

From: [Elaine Iannuzziello](#)
To: [Councillor Moise](#); [Toronto East York Community Council](#); [Councillor Malik](#)
Cc: [Robert Duke](#); [Dianne Coles](#); [Jerrett Young](#); [Alex MacIsaac](#)
Subject: [External Sender] Re: 110-112 AdelaideStreetEast and 85 Lombard Street - Zoning By-law Amendment Application - Appeal Report (Ward 13)
Date: February 10, 2025 10:20:58 PM
Attachments: [July 2 2024 95 Lombard Street OBJECTI 250120 110758-compressed.pdf](#)

Re: TEYCC February 20, 2025 - TE-20.13
110-112 AdelaideStreetEast and 85 Lombard Street - Zoning By-law Amendment Application
- Appeal Report (Ward 13)

Councillor Chris Moise,
Ward 13, Toronto Centre andChair TEYCC City Hall,
100 Queen Street West Toronto, ON. M5H 2N2
CouncillorMoise@toronto.ca

February 10, 2025

Dear Councillor Moise and members of the Toronto EastYork Community Council,

I am a condo owner at 95 Lombard Street (St. James Square) and have lived here for almost twenty-five years. The 65 storey tower proposed for the 110-112 Adelaide St. East/85 Lombard St. site is immediately to the west of our low-rise condo building and, if approved and built, would have a hugely negative impact not only on us but on our entire St. James Park neighbourhood.

Our committee of three here at 95 Lombard has been studying and analyzing the various proposals for this site since the very first one made in March 2020. Attached to this message is a PDF of our July 2, 2024 Letter of Objection to the current proposal - the one now before the OLT. All five members of the Design Review Panel voted against this proposal. They gave the design a failing grade, but the applicant has not made any revisions. Therefore, the reasoned argument against this proposal as presented in our July 2, 2024 Letter of Objection stands and I respectfully invite you to read it.

Thank you.

Elaine Iannuzziello





The Residents of St. James Place, Metropolitan Toronto Condominium Corporation No. 889
95 Lombard Street, Toronto, ON. M5C 2V3

Councillor Chris Moise, Ward 13, Toronto Centre and Chair TEYCC
City Hall, 100 Queen Street West
Toronto, ON. M5H 2N2
Councillor_Moise@toronto.ca

July 2, 2024

Dear Councillor Moise,

**RE: PLANNING APPLICATION for rezoning REFERENCE NO 20 120404 STE 13 OZ (April 2024) and
PLANNING APPLICATION for Site Plan Approval REFERENCE NO 22 186104 STE 13 SA (August 8, 2022)**

110 ADELAIDE STREET EAST (hereinafter referred to as “110 Adelaide”)

This letter is in reference to the revised rezoning application 20 120404 STE 13 OZ and the site plan approval application 22 186104 STE 13 SA by 110 Adelaide Street East Inc. to tear down an existing four storey office building erected in the 1920's and allow a new 65 storey (217.6 metres inclusive of an 8 metre mechanical penthouse) residential/mixed use building on three assembled lots. The proposal consists of a 65 storey tower facing Adelaide Street which is built out to the east, west and north property lines of the site with an integrated 10 storey projection on the north side to the Lombard Street property line. Commercial uses would be located at grade with office uses on the second floor and residential uses above.

Total gross floor area of the proposed building is 37,100 square metres, comprising 36,370 square metres of residential gross floor area and 730 square metres of non-residential gross floor area. A total of 600 residential units are proposed plus 670 bicycle parking spaces and NO vehicle parking spaces. The developer is requesting zoning amendments to City of Toronto Zoning By-law 438-86 and city-wide Zoning By-law 569-2013 governing the three lots in question: 110 Adelaide Street East, 85 Lombard Street and 108 Adelaide Street East (a small parking lot) which cover an area of 1,306 square metres (0.13 hectare).

The developer is proposing a density of 28.41 FSI (Floor Space Index) which exceeds city area limits on this section of Adelaide Street East [CR4.0 (c2.0,r4.0)] and on Lombard Street [CR4.0 (c0.5,r4.0)].

