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May 7, 2026

Via Email (cameron.mckeich@toronto.ca; horatio.waller@toronto.ca)

Without Prejudice

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To Whom it May Concern:

**Re: Settlement Offer – 2-4, 80 Union Street
Ontario Land Tribunal Case No. OLT-25-000325
City of Toronto Planning Application No. 21 235872 STE 09 OZ**

We represent 1057100 Ontario Limited (the “**Owner**”), the registered owner of the lands municipally known as 2-4 and 80 Union Street (the “**Property**”) in the City of Toronto (the “**City**”). On November 8, 2021, the Owner submitted applications to amend the City’s Official Plan and City Zoning By-law No. 569-2013 (City Application No. 21 235872 STE 09 OZ, the “**Application**”) as it relates to the Subject Property. The Application was deemed complete by the City on July 26, 2022.

Pursuant to subsections 22(7) and 34(11) of the *Planning Act*, R.S.O. 1990, c. P.13 (the “**Planning Act**”), on April 23, 2025, the Owner appealed the Applications to the Ontario Land Tribunal (the “**Tribunal**”), which appeal was assigned Tribunal Case No. OLT-25-000325 (the “**Appeal**”). In its order dated October 22, 2025, the Tribunal set a ten-day hearing for the Appeal scheduled to commence on July 13, 2026.

Further to our productive and fruitful discussions with City staff, we write to make a without prejudice offer to settle the Appeal with the City in its entirety (the “**Settlement Offer**”). The Settlement Offer terms are as follows:

1. Settlement Plans and Terms

The zoning by-law amendment and official plan amendment will permit the proposed mixed-use development subject to the matters expressly set out herein (the “**Development**”), substantially in accordance with the set of plans and drawings and site

statistics which is attached hereto as Schedule "A" (the "**Settlement Plans**"), which include the following:

- (a) three mixed-use buildings (56-storey and 51-storey north towers on a shared six storey podium and a 47-storey south building on a six storey podium, excluding mechanical penthouses), comprised of:
 - (i) a maximum of 119,000 square metres of residential gross floor area; and
 - (ii) a minimum of 3,500 square metres of non-residential gross floor area;
- (b) for the podium and tower portions of the Development, height, massing, and setbacks substantially as depicted in the Settlement Plans;
- (c) the provision of amenity space at a rate of no less than 2.7 square metres per residential unit, of which a minimum of 1.4 square metres per residential unit shall constitute indoor amenity space;
- (d) a unit mix that meets or exceeds the City's Growing Up Guidelines; and
- (e) Two Privately Owned Publicly Accessible Spaces (POPS) of a minimum 100 square metres and 78 square metres respectively, in the locations identified as "POPS Area" on the Settlement Plans, to be shown in the zoning diagram, with POPS easement to be conveyed to the City prior to the earlier of first condominium registration and first residential use of any part of the Development, with the precise size and configuration to be finalized as part of the Site Plan Approval (SPA) process.

The Settlement Plans included alongside this Settlement Offer, if accepted by City Council, are intended to amend the plans previously submitted to the Tribunal for the Appeal.

2. **Other Settlement Terms**

The following terms also form part of the Settlement Offer:

- (a) As part of the Site Plan Approval (SPA) process and if requested by the City, the Owner shall agree to construct a fence or other boundary condition on the Subject Property to separate the Subject Property from the adjacent lands, being the future public transit bus loop as part of the future St. Clair- Old Weston Station (the "**Proposed Boundary Condition**"). For greater clarity, the size, type, and location of the Proposed Boundary Condition are matters that shall be addressed as part of the SPA process;
- (b) Upon issuance of a Final Order in the Appeal, the Owner shall withdraw its Draft Plan of Subdivision Application for the Subject Property, bearing City Application No. 21 235877 STE 09 SB; and

- (c) The Owner's obligations pursuant to s. 42 of the *Planning Act* shall be satisfied by the payment of cash-in-lieu of parkland dedication, to be paid prior to the issuance of the first above-grade building permit for the Development. For additional clarity, no physical parkland dedication will be conveyed by the Applicant as part of the Development.

