BOUSFIELDS INC.

Planning & Urban Design Rationale



38-50 Park Road

City of Toronto

Prepared For

Helberg Properties Limited

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BOUSFIELDS INC.

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This Planning and Urban Design Rationale report has been prepared in support of an application by Helberg Properties Limited to amend the City of Toronto Official Plan and the City-wide Zoning By-law 569-2013, as amended, with respect to a 0.18 hectare site, municipally known as 38-50 Park Road. The requested Official Plan Amendment and Zoning By-law Amendment would permit the construction of a new 31-storey purpose-built rental building and the full retention and adaptive reuse of the important heritage building at 50 Park Road, which will be integrated into the new development.



1 Introduction

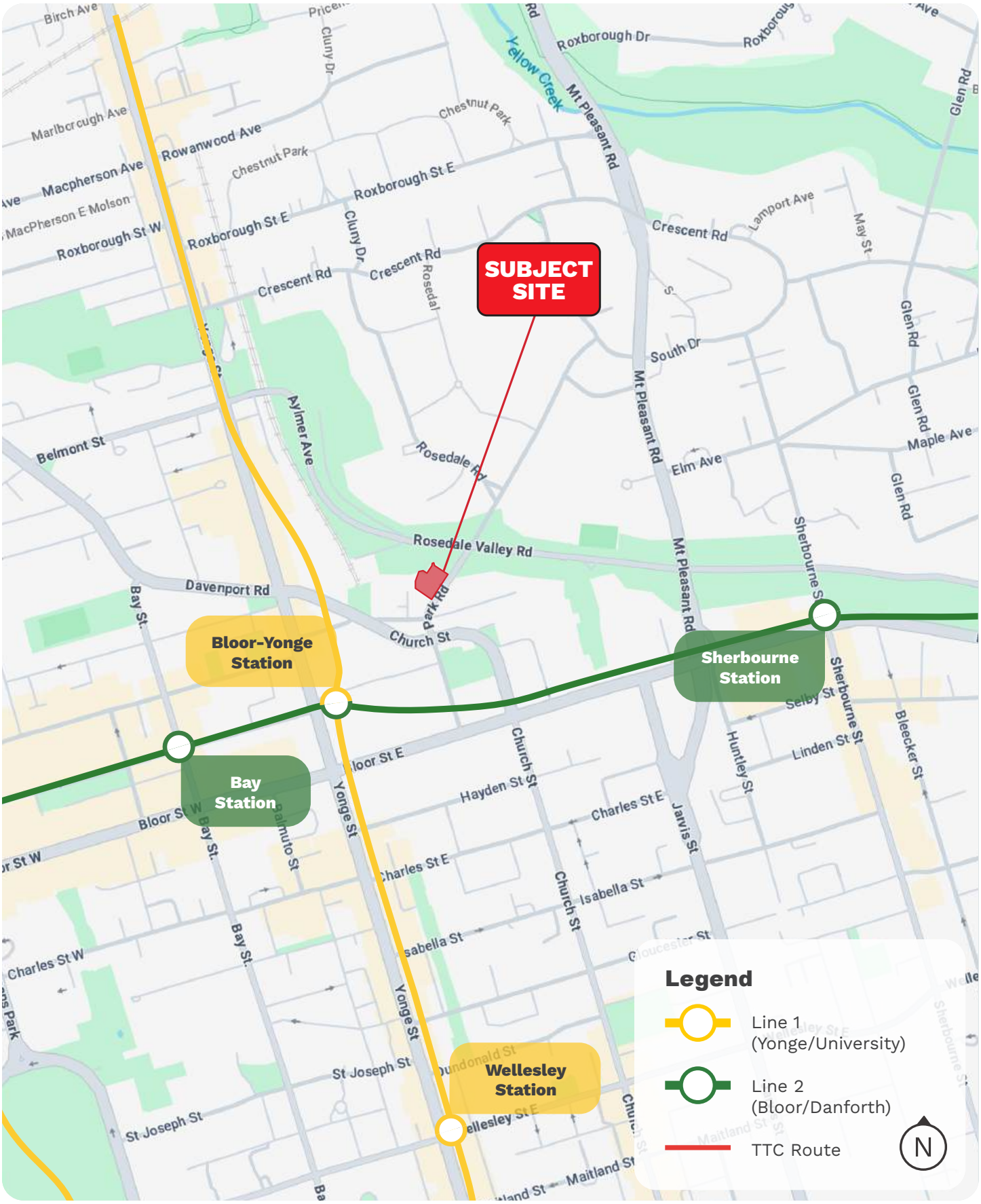


Figure 1 - Location Map

This Planning and Urban Design Rationale report has been prepared in support of an application by Helberg Properties Limited to amend the City of Toronto Official Plan and the City-wide Zoning By-law 569-2013, as amended, with respect to a 0.18 hectare site located on the west side of Park Road, just north of Church Street, municipally known as 38-50 Park Road (the "subject site") (see **Figure 1**).

The subject site is located within the northeastern portion of the *Downtown*, on the periphery of the Bloor-Yorkville/North Midtown area, and is currently developed with a mix of uses and building types, including a 3½-storey triplex at 38 Park Road, an aging 8-storey apartment building at 40 Park Road and a 2-storey office building at 50 Park Road, which is designated under Part IV of the *Ontario Heritage Act*.

The requested Official Plan Amendment and Zoning By-law Amendment would permit the construction of a new 31-storey purpose-built rental building and the full retention and adaptive reuse of the important heritage building at 50 Park Road, which will be integrated into the new development (the "proposal"). The heritage building will be rehabilitated and restored as part of the proposal, resulting in a positive contribution to the streetscape and the broader community.

The initial feasibility, design vision and Pre-Application Consultation were undertaken in collaboration with David Chipperfield Architects in London (UK), an internationally recognized and award-winning architectural firm with a reputation for expertise in the design process and the enduring quality of its projects. It is the intention that David Chipperfield Architects will be the Design Architect for the project upon successful receipt of approvals, with BDP Quadrangle Architects Ltd., one of Canada's leading architectural firms, acting as the collaborating Architect of Record during all stages of the project. The design is intended to be distinctive and will create a modern landmark building that recognizes and enhances the cultural heritage value of 50 Park Road, while promoting design excellence in the *Downtown*.

The proposal is comprised of approximately 25,041 square metres of gross floor area ("GFA"), resulting in a density of 14.2 FSI. It includes approximately 24,408 square metres of residential GFA and 633 square metres of non-residential GFA, as well as 289 rental units, including 40 rental replacement units. As is the case with the existing condition, the non-residential portion of the development would be contained within the building at 50 Park Road, which is currently utilized as office space, and the residential use portions of the development would generally be contained to the properties at 38 and 40 Park Road.