Introduction

The residents of MTCC 889, St. James Place, living immediately adjacent to the site, to the east on Lombard Street, wish to make TEYCC aware of a number of serious concerns and objections that we have regarding the proposed development of this residential/mixed-use building and the proposed Zoning By-Law amendments referenced above. In this letter we will address:

- 1. Legal parcel and title agreements with 95 Lombard, 120 Adelaide Street East and The Holiday Inn Express (111 Lombard)**
- 2. St. Lawrence and Old Town Neighbourhood Fit**
- 3. Density, Transition, Separation and Setback**
- 4. Negative Impact on St. James Cathedral and St. James Park**
- 5. Other Design Concerns**
- 6. Demolition and Construction Process Problems**

We are open to development that maintains and enriches the vibrancy of our downtown neighbourhood and fully endorse TOcore development plans as presented to date. This development application, however, does not meet a number of key TOcore policies and Toronto Tall Building Design Guidelines that support and enhance city and neighbourhood plans, and would indeed impede future TOcore development plans. We believe that the negative impacts and risks that this development brings to our neighbourhood cannot be mitigated.

1. Legal parcel and title agreements with 95 Lombard, 120 Adelaide Street East and The Holiday Inn Express (111 Lombard)

St James Square originated when the property of 78 Jarvis was divided into 95 and 111 Lombard, 120 and 134 Adelaide Street East. The properties formed a legal shared facilities agreement in order to come to terms with the ownership and obligations to the common space between them but it also ties these properties together on any decision to change the current ownership title with an LDA.

The property title from the city land registry office for St James Square is shown in Figure 1. Ownership of the land for the 95 Lombard condos, 111 Lombard - the hotel and 120 Adelaide - the commercial building housing the nail Salon are all registered under St James Square. It clearly shows the bond between St James Square properties.

The city has requested that the applicant obtain an LDA from 120 Adelaide in order to move forward with this development. As we have now pointed out to the city, at the public community consultation meeting on May 28, 2024, that St James Square is tied together in property decisions, it would not be responsible for the city to accept an LDA from 120 Adelaide unless the city requires sign off from the rest of the properties of St James Square.

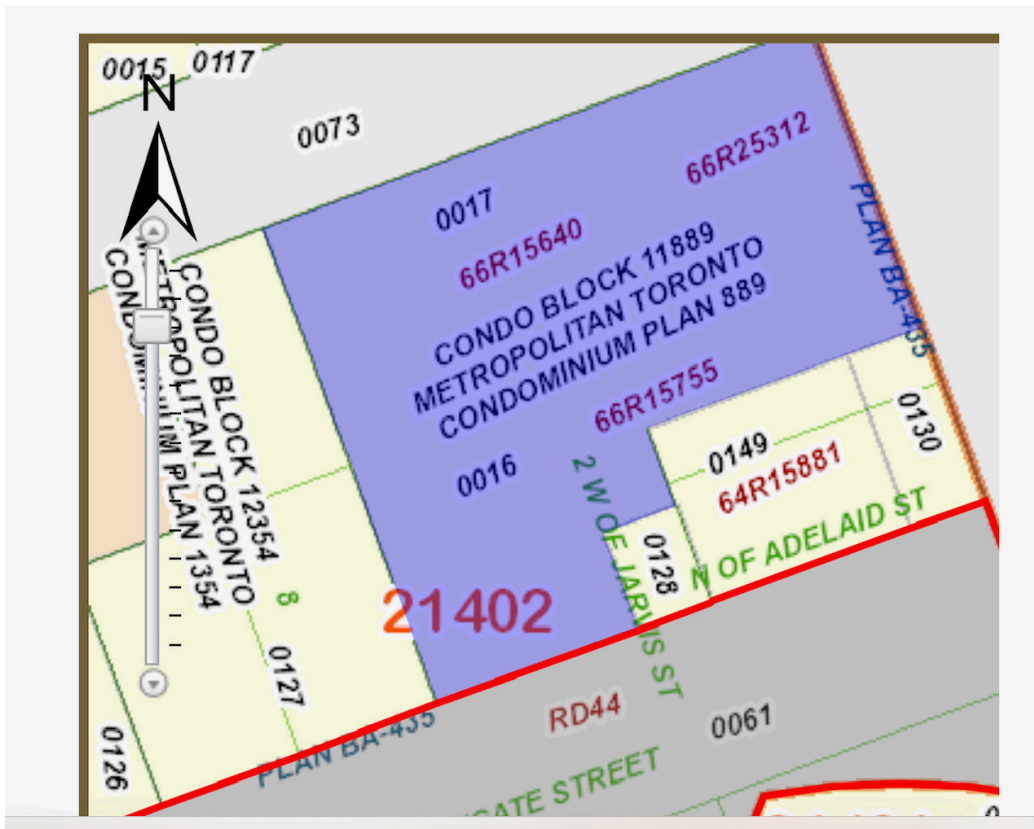


Figure 1. Property Title for St. James Square

2. St. Lawrence and Old Town Neighbourhood Fit

The proposed development does not fit historically or culturally in our neighbourhood. The submitted application is contextually inappropriate as both the 110 Adelaide site and the building design do not meet the fit and transition requirements for the St. Lawrence and Old Town historic and cultural precinct as set out in the TOcore official plan. TOcore defines the St. Lawrence and Old Town Neighbourhood as a mature precinct with decades of well-planned development.