3. Conditions Prior to the Issuance of a Final Order

The Owner agrees that the following matters will be addressed to the satisfaction of the City prior to the issuance of a final order by the Tribunal allowing the Appeal on the terms set out herein:

- (a) the final form and content of the draft Official Plan Amendment is to the satisfaction of the Executive Director, Development Review and the City Solicitor;
- (b) the final form and content of the draft Zoning By-law Amendment is to the satisfaction of the Executive Director, Development Review and the City Solicitor;
- (c) the Owner has at their sole cost and expense:
 - (i) submitted a revised Functional Servicing, Stormwater Management, and Hydrogeological Reports for review and acceptance to the satisfaction of the Director, Engineering Review, Development Review, in consultation with the General Manager, Toronto Water. The reports will determine whether the municipal water and fire flow, sanitary and storm sewer capacity can support the proposed development and whether upgrades or improvements of the existing municipal infrastructure are required;
 - (ii) entered into a financially secured agreement for the construction of any improvements to the municipal infrastructure, to the satisfaction of the Executive Director, Development Review and the City Solicitor, should it be determined that upgrades and / or road improvements are required to support the development, according to the accepted Transportation Impact Study and / or the accepted Functional Servicing Report (which for greater clarity shall not include any construction, security or conveyance of any kind related to the Transportation Master Plan, including, but not limited to, any improvements to Union Street or the future St. Clair – Old Weston Station site);
- (d) the Owner has submitted a revised Transportation Impact Study, including Transportation Demand Management Plan, to the satisfaction of the Executive Director, Development Review and the General Manager, Transportation Services;
- (e) the Owner has submitted a Rail Safety and Risk Mitigation Report, revised if necessary, that has been peer reviewed by a third-party consultant, to the satisfaction of the Executive Director, Development Review;

- (f) the Owner has submitted a revised Noise and Vibration Study including peer review by a third-party consultant, to the satisfaction of the Executive Director, Development Review;
- (g) the Owner has submitted a phasing plan to demonstrate the order in which the various elements of development would be delivered, in conjunction with planned improvements from the St Clair Avenue West Area TMP, to the satisfaction of the Executive Director, Development Review;
- (h) the Owner has submitted a revised Pedestrian Level Wind Study and the results of the study, including mitigation of adverse wind effects, are to the satisfaction of the Chief Planner, City Planning and Executive Director, Development Review. The wind study shall not recommend wind barriers in the public realm as a mitigation measure to achieve satisfactory wind effects. For additional clarity, wind barriers in the two Privately Owned Publicly Accessible Spaces (POPS) referenced in Section 1(e) of this Settlement Offer Letter shall not be recommended in the wind study unless absolutely necessary as a last resort to mitigate adverse wind effects, demonstrated to the satisfaction of the Chief Planner, City Planning and Executive Director, Development Review, and in such circumstances any wind mitigation features located within the POPS shall not adversely impact the pedestrian circulation and usability of the POPS, as determined by the Chief Planner, City Planning and Executive Director, Development Review; and
- (i) the Owner has submitted a revised Arborist Report, Soil Volume Plan, and Tree Preservation Plan to the satisfaction of the Executive Director, Environment, Climate and Forestry.

The City and the Owner also agree and acknowledge if in finalizing the form of zoning by-law the parties disagree as to whether a holding provision is appropriate, the Tribunal may be spoken to regarding the appropriateness of such request.

4. Settlement Offer Conditions

This Settlement Offer is conditional on:

- (a) City Council accepting this Settlement Offer during its meeting scheduled for May 20 – 22, 2026; and,
- (b) The City consenting to the Owner requesting a settlement hearing for the Appeal, to be held during or before the hearing scheduled for the Appeal, for the issuance of an Interim Order by the Tribunal approving the Development in principle (however, should the conditions outlined in Section 3 herein be cleared prior to the settlement hearing, the City will consent to the Owner requesting the

issuance of a Final Order by the Tribunal approving the Development at the settlement hearing).

This Settlement Offer is made without prejudice. Should the Settlement Offer be accepted by City Council, it may be released publicly.

Should you require further information please do not hesitate to contact our office.

Sincerely,

McCarthy Tétrault LLP



Michael Foderick*
Partner | Associé

MF/JC
Attachment

SCHEDULE "A"

