

June 10, 2024

Melanie Schneider, Senior Planner  
Community Planning TEY District – South  
City of Toronto  
Toronto City Hall, 100 Queen Street West  
Toronto, Ontario M5H 2N2

Dear Ms. Schneider,

**Re:    *Planning and Urban Design Addendum Letter*  
         *2400 – 2440 Dundas Street West, Toronto*  
         *File No. 23 124848 STE 04 OZ***

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## **1.0    Overview**

As you are aware, we are the planning consultants for FORA Developments (“FORA”), the owners of a 1.1 hectare site located on the east side of Dundas Street West, north of Bloor Street West in the City’s west end. The site is a consolidation of two properties, municipally known as 2400 and 2440 Dundas Street West (the “subject site”) and is currently occupied by two low-rise commercial buildings.

In March 2023, an application to amend Former City of Toronto Zoning By-law 438-86 and City-wide Zoning By-law 569-2013, as amended, was filed in support of a proposal to redevelop the subject site with a multi-tower, transit supportive development (the “initial application”). The proposal contained a mix of new residential units together with commercial and employment uses. Improvements to the public realm were integrated with the development through a sizable open space area. Since the initial application was filed, the proposal has been revised in response to the comments received, in particular those related to parkland, land use and heritage.

The revised development proposal (the “Revised Proposal”) continues to contemplate a two-building, three-tower mixed-use development, anchored by a food store and enhanced by an on-site park and privately-owned publicly accessible space (“POPS”). Key changes to the proposal include the location of the primary vehicular entrance, location of the public park and the proposed reconstruction of the existing Shoppers Drug

Mart facade (2400 Dundas Street West). The orientation of the podium and tower elements have been adjusted to respond to these changes.

The following addendum letter should be read in conjunction with our March 2023 Planning and Urban Design Rationale Report. This letter provides an overview of the application's history, key comments received on the initial application as well as a summary of the Revised Proposal. Our letter concludes with our opinion regarding the appropriateness of the development, as well as the draft Zoning By-law Amendments. It is our opinion that the revised development proposal appropriately responds to the comments issued by City Staff, while maintaining the overarching vision and policy framework applicable to the subject site. The subject site represents an opportunity for intensification, bringing new housing, and employment uses to a transit-supportive site.

## **2.0 Application History**

The initial Zoning By-law Amendment application was submitted on March 14, 2023, following a series of stakeholder and community meetings that took place between December 2022 and February 2023. The initial application was deemed complete as of April 21, 2023.

The proposal subject to the initial application contemplated the redevelopment of the subject site with new a transit- and pedestrian-oriented development inclusive of new residential, commercial, employment and open space uses. The proposal included two mixed-use buildings with three towers positioned above. The proposed towers ranged in height from between 18 and 36 storeys. Central to the development, along the Dundas Street West frontage, was an approximate 1,000 square metre privately-owned publicly accessible space ("POPS").

With respect to parking, servicing and access, the proposal considered closing the existing curb cut/driveway and introducing a new private road opposite Chelsea Avenue, supported by a signalized intersection. The new private road would serve as the primary vehicular and loading access to the underground garage, and the Bloor GO/Union Express ("Bloor GO/UP Station") pick-up/drop-off ("PUDO"). As you are aware, the site is subject of a blanket easement in favour of Metrolinx to allow for permanent pedestrian and vehicular access through the subject site to the PUDO. It is our understanding that the easement is not limited to a particular area or portion of the subject site.

Following the submission of the initial application, the owners and their consultant team attended and participated in a City-led Community Consultation Meeting on June 20, 2023. Moreover, upon receipt of the issued comments, the owner and consulting team participated in several working meetings with City Staff to discuss revisions to the development proposal. A virtual working group with City Staff was held on October 12, 2023, followed by a second in-person meeting on February 13, 2024. More recently, the owner and members of the consulting team met with City Staff on May 2, 2024 to discuss the Revised Proposal.

### **3.0 Summary of Comments Received**

Following the submission of the initial application, the project team received comment memorandums issued by City Departments and other commenting agencies, in addition to those shared by the local community. Key comments received on the initial application include:

- **On-site parkland dedication:** it was suggested that the parkland dedication requirement be satisfied through an on-site dedication of at least 1,044 square metres;
- **Food store access:** the owner was encouraged to explore the maintenance of the food store through construction phasing to ensure continued food access in the community; and
- **Façade retention:** it was suggested that the existing 'Shoppers Drug Mart' building frontage be integrated into the proposal.