The highlighted area in **Figure 2** shows how all development has accented neighbourhood cultural and historic aspects (namely, the St. Lawrence Market, St. Lawrence Hall, St. James Park and St. James Cathedral) by respecting and complementing the scale, character and form in this section of the precinct. The latest example of enhancing development is the St. Lawrence Market North design and construction of a five storey (25.3 metre) building.



Figure 2. St. Lawrence Neighbourhood HCD with 110 Adelaide site outlined in red



Figure 3. Proposed redevelopment of 110 Adelaide site

The developer proposes a 217.6 metres, 65 storey building in an area where city By-laws specify a height limit for the north side of Adelaide Street East of 23 metres and the south side of Lombard Street of 18 metres. The 110 Adelaide site is mid-block between Church and Jarvis Streets. The proposed design height does not transition with all the established heights of the neighbouring buildings for this section of Adelaide Street East.

Adelaide Street East, between Church and Jarvis Streets, is a street segment that abuts the north side of St. James Park, a significant downtown park, and also contains several heritage properties. The mid-block site is bounded on its west side by a low rise *heritage contributing* building (c.1889) and on its east side by a low rise building (1989) and then a series of five *protected heritage* low rise buildings (c.1870) stretching to the intersection with Jarvis Street. As a result, the site is not a suitable location for a tall building as illustrated in **Figure 3**. As stated in the Downtown Tall Buildings Vision and Supplementary Design Guidelines, Section 1.9 Other Streets Where Tall Buildings Are Not Suitable:

"There are a number of streets and street segments not identified as High or Secondary High Streets in this Supplementary Guideline. These are streets or street segments that abut significant parks or contain a critical mass of heritage properties and contributing heritage fabric, or have an existing or planned context which does not contemplate tall buildings as a suitable form of development."

It is against this immediate neighbourhood context that the submitted proposal is requesting a height exemption from By-Law 569-2013 and former By-Law 438-86. The remaining sections of this letter provide added rationale for not granting this exemption and for denying the proposed building request.

3. Density, Transition, Separation and Setback

In Toronto, tall buildings do not butt up against other mid and high-rise residential structures. This statement is validated by observation as one looks around the city and the immediate neighbourhood, and is supported by TOcore policies and the following Toronto building guidelines:

- Toronto Tall Building Design Guidelines - March 2013
- Avenues and Mid-Rise Buildings Studies Section 3: Performance Standards for Mid-Rise buildings - May 2010
- Downtown Tall Buildings Vision and Supplementary Design Guidelines - January 2018

The proposed tall building for the 110 Adelaide and 85 Lombard St. site is set back 0.4 metres from the property line, with a 2.5 metre step-back atop the 6th storey and a 1.1 metre step-back atop the 8th storey to the tower portion which rises 57 storeys straight up to the top of the 65th floor. The base is built out to the east and west property lines on Adelaide street. This creates a height differential that is more than twice the adjacent heritage building to the west and the six adjacent structures east of the site along Adelaide to the intersection with Jarvis Street. On Lombard Street the tower is built out to the east and west property lines. It has a 0.75 metre setback from the street property line with a 0.75 metre set-back at the top of the 2nd floor and then rises 8 storeys to the roof of the 10th floor where an outdoor amenity steps back 20 metres to the south. The lot portion of the site at 85 Lombard Street is only 15.98 metres wide and lacks the capacity to provide the required 12.5 metre setback from its east and west boundaries where the adjacent residential condominium towers already exist (95 and 77 Lombard respectively).

Our overall conclusion is that the 110 Adelaide site (lot shape, 1,306 square metre footprint and location) is not appropriate and too small for the proposed tall building. In support of this conclusion we submit the following three reasons:

First, the 110 Adelaide building proposal does not fit within the existing or planned neighbourhood context and does not provide an appropriate transition in scale down to existing low-rise buildings, parks, and open space. This is supported by Policy 3.1.2(3) in Section 3.1.2 of the TOcore Official Plan which states:

- c) create appropriate transitions in scale to neighbouring existing and/or planned buildings;*
- d) provide for adequate light and privacy;*
- e) adequately limit any resulting shadowing of, and uncomfortable wind conditions on, neighbouring streets, properties and open spaces, having regard for the varied nature of such areas."*