In addition, the proposal will make significant contributions to the public realm, including the conveyance of a 3.45 metre widening of the Park Road right-of-way along the frontages of 38 and 40 Park Road, which will expand the public realm and facilitate high-quality landscaping that will enhance the streetscape. The adaptive re-use of 50 Park Road will make additional contributions to the public realm by introducing new opportunities for other forms of non-residential uses that will activate the street and the abutting park edge.

This report concludes that the application is in keeping with the planning and urban design framework established by the Provincial Planning Statement, the City of Toronto Official Plan, the Downtown Secondary Plan and the applicable urban design guidelines.

From a land use perspective, the proposal will contribute to the achievement of policy directions supporting intensification and infill on underutilized sites within the built-up urban area, particularly in locations that are well-served by municipal infrastructure, including existing higher-order transit. The subject site is located in the *Downtown* and is located within Protected Major Transit Station Areas (PMTSA's) associated with the Bloor-Yonge, Bay and Rosedale Subway Stations. By virtue of the site's proximity to these subway stations (within an approximate 500-metre radius), the subject site forms part of a "major transit station area" and a "strategic growth area", which are areas identified for growth and intensification under the Provincial Planning Statement.

The subject site is currently designated *Neighbourhoods* in the City of Toronto Official Plan, a land use designation that limits the permitted height to 6 storeys along major streets such as Park Road. In order to permit the increased height, the proposed Official Plan Amendment seeks to redesignate the subject site to *Mixed Use Areas*. It is our opinion that the proposed redesignation is appropriate given: the existing mix of uses on the subject site, which include both residential and non-residential uses; the height of the existing building at 40 Park Road, which already exceeds the permitted height; the site's location in the *Downtown* and along Park Road (an identified Major Street in the City of Toronto Official Plan); and the existing and emerging context of tall buildings in the immediate vicinity of the subject site. Further, the size and depth of the subject site is able to accommodate a tall building form with appropriate setbacks from surrounding properties.

As recognized in the City's Expanding Housing Options in Neighbourhoods (EHON) initiative, the City has implemented policy changes that expand permissions to develop additional housing in *Neighbourhoods*, especially along major streets. These policy changes highlight the potential of *Neighbourhoods* that are situated along major streets in fulfilling a deep need for additional housing across the city.

Given the existing underutilized nature of the subject site, its proximity to existing and planned higher-order transit and its location within the *Downtown*, where intensification is generally anticipated and encouraged, an important opportunity exists to create a transit-supportive development, which optimizes and makes efficient use of land and existing and proposed infrastructure.

From a housing perspective, the proposal will add to the existing housing stock available in the *Downtown* by introducing 249 new rental residential units, while replacing the existing rental housing units on the subject site. The proposed development represents an important opportunity to reconstruct these units with more desirable layouts and living conditions, including ensuite laundry and modern mechanical systems and air conditioning, and replacing the existing units with higher quality apartments at similar rents. It is currently contemplated that the replacement units will include the same unit mix as the units within the existing building. The proposed 249 new rental units will add to the City's rental housing stock and provide a greater range of housing options for *Downtown* residents.

From a built form and urban design perspective, the proposal is contextually appropriate and will represent a high-quality addition to the area. The proposal will result in an appropriately scaled building that frames Park Road with good proportion and provides appropriate transition and separation in relation to the surrounding mix of building types with varying heights. The proposal will add an architecturally distinctive new building that is complementary to the character of the neighbourhood and will provide significant public realm improvements that will enhance the streetscape along Park Road. It will also help to animate the street frontage, thereby further enhancing pedestrian safety.

The proposed height is in keeping with the existing and emerging height context along the edge of the Rosedale Valley Ravine, where the *Downtown* tall building character interfaces with the ravine and low-rise neighbourhoods to the north. In particular, the height is in keeping with the existing and approved building heights in the immediate vicinity, which include 37 storeys at 825 Church Street and 28 storeys at 717 Church Street.

From a cultural heritage perspective, the proposed development has been designed and massed to conserve the cultural heritage value of 50 Park Road and would facilitate the adaptive re-use of the building in a manner that is consistent with and conforms with the applicable Provincial and City cultural heritage policies.

Based on the foregoing, this Planning and Urban Design Rationale report concludes that the proposal is appropriate and desirable in land use planning and urban design terms and, accordingly, we recommend approval of the requested Official Plan Amendment and Zoning By-law Amendment.

2 Site & Surroundings

2.1 Subject Site

The subject site is an assembly of three properties (38, 40, and 50 Park Road) located on the west side of Park Road, generally mid-block between Rosedale Valley Road to the north and Collier Street to the south (see **Figure 2)**. The assembled site is irregular in shape and has a combined site area of approximately 1,764 square metres (0.18 hectares) with approximately 48.4 metres of frontage along Park Road and a lot depth ranging from approximately 33 metres to 43 metres.

The subject site is currently developed with a 3½-storey multi-unit (triplex) dwelling (38 Park Road), an 8-storey rental apartment building (40 Park Road) and a 2-storey office building (50 Park Road). The existing multi-unit dwelling at 38 Park Road contains three residential units, two of which are owner-occupied and one of which is rented. The existing 8-storey apartment building at 40 Park Road contains a total of 39 rental residential units. The 2-storey office building at 50 Park Road was constructed in 1954 as the headquarters for the Ontario Association of Architects and is designated under Part IV of the *Ontario Heritage Act*.

The properties at 38 Park Road and 40 Park Road are neither listed on the City's Heritage Register nor designated under the *Ontario Heritage Act*. The property at 50 Park Road is contained within, and forms the southern boundary of, the South Rosedale Heritage Conservation District.



Figure 2 - Aerial Photo - Site Context

Topographically, the site slopes down from the south to the north by approximately 3.8 metres, as measured along the Park Road frontage. Along the north lot line of 50 Park Road, the site slopes down 1.4 metres from east to west, while the site slopes up by approximately 1.8 metres along the south lot line of 38 Park Road, resulting in a total grade differential of approximately 7.0 metres across the site.

Vehicular access to 38 Park Road is currently provided from a narrow 3.05 metre wide public lane running north from Collier Street, which provides shared vehicular access to the rear of the residential properties fronting the west side of Park Road. The travelled portion of the laneway dead ends at a retaining wall at the north end of 38 Park Road.