Settlement Plans, prepared by TACT Architecture, dated May 6, 2026

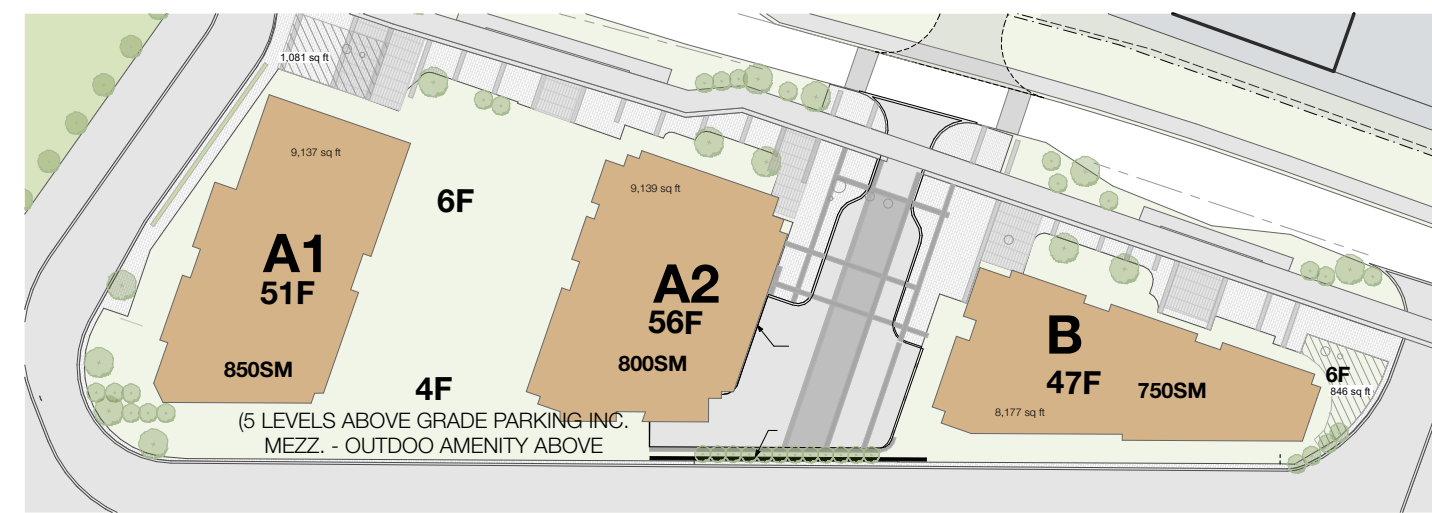
225194/539529
MTDOCS 64907746

Cameron McKeich, Solicitor, Horatio Waller, Solicitor - May 7, 2026

2-4 Union Street Schematic Design

Wednesday, May 6, 2026

FINAL SETTLEMENT PLANS



STATISTICS SUMMARY

MUNICIPAL ADDRESS	2-4 Union St.		TOTAL GFA	122,223 sm	FSI	9.06 x	TOTAL UNITS	1,713
GROSS SITE AREA	13,498 sm	1.350 ha	3.34 ac	<i>*AREA OF ENTIRE SITE NOT EXCLUDING STATION AREA OR ROAD WIDENING</i>				
NET SITE AREA	6,221 sm	0.622 ha	3.34 ac	<i>*DEVELOPABLE AREA</i>				
PARKLAND	sm	ha	ac					
TOTAL BUILDING COVERAGE	4,485 sm	0.448 ha	1.11 ac					
TOTAL OPEN SPACE	9,013 sm	0.901 ha	2.23 ac	<i>* OPEN SPACE NOTED INCLUDES STATION LANDS & ROAD WIDENING AREA</i>				
BUILDING		A1+A2		A1		B		TOTAL
		MID RISE AND TOWERS		TOWER		TOWER		
BLOCK AREA	sm							13,498
TOTAL GROSS FLOOR AREA	sm	86,361				35,862		122,223
RESIDENTIAL GFA	sm	85,760				32,961		118,721 97.1%
RETAIL GFA	sm			601				601
COMMERCIAL/OFFICE GFA	sm			2,901				2,901 2.9%
MAXIMUM HEIGHT	m	172.70		153.80		145.70		
	storeys	56		51		47		
UNITS		1,229				510		1,713
STUDIO		53						53 3%
1 BR		779				306		1,085 63%
2 BR		272				132		404 24%
3 BR		117				54		171 10%
AMENITY		REQUIRED	PROVIDED			REQUIRED	PROVIDED	REQUIRED PROVIDED
INDOOR AMENITY SPACE	sm	1,721	1,573			714	827	2,398 2,400 1.4x
OUTDOOR AMENITY SPACE	sm	1,598	1,775			663	455	2,227 2,230 1.3x
TOTAL		3,318	3,348			1,377	1,282	4,625 4,630
VEHICLE PARKING		REQUIRED	PROVIDED			REQUIRED	PROVIDED	REQUIRED PROVIDED
TOTAL		575	435			<i>Included in overall parking A1/A2</i>		575 435
RESIDENT		473	348					473 348
VISITOR / NON-RES RATE		102	81					102 81
		<i>Visitor/ Non-Res Shared</i>						<i>Visitor/ Non Res Shared</i>
CAR SHARE (INCL. IN TOTAL)			6					6
ACCESSIBLE (INCL. IN TOTAL)		12	12					12 12
EVSE NON RES.		21	21					21 21
EVSE (INCL. IN TOTAL)		348	369					348 369
LOADING TYPE 'B'								
LOADING TYPE 'G'			1			1		2 2
LOADING TYPE 'C'			1			1		2 2
BICYCLE PARKING								REQUIRED PROVIDED
TOTAL								1,869 2,080
LONG TERM								1,521 1,923
SHORT TERM								338 147
PUBLICLY ACCESSIBLE								10 10
Notes:	1. All GFA numbers calculated per bylaw 569-2013. (includes above grade parking as GFA) 2. Refer to report prepared by BA Group for vehicle and bicycle parking information. 3. All areas in square meters and rounded to the nearest whole number.							

