

Address: 262 – 266 St. George Street

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| Project Name: 262 -266 St. George Street | Date of Application: January 9, 2025 |
| Application Number: 25102375STE11OZ | Date of ARA Board Approval of this Position Statement: T B D |
| P+D (2) Draft recommended to Board on: | P+D Review Group: Gimmi, Mickie, Montgomery, Shaul, Sisam, Wiercinski |

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| Project Status: Planning and Zoning | | | | | |
| | Pre-application | | Application Submitted | x | Project Review Mtg (P&D) |
| | TEYCC(3) | | Community Council: | | Community Consultation Meeting March 5, 2025 |
| | | | | | OLT (4) appeal: |
| Project Status: | | | | | |
| | Application Submitted | x | Staff-led Working Group (WG) | | Councillor |
| What the Developer Wants Now: | | | | | |
| | Official Plan Amendment | x | Zoning By-law Amendment | x | Site Plan Approval |
| | | | | | Heritage approval x |

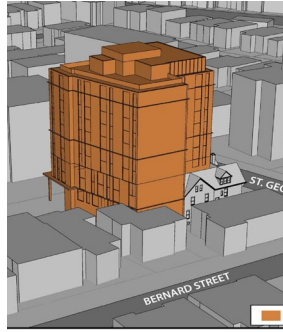
This Statement, and the views expressed in it, are presented by ARA ‘without prejudice’ to any legal actions arising in the course of the City’s review and possible appeals.

Brief Description of Project:

The applicant requests a combined official plan and zoning by-law amendment to facilitate the development of the site for a 12 - storey, residential building containing 86 dwelling units and the adaptive re-use of the heritage listed buildings at 262 and 264 St. George Street. The proposed building height is 38 metres with a 6 metre wrapped mechanical penthouse. The gross floor area of the project is 6556.2 sm. 3 parking visitor spaces and 1 accessible parking space are proposed. 16 visitor/short term and 78 resident/long term bicycle spaces are proposed.



View South



View Northeast



View Northwest

ARA's Issues:

A review of the project documentation posted on the City's Application Information portal has highlighted the following concerns:

1. Community Consultation

Notwithstanding an elaborate Public Consultation Strategy (November 2024), included with the application and posted on the AIC website, the community has yet to participate in a comprehensive public consultation process. Strategy Corp has stated the applicant's commitment to meaningful consultation through 'applicant led stakeholder's meetings (plural) to encourage collaboration' detailed on pages 12-16 of the Report.

As of February 24, several of the identified stakeholders have confirmed NO outreach or notification from the applicant, nor of the virtual community consultation meeting scheduled to be held on March 5/25 and which requires registration beforehand to attend. The stated process in the report is disingenuous.

2. Tenants

Between the three houses, there are currently 4 rental dwelling units and 39 rental dwelling rooms, 43 living spaces in all.

In compliance with the OPA 453 (which only requires the replacement of dwelling room GFA), the developer proposes to replace the dwelling units (only) with 12 bachelor units (averaging 35.14 sm) and 1 one-bedroom apartment, (59.95 sm)

There will not be enough units to accommodate all the incumbent dwelling room tenants.

The units will not be affordable by the incumbent tenants. Due to the increased size of the proposed units, the rent, while calculated to be affordable per square metre will be approximately double that currently paid.

The four dwelling units are not eligible for replacement because there are less than 6 units per building. However, two of the four dwelling units are very large (5 bedrooms and 6 bedrooms). Anecdotal, at least the 6 bedroom unit is currently sublet to several tenants, so both large apartments are likely *de facto* dwelling rooms. These *de facto* dwelling room tenants will only receive compensation under the Residential Tenancies Act, with no support from the City.

There is a policy gap in the regulatory framework that could leave over 50 tenants unhoused.