While we acknowledge that other technical comments were issued in response to the initial application, the above comments were highlighted due to their impact on the overall organization of built form components of the proposal.

### **4.0 Revised Development Proposal**

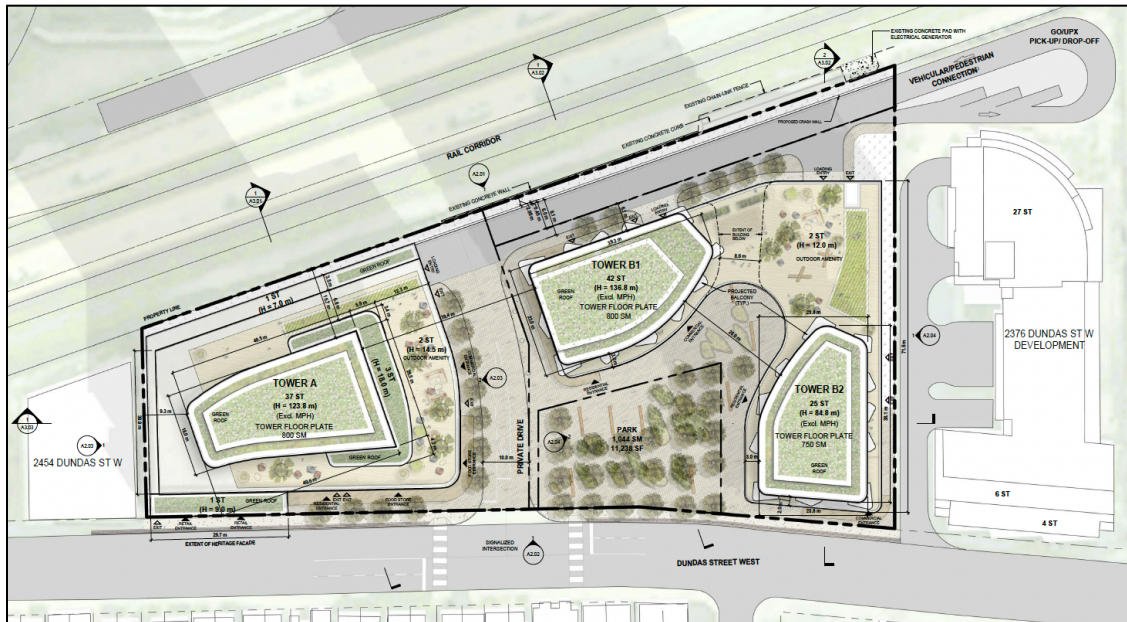
In response to the comments received and our discussions with City Staff, the built form elements within the proposal have been reorganized to further optimize the lands and achieve the objectives of a complete, transit-oriented development. The relocation of the private driveway and the provision of both an on-site public park and POPS will improve

the circulation of vehicles and pedestrians through the site and achieve a phasing strategy that is conducive to the continued operation of the existing food store during construction.

The revised development proposal maintains the overarching vision for the site, which is to intensify underutilized lands that are in proximity to two higher order transit lines. The Revised Proposal will maintain a mix of land uses, including residential, retail and core employment uses. The Revised Proposal continues to propose three towers, with revisions to the distribution of height across the site. Building/Tower A (*previously Tower A1*) will have a total height of 37-storeys (123.8 metres), Building B/Tower B1 (*previously Tower A2*) will have a total height of 42-storeys (136.8 metres) and Building B/Tower B2 (*previously Tower B*) will have a total height of 25-storeys (84.8 metres). Variation in the tower heights complement the existing and emerging built form context while contributing to the City's west-end skyline. A detailed description of the Revised Proposal is provided below, with **Table 1** containing a comparative summary of the initial and revised project statistics.

#### Site Organization

The reorganization of the built form elements in the development stemmed from the reconfiguration of the POPS into a rectangular public park and its location as well as the retention of the existing curb cut as the private driveway entrance. In the Revised Proposal, the relocated private driveway creates two distinct parcels, each anchored by a mixed-use building (**see Figure 1**). Due to the size of the northern parcel, Building A will contain only one tower, along with the newly relocated food store tenant. The southern parcel will contain an enlarged Building B that has been configured into a L-shaped building accommodating two towers. The design of Building B is reflective of the location of the public park and proposed POPS on the development site.