Vehicular access to the existing 8-storey apartment building at 40 Park Road is provided via two driveways from Park Road that run along the north and south sides of the building. The driveways join and loop around the west end of the building across the City-owned laneway lands. The 2-storey office building at 50 Park Road is served by a driveway that extends the length of the north side of the site, directly abutting Lawren Harris Park.



View from rear of subject site, looking east along the driveway north of 40 Park Road



City-owned laneway lands at west end of 40 Park Road



View from rear of subject site, looking east along the driveway south of 40 Park Road



View of driveway along the north side of 50 Park Road abutting Lawren Harris Park

The following provides additional details regarding the existing uses and structures on the properties that comprise the subject site.

38 Park Road

The property at 38 Park Road has a frontage of 7.62 metres along Park Road and a depth ranging from 32.6 to 37.3 metres, with a lot area of approximately 277.7 square metres It is currently developed with a 3½-storey triplex dwelling.

The dwelling was constructed in 1909 and has been subject to numerous additions and alterations since that date. It is accessed via two staircases that lead from the Park Road sidewalk to the residential entrances, which are elevated above the street, and one staircase that goes down to the lower level unit. The dwelling is built close to Park Road, with a 3.5 metre setback from the front lot line to the main front wall and a minimal setback to the staircases. There is limited landscaping in the front yard.



View of subject site, looking south along the west side of Park Road



View of subject site, looking south along the west side of Park Road with the future 28-storey condo (under construction) at 717 Church Street in the background



View of existing multi-unit dwelling at 38 Park Road and abutting low-rise uses to the south



View of north façade of 50 Park Road, looking south from Lawren Harris Park



Existing Apartment Building at 40 Park Road

40 Park Road

The property at 40 Park Road has a frontage of 22.85 metres along Park Road and a depth ranging from 37.3 metres to approximately 42.7 metres, with an area of approximately 917.1 square metres It is currently developed with an aging 8-storey rental apartment building that was constructed in 1956. The existing structure, now almost 70 years old, is a slab-style building that is approximately 13 metres in width (north-south) and 34 metres deep (east-west). The building has a single-loaded corridor design, with units facing north.

The building is set back approximately 3.7 metres from the front lot line along Park Road. The east façade, which faces Park Road, is largely composed of a blank brick wall, with windows for the stairwell and a single column of secondary windows facing east. The north façade features a high degree of glazing with primary residential windows that face the park. The south face of the building is completely blank.

The existing apartment building contains 39 rental units, including 12 studio units, 24 one-bedroom units and 3 two-bedroom units. In addition to the residential units, the building contains a small on-site laundry facility shared by the tenants. Other than the main lobby and laundry room, the building does not contain indoor or outdoor amenity space.

The pedestrian entrance to the building is from the Park Road frontage, leading to the ground floor. There are a total of 22 vehicular parking spaces serving the existing building, which are located primarily on the surface beneath the building along its north and south faces. To the west of the building, occupying the City-owned laneway lands, is a driveway and a surface parking area containing two parking spaces. The north and west limits of the City-owned laneway lands are demarcated by a retaining wall and a metal fence.

Of the 22 parking spaces, 15 are currently leased to tenants. The existing building does not have any dedicated bicycle parking spaces. There are also a total of 36 storage lockers, of which 25 are currently in use.



View from Lawren Harris Park towards retaining wall at the north and west limits of the City-owned lands



View from rear of 50 Park Road looking north towards retaining wall at the north limit of 40 Park Road

50 Park Road

The property at 50 Park Road has a frontage of 17.97 metres and a depth ranging from 32.1 metres to approximately 32.6 metres, with an area of approximately 625.1 square metres. It contains a 2-storey glass and buff brick modernist commercial office building. The building was designed by John C. Parkin of the architectural firm John B. Parkin and Associates and was constructed in 1954 as the headquarters for the Ontario Association of Architects (OAA). The existing building is currently utilized as an office.

The building is characterized by a minimalist modernist design, including a flat roof, which is articulated through clean lines and rectilinear forms. The building is positioned adjacent to Lawren Harris Park and responds to the site's natural slope, allowing access and egress on both levels and high-quality views to and from the adjacent parkland. The building was designated under Part IV of the *Ontario Heritage Act* on March 25, 1991 through designating By-law 182-91 for its architectural value.

The building is set back 3.75 metres from Park Road to its main front wall. A set of stairs extends from the main entrance at the second floor to the Park Road sidewalk, extending to the limit of the Park Road right-of-way and beyond. There is also a set of stairs leading down to the lower level, which includes storage and building service areas beneath the stairs.

The south face of the building is one storey in height, with a blank wall. The north face is two storeys in height, with windows facing toward the park. The driveway along the north lot line slopes down from Park Road and dead ends, with an interlock paving area in the northwest portion of the property used in part for bicycle and vehicular parking.

2.2 Area Context

The subject site is located at the edge of the Bloor-Yorkville/North Midtown area, within the northeastern portion of the *Downtown* (see **Figure 3**). The local area reflects one of the most dynamic and mixed-use settings in the *Downtown*, with a diversity of services, amenities and employment uses. The subject site is within close walking distance of multiple higher-order public transit stations and a variety of retail stores, large office buildings and institutional uses, including the Toronto Reference Library.

Towards the north and east, the surrounding area is predominantly comprised of low-rise residential houses and ravine and park space along the Rosedale Valley Road corridor. Towards the south and west, the area is predominantly comprised of existing and planned tall residential, office and mixed-use buildings along the Yonge Street and Bloor Street corridors. At a broader scale, the Bloor-Yorkville/North Midtown area is characterized by a mix of land uses and a range of building types, including residential, retail and employment uses in low-, mid- and high-rise building forms. The area is also known for its collection of designated and listed heritage buildings, which contribute to the area's distinctive character.

This high-density, mixed-use community has attracted significant residential growth in recent years, which has further contributed to the vitality of local retail and amenities.