Note: Building permit issuance shall be subject to the building permit drawings not being in contravention with these approved plans and drawings including, but not limited to, the exterior design of the building and exterior building materials

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 660H College Street (rear lane)
 Toronto Ontario M5G 1B8
 416-516-1949
 info@tactarchitecture.com

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 Published Wednesday, May 6, 2026.
 file: 2-4 Union v.23.pn

job title

2-4 Union Street

client

1057100 Ontario Limited

sheet title

Statistics Summary

drawn by

MM

checked by

PJ

issue date

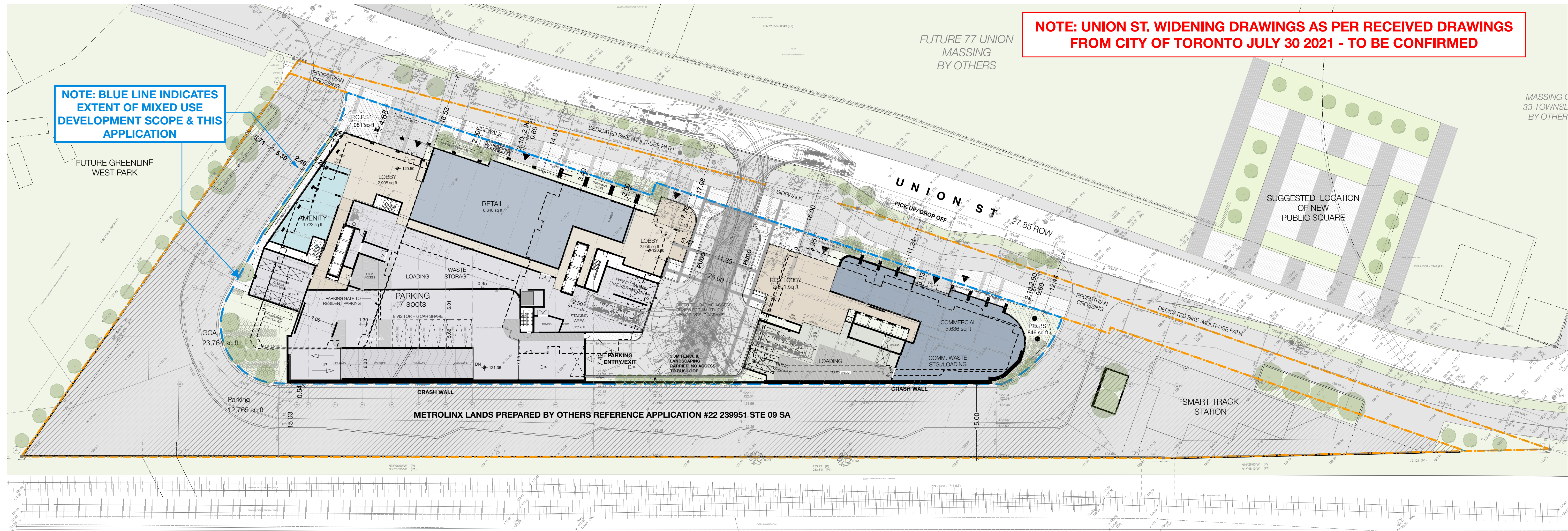
Wednesday, May 6, 2026

job number

2012

scale

NOTE: UNION ST. WIDENING DRAWINGS AS PER RECEIVED DRAWINGS FROM CITY OF TORONTO JULY 30 2021 - TO BE CONFIRMED



NOTE: BLUE LINE INDICATES EXTENT OF MIXED USE DEVELOPMENT SCOPE & THIS APPLICATION

FUTURE GREENLINE WEST PARK

FUTURE 77 UNION MASSING BY OTHERS

MASSING C 33 TOWNSHIP BY OTHERS

SUGGESTED LOCATION OF NEW PUBLIC SQUARE

METROLINX LANDS PREPARED BY OTHERS REFERENCE APPLICATION #22 239951 STE 09 SA

SMART TRACK STATION

1 GF
 A203 SCALE: 1:400

SYMBOL LEGEND

- CONVEX MIRROR
- TWO WAY TRAFFIC
- HORIZONTAL BICYCLE STORAGE
1.2m HEIGHT MIN
- STACKED BICYCLE STORAGE
DECKER SINGLE SIDED
2.7m HEIGHT MIN
- VERTICAL BICYCLE STORAGE
2.4m HEIGHT MIN
- STORAGE LOCKER
2.0m HEIGHT MIN
- STANDARD PARKING SPACE
2.0m HEIGHT MIN
(ROUGH-IN PROVIDED FOR EVSE)
- BARRIER FREE PARKING SPACE
2.1m HEIGHT MIN
(ROUGH-IN PROVIDED FOR EVSE)
- PARKING SPACE WITH ELECTRIC VEHICLE SUPPLY EQUIPMENT
- SMALL CAR PARKING SPACE