**Figure 1: Revised Proposal, Architectural Site Plan**

### Building A (Tower A)

#### *Podium Building*

Building A continues to be located in the northern portion of the subject site and is now bound to the south by the relocated private driveway. With respect to uses, the podium will be largely dedicated to the future food store, however the ground floor will contain three smaller units for retail and core employment uses, as well as the residential lobby for Tower A1. Servicing continues to be proposed within the building envelope, with singular vehicular entrance on the south side of the building. Notwithstanding the functional aspects of the building that are contained within the podium, and in particular the ground floor, the proposed non-residential uses and retail lobby have been located to front onto Dundas Street West and the private street to maintain activation and animation of the public realm.

Through the relocation of the private driveway, and reorientation of the public space contribution, Building A has been brought closer to the Dundas Street West frontage, while still providing an ample setback from the property line. A 5.0 metre ground floor setback will be provided from the west property line, achieving a minimum 7.1 metre pedestrian sidewalk, inclusive of a 2.1 metre-wide clearway. The widened boulevard will be reduced as the Revised Proposal will incorporate the existing façade of the Shoppers Drug Mart building (2440 Dundas Street West), which is generally constructed to the property line.

As discussed in the June 7, 2024, memorandum prepared by ERA Architects Inc. (submitted under a separate cover), 2440 Dundas Street West will be dismantled and reconstructed with modifications the west façade and portions of the north and south returns. The proposed reconstruction strategy put forward by ERA Architects Inc., meets the intent of the City's comment, and will see the area's warehouse character incorporated into the Revised Proposal.

To the north and east property lines, the ground floor of Building A will be setback 1.0 and 2.0 metres, respectively. We will note that a crash wall, approximately 7.0 metres high, will be provided along the eastern building façade and extend to the north. Above the ground floor, a mezzanine level has been incorporated to accommodate residential bicycle parking. Level 2 above will be occupied by the food store and will be setback 5.0 metres above the reconstructed façade, approximately 2.0 and 3.5 metres, respectively, from the north and east building faces. As a result of these step backs, Building A will have a street wall height of 14.5 meters generally along the west and south faces of the building. Building A will have a total height of 14.5 meters.

#### *Tower A1*

Tower A1 will begin on Level 3, as compared to Level 4 in the initial proposal. The tower will be used exclusively for residential uses, with indoor and outdoor amenity areas located on Level 3, with a mix of residential units in the levels above. The revised tower has been oriented generally in a north-south direction, parallel to the rail corridor, and will have an overall height of 37-storeys (123.8 metres excluding mechanical). A consistent floor plate of approximately 800 square metres will be provided, with the exception of Levels 3 and 4. Due to the irregular shape of the tower floorplates, the dimensions discussed in the following paragraph are the minimums and reflect the typical tower floorplates.

To the west, the tower will provide for a minimum setback of 10.5 metres to the property line. To the north, the tower will be set back approximately 9.3 metres to the mutual property line shared with 2454 Dundas Street West. To the east, the tower will be set back 15.7 meters to the east property line, and to Building B/Tower B1 to the south, a separation distance of 39.4 metres will be achieved. With respect to private amenity, inset balconies will be provided for residential units within the tower.



## Building B (Towers B1 and B2)

### *Podium Building*

Building B will be located in the southern portion of the site, south of the proposed private road. Programming for Building B will be focused on the provision of core employment uses, which may include offices, artist studios, labs, R&D facilities, medial, information and technical, co-working space and light manufacturing, among other similar uses. Similar to Building A, the relocation of the private driveway and public spaces influenced the design and orientation of Building B. Whereas in the initial proposal Building B contained only one tower, the Revised Proposal will accommodate two towers above a shared, L-shaped 2-storey podium. Building B will frame the proposed public park and POPS to encourage pedestrian activity within the site, and through it towards the PUDO.

Similar to Building A, loading, servicing and bicycle parking areas have been located in portions of the ground floor that do not have frontage onto a public street or public open spaces. These frontages will be reserved for residential and core employment uses to activate the public park and POPS, as well as create a presence in the proposed pedestrian connection / walkway.

At-grade, Building B will present as two separate buildings. An 8.6-metre-wide covered pedestrian connection / walkway will bisect the northern and southern portions of the podium. This walkway will lead pedestrians and residents of the building from the park and POPS to the PUDO area. A similar paving palette will be used in the connection and POPS in effort to unify the spaces and help those navigate the site to the PUDO. To the Dundas Street West property line, the ground floor of Building B will be set back approximately 3.0 metres, for a total of 5.7 metres to the curb. A 2.1-metre-wide pedestrian clearway will be maintained. Towards the public park, generally on the north side of Building B, a 5.0-metre-wide setback will be provided to the ground floor. Towards the west property line, the building will be set back 14.6 metres, which includes the private driveway and crash wall. To the mutual property line with 2376 Dundas Street West to the south, a 3.0 metre setback will be provided.

