

July 2, 2026

Konain Edhi  
Planner, Community Planning  
Toronto and East York District  
18th Floor, East Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
[Konain.Edhi2@toronto.ca](mailto:Konain.Edhi2@toronto.ca)

Dear Ms. Edhi,

**RE: Application for Official Plan and Zoning By-law Amendment – 410–444 Yonge Street and 1–23 College Street (City of Toronto File No. 25 191175 STE 11 OZ)**

We are writing on behalf of the 777 Bay Street (“777 Bay”) ownership group, the immediate neighbour of the lands subject to the above-noted application filed by GWL Realty Advisors (“GWLRA”). 777 Bay’s property encompass primarily the northwest quadrant of the College Park block (the “Block”), inclusive of the 30-storey, 832,000 square foot Class “A” office building and retail complex.

The Block, consisting of the 777 Bay property, GWLRA property and various other properties, shares extensive infrastructure built up over decades of integrated operation, including shared servicing components, parking, loading, and points of vehicular and pedestrian access and egress. As a result, the Block is operationally and contractually intertwined to a significant degree and is governed by a number of existing reciprocal agreements and easements.

As an owner and developer in our own right, we are supportive of thoughtful intensification that advances the City of Toronto’s city-building and policy objectives. However, given the interdependency of the Block, we believe that GWLRA’s redevelopment proposal would benefit from significantly more coordination with the neighbouring landowners and impacted parties.

GWLRA initiated a preliminary discussion with 777 Bay ownership prior to their initial application, which was filed July 9, 2025. Other than the statutory community meetings, no further discussions were initiated by either the applicant or the City with the 777 Bay ownership group. As such, the 777 Bay ownership initiated discussions with GWLRA in February 2026 and City Planning staff in March 2026 to raise a number of concerns with the proposed redevelopment plans. While the City addressed some of the concerns, we recognize that the City’s ability to secure these items at the Official Plan and Zoning By-law Amendment stage is limited. As such, a significant number of outstanding matters remain to be resolved at a more appropriate approvals stage, and will require 777 Bay’s cooperation in order for the development to be constructed and operated as proposed. These are summarized below for the City’s consideration.

## Areas Requiring Coordination

### 1. Planning & Urban Design

#### *Tall Building Design Guidelines:*

GWLRA's proposed tower separation is below the 12.5-metre standard relative to our shared property line, which constrains future as-of-right development on the 777 Bay lands. We appreciate that the City is now proposing to secure a minimum 9.8-metre separation from our site for the north tower and have been assured this will be reflected in the final by-law, along with no projections permitted within the 9.8-metre separation, including balconies. We would further appreciate confirmation that, should a building be proposed on our lands adjacent to this property line in the future, the same setback requirement would apply to our property, and that we would not be required to compensate for any separation deficiency on our property arising from GWLRA's development.

#### *Wind Mitigation Measures:*

Should any wind mitigation measures for the proposed development require projections or encroachments over our lands, we would expect to be consulted in advance, as such measures would require permission from 777 Bay ownership.

#### *Landscaping:*

The application contemplates revisions to existing landscaping on the 777 Bay lands. As these lands are within our ownership, any such changes require our consultation and consent and should reflect the highest and best future use of those lands. Any proposed surface-level changes on any lands must not conflict with the significant below-grade infrastructure servicing 777 Bay. The shared courtyard areas within the Block and City Park are important amenities that have been servicing 777 Bay's tenants for years. As a major stakeholder and landowner within the College Park block, 777 Bay requests consultation on any proposed master planning revisions to these vital public amenities.

### 2. Shared Infrastructure & Existing Agreements

The full extent of changes to shared infrastructure and of any new infrastructure affecting the 777 Bay lands has not yet been defined or discussed with 777 Bay ownership to-date. We anticipate that the development will require amendments to existing reciprocal agreements and the negotiation of new cost-sharing arrangements.