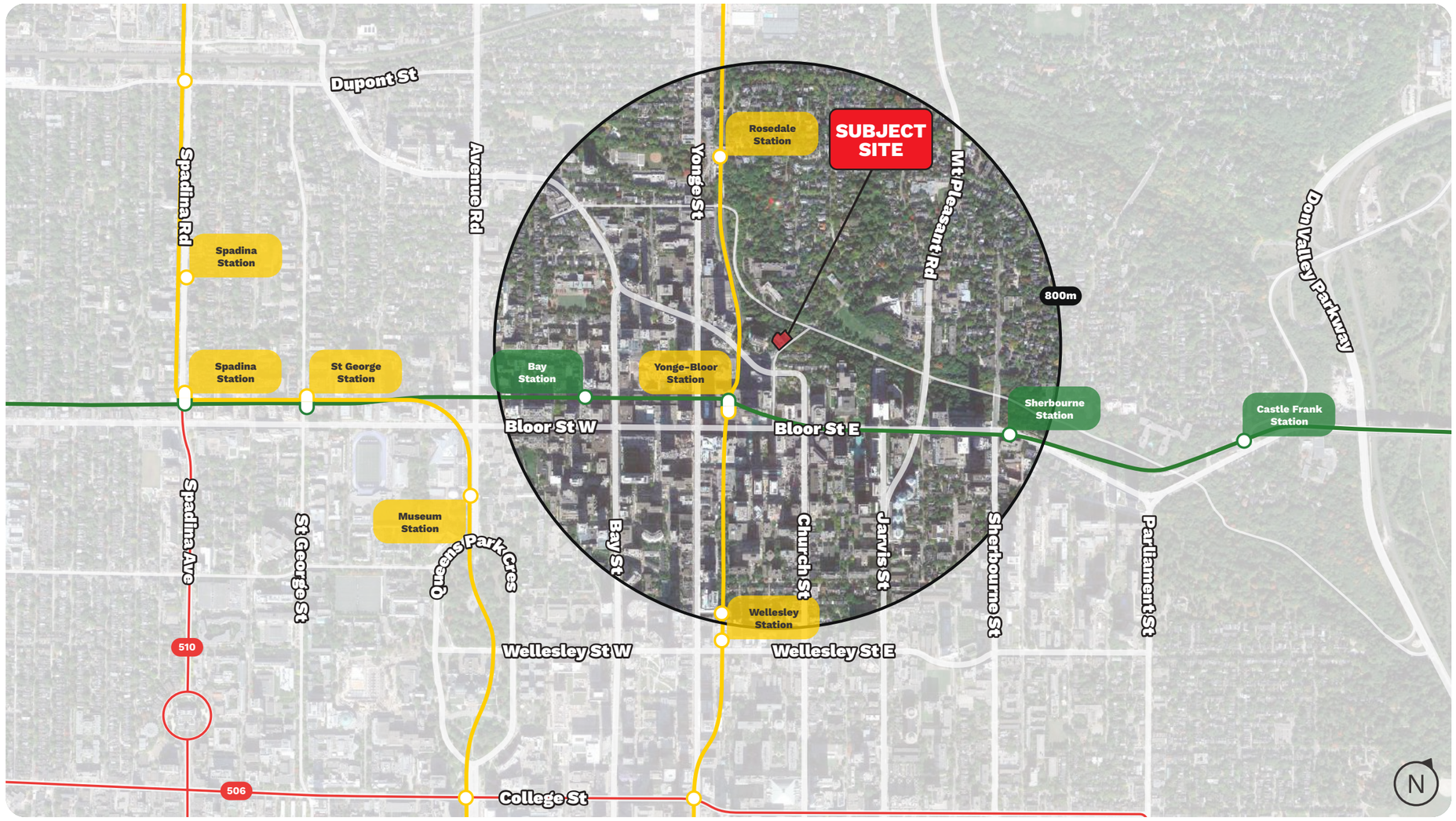


Figure 3 - Aerial Photo -Bloor-Yonge Transit Context

Asquith-Collier Neighbourhood

The Asquith-Collier Neighbourhood is a remnant of a larger low-rise residential neighbourhood which previously existed in the northeast quadrant of Yonge Street and Bloor Street East (up to 1930). It consisted of a number of east-west streets (from north to south, Severn Street, Ellis Street (no longer in existence), Collier Street and Bismarck Avenue (subsequently renamed to Asquith Avenue) and one north-south street (Gwynne Avenue, subsequently renamed to Park Road). All of the streets were narrow, with rights-of-way ranging from 35 to 50 feet (10.7 metres to 15.2 metres).

Subsequently, the street and block pattern and the built form have been altered due to major public infrastructure projects and numerous redevelopment projects that have taken place within the area, particularly in the areas west of Park Road and south of Asquith Avenue. The Church Street extension, which extended Church Street north and west from its terminus at Bloor Street to link to Davenport Road along a curvilinear alignment, was completed in 1931, severing the east and west portions of Collier Street and Asquith Avenue from one another, and eliminating portions of Ellis Street. The Yonge Street subway line was constructed in 1954, emerging from below grade just north of Church Street in the area formerly occupied by houses on Ellis Street and Reynolds Place.

Subsequent to construction of the subway, the neighbourhood has been substantially redeveloped with tall towers along the Yonge Street and Bloor Street frontages as well as within the interior of the neighbourhood, with generally increasing heights over time (15 storeys at 66 Collier Street, 17 storeys at 40 Asquith Avenue, 32 storeys at 8 Park Road and 37 storeys at 825 Church Street, as well as 28 storeys under construction at 717 Church Street and 42 storeys approved at 820 Church Street).

Midtown

The Midtown area is one of the most prominent mixed-use areas of the City, which includes commercial, residential, high-end retail, entertainment and institutional uses. The Midtown area is generally centred on the east-west axis of Bloor Street, with high-rise buildings extending along the main north-south cross streets of Yonge Street, Bay Street and Avenue Road. The character of the Midtown area is that of a highly urban, mixed-use area which combines the amenity, scale, and character of areas such as the University of Toronto, Queen's Park, the Royal Ontario Museum, the Yorkville area, the Annex and the Bloor Street retail areas.

In terms of urban structure, the Bloor-Yorkville/North Midtown area consists of a "height peak" at the Yonge/Bloor intersection and "height ridges" extending along Yonge Street to Ramsden Park as well as along Bloor Street, Bay Street and Avenue Road, which generally provide a transition in scale from the "height peak". Within the "height peak" at the Yonge/Bloor intersection is a cluster of existing and approved tall buildings that range between 34 and 99 storeys. To the north of the "height peak", within the Yonge Street "height ridge", there are existing and approved buildings that range in height between 32 and 58 storeys.

2.3 Immediate Surroundings

To the immediate **north** of the subject site is Lawren Harris Park, a 0.37-hectare park that fronts on Park Road and extends west along Rosedale Valley Road. The park is manicured and occupied by mature tree vegetation. It includes a pedestrian pathway that traverses through the park, connecting Park Road and Rosedale Valley Road. The park is part of the City's Ravine and Natural Feature Protection (RNFP) Area and is within the Natural Heritage System (NHS). In addition, the park is located within the Toronto and Region Conservation Authority (TRCA) Regulated Area.

