Street West and 1000 Bay Street), and one commercial tower (56 Wellesley Street West), which range in height between 17- and 32-storeys, which includes the recently completed condominium building at the southeast corner of St. Joseph Street and Bay Street.

Further north and south along both sides of Bay Street are a range other residential and commercial towers. Notably, at the northwest corner of St. Mary Street and Bay Street (1080 Bay Street and 65 St. Mary Street) is the recently complete "U Condominium" redevelopment comprised of two 45 and 55-storey towers. And, at 70 St. Mary Street, is an application, approved in principle, for a 40-storey mixed-use residential condominium and institutional tower that will integrate the Loretto College Residence currently situated on-site. We note that 70 St. Mary Street is also situated within the Secondary Plan Historic Campus Character Area and is designated *Institutional Area* under the City of Toronto Official Plan.

In our opinion, redevelopment of the Subject Lands for a mixed-use institutional/residential buildings is both appropriate and desirable, and represents a flexible and practical strategy that will allow the existing institutional uses to modernize their facilities while remaining on the site.

Official Plan Policy 4.8(1) states that: *Institutional Areas are made up of 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.* In this regard, housing associated with the institutional use is currently permitted. The policies do not specifically direct that this housing could only be directly owned and operated by the institution. Further, student housing is a permissible use under the current zoning by-law land use designation.

Official Plan Policy 4.8(6) provides that, when lands are declared to be surplus, the owner is encouraged to investigate alternative suitable institutional uses prior to applying to redesignate the lands for other purposes. The in-force Secondary Plan specifically recognized the need for planning regulations to give institutions "flexibility to adjust to changing program, technological and funding constraints". In order to provide this flexibility to modernize and upgrade their facilities, given public-sector funding constraints, including planning regulations to allow for mixed-use development provides a workable strategy to generate funding for new facilities.

In our opinion, the underlying land use planning concern in the Official Plan policies is the maintenance of the existing *Institutional Areas* land base, generally within the University of Toronto area, specifically for institutional uses. In this regard, institutional uses would be retained on the Subject Site and permission for residential uses would be added. Similar approaches have been applied by way of exceptions to the *Institutional Areas* designation at 77 Charles Street West and 70 St. Mary Street, which permit institutional and residential uses with defined gross floor areas for each use.

The integration of residential use with institutional is appropriate for the Subject Site given its location on the edge of the *Institutional Areas* designation. As noted in the staff

report for 77 Charles Street West, the site-specific permission for residential uses "recognizes that many surrounding properties to the north and west are being used, or approved, for residential and other non-institutional uses....The proposed mix of uses enables the site to relate to both the institutional setting of the University of Toronto and the predominantly residential character of the lands to the north and west."

Requested Revisions to the Draft Secondary Plan:

Based on the foregoing, it is our opinion that the scale and character of the Subject Lands and their surroundings differs from the Historic Campus and act as a transition between the Historic Campus and the high-density development that has occurred along on the Bay Street corridor. Given the significant growth along the Bay Street corridor, it would be appropriate to categorize the Subject Lands as a separate Character Area. As such, we have the following comments:

1. We would request that the Subject Lands be removed from the "Historic Campus Character Area", as shown on Schedule 2, and that a new Character Area, "The Bay Street Transition Character Area" be added to Schedule 2.
2. Further, we request that, a new section be added to the end of Chapter 3 (Character Areas and Heritage) of the updated Secondary Plan to reflect the unique characteristics of the proposed "Bay Street Transition Character Area" (refer to Appendix A). As a transitional area that is adjacent to higher density Mixed Use Areas designations, this new Character area could have characteristics similar to the West Campus Character Area, including the potential for future growth and expansion in the Secondary Plan.
3. That Section 5.2 be updated to integrated a policy regarding The Bay Street Transition Character Area.
4. Section 5.3 be updated to recognize The Bay Street Transition Character Area.
5. We request that the preamble of Section 5.4 of the draft Secondary Plan be updated to reflect the potential for growth and change in The Bay Street Transition Character Area.
6. Similarly, we request that policies regarding The Bay Street Transition Character Area be added to at the end of Section 5.4 to provide direction on the future redevelopment of the properties within the Subject Lands. Further, we request that these policies provide flexibility for the Bay Street Transition Character Area to provide for commercial or residential uses within mixed-use institutional/residential redevelopment projects on a site-specific basis. The policies could require that a minimum amount of institutional use would continue

to be provided in combination with the new residential or commercial uses. In this regard, an objective of the in-force Secondary Plan (Policy 2.2), is to 'provide planning regulations that give the institutions flexibility to adjust to changing program, technological and funding constraints.'

The integration of these proposed modifications to the draft Secondary Plan, including the additional permitted uses with the institutional permission, could provide the Toronto Catholic School Board, the Basilian Fathers and St. Michael's College with more flexibility to upgrade their facilities while remaining on site. Revisions to the draft Secondary Plan have been proposed in a redlined version of the document in the attached **Appendix A**.

Draft University of Toronto St. George Campus Urban Design Guidelines

It is our understanding that the Draft University of Toronto St. George Campus Urban Design Guidelines are intended to be applied in conjunction with the Secondary Plan. The introduction to the Guidelines states that they provide 'high-level design principles and general criteria based on distinct Character Areas that apply across the Secondary Plan Area' and that further, more detailed guidance is provided on a block-by-block basis for only the lands owned by the University. These more detailed guidelines do not apply to the Subject Site.

The basis of our comments regarding the draft University of Toronto St. George Campus Urban Design Guidelines is similar to the issues we have outlined above regarding the draft Secondary Plan. As such, the following outlines our requested revisions to the draft Urban Design Guidelines:

7. We request that the Subject Lands be removed from the "Historic Campus Character Area", as shown on Figure 3.0: Character Area Map, and that a new Character Area, "The Bay Street Transition Character Area" be added to this figure.
8. Regarding Section 3.1, we request that a description of The Bay Street Transition Character Area be added.
9. We request that Section 3.4.3 be modified to identify that additional height can be accommodated at locations in close proximity to Bay Street, specifically that the 5th bullet point in Section 3.4.3, at the top of page 37, be modified by the addition of the following point: "respond appropriately to the adjacent High Streets, Bay Street and Wellesley Street West, to provide a transition of heights and density to be accommodated along the edges of the Secondary Plan area".

10. That Figure 3.12 be modified to colour the Subject Lands as the blue 'Areas of greater intensity' rather than the yellow 'Areas of less intensity' shown on the two St. Joseph Street sites in the Subject Lands.
11. That Section 4, Block Specific Guidelines, Block P, be modified to identify that the lands to the west of this block, at 74 Wellesley Street West, 95 St. Joseph Street, and 113 St. Joseph Street are identified as 'Taller Element Zone' in the Built Form illustration and cross sections and that the text of this section regarding Block P be updated to describe the permissions for taller elements on 74 Wellesley Street West, 95 St. Joseph Street, and 113 St. Joseph Street.