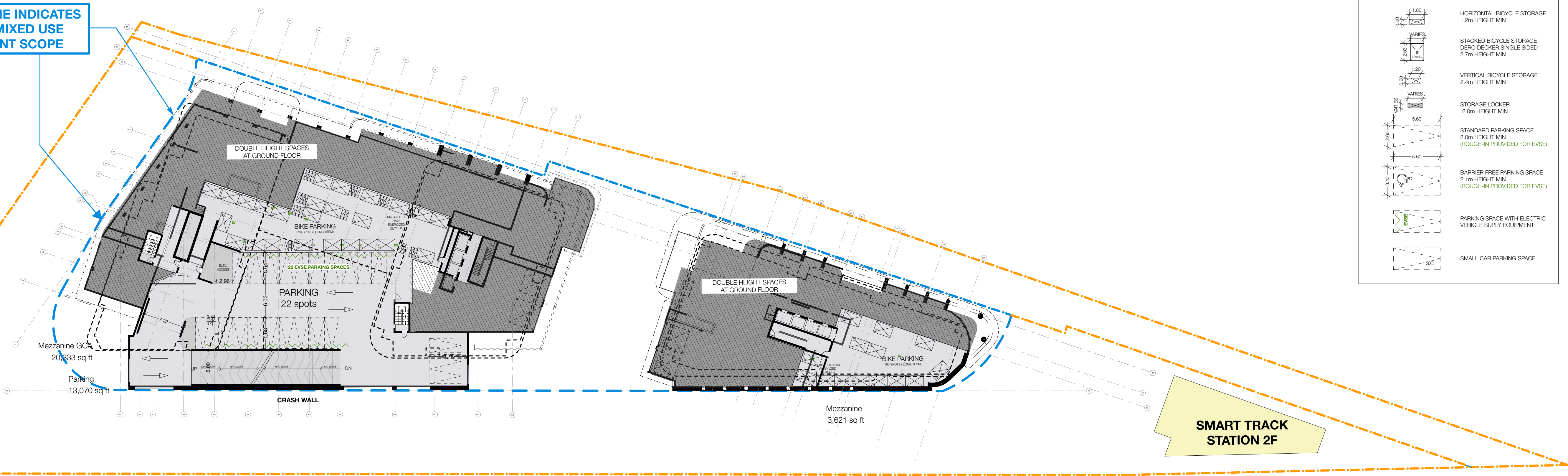
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job title: **2-4 Union Street**
 client: **1057100 Ontario Limited**
 sheet title: **GF & MEZZ**
 drawn by: **MM** checked by: **PJ**
 issue date: **Wednesday, May 6, 2026**
 job number: **2012** scale: **1:400, 1:1**