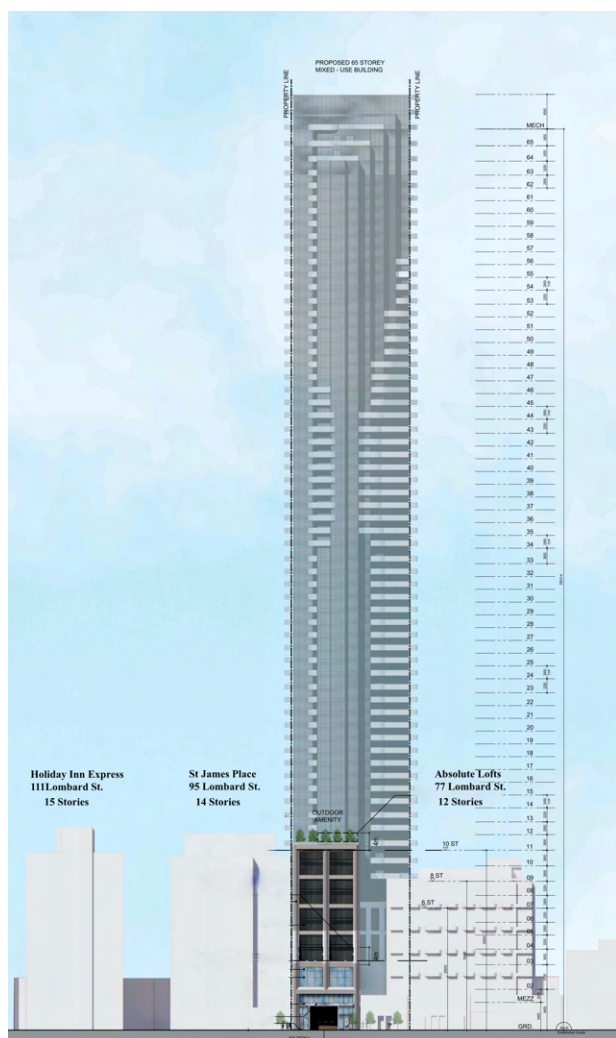


Figure 4. Vertical View

Figure 2 (page 3) shows that all buildings on the south side of Lombard Street and north side of Adelaide Street East are in form and buildable to fit and transition in scale with the St. James park across the street. The proposed 110 Adelaide tower neither fits nor transitions in scale.

Further support is provided by Policy 4.5.2(c) which outlines a number of criteria for a development within the Mixed Use Areas designation, including:

“...locating and massing new buildings to provide a transition between areas of different development intensity and scale, through means such as providing appropriate setbacks and/or a stepping down of heights, particularly towards lower scale neighbourhoods.”

Second, both **Figure 2** (page 3) and **Figure 4** illustrate that without the proposed 110 Adelaide tall building, ample separation distance exists between 95 Lombard Street and 77 Lombard Street and between 95 Lombard Street and the Holiday Inn Express. Each pair of buildings has facing windows and separation between towers. The proposed 110 Adelaide tower does not provide separation distance between buildings adjacent to the site (i.e. 95 and 77 Lombard Street) as specified in Section 3.2.3 Separation Distances of the Toronto Tall Building Design Guidelines:

“Where the existing context is characterized by tower separation distances greater than 25 metres, provide tower setbacks and separation distances in keeping with the more generous spacing established by the context.”

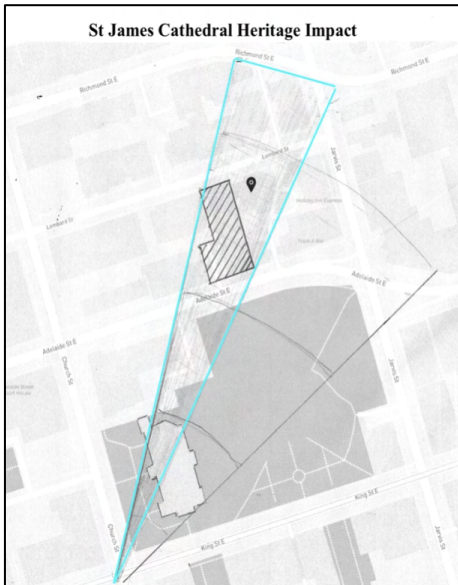
Third, the 110 Adelaide proposal is located on a mid-block site. Section 3.2.3 of the Toronto Tall Building Design Guidelines, Separation Distances, specifies that on small sites: *“Setback tall building towers 12.5 metres or greater from the side and rear property lines or centre line of an abutting lane.”* As a mid-block structure, the tower at the 110 Adelaide and 85 Lombard Street site should be set back 12.5 metres from both the east and the west site boundaries. The developer has not done this. The 110 Adelaide proposal eliminates the existing separation distance between the facing windows of 95 and 77 Lombard Street. The Downtown Tall Buildings Vision and Supplementary Design Guidelines, 1.3 Factors Mitigating Height states the following:

“Some sites are simply too small to meet the separation and set back distance requirements of the City-wide and Supplementary Downtown Tall Building Design Guidelines. These small sites cannot accommodate a tall building without compromising the Downtown Vision and diminishing development rights of adjacent sites and should not be developed with tall buildings.”