There are a number of rooming houses in the Annex. These accommodations fulfill an essential purpose and are part of the Annex's history and the fabric of the neighbourhood. The dwelling room tenants are our neighbours and should not be living on the street or in tents. In the current housing crisis, we need this deeply affordable typology more than ever. Its destruction only serves to compound that crisis by displacing our most vulnerable community members.

A better solution must be found to address the needs of the official dwelling room tenants and the unofficial tenants sharing the large apartments. We note the one-to-one replacement of units at 566-576 Sherbourne Street and 29-37 Linden Street and close to one-to-one replacement at 191-199 College Street and 74-76 Henry Street.

3. Heritage

262 and 264 St. George Street are listed buildings and identified in the West Annex Phase II Heritage Conservation District Study. The stated intention of the project is to see adaptive re-use of the heritage buildings, however, this is facadism as very little else is being conserved.

St. George Street is characterized by a mix of architecture from the classic Annex style to Edwardian to early examples of apartment homes to mid-century modern apartment buildings. This architectural mix, a living history of architecture in the Annex and Toronto, is what makes St. George Street unique exceptional and memorable.

These heritage buildings together with the building at 260 St. George wrap the corner of St. George Street and reflect a similarly positioned building kitty corner to the south east, remnants of the Annex style of residences still evident in this area.

In the past, mansions were demolished to make way for mid-century modern buildings. However, when new buildings were constructed, the common approach was to maintain street setbacks positioning buildings not to infringe on adjacent architecture. The historic buildings are as intact as the newer ones creating the special streetscape of St. George Street.

Therefore, the reduction of two historic buildings to facades and the demolition of a third, will represent a critical diminution of the architectural mix. It is not adaptive reuse by the farthest stretch of the imagination. In fact, the present use of the buildings is adaptive reuse. The developer is proposing taxidermy. Claims that the retention and restoration of the facades show a sensitivity with the historical architecture ring false.

The mass of the proposed addition overwhelms the house form residential heritage buildings identified in the West Annex Phase II Heritage Conservation District that abut the property. There is no transition to the district.

A rendering of the proposal shows the impact of the proposal to the residences to the west, and the south.

4. Parking Pick-up and Drop-off

No parking for residents is proposed (maximum 45 spaces). Two visitor parking spaces are proposed (the minimum 2-maximum permitted 13). One accessible parking space is proposed whereas three are required.

The proposal does not reflect the shortage of on-street parking in the neighbourhood. The proposal compounds the problem created by several proposed/approved developments in the area that do not provide for parking. While well served by transit, not everyone has the mobility to take transit, cycle or walk, let alone as the recent snow event has demonstrated.

The issues of pick-up and drop-off and e-commerce have not been addressed by data.

5. Vehicular Movement

The Transportation Operations Assessment correctly notes that one Type “G” loading space is required for the subject site. It also correctly notes that mid-rise buildings that have between 31-60 units AND between 5 and 11 storeys in height may forego front-end waste collection requirements and utilize multi-residential curbside collection under which curbside bins are brought to the curb for collection.

The Assessment argues that curbside collection is appropriate as the proposed building exceeds the height requirement “by only one storey” while at the same time acknowledging that the number of units proposed is 86.

The test cited is conjunctive not disjunctive. The number of units exceeds the maximum by over 40%. The prospect of bins lining the street on collection day is inappropriate and inexcusable. A type “G” loading space should be required.

6. Site Servicing

The subject site is serviced by a combined storm/sanitary sewer on St. George Street.

The Functional Servicing Report estimates that the estimated sanitary outflows from the proposed building will rise from 0.66L/s to 1.81 L/s, and increase of 1.15l/s or almost 60%. Recent developments rationalize such increases by arguing that there is capacity in the existing combined sewer.

There are two issues with this rationale. One is the compound effect of such increases from current and proposed developments. The second is as last year’s storms have demonstrated, combined sewers were overwhelmed and discharged untreated effluent directly into Lake Ontario, resulting in extended closing of public beaches.

