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March 5, 2026

Our File No.: 250829

WITHOUT PREJUDICE

City of Toronto
Legal Services
26th Floor, 55 John Street
Metro Hall
Toronto, ON M5V 3C6

Attention: Jessica Braun

Dear Sirs/Mesdames:

**Re: 895 Lawrence Avenue East – Without Prejudice Settlement Offer
Ontario Land Tribunal Case No. OLT-25-000319**

We are solicitors for 895 Lawrence Ave E. Inc. in respect of the property known municipally in the City of Toronto as 895 Lawrence Avenue East (the “**Lands**”). We are writing on behalf of our client to provide a without prejudice settlement offer in respect of the above-noted matter, which should be considered as open until the conclusion of the City Council meeting scheduled to commence on March 25, 2026, unless otherwise indicated.

As you know, our client engaged in without prejudice mediation with City staff regarding the redevelopment proposal for the Lands. These discussions resulted in a revised set of plans, prepared by r. Varacalli Architect Inc., which are attached to this letter as Schedule “A” (the “**Revised Plans**”). Our client greatly appreciates the efforts of City staff in achieving this recommended settlement.

The terms of this without prejudice settlement offer are as follows:

1. The settlement offer is based on the Revised Plans, which would be implemented through approval of the resulting zoning by-law amendment, to be finalized to the satisfaction of the City in accordance with the Revised Plans.
2. Key aspects of the Revised Plans include:
 - a. The overall built form has been adjusted in accordance with the Revised Plans to achieve increased setbacks and stepbacks, including appropriate tall building

separation, with transition in height from Lawrence Avenue East to The Donway West, and increased setbacks for the podiums.

- b. The heights of the reconfigured buildings have been reduced from 34-storeys, 32-storeys and 26-storeys to 29-storeys, 26-storeys and 14-storeys, with corresponding reductions in height.
 - c. Public space has been increased through provision of on-site circulation through the Lands with an open walkway to Lawrence Avenue East, a covered breezeway with adjacent retail aligned with Leadley Lane to the east, and a driveway with two sidewalks to The Donway West, additional green spaces, and an enhanced pedestrian realm along the two streets with a publicly-owned privately-accessible open space (or POPS) at the corner.
 - d. The proposed unit mix includes a minimum of 10% of the units as 3-bedroom units and 25% of the units as 2-bedroom units, which will be secured in the implementing zoning by-law amendment. The updated unit mix also reduce the number of proposed studio units to increase the number of one-bedroom units in response to comments from the resident association.
 - e. The implementing zoning by-law amendment will secure a minimum amount of combined indoor and outdoor amenity space at a ratio of 4.0 square metres per unit.
3. As part of any settlement of this matter, our client is prepared to work with the local councillor to provide public art or other amenities on the Lands as an in-kind community benefit pursuant to subsection 37(6) of the *Planning Act*, with the final percentage of the value of the community benefit charge to be determined in the future, pursuant to subsection 37(7) of the *Planning Act*, with the details secured in an agreement with the City of Toronto;
 4. Our client agrees that, in the event City Council accepts this without prejudice settlement offer, the final order of the Ontario Land Tribunal would be withheld, pending completion of the following pre-conditions, with the Ontario Land Tribunal available to be spoken to in the event that an issue arises as a result of completion of those pre-conditions:
 - a. the final form and content of the draft Official Plan Amendment and Zoning By-law Amendments are to the satisfaction of the City Solicitor and the Executive Director, Development Review;
 - b. the owner has submitted a revised Functional Servicing Report and Stormwater Management Report, Hydrogeological Review, including the Foundation Drainage Report ("Engineering Reports") to the satisfaction of the Director, Engineering Review, Development Review;

- c. the owner has secured the design and provided financial securities in respect of any upgrades or required improvements to the existing municipal infrastructure identified in the accepted Engineering Reports, to support the development, all to the satisfaction of the Chief Engineer and Executive Director, Engineering and Construction Services and the General Manager, Toronto Water, should it be determined that improvements or upgrades are required to support the development, according to the Engineering Reports accepted by the Director, Engineering Review, Development Review, unless otherwise secured through a holding provision in the by-law;
- d. the owner has ensured that implementation of the accepted Engineering Reports does not require changes to the proposed amending By-law or that any required changes have been made to the proposed amending By-law to the satisfaction of the Executive Director, Development Review, and the City Solicitor, including the use of a Holding ("H") By-law symbol regarding any new municipal servicing infrastructure or upgrades to existing municipal servicing infrastructure, as may be required;
- e. the owner has submitted a revised Pedestrian Level Wind Study, including an updated wind tunnel test with the identification of any required mitigation measures to be secured in the Zoning By-law Amendment and through the Site Plan Control Process, to the satisfaction of the Chief Planner, City Planning and Executive Director, Development Review;
- f. the owner has submitted an elevation drawing or rendering of the north/front elevation (looking south) showing the proposed development and the adjacent heritage building in their entirety with reference datum lines of the adjacent listed building, as well as a revised Heritage Impact Assessment, to the satisfaction of the Senior Manager, Heritage Planning;
- g. the owner has submitted a revised Transportation Impact Study, Supplementary Transportation Analysis, Travel Demand Management Plan, and Parking Study all to the satisfaction of the Transportation Review, Executive Director, Development Review;
- h. the owner has submitted a revised Arborist Study, Tree Preservation Plan, Soil Volume Plan, Landscape Plan, and Planting Plan, to the satisfaction of the Executive Director, Environment, Climate & Forestry; and
- i. the owner has submitted an updated complete Toronto Green Standards Checklist and Statistics Template, Version 4.0, to the satisfaction of the Chief Planner, City Planning and Executive Director, Development Review.

As noted above, this without prejudice settlement offer will remain open until the end of the City Council meeting scheduled to commence on March 25, 2026, unless otherwise indicated, at which point it should be considered as withdrawn if not accepted by City Council.

Yours truly,

Goodmans LLP



David Bronskill
DJB/

SCHEDULE "A"
REVISED PLANS

1415-7000-5784