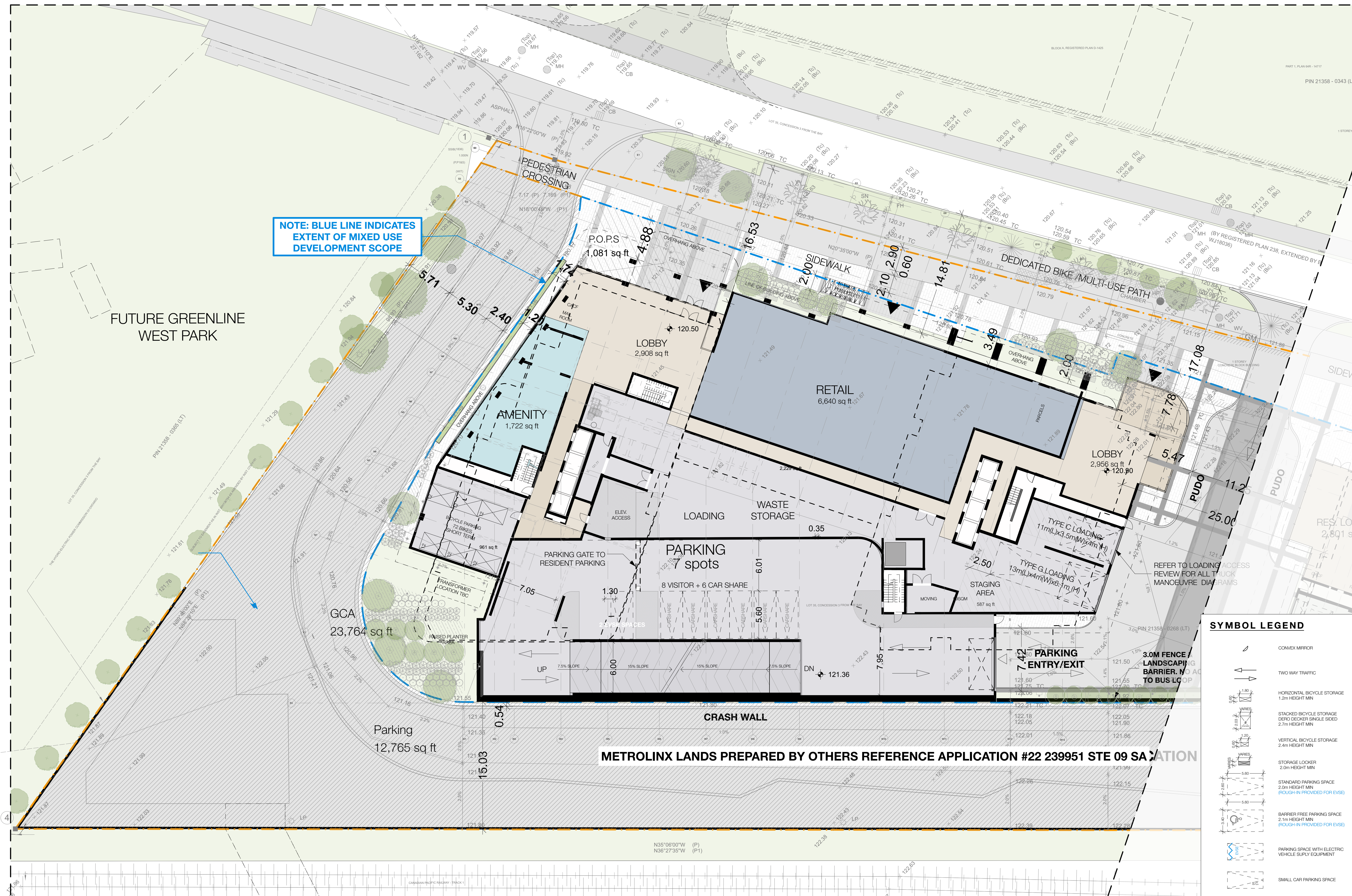
NOTE: BLUE LINE INDICATES EXTENT OF MIXED USE DEVELOPMENT SCOPE



2 MEZZ (parking)
 A203 SCALE: 1:400

NOTE: UNION ST. WIDENING DRAWINGS AS PER RECEIVED DRAWINGS FROM CITY OF TORONTO JULY 30 2021 - TO BE CONFIRMED

Revision: 2021.11.08
 2023.03.27
 WJ180366
 JSA/SPK



NOTE: BLUE LINE INDICATES EXTENT OF MIXED USE DEVELOPMENT SCOPE

FUTURE GREENLINE WEST PARK

SYMBOL LEGEND

	CONVEX MIRROR
	TWO WAY TRAFFIC
	HORIZONTAL BICYCLE STORAGE 1.2m HEIGHT MIN
	STACKED BICYCLE STORAGE ZERO DECKER SINGLE SIDED 2.7m HEIGHT MIN
	VERTICAL BICYCLE STORAGE 2.4m HEIGHT MIN
	STORAGE LOCKER 2.0m HEIGHT MIN
	STANDARD PARKING SPACE 2.0m HEIGHT MIN ROUGH-IN PROVIDED FOR EYES
	BARRIER FREE PARKING SPACE 2.1m HEIGHT MIN ROUGH-IN PROVIDED FOR EYES
	PARKING SPACE WITH ELECTRIC VEHICLE SUPPLY EQUIPMENT
	SMALL CAR PARKING SPACE