Further north, on the north side of Rosedale Valley Road, is the South Rosedale neighbourhood, which is predominantly comprised of detached dwellings with interspersed low-rise and mid-rise apartment buildings. At the northwest corner of Park Road and Rosedale Valley Road is a heavily treed public open space area, to the west of which are a pair of 3-storey semi-detached dwellings and a detached dwelling served by a shared driveway from Rosedale Valley Road (132 and 136-138 Rosedale Valley Road. Further to the north and west are a 9-storey rental residential building built in the 1950s (Fontainebleu Apartments, 130 Rosedale Valley Road) and an 'L'-shaped 9-storey residential building (Arbour Glen Co-operative, 120 Rosedale Valley Road/16 Rosedale Road). The latter building climbs the valley slope, resulting in a height of 4 storeys along Rosedale Road).

Above the valley floor and beyond the lands fronting on the north side of Rosedale Valley Road are detached houses on large lots fronting on the north and south sides of Pine Hill Road (6-16 Pine Hill Road and 5-11 Pine Hill Road), the latter of which back onto the valley slope.

To the northeast, within the northeast quadrant of Rosedale Valley Road and Park Road, is the Branksome Hall school campus, which includes a playing field on the valley floor.



View from Lawren Harris Park, looking southeast towards the subject site



View from Lawren Harris Park, looking west with Milan Condos in the foreground



View from Lawren Harris Park, looking north towards Rosedale Valley Road and the Fountainebleu Apartments

Immediately **east** of the subject site, at the southeast corner of Park Road and Rosedale Valley Road, is Hazeldean Park, a heavily treed 0.50 hectare public park. To the south of the park, opposite the properties at 30-38 Park Road, is a row of 2½-storey semi-detached dwellings fronting on the north side of Collier Street (116-154 Collier Street), as well as a 2½-storey detached dwelling at 156 Collier Street. The properties at 116-118 and 120 Collier Street back onto Park Road, with a retaining wall along the street edge. With the exception of 116 Collier Street, all of the properties are listed on the City's Heritage Register.

The dwellings on the north side of Collier Street form part of a small neighbourhood pocket that also includes semi-detached and row houses on the south side of Collier Street, the east side of Park Road and the north side of Asquith Avenue. Milner Parkette, a 569 square metre park, is located at the northeast corner of Church Street and Asquith Avenue.

Further south and east are commercial office buildings lining the north side of Bloor Street East, including a 7-storey office building located on the block between Park Road and Church Street (120 Bloor Street East), a 15-storey office building at the northeast corner of Bloor Street East and Church Street (160 Bloor Street East) and 11- and 12-storey office buildings at 200 and 220 Bloor Street East (the Manufacturers Life Insurance Company Financial Headquarters).

Directly **south** of the subject site, fronting the west side of Park Road, are two 3½-storey semi-detached dwellings (34-36 Park Road), followed by two semi-detached dwellings (30-32 Park Road) at the corner of Park Road and Collier Street. The dwellings are located on small lots, with depths that narrow toward the corner.



View from 38 Park Road, looking east towards the low-rise dwellings on the north side of Collier Street



Low-rise dwellings on the north and south side of Collier Street, looking east from Park Road



Abutting low-rise dwellings at 32 to 36 Park Road

The abutting residential dwelling at 36 Park Road has a zero setback from the lot line adjoining 38 Park Road, and is set back approximately 3.5 metres from the Park Road right-of-way. The property at 34 Park Road is occupied by a clinical research facility (Research Toronto), while the properties at 30-32 Park Road are occupied by office and medical clinic uses (Cowan Law and S.T.A.R.T. Clinic). As noted previously, the above-noted properties are served by a public laneway running north from Collier Street, which also serves 38 Park Road.

Further south is a triangular development site bounded by Collier Street, Church Street and Park Road, municipally known as 717 Church Street, formerly developed with two pairs of semi-detached dwellings and a 4-storey office building. The 717 Church site is at a higher elevation than the subject site (i.e. 115.8 metres CGD vs. 110.1 metres CGD, almost two storeys higher).

A 28-storey (96.6 metre) condominium building known as Park Road Condos is currently under construction on the site. Rezoning approval for the 717 Church Street development was initially granted by the Ontario Land Tribunal on August 12, 2022 for a 27-storey tower with a metric height of 99.3 metres, inclusive of the mechanical penthouse. The proposal was later revised to 28 storeys (96.6 metres inclusive of the mechanical penthouse). The development includes an overall GFA of approximately 17,624 square metres, resulting in a density of 19.6 FSI. As part of the development, the westerly portion of Collier Street is to be closed from Church Street to a point approximately 45 metres to the east.

Further south, at the southeast corner of Church Street and Park Road, is an older 17-storey slab apartment building built in 1984 (40 Asquith Avenue), followed by 32- and 37-storey towers that form part of the Hudson's Bay Centre (8 Park Road and 90 Bloor Street East, respectively). To the southwest is recently approved 42-storey residential/hotel building at 820 Church Street.



Rendering of future 28-storey condominium building at 717 Church Street (looking east towards Park Road)



Architectural rendering of approved 42-storey residential/hotel building at 820 Church Street

To the **west** of the subject site is a 15-storey slab-style apartment building (66 Collier Street), which was constructed in 1974. The building is oriented east-west, with its main windows and balconies facing north and south. It is set back of approximately 15.5 metres from the public lane to the east. Vehicular access to the building is provided by way of a driveway from Collier Street immediately to the west of the public lane. A heavily treed slope that forms part of the property is located north of the building and slopes down toward Lawren Harris Park.

To the northwest of 66 Collier Street at the foot of the slope is a 3-storey building known as The Studio Building (25 Severn Street), which was constructed in 1913-1914. The building was used as the home and working studio of several Group of Seven painters, their predecessors and their artistic descendants. The property was listed on the City of Toronto Heritage Register in 1973 and was subsequently included in the South Rosedale Heritage Conservation District.



View from rear of 38 Park Road, looking north along City-owned laneway



Rear of 40 Park Road as viewed from City-Owned laneway lands at rear of 38 Park Road



Looking south along City-owned laneway at the rear of 38 Park Road



View of City-owned laneway, looking north from north side of Collier Street



66 Collier Street (foreground) and Milan Condos at 825 Church Street (background)

To the west of 66 Collier Street is Harold Town Park and the Line 1 subway corridor, which runs above ground between Harold Town Park and the Rosedale Subway Station.

