



January 26, 2023

Project No: 23173

Via Email (phc@toronto.ca)

Planning and Housing Committee
City of Toronto
10th Floor, West Tower
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Nancy Martins

Dear Sir/Mesdames:

***Re: Item PH9.1 – January 29, 2024 Meeting
Ready, Set, Midtown: Zoning Review
City-Initiated Zoning By-law Amendment for Select Lands Designated
Apartment Neighbourhoods
299 Roehampton Avenue, City of Toronto***

We are the planning consultants for K+G Group, the owner of the property municipally known as 299 Roehampton Avenue in the City of Toronto (the “subject site”). The subject site is currently occupied by a 12-storey slab-style rental apartment building (KG Hampton House).

As you know, on November 30, 2023, the City of Toronto released a draft zoning by-law amendment for the lands designated as *Apartment Neighbourhoods* within Midtown’s 22 Character Areas (the “Draft ZBA”). Subsequently, on December 14, 2023, we submitted a letter on behalf of our client providing preliminary comments on the Draft ZBA as it would apply to the subject site.

We are now writing to provide our client’s comments to Planning and Housing Committee regarding the recommended draft zoning by-law amendment that was released on January 17, 2024 (“Recommended Draft ZBA”), and in particular, as it would apply to the subject site.

It is our opinion that the Recommended Draft ZBA, including but not limited to the proposed building height and setbacks, would not allow for the appropriate and desirable level of intensification and transit-supportive development on the subject site, as provided

for by the applicable planning policy regime, including the Provincial Policy Statement (2020), the Growth Plan for the Greater Golden Horseshoe (2019), the City of Toronto Official Plan, and the Yonge-Eglinton Secondary Plan.

To provide some background, the subject site is located within the delineated boundaries of Mount Pleasant Protected Major Transit Station Area (PMTSA) and within draft Site and Area Specific Policy 680 (SASP 680) through Official Plan Amendment 570, which was adopted by City Council on July 21, 2023. The minimum density target established for the subject site is 2.0 FSI.

Furthermore, the subject site is designated as *Apartment Neighbourhoods* in the City of Toronto Official Plan and the Yonge Eglinton Secondary Plan and is located within the Eglinton East Apartment High Street Character Area. This Character Area has an anticipated height range of 8 to 12 storeys, with the exception of lands within 250 metres of the Mount Pleasant LRT Station, within which heights of generally 15 to 20 storeys. In this respect, the subject site is immediately north of the Mount Pleasant LRT Station, therefore the applicable height range is generally between 15 to 20 storeys (Policy 5.4.3(C)). We note that the height ranges in the Secondary Plan are only intended to provide guidance with respect to the built form for the area. An Official Plan Amendment is not required to achieve greater heights. Furthermore, the surrounding context is emerging as a tall building node with heights well in excess of the anticipated 15-20 storeys height range.

Based on the foregoing background information, we provide the following comments on the Recommended Draft ZBA. Our main concern with the Recommended Draft ZBA relates to the proposed regulations limiting intensification on the subject site and the surrounding Mount Pleasant PMTSA, which does not align with the provincial policy regime regarding transit-supportive densities within MTSA's.

- Diagram 4B of the Recommended Draft ZBA seeks to restrict heights to 20 storeys and 63 metres on the subject site. We request that the City consider the appropriateness of these heights as they do not reflect the emerging context and will result in limiting intensification within the Mount Pleasant PMTSA.
- The Recommended Draft ZBA proposes a maximum tower floorplate of 750 square metres. This restriction is inconsistent with the emerging context of tall building in this area. Moreover, this regulation would hinder the ability to provide functional layouts of units, particularly in instances where the replacement of existing rental units in a "like-to-like" manner is mandated, as is anticipated in the future redevelopment of the subject site.

- The Recommended Draft ZBA proposes a minimum side yard and rear yard setbacks of 15.0 metres for portions of the building above Level 4 or above a height of 15.0 metres (whichever is less). These minimum setbacks are more than those recommended by the City of Toronto Tall Building Design Guidelines (i.e., 12.5 metres). Moreover, there are many examples of towers with reduced setbacks of less than 12.5 metres in the Yonge-Eglinton Area.
- The Recommended Draft ZBA proposes a minimum tower separation distance of 30 metres, in excess of those recommended by the City of Toronto Tall Building Design Guidelines (i.e., 25 metres). In this regard, the Yonge-Eglinton Area includes many examples of towers with reduced separation distances of less than 25 metres between towers. This approach does not reflect the emerging context of tall buildings in the area. Moreover, there is no planning or urban design justification to do so in an area that is planned for and experiencing significant intensification.
- The Recommended Draft ZBA limits the size of residential lobbies. There is no planning or urban design justification to do so.

In our opinion, the Recommended Draft ZBA fails to recognize the intensification and transit-supportive development potential of the subject site in accordance with the Provincial Policy Statement (2020), the Growth Plan for the Greater Golden Horseshoe (2019), the City of Toronto Official Plan and the Yonge-Eglinton Secondary Plan. In our opinion, the above-noted heights would not support the applicable transit-supportive built form and land use policy objectives nor be consistent with the existing and emerging tall building context within a PMTSA.

We kindly ask that you consider our comments on the Recommended Draft ZBA and would appreciate being included on any notice list with respect to this matter.

Yours truly,
Bousfields Inc.



David Charezenko, MCIP, RPP

cc: Jackie Chan, KG Group