Draft St. George Campus Zoning By-law Amendment

Lastly, we have reviewed the draft St. George Campus Zoning By-law Amendment. We note that the draft Zoning By-law Amendment indicates in a note that there are no changes proposed to the zoning for the non- University of Toronto/Federate lands, as indicated on Map 2 of the draft Zoning By-Amendment.

The Subject Lands are 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). Residential uses are not otherwise permitted.

The maximum permitted density is 2.0 FSI. The zoning height map provides for a height limit of 14 metres within the first 15.2 metres of lot depth from the street of the properties fronting onto St. Joseph (95 and 113 St. Joseph) and remainder of the St. Joseph Street sites, being subject to a height limit of 23 metres. The permitted height for 74 Wellesley Street West is permitted to be up to 36 metres, as indicated on Map 2 of the draft Zoning By-law Amendment. Additional provisions in the By-law regarding setbacks, separation distance, outdoor space requirements also apply.

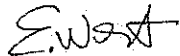
The following outlines our requested revisions to the draft St. George Campus Zoning By-law Amendment:

12. We request that Map 4 – Taller Element Zones Map, be modified to include the following Taller Element Zones located at: 95 St. Joseph Street (T, 90); 113 St. Joseph Street (T, 80); and 74 Wellesley Street West (T, 107).

13. That Part III – USES, be modified by the addition of a new item (6) to indicate that a mixed institutional/residential building is permitted on the lands municipally known as 95 St. Joseph Street, 113 St. Joseph Street and 74 Wellesley Street West.

If you require any additional information or clarification, please do not hesitate to contact me or my colleague Joshua Butcher.

Yours very truly,
Bousfields Inc.



Emma West, Partner, MCIP, RPP

Appendix A. Proposed Revisions to the Draft Secondary Plan

Proposed revisions and additions to the draft Secondary Plan are provided below in red:

- **Section 3.1 Character Areas be revised to add the following policies after item # 29:**

The Bay Street Transition Character Area

30. The Bay Street Transition Character Area serves as an interface between the institutional character of the University of Toronto Campus to the west and immediate north, and the highly urban mixed-use context of the City's Downtown along the adjacent Bay Street and Wellesley Street West corridors. The Bay Street Transition Character Area is currently developed with mid-rise modernist buildings, surrounded by taller building forms to the east, southeast and northeast. This area represents an ideal location for future growth and expansion within the Secondary Plan area. Redevelopment of the Bay Street Transition Character Area would provide an appropriate transition between the institutional character of the Historic Campus Area, Bay Street and Wellesley Street West. It is a suitable location to provide a mix of compatible and complementary institutional, commercial, and residential uses.
31. The Bay Street Transition Character Area is characterized by the following attributes:
 - a. Development and use of this precinct to accommodate future mixed-use institutional/residential redevelopment, including residential and commercial uses, to support the growth, expansion and reinvestment in the existing institutions.
 - b. Accommodate growth through comprehensively planned full-scale redevelopment, resulting in a diverse built form and large-footprint buildings.
 - c. Direct connections with the city streets and immediate urban context, and an urban character that complements contrasts with the Historic Campus.

d. Varied expressions of modernist architectural styles that contrast with the Historic Campus.

- **Section 5.2 A Strategy for Balanced Intensification be revised as follows:**

5.2 A Strategy for Balanced Intensification

As the University of Toronto adapts to meet the needs of a changing student body and related changes in space needs, and as other institutions and uses in the Secondary Plan Area evolve and change, this Plan establishes a context-sensitive approach to directing and managing that change through the use of the Character Areas described in Section 3. Balanced intensification of the Secondary Plan Area means directing the majority of development to areas that are best positioned to accommodate it (Bloor Street Sub-Area in the North Campus Character Area, West Campus Character Area, and South Campus Character Area and Bay Street Transition Character Area) in order to allow for the stability of other areas (the Historic Campus Character Area and the core of the Huron-Sussex Character Area). In all cases, growth and change will enhance the overall area and result in an improved public realm, new greening opportunities, better connections, high-quality urban design and architectural excellence.

42. The Bay Street Transition Character Area can accommodate significant growth and change through comprehensively planned mid to high-scale redevelopment. There are opportunities for taller elements subject to an appropriate physical transition and the development criteria set out in this Plan.

- **Section 5.3 Built Form be revised as follows:**

5.3 Built Form

The existing pattern of development in the Huron-Sussex Character Area primarily consists of low-rise house form buildings and low-scale apartment buildings, with some mid-rise elements on Spadina Avenue and Harbord Street. The Historic Campus Character Area is the main concentration of low-scale institutional buildings. Elsewhere in the

Secondary Plan Area, such as the Bay Street Transition Character Area, the pattern of development consists of mid-scale institutional buildings punctuated with taller elements. These building types, and development patterns, will continue to be the basis for new development, albeit in an intensified form where appropriate. Often institutional buildings require a larger floorplate and floor-to-ceiling heights than typical development to accommodate the unique nature of the varied institutional uses. Building heights will be included in the Zoning By-law.

- **Section 5.4 Character Area Development Criteria be revised with the addition of the following text in the preamble and policies following item #54:**

5.4 Character Area Development Criteria

The Bay Street Transition Character Area may see significant reinvestment as existing institutions look to grow, modernize or adapt in response to their changing economic and programmatic needs. Redevelopment of the Bay Street Transition Character Area should be comprehensively planned and include signature buildings that appropriately transition between the tall buildings of the Bay Street and Wellesley Street West corridors and the low-rise Historic Campus Character Area.

55. New development in the Bay Street Transition Character Area will respect and reinforce the main attributes of the Character Area identified in Section 3 by:

- a) Massing and orienting mid- and taller-scale storey elements to provide appropriate transition to Historic Campus Character Area.
- b) Encouraging an innovative approach to architectural and landscape design that is in keeping with the pattern of architectural excellence within the Secondary Plan Area
- c) Ensuring active frontages along Wellesley Street West and St. Joseph Street with active uses at grade.
- d) Maintaining and enhancing open spaces in the form of public streets, setbacks, laneways, and links through large blocks.

- **The Secondary Plan Schedules be revised as follows:**

- Schedule 1: Shift the University of St. Michael's College boundary to the north side of St. Joseph Street.
- Schedule 2: Remove the Subject Lands from the "Historic Campus Character Area" and add to a new proposed Character Area, "The Bay Street Character Area".



April 11, 2018

Project No. 17354

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: Updated University of Toronto St. George Campus Secondary Plan
Proposed Amendments***

We are the planning consultants for the owners of St. Joseph's College School at 74 Wellesley Street West (the "Subject Lands"). These lands are within the University of Toronto St. George Campus Secondary Plan boundary but are owned and operated by the Toronto Catholic District School Board. The site is occupied by St. Joseph's College School, a 4-storey modernist building that was constructed in 1961.