Above the ground floor, a mezzanine level has been incorporated to accommodate residential bicycle parking and will extend over the entirety of the podium. Level 2 above will be occupied largely by the core employment uses, with an indoor amenity room provided in the north portion of the floor. This indoor amenity room will be for residential use only. Level 2 will retain the setbacks established at grade.

Building B will have an overall height of 2-storeys (11.0 metres), and a ground floor height of slightly less than 7.0 metres. While Building A is also 2-storeys in height, the larger floor-to-ceiling height required by the food store results in a slightly taller streetwall compared to Building B.

#### *Towers B1 and B2*

Towers B1 and B2 will begin on Level 3, as compared to Level 4 in the initial proposal. The towers will be used exclusively for residential uses, with indoor and outdoor amenity areas located on Level 3, with a mix of residential units in the levels above. Tower B1 will have a similar orientation to Tower A, and Tower B1 will be parallel to the southern property line. The buildings will have an overall height of 42-storeys (136.8 metres) and 25-storeys (84.8 metres), respectively, with floorplates of approximately 800 and 750 square metres, respectively. The massing of Towers B1 and B2 will be differentiated from Tower A through the provision of projecting balconies for the residential units in the towers.

Due to the irregular shape of the tower floorplates, the dimensions discussed in the following paragraph are the minimums, and reflect the setbacks provided by the typical tower floorplates. To the west, Tower B1 will provide for a minimum setback of 8.0 metres to the boundary of the public park, and to the east, the tower will be set back approximately 14.5 metres to the property line. To the south, the tower will be set back more than 30 metres to the mutual property line and separated by approximately 26.0 metres from Tower B2.

With respect to Tower B2, a minimum setback of approximately 5.0 metres will be provided to the west property line. To the north, the tower will also be set back approximately 8.0 metres to the boundary of the public park. To the south, the tower will be set back 6.0 metres.

#### Parks and Open Space

As mentioned above, the Revised Proposal provides for an on-site parkland dedication in the form of a rectangular public park fronting onto Dundas Street West. The approximate 1,044 square metre public park will serve as a new focal point for the development and will contribute to a safe and direct pedestrian connection to the PUDO.



The southwest corner of the proposed park will transition into an approximate 301 square metre POPS, which has been designed and oriented to direct pedestrians to the PUDO. The proposed POPS will extend the public realm into the development site, providing public frontage to the interior faces of Building B.

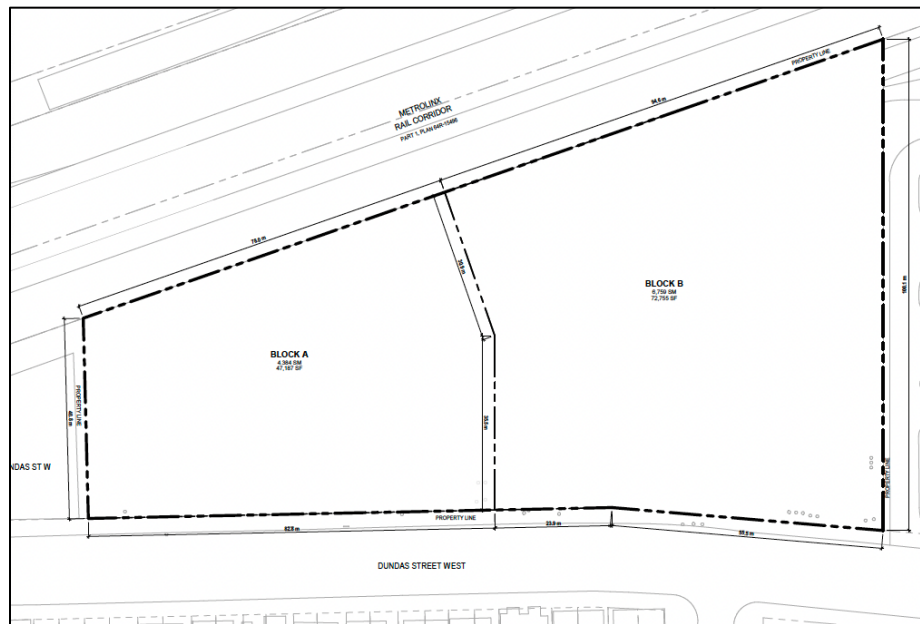
#### Parking and Circulation

In the Revised Proposal, the private driveway entrance will remain in its current location as it is on the site today. The private driveway will provide for a width of 10 metres, with a sidewalk on either side varying in width between 2.0 and 5.0 metres. The driveway will extend into the site and then will orient south towards the PUDO. Both vehicular traffic, as well as loading and servicing vehicles will utilize this driveway.