4. Negative Impact on St. James Cathedral and St. James Park

St. James Cathedral and St. James Park are the cultural and historic centre of our neighbourhood. The proposed development at 110 Adelaide contravenes protections in place for both these properties. The Downtown Tall Buildings Vision and Supplementary Design Guideline Section 1.3, Factors Mitigating Height, states the following:

“Three mitigating factors that take precedence over heights assigned to High Streets and Secondary High Streets. The presence of any of these factors overrides the ability to locate a tall building on a particular site if it is deemed to negatively impact any of the following: heritage properties located on or adjacent to the development site; sunlight on parks and open spaces; and views of prominent and heritage properties, structures and landscapes.”



The proposed tall building at 110 Adelaide has a significant impact on St. James Cathedral's heritage roof and spire sky view by exceeding the height limit on the north side of Adelaide Street East which is zoned CR 4.0, with a 23 metre height limit (see **Figure 5**).

St. James Cathedral is protected by the Enhanced View Protection Policy, TE34.86 adopted by Toronto City Council on July 23, 2018 directing city planning to use these policies when considering and evaluating any development that would go against these recommendations. This amendment now includes view protection for the silhouette view of the whole Cathedral including the roofline, spire and clock tower from the southwest corner of Church and King Street East. It is estimated that approximately 619 properties are within the Site and Area Specific Policy 539 – including the proposed site at 110 Adelaide E. as shown within the mapped “affected properties” in **Figure 5** and **Figures 6a** and **6b** which outlines the St. James Cathedral protected view.

Figure 5. Affected Properties

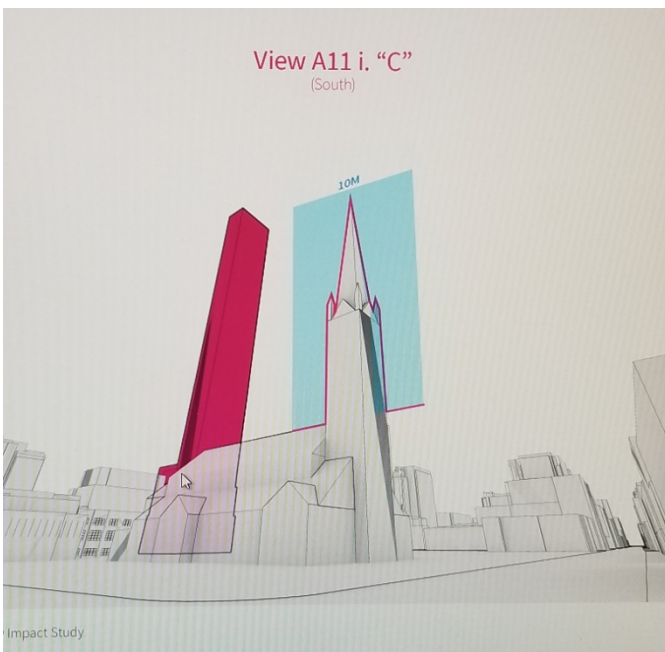


Figure 6a. Impact on St James Cathedral protected view



Figure 6b. St James Cathedral protected view from the SW corner of Church and King

By their own admission, ERA Architects Inc, have included a graphic in the 110 Adelaide Street revised proposal View Impact Report that shows how their proposed building impedes on the roofline of St James Cathedral which is in direct conflict with the Enhanced View Protection Policy. In comparison to today's view of St James Cathedral, shown in **Figure 6**, the new building application would be the only building in the neighbourhood that would obstruct this view.

The photos below are taken from inside the newly refurbished St. James Park looking north to Adelaide Street East. This transformation of the park has been a major expenditure for the City. In the master plan for the transformation, the project team from Gehl Architects notes, *"Good building to street proportion. Park surrounded by 3 to 8 storey high buildings."* This creates a vibrant and healthy open green space in our historic neighbourhood.