As you are aware, we submitted a letter in November 2017 which included comments on the earlier drafts of the Secondary Plan documents on behalf of the owners of 74 Wellesley Street West and two adjacent landowners at 95 St. Joseph Street and 113 St. Joseph Street. Please be aware that we are no longer acting on behalf of the two St. Joseph Street owners and therefore the following comments are submitted only on behalf of the owners of 74 Wellesley Street West.

On behalf of our client, we are writing with respect to the February 2018 revised materials prepared in support of the update to the University of Toronto St. George Campus Secondary Plan (the "Secondary Plan") that were prepared by the University of Toronto with their planning consultant Urban Strategies Inc. ("USI") including: the draft Official Plan Amendment ("OPA"); the draft University of Toronto St. George Campus Urban Design Guidelines (the "Guidelines"); and the draft St. George Campus Zoning By-law Amendments (the "Zoning By-law Amendments"). These documents are a part of the resubmission made by the applicant in February 2018 as updates to the earlier 2016 documents.

We have reviewed the draft Secondary Plan/OPA, draft Urban Design Guidelines and draft Zoning By-law Amendment as they apply to the Subject Lands and our earlier comments. We continue to have concerns with the draft documents and have proposed revisions as they relate to 74 Wellesley Street West. As discussed in our November 2017 letter, it is important that the policy and regulatory context provide a more flexible framework that will

permit the existing institution to grow, modernize, and adapt in response to changing economic and programmatic needs, while responding to alternative funding opportunities as they arise.

Subject Lands

The Subject Lands are located along the eastern edge of the Secondary Plan area. The property is situated on a downtown city block that is bound by Bay Street to the east, Wellesley Street to the south, Queens Park Crescent to the west, and St. Joseph Street to the north.

The City of Toronto Official Plan (Land Use Plan, Map 18) designates the Subject Lands *Institutional Areas*. The Subject Lands are on the edge of this *Institutional Area* and are immediately adjacent to properties which front onto Bay Street and Wellesley Street West that are designated *Mixed Use Areas*. The *Mixed Use Areas* designation generally extends along the Bay Street corridor.

Surroundings

The Subject Lands are located at the interface between a predominantly low- to mid-rise institutional precinct to the west, which is comprised of a number of institutional uses (including University of Toronto, St. Michael's College, the Cardinal Flahiff Basilian Centre and Provincial Legislative buildings), and the high-rise Bay Street corridor to the east with heights reaching 55-storeys.

Within the context of the City's Downtown Tall Buildings: Vision and Supplementary Guidelines, although the Subject Lands are excluded from these downtown tall building guidelines, the guidelines do apply to the surrounding area. The portion of Wellesley Street West to the south of the Subject Lands and Bay Street, to the east, are both identified as a High Streets with a height range of 92 to 152 metres (30 to 50 storeys) in a Tower-Base Form along Bay Street and 62 to 107 metres (20 storeys to 35 storeys) in a Tower-Base Form on Wellesley Street West in the Tall Building Design Guidelines.

The Bay Street corridor is a major commercial and residential high-rise street in the *Downtown*, extending north from Queens Quay at the waterfront through the central business district to Davenport Road in the Midtown area. Although the west side of Bay Street, between Bloor Street and Wellesley Street, has traditionally been perceived as the easterly edge of the University of Toronto and the affiliated Victoria University and St. Michael's College, the actual boundary between the University of Toronto campus and the surrounding city fabric is generally set back west from Bay Street.

To the immediate east of the Subject Lands, is 62 Wellesley Street West, an 18-storey condominium building known as Queen's Park Place. Further east, fronting onto the southwest corner of Wellesley Street West and Bay Street, is 56 Wellesley Street West, a

17-storey commercial office building. To the north of 56 Wellesley, fronting onto the northwest corner of Bay Street and St. Joseph Street is 1000 Bay Street, a recently completed 32-storey condominium building known as "1 Thousand Bay". These properties are all designated *Mixed Use Areas* under the City of Toronto Official Plan and fall immediately outside of the Secondary Plan Area boundary.

To the immediate south of the Subject Lands, is the Ontario Government Building complex, which generally spans from Queens Park Crescent to Bay Street and houses Provincial ministerial offices. Constructed in 1969, the four tower complex ranges in height between 10- and 24-storeys. The lands are designated *Institutional Areas* under the City of Toronto Official Plan but fall just outside the Secondary Plan Area.

To the immediate west of the Subject Lands, are a series of University of Toronto and affiliated college buildings that range between 3- and 4-storeys, which includes Regis College. Fronting onto Queens Park Crescent, are four converted mansions that are either listed or designated on the City's Heritage Registry. These properties are all designated *Institutional Areas* under the City of Toronto Official Plan and fall within the Secondary Plan Area. The property located immediately to the west is 90 Wellesley Street West.

To the immediate north of the Subject Lands is 95 St. Joseph Street, which is occupied by the Cardinal Flahiff Basilian Centre, a 4-storey "E-shaped" building owned by the Basilian Fathers of Toronto. The existing building was originally constructed in 1949 as the St. Basil's Seminary but was altered in 1979 with the construction of a 4th floor addition. Today, the building provides housing for retired Basilian fathers, and also houses the Basilian Father's Curial Offices. Also, to the immediate north of the Subject Lands is 113 St. Joseph Street, which is occupied by the John M. Kelly Library, a 4-storey modernist concrete building that was constructed in 1969. The library is owned by the University of St. Michael's College, a University of Toronto affiliated College. The lands for the library were purchased from the Sisters Adorers of Precious Blood site on St. Joseph in 1967.

Further north is the University of St. Michael's College, a park-like campus, which is characterized by a combination of varied institutional built forms and mansions on former estate lots, many of which are either 'listed' or 'designated' properties on the City's Heritage Registry. St. Basil's Church and Odette Hall are two of the most prominent buildings. These properties are all designated *Institutional Areas* under the City of Toronto Official Plan and fall within the Secondary Plan Area. Further north, at the northwest corner of St. Mary Street and Bay Street (1080 Bay Street and 65 St. Mary Street) is the recently complete "U Condominium" redevelopment comprised of two 45 and 55-storey towers. And, at 70 St. Mary Street, is a proposed 40-storey mixed-use residential condominium and institutional tower that has been approved by the City in principle that will integrate the Loretto College Residence currently situated on-site with this new development.

Draft Official Plan Amendment

As noted, we have undertaken a review of the updated draft Secondary Plan/draft Official Plan Amendment as it applies to the Subject Lands and the surrounding area with respect to built form and the policy context.

In our review, we note that some of the comments that we had provided in November have been addressed. However, we continue to have comments regarding the 74 Wellesley Street West site and its surroundings, as discussed in more detail below. An edited draft of these proposed revisions to the draft Secondary Plan text is provided in **Appendix A**.