On the west side of the subway corridor is a 37-storey (113.0 metre) residential tower at 825 Church Street (Milan Condos). West of Milan Condos is a Canadian Tire store at 835-839 Yonge Street. A rezoning application was submitted on June 29, 2022 to permit the redevelopment of the Canadian Tire store site with a mixed-use development consisting of two towers with overall heights of 41 storeys (142 metres) and 49 storeys (166 metres), inclusive of a 10-storey podium element. The 41-storey tower would be located adjacent to the east boundary of the site, in proximity to the subway line and overlooking the Rosedale Valley Ravine. The proposal also includes approximately 14,627 square metres of retail space which will be used as a Canadian Tire Store and Auto Centre, maintaining the existing store on site. Overall, the development includes a total gross floor area of 91,151 square metres and 950 residential units, resulting in a density of approximately 8.8 FSI.

Further north along the east side of Yonge Street, the site of the Toronto Community Housing head office at 931 Yonge Street (southeast corner of Yonge Street and Aylmer Avenue) was rezoned in 2024 to permit a 32-storey mixed-use building (106.0 metres, including mechanical penthouse), with 250 dwelling units (33% affordable) and 150 square metres of ground floor commercial space, resulting in a density of 22.4 FSI.

Further west, on the west side of Yonge Street, north of Davenport Road, a rezoning application was approved by the OLT on January 30, 2024 to permit the redevelopment of the site at 906 Yonge Street with a mixed-use development comprised of a 40-storey (138.2 metre) tower fronting on Yonge Street and a 23-storey (84.0 metre) tower fronting on McMurrich Street. The mixed-use development includes at-grade retail uses fronting on Yonge Street, and residential and hotel uses above. The two buildings include an overall GFA of 28,630 square metres, 760 square metres of which is non-residential GFA, resulting in a density of 12.5 FSI.



Rendering of proposed 41 and 49-storey development at 835-839 Yonge Street

2.4 Transportation Context

Road Network

Park Road runs in a north-south direction between Bloor Street East to the south and South Drive to the north. It is classified as a Minor Arterial road by the City of Toronto's Road Classification System between Church Street and Rosedale Valley Road, while the segments of Park Road to the north and south are identified as Collectors. Adjacent to the subject site, Park Road has a two lane cross-section (within one lane in each direction) and dedicated turn lanes at key intersections. There is a narrow sidewalk (1.75 metres) located on the west side of the street only, which is adjacent to the curb. On-street parking is not permitted on either side of the street.

Park Road, between Church Street and Rosedale Valley Road, is identified on Map 3 of the City of Toronto Official Plan as a Major Street with a planned right-of-way width of 20 metres. Based on the Transportation Impact Study ("TIS"), prepared by BA Group (dated July, 2025), the segment of Park Road adjacent to the subject site has an existing right-of-way width of approximately 10.7 to 10.8 metres. The segment of Park Road south of Collier Street has an existing right-of-way width of approximately 15.2 metres to 15.6 metres, while the right-of-way for the segment north of Rosedale Valley Road ranges from approximately 14.3 metres to 27.5 metres.

Rosedale Valley Road is classified as a Minor Arterial which generally runs southeast-northwest, on the floor of the Rosedale Valley Ravine, from the Bayview Extension to Severn Street, where it turns northerly and becomes Aylmer Avenue. The segment of Rosedale Valley Road north of the subject site has an existing right-of-way width of approximately 20 to 21 metres with a two-way, two-lane urban cross section. The planned right-of-way width for the segment of Rosedale Valley Road/Aylmer Avenue between Park Road and Yonge Street is shown as "Non-uniform width, to be retained as existing at the time of Plan adoption". The Rosedale Valley Trail runs along the south side of the street east of Park Road with a sidewalk on the north side west of Park Road. On-street parking is not permitted.

Collier Street is classified as a Collector road by the City of Toronto's Road Classification System for the segment between Church Street and Park Road. It runs generally east-west approximately 30 metres south of the subject site, between Yonge Street and its terminus approximately 130 metres east of the subject site. Collier Street has an existing right-of-way width ranging from 11.7 to 13.5 metres with a two-way, two-lane urban cross section from Church Street to its terminus to the east, and has a one-way, two-lane cross section from Church Street to Yonge Street with sidewalks on both sides. On-street parking is permitted on the north side of Collier Street west of Church Street and east of Park Road. As noted above, the portion of Collier Street immediately east of Church Street is proposed to be closed.

Church Street, located approximately 60 metres south of the subject site, is classified as a Major Arterial Road and generally runs in a north-south direction. North of Bloor Street, Church Street curves northwesterly to connect to Yonge Street opposite Davenport Road. It has an existing and planned right-of-way width of 20 metres. Church Street is a two-way, four-lane street with pedestrian sidewalks provided on both sides of the street. On-street parking is not permitted.



View looking west along Collier Street, adjacent to 717 Church Street

Transit Network

From a transit perspective, the area has excellent access to existing public transit, including higher order transit (see **Figure 4)**. The subject site is located approximately 265 metres radius distance (360 metres walking distance, representing a 4- to 5-minute walk) northeast of the nearest entrance to the Bloor-Yonge Subway Station. Bloor-Yonge is an interchange station providing access to both Line 1, Yonge-University and Line 2, Bloor-Danforth. Line 1 offers connections to various other transit systems throughout Toronto and the Greater Toronto Area, including GO and Viva Transit services. Line 2 operates along Bloor Street from Kipling station in the west to Kennedy station in the east. The Line 1 and Line 2 subways provide service every 2-3 minutes during rush hours and every 4-5 during off-peak hours.

Additionally, the subject site is located approximately 500 metres northeast of Bay Station on Line 2 (a 7- to 8-minute walk) and approximately 525 metres southeast of Rosedale Subway Station on Line 1 (a 9- to 10-minute walk).

In addition to subway service, the following TTC surface transit routes operate near the subject site:

Route 97C Yonge, which operates between Eglinton Station and Union Station on Line 1 (Yonge-University). The 97C branch operates seven days a week from approximately 6:30 AM to 1:30 AM. Service frequency is between 25 and 30 minutes.

Route 300 Bloor-Danforth Night Bus, which operates between Kennedy Station, the area of Warden Avenue and Danforth Avenue, the area of The West Mall and Burnhamthorpe Road, and Toronto Pearson International Airport, generally in an east-west direction. Both the 300A (Warden-Pearson Airport) branch and the 300B (Kennedy Station-West Mall) branch operate during the overnight period, seven days a week. Headways are approximately 30 minutes.

Route 320 Yonge Night Bus, which operates between the area of Queens Quay West and Bay Street, and the area of Steeles Avenue East and Yonge Street, generally in a north-south direction. One single branch operates during the overnight period, seven days a week. Headways are approximately 30 minutes.

Planned Transit Improvements

The TTC is developing plans for the expansion of Bloor-Yonge Subway Station, which is anticipated to relieve congestion and overcrowding on and between the subway platforms. Draft plans indicate that an alternative station entrance is planned, which could be located closer to the site than the existing entrances.