7. OPA

The Planning Rationale cites proximity to the Apartment Neighbourhood land use designation as rational for the change from Neighbourhood. This is the second time in the last year that Apartment Neighbourhood has expanded into an area which is intended for lower-scale residential buildings.

The Neighbourhood designation currently extends to include four properties along St. George Street. This serves to secure a residential scale context for the precinct.

The change in designation to Apartment Neighbourhood will allow for the violation of this context, with the proposal looming over the residential fabric and imposing on its character and scale.

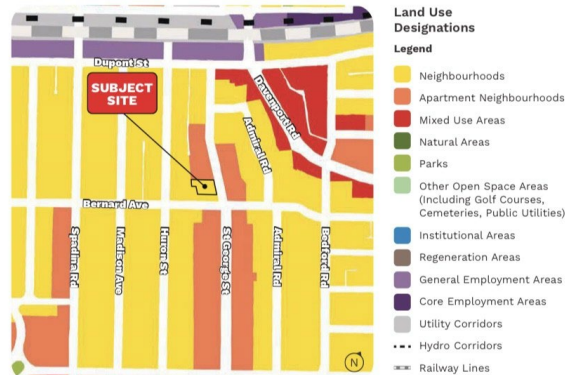


Figure 12 - Toronto Official Plan Map 17, Land Use

44 Planning & Urban Design Rationale
Bousfields Inc.

8. Massing

Because the building setbacks are so minimal, (2.9 m to the south and 1.5m to the north) it is not possible to locate windows in the sidewalls resulting in blank and undelineated walls which are 44 m high. The one northwall is fully visible from St. George Street and the south wall looms over the houses along Bernard Ave. These large blank walls are all too evident in the renderings for the proposal- in stark contrast to the scale and refinement of many of the mid-century apartment blocks along St. George Street.

9. Transition

Stepbacks were once part of the Mid-rise guidelines, however they are no longer required. This unfortunately creates extremely abrupt transitions from three storeys to 12 storeys behind the houses on Bernard Ave as well as at the rear of the houses along Huron Street to the west.

10. Public Realm and Access to Parks

There are seven City and privately owned trees in the site. The applicant proposed to remove three significantly large trees, two of which line St. George Street. Three other trees will be injured. Substantial replacement planting must be provided including large caliper trees.

11. Amenity Space

It is unclear in the application and project statistics what amount of amenity space is required and what is being provided. Further, the amenity space remaining for the tenants of the existing building has not been identified. Are the existing tenants allowed access to the new amenities in the condominium? Clarity is required.

Conclusion

A number of issues and concerns must be resolved for this development to be a positive and meaningful contribution to the community.

We suggest that the applicant follow the elaborate public engagement plan so nicely outlined in detail in their Communications Strategy to receive community feedback on 'matters that will be continually explored be examined in greater depth throughout ongoing discussions and the greater consultation process'.

As noted earlier stakeholders identified in the communications strategy have not been notified of the Community Consultation Meeting scheduled for March 5th. The City's sign indicating a change for the site was put in place on February 21/25. Although the sign states "public meeting information will be posted when available" at this writing no information has been posted. Notification was to be distributed to residents within 150 metre radius of the site in a timely fashion.

We request that March 5, 2025 meeting be rescheduled to allow for a suitable notification period and to allow resident to register for the meeting.

Comments on this Exposure Draft Project Position Statement, should be emailed to Henry Wiercinski or Elizabeth Sisam, Co-chairs, Planning and Development Committee at:
info@theara.com

Chronology

March 5/2025 Community Consultation Meeting scheduled

Notes:

- 1.Planners on the file are: Esha Biddanda Pavan
- 2.ARA's Planning and Development Committee
- 3.Toronto and East York Community Council
- 4.Ontario Land Tribunal, formerly Local Planning Appeals (LPAT) and before LPAT, Ontario Municipal Board (OMB)