Consistent with our earlier comments, we acknowledge that the updated draft Secondary Plan now includes a Bay St. Corridor Character Area and that 74 Wellesley Street West is proposed to be included in this Character Area rather than the earlier proposal to be included in the "Historic Campus Character Area". It is our opinion that the Bay St. Corridor Character Area is more appropriate for the Subject Lands. The addition of this Character Area reflects the distinct character of these lands and was not consistent with the Historic Campus Character Area. They are more appropriately described as the unique interface in both built form and architectural style between the adjacent low to mid-rise institutional historic University and Government style, and the adjacent high-rise Bay Street corridor, located outside of the Secondary Plan area.

Height:

Notably, to the immediate south of the Subject Lands, is the four tower Ontario Provincial Government office complex, dating from the late 1960's, with heights ranging between 10- and 24-storeys. To the immediate east of the Subject Lands are two residential towers (62 Wellesley Street West and 1000 Bay Street), and one commercial tower (56 Wellesley Street West), which range in height between 17- and 32-storeys, which includes the recently completed condominium building at the southeast corner of St. Joseph Street and Bay Street.

Further north and south along both sides of Bay Street are a range other residential and commercial towers. Notably, at the northwest corner of St. Mary Street and Bay Street (1080 Bay Street and 65 St. Mary Street) is the recently complete "U Condominium" redevelopment comprised of two 45 and 55-storey towers. And, at 70 St. Mary Street, is an application, approved in principle, for a 40-storey mixed-use residential condominium and institutional tower that will integrate the Loretto College Residence currently situated on-site. We note that 70 St. Mary Street is also situated within the Secondary Plan Historic Campus Character Area and is designated *Institutional Area* under the City of Toronto Official Plan.

Use:

One of the comments that we had provided in our earlier letter that was not addressed in the updated materials was related to the permitted uses on the Subject Lands. In our opinion, redevelopment of the Subject Lands for mixed-use permissions for a combination of institutional and residential buildings is both appropriate and desirable. This would provide a flexible and practical strategy that would allow the existing institutional uses to modernize their facilities. Therefore, we request again that these residential permissions be integrated into the Bay Street Corridor Character Area.

With respect to these land use permission, it is important to consider this in the context of the Official Plan and the in-force Secondary Plan.

Official Plan Policy 4.8(1) states that: *Institutional Areas are made up of 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.* In this regard, housing associated with the institutional use is currently permitted. The policies do not specifically direct that this housing could only be directly owned and operated by the institution. Further, student housing is a permissible use under the current zoning by-law land use designation.

Official Plan Policy 4.8(6) provides that, when lands are declared to be surplus, the owner is encouraged to investigate alternative suitable institutional uses prior to applying to redesignate the lands for other purposes. The in-force Secondary Plan specifically recognized the need for planning regulations to give institutions "flexibility to adjust to changing program, technological and funding constraints". In order to provide this flexibility to modernize and upgrade their facilities, given public-sector funding constraints, including planning regulations to allow for mixed-use development provides a workable strategy to generate funding for new facilities.

Further, the in-force Secondary Plan clearly indicates that the identity and use of 74 Wellesley Street West differs from most of the lands in the Secondary Plan area. Map 20-5 identifies 'Areas of Special Identity'. On that Map, 74 Wellesley Street West is not included in the areas identified as 'Institutional'. Policies for Areas of Special Identity are addressed in Section 4 of the in-force Official Plan. The Plan states that 'Certain sub-areas within the University of Toronto Area have a unique character which should be protected and enhanced by additional regulations specific to the sub-area.' Further, Policy 4.1.1 states that "...objectives for the Institutional Area of Special Identify are to preserve and enhance the built and open space environment, to encourage the usefulness of, not limit physical changes to, existing buildings within this area and to ensure that any infill development is carefully designed to be compatible with and supportive of the area's pattern and heritage character.' The Subject Lands, 74 Wellesley Street West, are not included in this or any other Areas of Special Identity. This indicates that the Subject Lands are not an area of focus for institutional uses. Further, the in-force Secondary

Plan's Map 20-12: Key Map Potential Site identifies the Subject Lands as part of a Development site (#25: 74-90 Wellesley Street). Section 6 of the in-force Secondary Plan indicates that the development of these sites fulfills the objectives of the Secondary Plan.

As previously stated, in our opinion the underlying land use planning concern in the Official Plan policies is the maintenance of the existing *Institutional Areas* land base, generally within the University of Toronto area, specifically for institutional uses. In this regard, institutional uses would be retained in the Character Area and permission for residential uses would be added. Similar approaches have been applied by way of exceptions to the *Institutional Areas* designation at 77 Charles Street West and 70 St. Mary Street, which permit institutional and residential uses with defined gross floor areas for each use. These sites are also in the proposed Bay St. Corridor Character Area.

The integration of residential use with institutional is appropriate for the Subject Lands given its location on the edge of the *Institutional Areas* designation and outside of the in-force Secondary Plan's Institutional Areas of Special Identity. As noted in the staff report for 77 Charles Street West, the site-specific permission for residential uses "recognizes that many surrounding properties to the north and west are being used, or approved, for residential and other non-institutional uses....the proposed mix of uses enables the site to relate to both the institutional setting of the University of Toronto and the predominantly residential character of the lands to the north and west."

Requested Revisions to the Draft Official Plan Amendment:

Based on the foregoing, we have the following comments on the draft Secondary Plan/Official Plan Amendment:

1. Section 2 includes the vision for the Secondary Plan Area. The final paragraph, before Section 2.1, includes a summary of the character areas throughout the plan. A statement regarding the Bay Street Corridor Character Area should be added to this paragraph to emphasize the nature of this Character Area, particularly with respect to its attributes as a transition from the development in the Bay Street Corridor and the University-related lands.
2. Section 2.1 includes the objectives for the Secondary Plan. In the earlier draft of the updated the objectives included item c: 'Support the growth and evolution of the University of Toronto and other institutions in the Secondary Plan Area by permitting a wide range of supporting uses' This statement should be added back into the list of objectives in section 2.1.1.
3. Throughout Section 3, the phrase 'maintained and protected from new development' is used with respect to public and publicly accessible private open

spaces. It is unclear what the term 'protected' means and how this will be evaluated.