Photo 1 is a view of the new central pavilion in the park taken in 2020. When you cross the park, you arrive at Adelaide Street East. Note the sky view in the photo. If the proposed development at 110 Adelaide were allowed to move forward, you would have a 65 storey building just next to the small red brick 14 storey building at 95 Lombard Street. This proposed building would be over four times higher than the condominium building on Lombard Street and would take away the uninterrupted sky view looking north from the park. In fact, with the recent applications submitted or recently approved, there will be a wall of new structures eliminating any sky view north of the park.

Photo 2 is of the same view taken in January 2024 where we can see that the city is allowing applications to take away the sky view of the park. This new proposed development would be one more building eliminating a view to residents of the area who enjoy the green space in St James Park.



Photo 1. St. James Park 2020



Photo 2. St. James Park 2024

Photos 3 & 4 (on page 8) are views looking north through the park toward Adelaide Street from the newly designed children's playground. Again, note the continuous sky view and the impact a 65 storey building would have on this image which would be over four times the height of the red buildings currently in this photo and be one more building to erode this view.

Toronto Tall Building Design Guidelines Section 1.4 states, “*Tall buildings should be located and designed to protect access to sunlight and **sky view** within the surrounding context of streets, public parks, private open space, and other shadow sensitive areas.*”

Downtown Toronto and the area which immediately surrounds it, has a limited number of parks and open spaces that play a vital role in its character and the quality of life for its residents, workers and visitors. As Downtown continues to steadily intensify, the need to protect these parks and open spaces becomes increasingly important.

To keep St. James Park as a significant landmark in the neighbourhood, we strongly feel that the proposed development at 110 Adelaide must not be allowed to move forward.



Photo 3. St. James Park children's area 2020



Photo 4. St. James Park children's area 2024

5. Other Design Concerns

In addition to the major site and design deficiencies that we have already identified, there are several other design concerns which have been overlooked by the applicant, or not addressed at all, including:

Insufficient tower separation and setback.

This results in the loss of privacy for adjacent condominium apartments with their facing windows, including:

- All thirteen 04 suites at 95 Lombard which are ~4.5 metres from the property line. The proposal includes a 5.5 metre step-back for a third floor outdoor amenity midway along its east wall. This results in six floors of three east facing apartment windows that look directly into the west and south facing windows to the main living space of all thirteen 04 suites at 95 Lombard.
- All 05 suites at 95 Lombard which are on the property line and opposite the 5th through 10th floors on the east face of the proposed building. The proposal includes a fifth floor 5.5 metre step-back outdoor amenity on the east wall. This outdoor amenity faces directly into the west and south facing windows to the main living space of an 05 suite at 95 Lombard. As well this outdoor amenity results in the proposed north east corner apartments with east and south facing windows on the 5th through 10th floors having a direct view into the west and south facing windows to the main living space of the 05 suites opposite at 95 Lombard. Privacy is further eroded by balconies that project out from the east and north sides of the tower.
- The 77 Lombard Street residents will experience negative impacts on their privacy due to lack of separation and setback from their property line.

Balconies, outdoor amenities and terraces, loss of privacy/enjoyment/over-look.

With minimal to no tower setback, the proposed tower's north, east and west facing balconies, plus third, fifth and ninth floor outdoor amenities create a loss of privacy and over-look for the south facing windows and balconies of the residential condominium building at 77 Lombard Street and the west and south facing windows to the main living space for the condos at the residential building at 95 Lombard Street. As well, the proposed

tenth floor roof outdoor amenity creates a direct view into all east facing windows of residents at 77 Lombard Street.

Security issues for 95 Lombard Street.

The proposed 5th floor outdoor amenity creates an immediate security issue for at least one 05 unit at 95 Lombard. The affected unit has west facing solarium windows that could be accessed directly from this Outdoor Amenity, which will be open to office workers, residents and/or visitors to the building.

Lower tower design. The lower portion of the proposed tower is built to the lot line and abuts the contributing historic building (c.1889) at 100 Adelaide Street East (which currently houses the Pearl Diver restaurant) obscuring its three ground level windows.