#### Phasing Strategy

The reconfiguration of the built form elements on the subject site will result in a phasing strategy that allow for the existing food store to continue its operations during construction until such a time as the new food store is constructed. Phase 1 (Block A) will include Building/Tower A, as well as the proposed private driveway, as illustrated in **Figure 2**. Phase 2 (Block B) will be comprised of the remainder of the site, including the new public park, Building B, Towers B1 and B2.

It is the plan of the owner to relocate the existing food store to Building A once it has been constructed. The proposed phasing strategy will result in minimal interruption in service and will mitigate concerns related to an “interim” food desert for the local community. An interim driveway will be provided to existing food store during the construction of Phase 1.



**Figure 2: Proposed Phasing Plan**

**Table 1: Comparative Statistics**

	<b>March 2023 Proposal</b>	<b>June 2024 Proposal</b>
<b>Site Area</b>	11,143.0 square metres	11,143.0 square metres
<b>Building Height</b>		
Tower A1	18-storeys	37-storeys
Tower A2/B1	25-storeys	42-storeys
Tower B/B2	36-storeys	25-storeys
<b>Total Gross Floor Area</b>	<b>58,900.2 m<sup>2</sup></b>	<b>78,178.5 m<sup>2</sup></b>
<i>Residential</i>	54,227.9 m <sup>2</sup>	71,913.4 m <sup>2</sup>
<i>Non- Residential</i>	4,672.4 m <sup>2</sup> (8.0%)	6,265.2 m <sup>2</sup> (8.0%)
<i>Retail</i>	434.4 m <sup>2</sup>	206.5 m <sup>2</sup>
<i>Food Store</i>	1,875.4 m <sup>2</sup>	2,863.0 m <sup>2</sup>
<i>Core Employment</i>	2,362.6 m <sup>2</sup>	3,195.7 m <sup>2</sup>
<b>Density</b>	<b>5.3 FSI</b>	<b>7.0 FSI</b>
<b>Open Space Area(s)</b>	<b>1,000 m<sup>2</sup> (POPS)</b>	<b>302.5 m<sup>2</sup> (POPS) 1,044 m<sup>2</sup> (Public Park)</b>
<b>Total Units</b>	<b>873 units</b>	<b>1,214 units</b>
<i>Studio</i>	0 units (0%)	185 units (15.2%)
<i>One-bedroom</i>	598 units (68.5 %)	656 units (54.0%)

<i>Two-bedrooms</i>	<i>186 units (21.3 %)</i>	<i>251 units (20.7%)</i>
<i>Three-bedrooms</i>	<i>89 units (10.2 %)</i>	<i>122 units (10.0%)</i>
<b>Amenity Space</b>	<b>3,492.0 m<sup>2</sup> (4.0 m<sup>2</sup>/unit)</b>	<b>4,856 m<sup>2</sup> (4.0 m<sup>2</sup>/unit)</b>
<i>Indoor</i>	<i>2,423.0 m<sup>2</sup> (2.8 m<sup>2</sup>/unit)</i>	<i>2,428 m<sup>2</sup> (2.0 m<sup>2</sup>/unit)</i>
<i>Outdoor</i>	<i>1,069.0 m<sup>2</sup> (1.2 m<sup>2</sup>/unit)</i>	<i>2,428 m<sup>2</sup> (2.0 m<sup>2</sup>/unit)</i>
<b>Vehicular Parking</b>	<b>212 parking spaces</b>	<b>172 parking spaces</b>
<b>Bicycle Parking</b>	<b>989 parking spaces</b>	<b>1,373 parking spaces</b>

## 5.0 Policy and Regulatory Framework

From the time of the submission of the initial applications, a number of new policy documents have been released and/or enacted by the Provincial government. Those applicable to the subject site and the Revised Proposal are summarized below, but the policies and urban design guidelines set out in Section 4 of our 2023 Planning and Urban Design Rationale Report continue apply to the subject site.