4. Section 4.1.1 addresses growth through intensification, specifically stating that the Character Area, including the Bay Street Corridor Character Area are appropriate for a mid-scale institutional form, generally up to 12 institutional storeys. It is unclear if this means an institutional building with 12 storeys or if it means a building that has heights of storeys which are typical of institutional buildings, without necessarily being an institutional building. As discussed, a flexible and practical strategy that would allow the existing institutional uses to modernize their facilities could include the integration of permitted uses other than institutional in the base building and therefore defining the height as '12 institutional storeys' does not capture the need for flexibility in the use. Similarly, section 4.1.5 makes reference to these 'institutional storeys'.
5. Further, we request that these policies provide flexibility for the Bay Street Corridor Character Area to provide for commercial or residential uses within mixed-use institutional/residential redevelopment projects. The policies could require that a minimum amount of institutional use would continue to be provided in combination with the new residential or commercial uses. In this regard, an objective of the in-force Secondary Plan (Policy 2.2), is to 'provide planning regulations that give the institutions flexibility to adjust to changing program, technological and funding constraints.'
6. Section 4.4.8 provides specific policies for the Bay Street Corridor Character Area. Item c states that the character area will 'include mid-block connections that contribute to the fine-grained pedestrian network between buildings and through large blocks'. Given that most of the properties in this Character Area are owned by owners other than the University, we request that this policy be revised to provide flexibility in the requirement and implementation.
7. Section 5 addresses Land Use. As described, we request that a flexible and practical strategy with respect to land use in the Bay Street Corridor Character Area be provided to allow the existing institutional uses to modernize their facilities. In addition, the earlier draft of the Secondary Plan included in Section 5.32.a a policy that states that lands designated Institutional Areas may be used for 'any of the uses permitted by the Official Plan for Institutional Areas as may be delivered by the Official Plan for Institutional Areas as may be delivered by, or with partner organizations or the private sector, including student, faculty or employee housing'. We request that this policy be inserted again into the OPA.
8. Section 8 of the OPA is a new section on Housing. The first sentence of this section states that 'The Secondary Plan Area provides a range of housing options associated with the University of Toronto.' Recognizing that there are a number

of other landowners, including other institutions in the Secondary Plan Area, we request that this statement be modified to reflect the mix of landowners in the Secondary Plan Area. Further, we request that a statement be added to this section regarding housing options for other institutions and landowners in the area.

The integration of these proposed modifications to the draft Secondary Plan/Official Plan Amendment, including the additional permitted uses with the institutional permission, could provide the Toronto Catholic School Board with more flexibility to upgrade their facilities.

Draft University of Toronto St. George Campus Urban Design Guidelines

It is our understanding that the Draft University of Toronto St. George Campus Urban Design Guidelines are intended to be applied in conjunction with the policies of the Secondary Plan. While we understand that the Guidelines are primarily focused on the University of Toronto owned lands, the introduction to the Guidelines states that they provide 'high-level design principles and general criteria based on distinct Character Areas that apply across the Secondary Plan Area'. Therefore, these more detailed guidelines do not apply to the Subject Lands. However, we request that more detailed guidelines for 74 Wellesley Street West be included in the Guidelines, either as a new 'Block' or in combination with one of the 'Blocks' that is already included in the draft Guidelines. A draft of the detailed guidelines for the 74 Wellesley Street West block is described below and attached to this letter as **Appendix B**.

In addition, to the detailed Block description for 74 Wellesley Street West, we have additional comments on the Guideline document. The basis of our comments regarding the draft University of Toronto St. George Campus Urban Design Guidelines is similar to the issues we have outlined above regarding the draft Secondary Plan. As such, the following outlines our requested revisions to the draft Urban Design Guidelines:

9. That the guidelines be revised to ensure that they generally apply to all sites in the Secondary Plan Area. In addition, that Section 2.1 of the Guidelines document provides a summary of the Vision for the St. George Campus. Given that the first part of the Guideline document is meant to apply to the overall Secondary Plan Area, we request that this vision section be updated to apply to the full Secondary Plan Area and that a statement regarding the Bay Street Corridor Character Area be added, similar to the Official Plan Amendment.
10. That Section 4, Block Specific Guidelines, be modified to identify that the lands at 74 Wellesley Street West, to include the setback along Wellesley Street West on the Public Realm Considerations drawing and that a 'Taller Element Zone' be added to the drawing in the Built Form Consideration illustration and cross sections

The text for the Block Vision, Public Realm Considerations and Built Form Consideration also needs to be updated to describe the permissions for taller elements, setbacks and floor plates at 74 Wellesley Street West (refer to attachment).

Draft St. George Campus Zoning By-law Amendment

Lastly, we have reviewed the draft St. George Campus Zoning By-law Amendments for By-laws 569-2013 and 438-86. While we acknowledge that there has not yet been an application submitted for the zoning by-law amendment, the draft documents were submitted as part of the February 2018 resubmission and were available on the City's website. We note that the draft Zoning By-law Amendment indicates in a note that there are no changes proposed to the zoning for the non- University of Toronto/Federate lands, as indicated on Map 2 of the draft Zoning By-Amendment and therefore, we request that amendments be included for the 74 Wellesley Street site. An edited draft of these proposed revisions to the draft by-law in **Appendix C**.

The Subject Lands are 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). Residential uses are not otherwise permitted. The maximum permitted density is 2.0 FSI. The zoning height map provides for a height limit of 14 metres within the first 15.2 metres of lot depth from the street of the properties fronting onto St. Joseph (95 and 113 St. Joseph) and remainder of the St. Joseph Street sites, being subject to a height limit of 23 metres. The permitted height for 74 Wellesley Street West is permitted to be up to 36 metres.

The following outlines our requested revisions to the draft St. George Campus Zoning By-law Amendment to Zoning By-law 483-86:

1. That Part IV – USES, be modified by the addition of a new item (6) to indicate that mixed use, institutional, residential uses are permitted on the lands municipally known as 74 Wellesley Street West.
2. We request that Map 1 – Required Setbacks from the Property Line be modified by the addition of a 6 metres required setback to 74 Wellesley Street West along the Wellesley Street frontage.

3. We request that Map 2 – Maximum Building Heights be modified to provide a maximum building height of 48 metres at 74 Wellesley Street West to be consistent with the policies of the proposed Official Plan Amendment, which states in Section 4.1.1 that to address growth through intensification, including in the Bay Street Corridor Character Area, the appropriate height for a mid-scale institutional form is generally up to 12 institutional storeys.
4. We request that Map 4 – Taller Element Zones Height Map be modified by the addition of a Taller Element Zone with a maximum height of 110 metres at 74 Wellesley Street West. This is supported by Section 4.1.5 of the Official Plan states that new taller elements greater than 12 institutional storeys in height are generally appropriate in the growth areas described in Section 4.1.1 of the OPA including the Bay Street Corridor Character Area.
5. We request that Map 5 -Taller Element Maximum Floorplate Size Map be modified by the addition of a Taller Element Maximum Floorplate of 1,750 square metres. Given the size of the size and the range of uses that could be permitted on the site, including residential, student housing and institutional, it is our opinion that this maximum floor plate size is appropriate.

If you require any additional information or clarification, please do not hesitate to contact me.

Yours very truly,
Bousfields Inc.