Zero Residential Visitor and Commercial Parking Spaces. The provision of zero residential visitor spaces ignores the minimum parking requirement outlined in the amended Zoning By-law 569-2013. As such, permission to amend the residential visitor requirement is requested as part of the application. This is a serious design concern as it will add to the existing unacceptable congestion. (See Photo 5)



Photo 5. Typical traffic congestion going southbound at the intersection of Jarvis and Adelaide

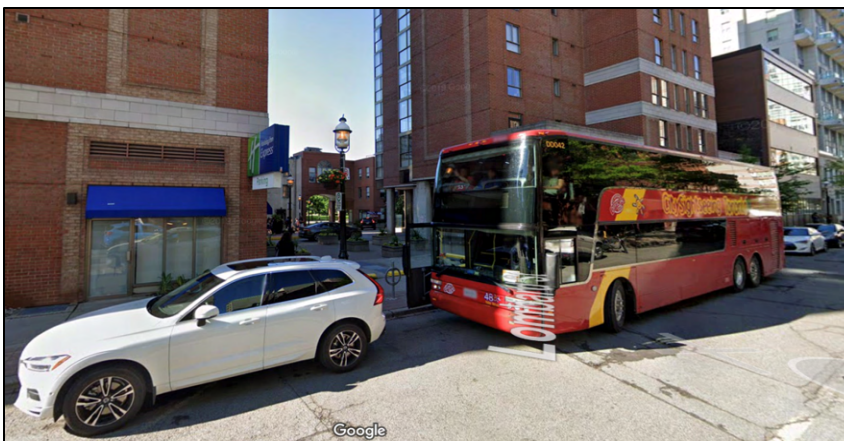


Photo 6. Limited parking availability on Lombard Street makes overflow of vehicles a major problem

Single vehicle access from Lombard Street to service the building. In the new proposed development, the designer has one garage door to enter the building for all vehicle services and deliveries and NO vehicle parking access. In theory, this takes away some of the challenges of staging and parking at street level, but, with 600 residential units plus commercial and retail on the site, the presence of delivery and service vehicles requiring access to the site rises exponentially. How will the overflow of vehicles on Lombard St. be managed? (See Photo 6) In addition, the active bike lane on Adelaide running parallel to the southern face of the proposed building further restricts vehicular access to the site and adds to the congestion.

Ventilation on the street. The ventilation grates are located where the parking ramp meets the public sidewalk, on Lombard Street which is a secondary high street in a mixed neighbourhood, creating noise and odour concerns.

Loss of natural light and shadowing.

The applicant's own shadow study confirms the negative impact that their tower would have on adjacent properties and on Lombard Street:

- Adjacent 95 Lombard Street solariums would be in shadow between noon and sunset
- The west facing solarium windows of units 505, 605 and 705 at 95 Lombard will be blocked by the height of the north portion of the tower, whereas they are currently not blocked
- Adjacent 77 Lombard Street balconies would be in shadow between sunrise and noon
- All buildings on the north side of Lombard Street between Church and Jarvis Streets would experience one to two additional hours of shadow

Privacy Concerns for 95 Lombard Street Condo Residents.

While the section of the building that faces Lombard Street is 10 storeys tall, it is not a separate building but rather the northern extension of the tower. This extension of the tower is an integral part of the building and site design. The entire application needs to follow the Tall Building guidelines. The application cannot be split in order to apply guidelines for a mid-rise structure to the Lombard St. portion of the building and guidelines for a tall building structure to the Adelaide St. portion.

Therefore, the total distance required between the windows on the building at 85 Lombard and the windows of the building at 95 Lombard, need to be the required 12.5 metres from the lot line NOT the 5.5 metres distance proposed.

6. Demolition and Construction Process Problems

Currently the **Site Plan Approval REFERENCE NO 22 186104 STE 13 SA (August 8, 2022)** listed on the AIC city website is in reference to the old application NOT the newly revised application submitted April 2024. Will this be updated? The current supporting documents are not relevant to this new application.

The addition of proposed developments on Lombard Street itself and surrounding area (including two huge demolition and construction proposals on both the north and the south side of Lombard directly opposite and next door to 95 Lombard) adds to existing congestion with traffic load, street closures and lane restrictions that are unacceptable for local residents. To look at the overall impact, we have created two tables. Table 1 lists ongoing applications under construction in the surrounding area. Table 2 lists applications proposed or approved that will impact the area. The placement of construction rigs is a major issue as well as streets narrowed by construction hoarding which present a danger to both pedestrians and drivers.