### Bill 23 – More Homes Built Faster Act 2022

On October 25, 2022, the Province of Ontario introduced Bill 23, the *More Homes Built Faster Act*, which set out legislative changes to the *Planning Act* in effort to streamline the construction of 1.5 million new homes by 2031. These sweeping legislative changes aimed at addressing Ontario’s housing crisis received Royal Assent on November 28, 2022. While the 2023 Planning and Urban Design Rationale Report addressed the changes to parkland dedication set out in Bill 23, however, we will note that Bill 23 requires municipalities to update zoning and establish minimum as-of-right heights and densities within approved Major Transit Station Areas (“MTSA”s).

In this regard, Official Plan Amendment 540 does establish minimum density targets for lands surrounding the Dundas West Subway Station and the Bloor GO/UP Station Protected Major Transit Station Area, as discussed in Section 4.7 of our 2023 Planning and Urban Design Rationale Report.

### Draft Provincial Planning Statement (June 2023)

The draft Provincial Planning Statement was released on April 6, 2023, for public input, with an update released shortly after on June 16, 2023. This document combines the elements of the Growth Plan for the Greater Golden Horseshoe and the Provincial Policy Statement into a new land use policy document to support the achievement of Provincial

Direction on matters including increasing the supply of housing. The proposed policies of the draft Provincial Policy Statement are grouped under five pillars:

1. *Generate an appropriate housing supply:* with respect to generating an appropriate housing supply, the proposed policies identify large and fast-growing municipalities, with specific directions to plan strategically for growth. The specific directions in this regard include establishing and meeting minimum density targets for major transit station areas, nodes and corridors, and urban growth centres, as well as encouraging transit-supportive greenfield density targets.
  - a. The proposed policies require municipalities to provide a range and mix of housing options with an expanded definition to include multi-unit typologies, as well as require all municipalities to implement intensification policies.
  - b. The proposed policies also require municipalities to align land use planning policies with housing policies, including addressing homelessness and facilitating the development of a full range of housing options and affordability levels to meet local needs.
2. *Make land available for development:* the proposed policies provide flexibility for municipalities to use government or municipally established forecasts (at minimum). For municipalities in the Greater Golden Horseshoe, a transition phase is provided. The proposed policies now require the municipalities to plan for a minimum 25-year horizon, maintain a 15-year residential land supply and maintain land with servicing capacity for a 3-year supply of residential units.
  - a. Furthermore, the policies allow municipalities to undertake settlement area boundary expansions without being required to demonstrate the need for expansion. Municipalities will be required to plan for and protect industrial and manufacturing uses that are unsuitable for mixed use areas, using a new definition of “area of employment.” The policies also provide municipalities with greater control over employment area conversions to support the forms of development and job creation that suit the local context.
3. *Provide infrastructure to support development:* the proposed policies require municipalities to plan for infrastructure and to protect major infrastructure to accommodate growth. The policies also require the integration of land use planning and transportation as well as planning for schools and growth to ensure a coordinated approach.

4. *Balance housing with resources:* in this regard, the proposed policies eliminate the requirement to use the Provincial agricultural system mapping and require municipalities to designate specialty crop areas and prime agricultural areas. However, the policies still require protection of specialty crop areas by maintaining minimum separation distances between livestock operations and houses.
5. *Implementation:* the implementation policies speak to alignment with recent legislative amendments, requiring municipalities to undertake early engagement with Indigenous communities and coordinating with them on land use planning matters.

Public feedback on the draft Provincial Planning Statement was collected by the Ministry through its Environmental Registry, which closed on August 4, 2023. At the time this Addendum Letter was prepared, the Minister had not yet made a decision on the new Provincial Policy Statement.

#### Official Plan Amendment 591 (OPA 591)

Since the submission of the initial application in March 2023, the Ministry of Municipal Affairs and Housing enacted OPA 591, as adopted by City Council on December 12, 2023. As it relates to the subject site, Site and Area Specific Policy 796 is now in full force and effect.

## **6.0 Planning Rationale**

### Intensification

As set out in Section 5 of our March 2023 Planning and Urban Design Rationale Report, it continues to be our opinion that the applicable planning framework is supportive of mixed-use intensification on the subject site, given its location within a Mobility Hub and its proximity to the Bloor GO/UP Station. The revised development is supportive of policy directions articulated in Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe, the 2041 Regional Transportation Plan and the City of Toronto Official Plan, all of which promote intensification on sites which are well served by municipal infrastructure, particularly higher order transit. The optimization of density on lands that are well served by transit, located on an *Avenue* and designated *Mixed Use Areas* is

consistent with both good planning practice, the City's growth strategy as well as provincial directives for increasing the supply of housing in Ontario.