Emma West, Partner, MCIP, RPP

Appendix A: Proposed Revisions to the Draft Official Plan Amendment

Proposed revisions and additions to the draft Official Plan Amendment are provided below in red:

- **Vision (Section 2) be revised to add the following sentence to the final paragraph of the section as indicated below:**
 - 'Specific parts of the campus will also evolve to reinforce unique characteristics and enhance the contextual relationship of new buildings to their context and adjacent neighbourhoods. Huron Street evolves as an academic main street, with new buildings that define an enhanced and expanded public realm. The Spadina Street edge has been engaged with new building frontages that create a lively street life. The West Campus is a greener place as streets in the Secondary Plan Area are reprioritized to emphasize the safety and comfort of pedestrians and to become enjoyable parts of the public realm in their own right, with space currently allocated to on-street parking making way for landscaping and gathering spaces. New major open spaces in the West Campus are the hubs for student life and provide students with places to collaborate, socialize and relax. **The Bay Street Corridor serves as an interface between the institutional character to the west and the mixed use development along Bay Street to the east.'**
- **Section 2.1 Objectives be revised to add the following item to the list of objectives in Section 2.1.1:**
 - **Support the growth and evolution of the University of Toronto and other institutions in the Secondary Plan Area by permitting a wide range of supporting uses.**
- **Section 3 Public Realm be revised as indicated below:**
 - ⊖ 3.2.1 – The University Major Open Spaces shown on Map 3 will be maintained. **and protected from new development.**
 - 3.3.1 – The Municipal Parks shown on Map 3 will be maintained **and protected from new development.**
- **Section 4.1 Managing Growth: A Balanced Approach to Intensification be revised as indicated below:**
 - 4.1.1 – The West Campus, South Campus, North Campus, St. George Infill, Discovery District, and Bay Street Corridor Character Areas, as well as the western and southern edges of the Huron Sussex Character Area, as identified on Map 2, are generally appropriate for development of a mid-

scale institutional form generally up to 12 **institutional** storeys. Development may occur only where individual building sites can meet the policies of this Plan with respect to heritage conservation, provision of open space and mid-block connections, and the considerations listed in 4.2.

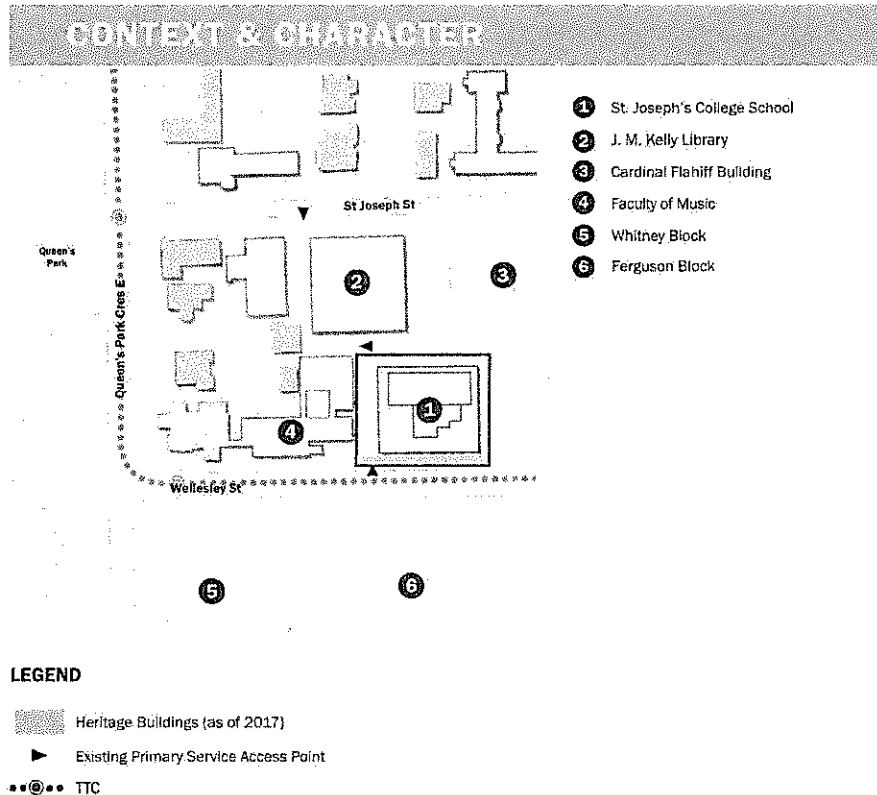
- 4.1.5 - New taller elements greater than 12 **institutional** storeys in height, in addition to those existing on the [date this plan comes into force], are generally appropriate in the growth areas described in 4.1.1, as well as in context-appropriate locations that have limited impact on adjacent historic buildings, the Historic Campus Character Area and the Huron Sussex Character Area shown on Map 2.
- **Section 4.4.8.1.c) be revised as indicated below:**
 - c) Include mid-block connections, **where possible**, that contribute to the fine grained pedestrian network between buildings and through large blocks.
- **Section 4.4.8.1 be revised to add item d) following item c):**
 - d) **Accommodate mixed-use institutional/residential redevelopment, including residential and commercial uses, to support the growth, expansion and reinvestment in the existing institutions.**
- **Section 5. Land Use be revised to add the following policy:**
 - – **Lands designated Institutional Areas may be used for any of the uses permitted by the Official Plan for Institutional Areas as may be delivered by, or with partner organizations or the private sector, including student, faculty or employee housing’.**
- **Section 8 Housing be revised as follows:**
 - **The Secondary Plan Area provides a range of housing options, including those associated with the University of Toronto. These University-related housing options include current long-term tenants, families, new faculty, students and other residents associated with the University. In addition to the University-related housing, the Secondary Plan area provides housing associated with other institutions as well as housing which is not associated with an institution.**



Appendix B. Proposed Modifications to February 2018 Draft University of Toronto St. George Campus Urban Design Guidelines

We request that the Block Specific Guidelines of the Urban Design Guidelines, be modified to identify that the lands at 74 Wellesley Street West, to include the setback along Wellesley Street West on the Public Realm Considerations drawing and that a 'Taller Element Zone' be added to the drawing in the Built Form Consideration illustration and cross sections The text for the Block Vision, Public Realm Considerations and Built Form Consideration also needs to be updated to describe the permissions for taller elements, setbacks and floor plates at 74 Wellesley Street West (refer to attachment). The following modifications through the addition of the following are proposed:

1. CONTEXT & CHARACTER

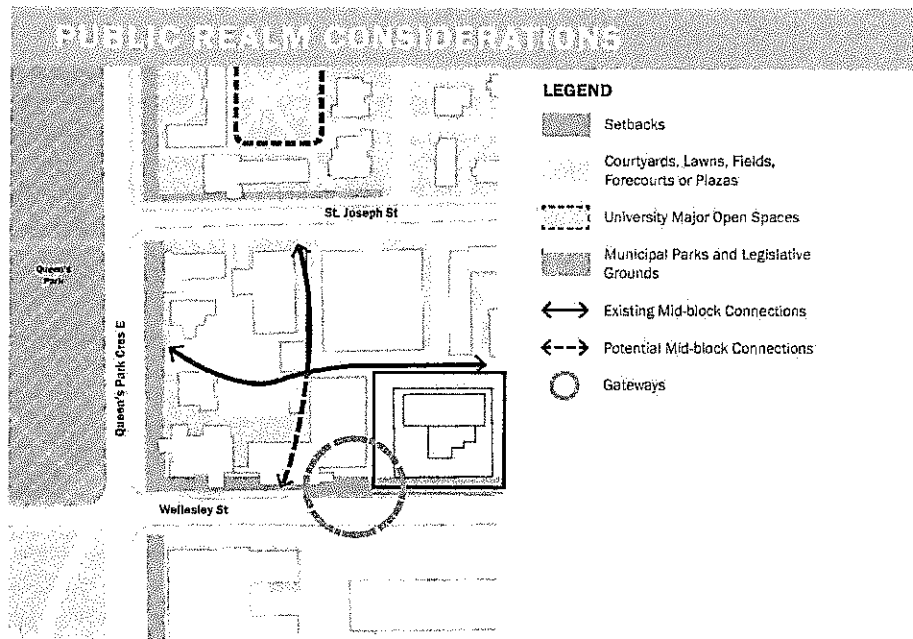


Block Vision

This Block contributes to creating a transition between the intensely developed corridor of Bay Street and the picturesque landscape of the Historic Campus. The Block can

accommodate a taller element that supports the transition towards the more highly developed Bay Street Corridor, the proposed taller element to the west and the low-scale heritage buildings further west. Evolution on this Block should relate to the existing Provincial government buildings to the south, the residential buildings to the east and reinforce the heritage resources and open spaces in the surrounding area with carefully considered buildings, open spaces and mid-block connections.

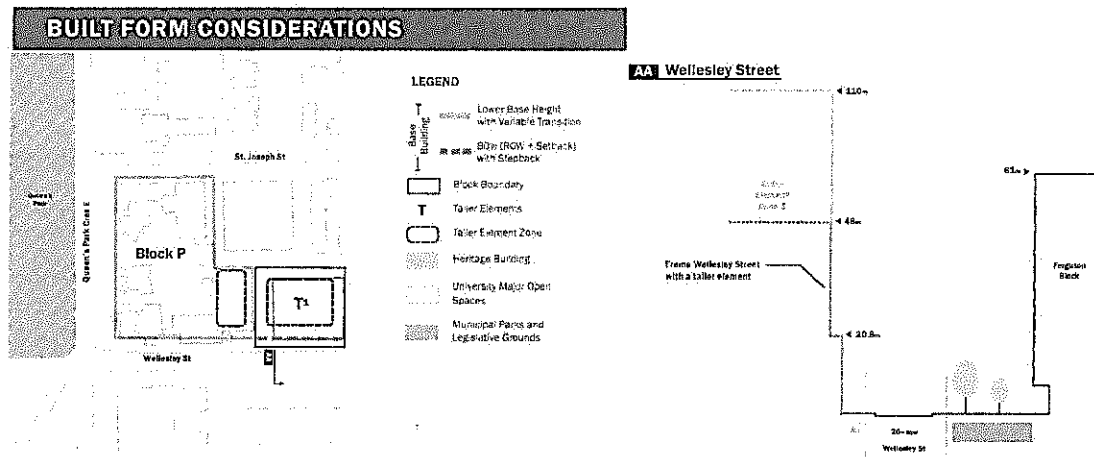
2. PUBLIC REALM CONSIDERATIONS



Public Realm Strategy

- Locate the east-west mid-block connection to maintain existing connections
- Create a taller element at 74 Wellesley Street West with active uses at-grade.
- Provide servicing access from Wellesley Street. Screen back-of-house servicing areas and waste storage or integrate into new buildings.
- Enhance the Wellesley Street streetscape to reflect the landscaping of the Whitney and Ferguson Buildings to the south and 90 Wellesley Street West to the west.

3. BUILT FORM CONSIDERATIONS



Built Form Strategy

- Mid-Scale Components: Typical mid-scale components with a maximum height of 48 metres.
- Taller Elements:
 - Number of Taller Elements Permitted: 1
 - Maximum Floorplate Size: 1,750 square metres
- New development that includes 74 Wellesley Street West will:
 - Incorporate a minimum 12.5 metre setback from the western and eastern property lines and from the centre line of the lane at the northern property line to the taller element;
 - Incorporate a minimum 6 metre setback from the Wellesley Street West property line; and
 - Transition from the historic character of the Historic Campus to the intense urban character of the Bay Street Corridor.
- Ensure that new development does not cast net-new shadows on Queen's Park between 10 a.m. and 4 p.m. on September 21st.
- Refer to additional guidance on Section AA.



Appendix C: Proposed Revisions to the Draft St. George Campus Zoning By-law Amendment to former General Zoning By-law No. 438-86

Proposed revisions and additions to the draft St. George Campus Zoning By-law Amendment are provided below in red:

- **Part IV – USES be revised to add the following item (6)**

(6) In addition to the uses permitted in Sections 8(1) and 8(2) of By-law No. 438-86, residential uses, including apartment buildings, are permitted on the lands municipally known as 74 Wellesley Street West.
- **Zoning By-law Maps 1, 2, 4 and 5 be revised as indicated in the attached Maps.**



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 cursive script that reads "Michael Loberto".

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).

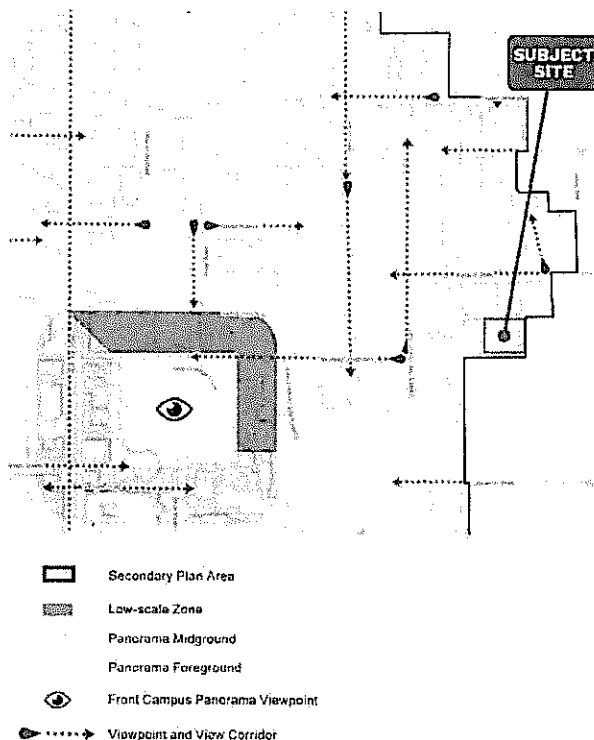
Comments on Draft Secondary Plan and Draft Guidelines

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.