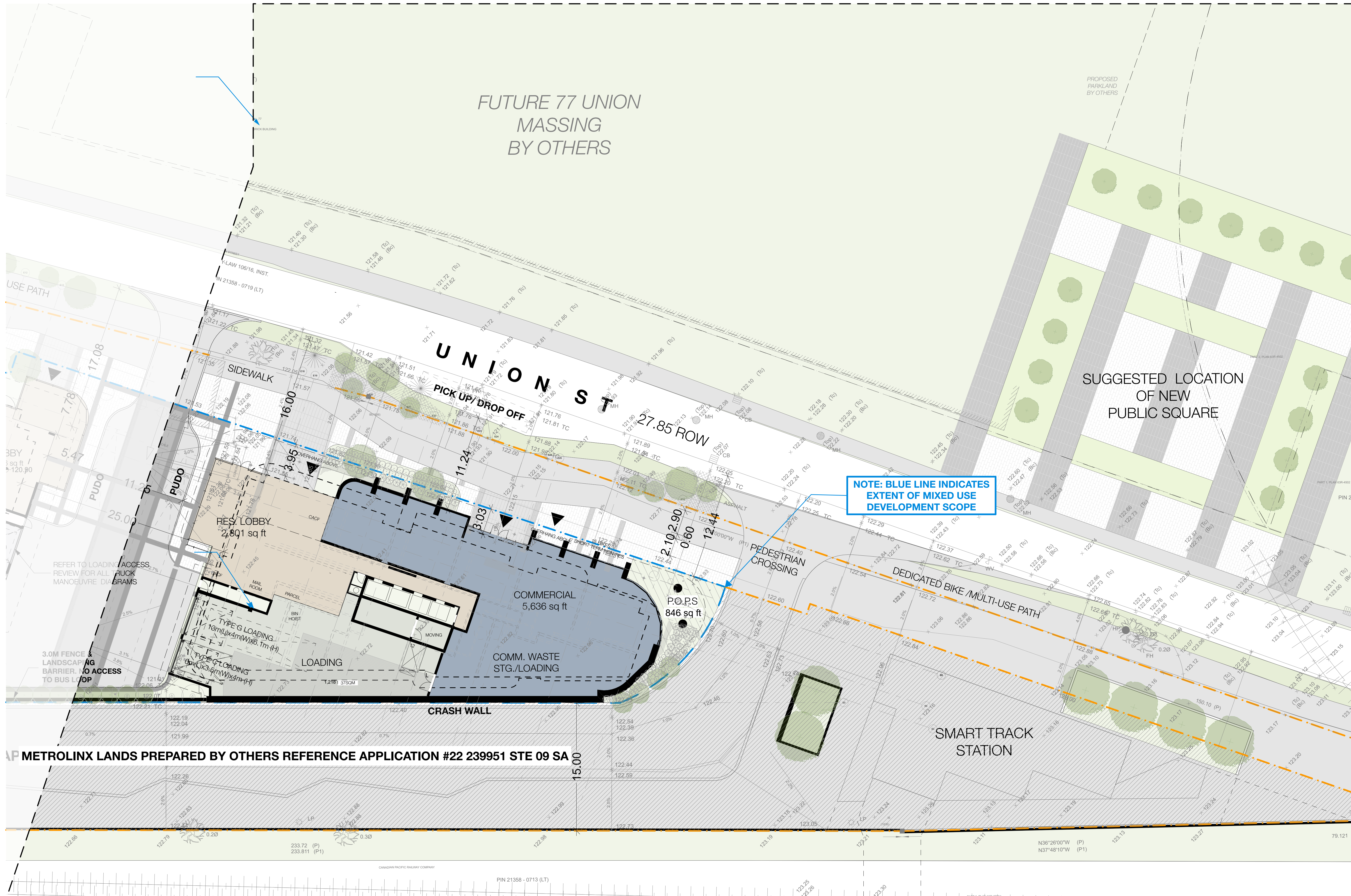
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job title
2-4 Union Street
 client
1057100 Ontario Limited
 sheet title
GF - North
 drawn by
MM
 checked by
PJ
 issue date
Wednesday, May 6, 2026
 job number
2012
 scale
1:400, 1:1

NOTE: UNION ST. WIDENING DRAWINGS AS PER RECEIVED DRAWINGS FROM CITY OF TORONTO JULY 30 2021 - TO BE CONFIRMED



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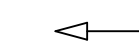
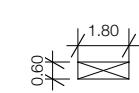

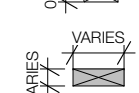
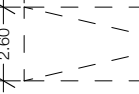