### Land Use

The proposed development continues to provide for a range and mix of land uses, including new residential units, at-grade retail uses, a new food store and dedicated space within the podium of Building B for offices and other core employment uses. It continues to be our opinion that the proposed development is consistent with the land use permissions of the Official Plan and Zoning By-law, all of which permit a broad range of uses on the site. The revised development proposal continues to conform with the *Mixed Use Areas* land use designation, which is now in force for the subject site, and in particular, Policy 4.5(2) of the Official Plan. Notwithstanding the built form changes contemplated in the Revised Proposal, the development will continue to achieve a balance of uses to support the area's existing and future residents, while also providing housing and employment opportunities in proximity to local and regional transit lines.

With respect to the non-residential land use requirements of SASP 796, which is now in full force and effect, it is our opinion that the Revised Proposal is in keeping with the policy directives, in particular with respect to the core employment uses ("CRE"). A total gross floor area of approximately 78,178.5 square metres has been proposed, of which 8 percent (or approximately 6,254.2 square metres) is required to be employment gross floor area. The Revised Proposal contemplates approximately 6,265.2 square metres of employment gross floor area of which the majority will be for core employment uses (51 percent), with the balance proportionally distributed amongst the food store and retail uses. The proposed CRE uses will be provided on the ground floor, and Level 2 of Building B. While the spaces have not been designed for a specific end user, the proposed Zoning By-law Amendment will allow for a range of CRE uses on the site, including, co-working spaces, office, cultural industry spaces and artist studios and R&D facilities, among others.

The Revised Proposal continues to include the replacement of the existing food store within a new, mixed-use building on the subject site. The new food store will exceed the minimum size requirement set out in SASP 796. In the Revised Proposal, the food store will have a total gross floor area of approximately 2,863.0 square metres, whereas a minimum of 1,850 square metres is required.

In regard to the residential component of the development, the proposal continues to provide for a range of unit sizes and typologies, which will contribute to diversifying the

housing choices in the area. It is our opinion that the Revised Proposal is supportive of the housing policy objectives set out in the Provincial Policy Statement, the Growth Plan, as well as the City of Toronto Official Plan and applicable guidelines. Our opinions with respect to the provision of housing in the Revised Proposal are consistent with our Housing Issues Report, which was submitted as an Appendix to our March 2023 Planning and Urban Design Rationale Report. The provision of affordable housing in the Revised Proposal, and FORA's commitments are discussed in the next section of this letter.

#### Affordable Housing

With regards to affordable housing, SASP 796 was not in force and effect at the time the initial Housing Issues Report was prepared. However, SASP 796 is now in effect for the subject site, subsection (h), which deals with the provision of affordable ownership and rental housing, is now applicable to the proposed development.

FORA is committed to satisfying the affordable requirements of SASP 796 in the new development, as detailed in the memorandum prepared by Goodmans LLP, the solicitors for FORA. This memorandum has been submitted under a separate cover as part of the resubmission.

#### Height, Massing, Built Form and Density

With respect to the revised building height, it continues to be our opinion that the subject site is an appropriate location for residential, mixed-use intensification and is a contextually appropriate location for a tall building given its immediate adjacency to the Dundas West Subway Station and the Bloor GO/UP Station. As discussed in our March 2023 Planning and Urban Design Rationale Report, the provision of a tall built form on the subject site would be in keeping with the emerging pattern of nodal intensification seen along the Bloor-Danforth Subway Line (Line 2), west of the Downtown and Central Waterfront.

We acknowledge that the tower heights illustrated in the revised development proposal deviate from the height strategy originally contemplated for the subject site. The initial proposal proposed the tallest building at the southern end of the subject site at 36-storeys, stepping down towards the northern extent of the site for a height of 18-storeys. The Revised Proposal continues to provide a transition in scale from the tallest tower at 42-storeys, down 25- and 37-storeys at the southern and northern portions of the subject site. In the Revised Proposal, the site's height "peak" has been positioned closer to the PUDO



/ station entrance, which is in keeping with the emerging patterns of other new developments around major transit station areas as discussed in our March 2023 Planning and Urban Design Rationale Report.