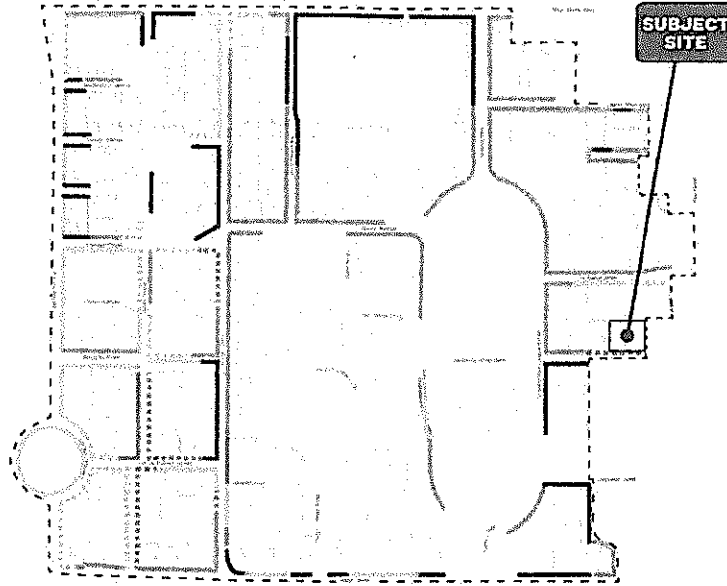
The open space character and low-scale of the core of the East Campus will be maintained, while the area south of St Joseph Street presents an opportunity for intensification of institutional and other uses. A mix of institutional and mixed use typologies will continue to create a transition in scale 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.










-  Secondary Plan Area
-  Maximum Base Height of 80% of the ROW With with Setback Transition
-  Maximum Base Height of 80% of the ROW With with Angular Plane Transition With with Angular Plan Transition
-  Maximum Base Height of 80% of the (ROW + Setback) With with Angular Plan Transition
-  Special Conditions
-  Maximum Base Height of 80% of the (ROW + Setback) With with Angular Plan Transition
-  Base Height Lower than 80% of ROW with Variable Transition

Figure 2.18

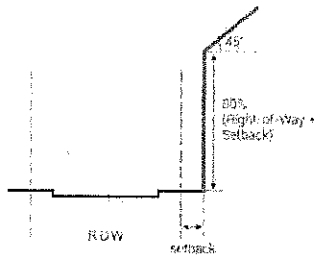


Figure 2.13

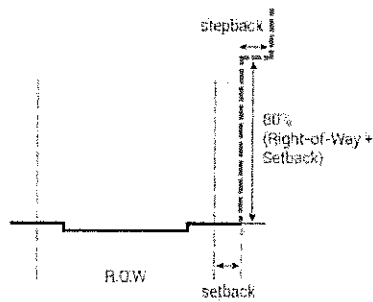


Figure 2.15

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.

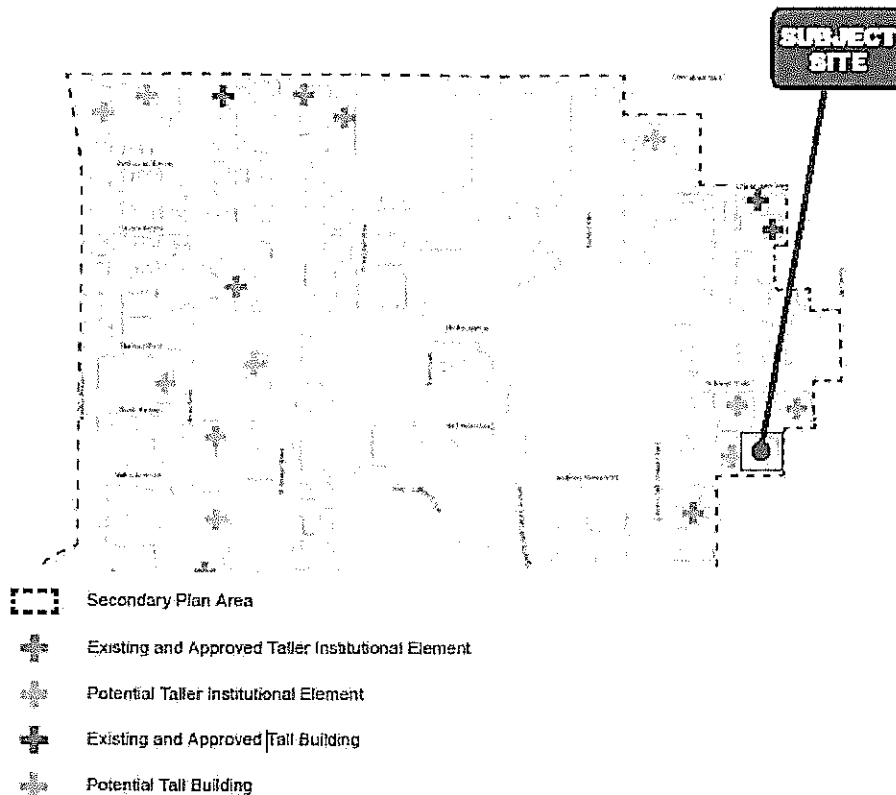


Figure 2.21

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

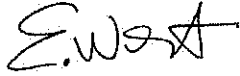
Generally, we have concerns that the draft Secondary Plan and Urban Design Guidelines do not adequately provide for potential redevelopment of the subject site, in particular, for a tall building element on the site. Several other policies issues have also been identified related to policy interpretation.

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 to contact the undersigned.

Yours very truly,

Bousfields Inc.



Emma West, MCIP, RPP



July 6, 2022

Members of Toronto City Council
Toronto City Hall
100 Queen Street West
Toronto, Ontario M5H 2N2

Dear Members of Toronto Council;

Re: *Item TE34.8: University of Toronto St. George Campus Secondary Plan - Official Plan Amendment Application - Final Report*

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 St. George Campus 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 have reviewed the draft University of Toronto Secondary Plan and Urban Design Guidelines. The TCDSB has engaged with City Staff throughout the drafting process, including attending the Community Consultation meeting in May of 2022 and submitting letters to the City throughout the process, including most recently a letter submitted to Toronto East York Community Council ("TEYCC") for the June 29, 2022 meeting.

TCDSB has concerns with the draft Official Plan Amendment adopted by TEYCC, particularly because the Secondary Plan and Guidelines do not provide for the redevelopment of the site, in this case, for a tall building element. Attached to this covering letter is TCDSB's letter to TEYCC with our letter which contains a summary of the TCDSB's concerns and their involvement with the draft Secondary Plan with relation to the TCDSB's landholdings at 74 Wellesley Street East. The letter also provides requested policy modifications to the draft Secondary Plan and Urban Design Guidelines to address their concerns.

Yours very truly,

Bousfields Inc.

Emma West, MCIP, RPP