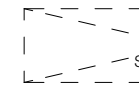

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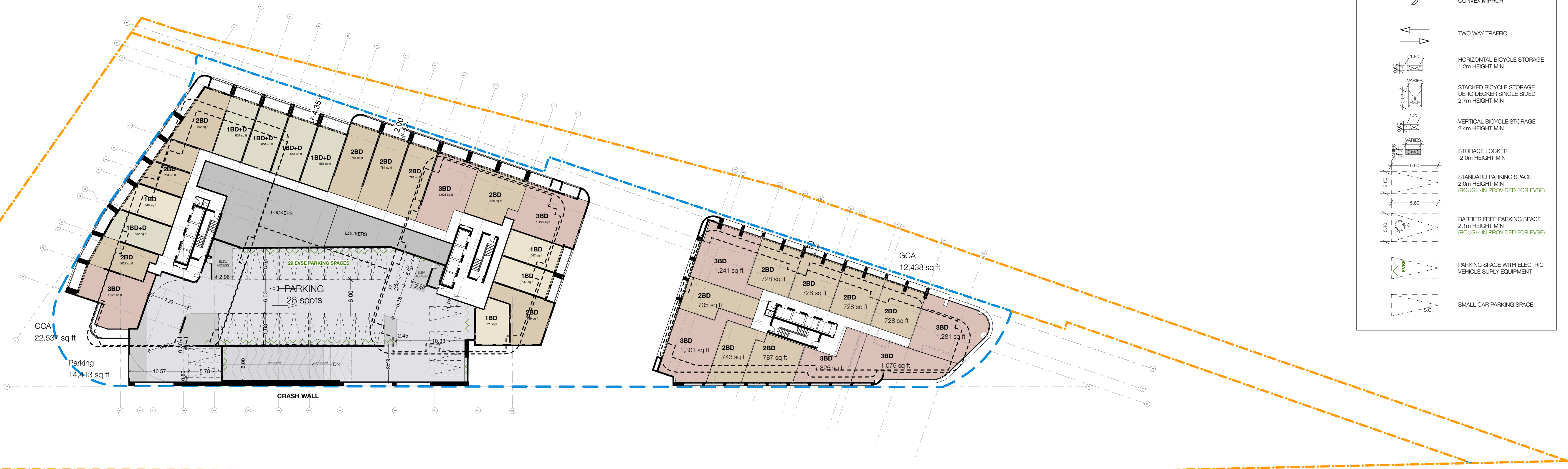
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job title: **2-4 Union Street**
client: **1057100 Ontario Limited**
sheet title: **GF - South**
drawn by: **MM** checked by: **PJ**

issue date: **Wednesday, May 6, 2026**
job number: **2012** scale: **1:400**
1:1

SYMBOL LEGEND

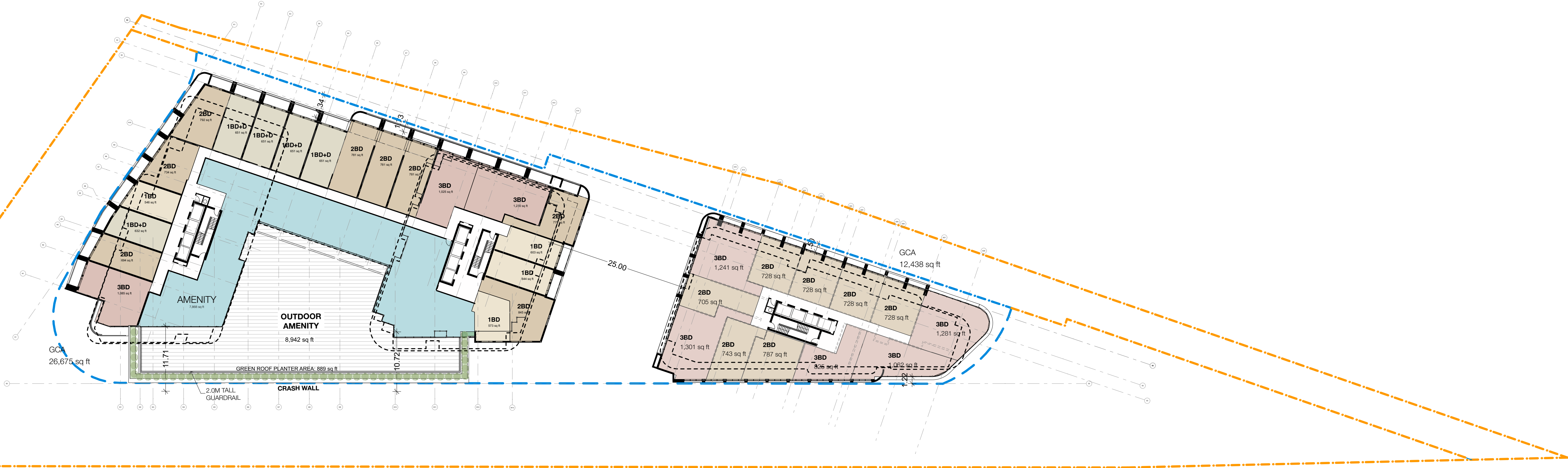
-  CONVEX MIRROR
-  TWO WAY TRAFFIC
-  HORIZONTAL BICYCLE STORAGE
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-  BARRIER FREE PARKING SPACE
2.1m HEIGHT MIN
(ROUGH-IN PROVIDED FOR EVSE)
-  PARKING SPACE WITH ELECTRIC
VEHICLE SUPPLY EQUIPMENT
-  SMALL CAR PARKING SPACE



1
A207

4F

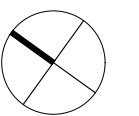
SCALE: 1:400



2
A207

5F

SCALE: 1:400



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job title
2-4 Union Street

client
1057100 Ontario Limited

sheet title
4F & 5F

drawn by
MM checked by
PJ

issue date
Wednesday, May 6, 2026

job number
2012 scale
1:400