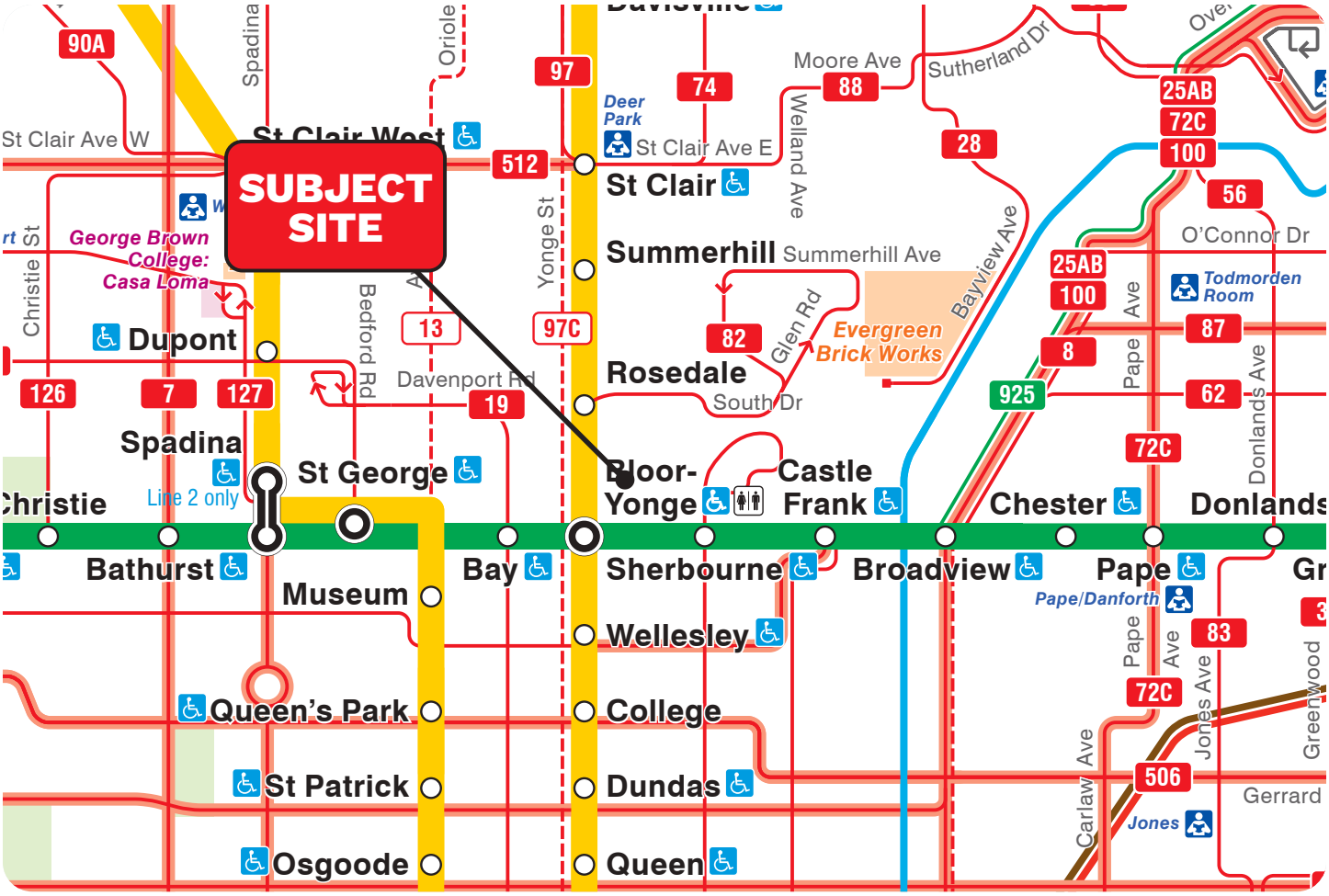


Figure 4 - TTC Transit Map

Cycling Network

The subject site is located approximately 60 metres south of the Rosedale Valley Road Multi-Use Trail, which extends from Bayview Avenue to Park Road, connecting St. James Cemetery, Wellesley Park, Toronto Necropolis Park, Rekai Family Parkette and Lawren Harris Park. The City has partnered with the TRCA to complete a redesign of the trail which will involve repairing, resurfacing and upgrading the trail, with construction anticipated in 2026.

Southwest of the subject site, cycle tracks run along both sides of both Yonge Street and Bloor Street West (**Figure 5**).

The nearest City of Toronto Bike Share station is located approximately 300 metres west of the subject site at the intersection of Yonge Street and Yorkville Avenue, with several other stations further south and west, including south of Bay Street and Scollard Street, outside of Bay Subway Station, on the south sides of the intersection of Bay Street and Bloor Street West, and on the south side of the intersection of Balmuto Street and Bloor Street West.



Figure 5 - Cycling Map



3 Proposal

3.1 Description of the Proposal

The proposal represents an opportunity to redevelop the subject site with a new high-quality rental residential building that retains and incorporates the heritage building at 50 Park Road and celebrates its unique natural setting in the *Downtown*. The proposal will replace the existing rental residential units on the subject site, while introducing new housing options and non-residential uses within a built form that is in keeping with the existing, approved and emerging planned context in the area. The proposal would also support the existing higher-order transit services in proximity to the site and would leverage the site's location within a "major transit station area".

As described in detail below, the proposal consists of a 31-storey purpose-built rental residential building with a height of 101.9 metres to the top of the roof and 107.9 metres to the top of the mechanical penthouse (see **Figure 6** and **Figure 7**). In total, the proposal includes 289 rental residential dwelling units and a total gross floor area ("GFA") of approximately 25,041 square metres, including 633 square metres of non-residential space, resulting in a density of 14.2 FSI.

Of the 289 residential units, the plans show 39 rental replacement units, representing a 1:1 replacement of the existing rental units within the 8-storey apartment building at 40 Park Road. The single rental unit within 38 Park Road was recently discovered and is not currently captured within the rental replacement programme of the proposal. The plans will be revised in a subsequent submission to achieve 100% replacement of the existing rental units on the subject site. On that basis, the proposal would provide a total of 40 rental replacement units.

The heritage building at 50 Park Road is proposed to be conserved in situ and adaptively reused to provide flexible non-residential space directed towards the Park Road frontage. The 50 Park Road building will be maintained as a distinct volume and will establish a 2-storey base building form that maintains the site's existing character and provides a transitional element addressing Lawren Harris Park and the low-rise residential neighbourhood further north along the east and west sides of Park Road.