Table 1 - Surrounding Construction of Tall Buildings in Neighbourhood
60-64 Queen St E & 131-135 Church St 57-storey mixed use development Under Construction
88 Queen St E & 30 Mutual St 52-storey mixed use development Under Construction
59 Richmond St E, 114 & 120 Church St (Alias) 48-storey mixed use development Approved (2024) Under Construction
89, 97 and 99 Church Street (The Saint) 47-storey mixed use development Under Construction
109-125 George St & 231 Richmond St E 39-storey mixed use development Approved February 3, 2022 Under Construction
90-104 Queen St E & 3 Mutual St 34-storey mixed use development Approved April 8, 2021 Under Construction
79-85 Shuter St 32-storey mixed use development Under Construction

Table 2 - Surrounding Proposed Applications for Construction of Tall Buildings in Neighbourhood
110-112 Adelaide Street East, 85 Lombard 65 storey mixed use development Proposed (submitted April 2024)
86, 100-108 Lombard St & 103 Richmond St E 59-storey mixed use building Proposed (submitted August 26, 2022)
23 Toronto St 80-storey mixed use development Proposed (submitted May 2, 2023)
15 Toronto St 53-storey mixed use building Proposed (submitted August 10, 2022)
34-50 King St E & 2 Toronto St 33-storey mixed use office & residential development Approved (in principle)
83-89 Queen St E & 119-127 Church St 59-storey mixed use building Approved February 6, 2024 (submitted August 8, 2022)
137-149 Church St & 18-20 Dalhousie St 54-storey mixed use development Approved (OLT Order August 5, 2022)
133-141 Queen St & 128 Richmond St E 40-storey mixed use development Approved by OLT (May 31, 2022)
120-134 Sherbourne St & 225-229 Queen St E 37-storey mixed-use building Approved by OLT (October 27, 2023)

Also, the applicant has not submitted a demolition plan or a construction plan as yet; so we have done our own research. A detailed demolition plan must address methodology, dust control, noise control, access and egress, and must provide a safety plan for adjacent properties and public roadways.

Recently, the view from 95 Lombard, unit 1005 can be seen in **Photo 7** (page 13) when an air conditioning unit was replaced at 85 Lombard, part of the application from the 110 Adelaide Street group. You can see how close the construction and demolition site of the proposed development will be to our existing condo building. It can also be noted that in the 3D rendering the proposed structure, there are no other surrounding buildings that give you reference to how close the development will be to the existing buildings.



Photo 7. Rooftop of 85 Lombard Street - part of the proposed demolition for the 110 Adelaide Street site - directly next to the existing condo at 95 Lombard Street.

The bricks are part of the 95 Lombard condo structure framing the window from which this photo was taken.

Assuming that the demolition of a perfectly serviceable building is successfully accomplished, the excavation for the foundation of the tower must then begin. Protecting the integrity of the surrounding buildings, their service entrances and the roadways must be the builder's first priority. The builder must protect 95 Lombard Street, 77 Lombard Street, 120 Adelaide Street East, 100 Adelaide Street East, the Adelaide roadway and the Lombard roadway - all with foundations at varying depths. As such, shoring will be required. A detailed construction plan must identify all tie back, raker and caisson wall locations and must provide details of where and how deep shoring removal will be once the building is constructed.

The tie back method of shoring is preferred by builders because it keeps their site clear of obstacles and maximizes the space within which to work, which is especially beneficial when they are building to the lot line on all sides, as is the case with this proposed development. In order for the builder to use tie backs, they must gain permission from the owners of the adjoining buildings to drill below their foundations. While neighbouring owners are, understandably, reluctant to have their buildings tampered with, they are sometimes persuaded by an offer of cash from the developer to allow this to happen. Without tie back rights, builders must use other less convenient methods such as rakers, struts, or a (more expensive) caisson wall. In addition, by law, the foundation wall of the new building cannot touch the foundation wall of an existing building; so styrofoam is placed between the two buildings below grade.

Above ground, the space within which to work will be extremely tight. The builder will ask adjoining property owners for easement rights to allow scaffolding to be built on their neighbour's property and air rights to allow cranes to swing over their neighbour's property. We are under no obligation to agree to these requests.

Summary

This proposed tall building at 110 Adelaide Street East on a small site is an overdevelopment which grossly exceeds By-law height limitations and is unable to meet key TOcore policies and Tall Building Design Guidelines regarding progressive transitioning, tower separation and tower setback. We feel that this total inability to propose a design in harmony with the immediate neighbourhood provides the most compelling basis for denying this building proposal. The many unaddressed areas of concern further underscore the numerous weaknesses in the submitted proposal.

In closing we would note that a proposed development must already present good planning before Section 37 is discussed. In this case, this proposed development is not good planning; so Section 37 Community Benefit should not be used to make a poor application acceptable.

Yours truly,

The Residents of MTCC #889 St. James Place Condominium
95 Lombard Street
Toronto, ON. M5C 2V3

cc: Alex Teixeira, Manager, Downtown Section, Community Planning Toronto and East York District
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Ausma Malik, Vice-Chairman TEYCC (Councillor_Malik@toronto.ca)
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