To assess impacts to shared access, loading and circulation matters, we would request a comprehensive loading, access, emergency/fire route and parking review addressing existing conditions, conditions during each phase of construction, and the final condition at completion, together with the applicant's proposed changes to the shared facilities, loading and parking agreements. The following areas need to be addressed:

#### *Shared Parking Access:*

GWLRA proposes a single, shared below-grade access point from Gerrard Street serving its parking and loading operations. This access also serves 777 Bay, including tenant vehicular access and our commercial loading and waste operations.

The proposal combines valet, visitor and residential traffic with commercial truck movements through the shared loading area, which raises operational and safety considerations for our building that will need to be addressed.

The proposed development relies on parking leased from 777 Bay located on the 777 Bay lands. We would welcome clarity on the leased parking and on how the proposed operation would interface with the existing shared parking arrangement, including continuity of underground access and egress for 777 Bay during construction and at completion.

#### *Shared Loading Infrastructure:*

The proposal contemplates changes to shared loading infrastructure governed by existing operational agreements, including the shared truck facilities. Any such changes require consultation with, and the cooperation of, 777 Bay. Any changes must also not conflict with prevailing commercial lease agreements for 777 Bay.

#### *Construction Staging & Phasing:*

A portion of the proposed construction staging is understood to be contemplated on a parcel owned by 777 Bay and leased to the City. Accordingly, use of this parcel for construction staging requires consultation with and consent from 777 Bay ownership.

Given the scale and duration of the work, we would request a detailed construction management and phasing plan overlaying existing and proposed conditions and addressing vibration, noise and dust monitoring over the full construction horizon. We anticipate that the work will require shoring, tieback, crane-swing, encroachment and limiting-distance agreements with 777 Bay, and we would welcome an early list of the agreements the applicant anticipates seeking, together with anticipated timing.

Of note, the southerly tower is proposed immediately adjacent to private lands which are leased to the City. As a result of the proposed design, construction of this tower at a nil setback will require swing-stage access agreements, and may potentially require long-term placement of scaffolding during the construction phase – both of which require consent for access and encroachment from 777 Bay. Once the building is fully constructed, maintenance of the southerly tower as contemplated will also likely require long-term access and encroachment agreements from 777 Bay.

The existing fire route along Hayter Street and the emergency exit routes serving 777 Bay along College Street must remain unimpeded, and existing pedestrian and subway access serving 777 Bay tenants, including access through the College Park lands, must be maintained throughout construction. Any servicing elements within the staging footprint would require rerouting subject to the approval of 777 Bay.

*Limiting Distance (Building Code)*

The current design of the south tower appears to include substantial glazing and balconies directly adjacent to our site at a nil setback. While staff may not regard our parcel as “developable” as it is currently leased to the City as parkland, this is still under private ownership and this configuration is a Building Code matter that would require a limiting distance agreement. GWLRA would need to enter into such an agreement with us in order to proceed with the design as currently presented.

**3. Conclusion**

More broadly, the matters identified above indicate that the development as proposed will require the consent of, and agreements with, 777 Bay ownership and, in certain respects, the City and other landowners within the Block. We would welcome confirmation of the agreements GWLRA anticipates seeking from us, and of the revisions it contemplates to existing agreements, so that these can be progressed in parallel with the planning process.

We raise these matters in the spirit of cooperation. We wish to work constructively with GWLRA and the City toward a development that is well-coordinated with its neighbours. We would respectfully request that the City take the matters set out above into account as the application is evaluated, and that appropriate conditions be secured to ensure the necessary coordination with, and agreements involving 777 Bay are in place before the development proceeds.

We would appreciate the opportunity to review the applicant’s detailed plans and to be kept apprised as the application advances, and we would be pleased to meet at your or the applicant’s convenience. Thank you for your consideration.

Regards,

A handwritten signature in black ink that reads "Dana Roebuck".

Dana Roebuck  
Senior Director, Development  
Canderel

on behalf of the ownership of 777 Bay Street