In recognizing that the height peak of the subject site has increased from 36- to 42-storeys, and the height of Tower A has increased from 18- to 26-storeys, our office reviewed the revised Shadow Study prepared by GPA Architects Inc. to understand the impacts with respect to light and shadow impacts on *Neighbourhoods*-designated lands or on nearby parks and open spaces. It is our opinion that the revised layout of the development, including the organization of towers and their orientation, allow for appropriate sunlight and sky view to remain present within the *Neighbourhoods* and this, would be considered “adequately limited” in accordance with the applicable Official Plan policies.

In terms of the podium buildings, it is our opinion that the heights of 14.5 metres (Building A) and 12.0 metres (Building B) will appropriately frame the public realm elements in the development with pedestrian-scaled street walls. The podium heights have been slightly lowered in the revised development proposal in response to the increase in public programming on the site, which includes a new public park and POPS, as well as the private driveway which will function as a multimodal route through the site.

From a massing and built form perspective, the Revised Proposal will continue to provide for two pedestrian-oriented podium buildings that will frame and define the revised private driveway and public space contributions at good proportion, including the public park, POPS and pedestrian walkway. With respect to the retained façade, Building A will provide a stepback above the façade to highlight its prominence on the site and to distinguish its massing and materiality from the remainder of the podium. With respect to Building B, the incorporation of a pedestrian walkway at-grade will break up the perceived massing of the podium and achieve a view corridor between the PUDO and the public park, as well as the Dundas Street West street frontage.

Above the podium, the tower elements will continue to provide for a minimum tower separation distance of 25.0 metres between towers and have been designed to fit harmoniously with the existing and emerging built form context of the surrounding area. The redesign of Building B into an L-shaped building has allowed Tower B2 (previously Tower B) to shift towards the southwest corner of the subject site. The revised location of Tower B2 has eliminated the facing condition between this tower and 2376 Dundas Street West, further mitigating concerns of overlook, privacy and sky view.

To the north, Towers A and B1 will provide for a separation distance that is proportional and appropriate for this scale of development. Towers A and B1 are proposed with floorplates of 800 square metres and while this floorplate is slightly larger than the initial proposal it is our opinion that it remains appropriate and is within the realm of floorplate sizes in the City for sites of this size, configuration and location in proximity to higher order transit. Moreover, the Revised Proposal contemplates a separation distance of approximately 39.0 metres between towers A and B1, which greatly exceeds the City-wide Tall Building Guidelines and lessens the impact of the incrementally greater floorplates.

Regarding the setback of Tower A to the north, it is our opinion that a tower setback of 9.3 metres is appropriate and will not limit the redevelopment potential of the lands to the north. While the proposed tower setback is less than 12.5 metres as set out in the City-wide Tall Building Guidelines, we are of the opinion that these lands could redevelop with a tall building in the fullness of time subject to a number of considerations including their assembly and consolidation. Our office has reviewed this consideration and believe that a future tower could be sited with the necessary setbacks from the rail corridor and other considerations while keeping within the City's tall building policies and guidelines. As such, should a tower be proposed in the future, it is our opinion that an appropriate separation distance would still be achievable between towers.

From a density perspective, it is our opinion that the revised density of 7.0 FSI is appropriate and desirable. From a policy perspective, the Revised Proposal will result in the optimization of an underutilized site in proximity to existing higher order transit lines and will exceed the minimum density prescribed in OPA 540, as adopted. Moreover, it continues to be our opinion that the suitability of a site for intensification and increased density should be based on an evaluation of built form impacts, rather than a numerical figure. As discussed in this letter, the improved massing of Buildings A and B, as well as the positioning of Towers A, B1 and B2 continue to mitigate negative light, view and privacy impacts resulting from the presence of tall buildings on the subject site.

## **7.0 Conclusions**

For the reasons discussed in this letter, it is our opinion that the revised development proposal is appropriate and desirable in land use planning terms and will provide for a transit- and pedestrian-oriented development with a mix of residential and non-residential land uses, including a food store. The reorganization of the future public park and private road elements will further enhance the development's ability to optimize lands in proximity

to existing transit and positively enhance the pedestrian experience to and through the development by establishing separate vehicular and pedestrian accesses to the PUDO.

The conclusions of the March 2023 Planning and Urban Design Rationale Report remain relevant.

We trust that this letter is satisfactory for your review. If you have any questions and/or comments regarding this addendum letter, please do not hesitate to contact the undersigned at your convenience.

Yours truly,  
**Bousfields Inc.**



Kate Cooper, MCIP, RPP