Figure 6 - Architectural Rendering - view of proposed development from east side of Park Road, looking west (BDP Quadrangle Architects)

Public Realm

The proposal will make significant contributions to the public realm along Park Road without impacting the cultural heritage value of the property at 50 Park Road (see **Figure 7**). In this respect, the proposal includes a 3.45 metre road widening along the frontages of both 38 and 40 Park Road, which will significantly expand the public realm. No widening is proposed along the frontage of 50 Park Road, because the existing heritage building extends to the limit of the existing right-of-way and beyond.

As noted previously, the existing sidewalk width along Park Road is approximately 1.75 metres (average); the proposed widening would allow for expanded sidewalks that are approximately 2.5 metres wide and would contribute to the creation of an expanded sidewalk zone of up to 8.95 metres at grade (as measured from the building face to the curb). The sidewalk zone is proposed to be enhanced with high-quality plantings, including three new street trees and would accommodate space for 10 visitor bicycle parking spaces.

In addition, the proposed development would remove the existing driveways and associated curb cuts to the north of 40 Park Road and to the north of 50 Park Road, thereby reducing the number of curb cuts from three to one and providing an opportunity to reinstate the sidewalk and reduce vehicular impacts on the public realm. The existing driveway that runs parallel to the north lot line of 50 Park Road has been reimagined to become a new outdoor gathering space for the non-residential uses in the building and provide access to, and further animate, the edge of Lawren Harris Park.

As requested by the City, the proposal would also facilitate improvements to the existing lane by accommodating a 0.98-metre widening adjacent to the 38 Park Road property, tapering to a point adjacent to the 40 Park Road property, which would contribute to an ultimate laneway width of 5.0 metres.

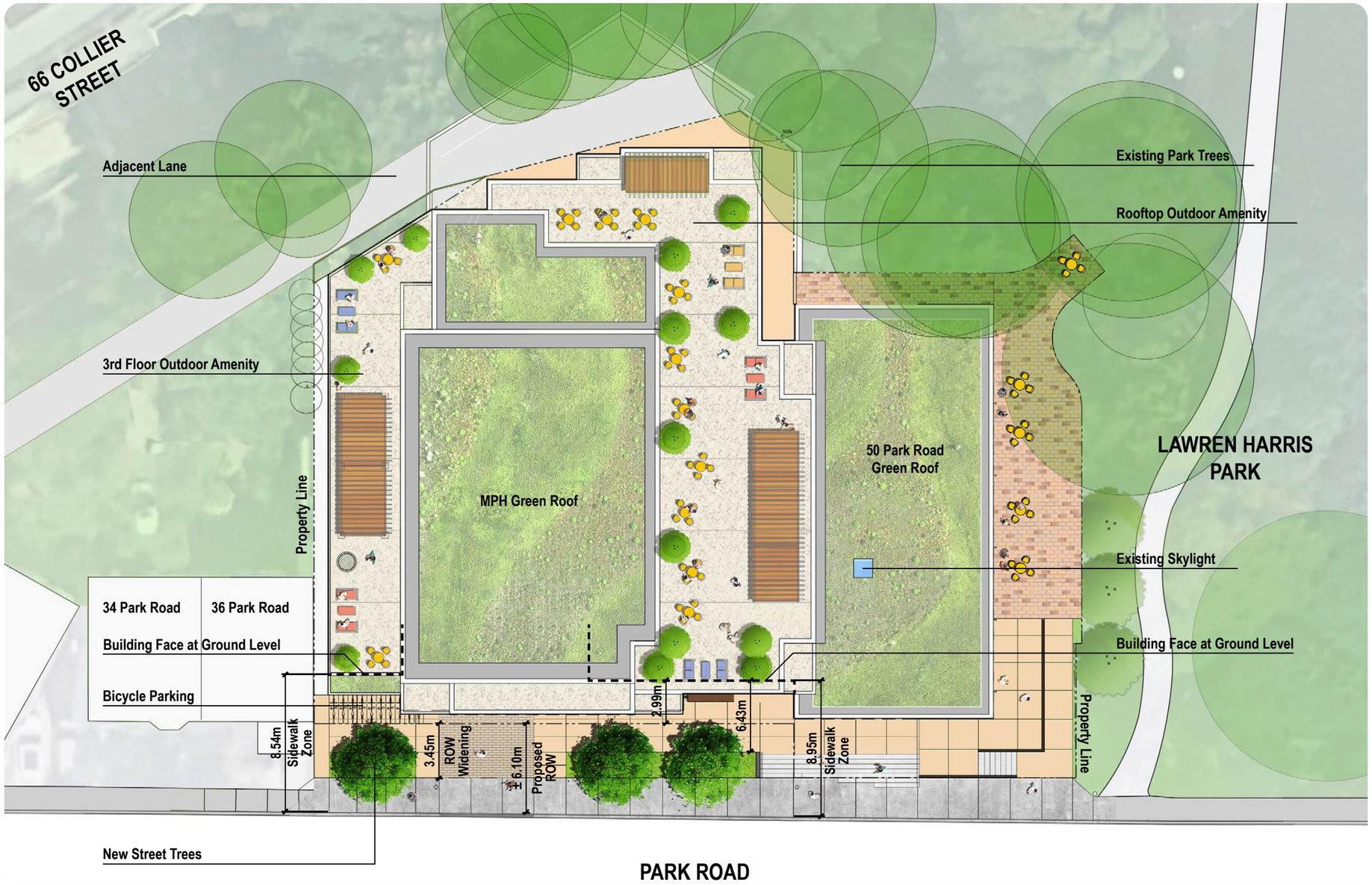


Figure 7 - Site Plan (Prepared by DTAH)



Figure 8 - Architectural rendering – View of proposed development from east side of Park Road, looking southwest (BDP Quadrangle Architects)

Base Building (Basement to Level 2)

The heritage building at 50 Park Road is to be conserved and incorporated into the development, establishing a 2-storey base building form at the north end of the site. The 50 Park Road building will be maintained as a distinct volume, with its form preserved and joined to the new building through a glazed connection at the ground level. A vertical frame element at the south limit of the glazed connection will reinforce the separation, acting as a visual break between the conserved building and the new development.

Two interior openings are proposed to facilitate circulation between the two buildings: one at the ground floor (i.e. the upper level of 50 Park Road), located at the southwest corner of the building, and one at the basement level (i.e. the lower level of 50 Park Road) near its southeast corner. The existing staircase to 50 Park Road is proposed to be extended southward to provide access to the new residential entrance. The stair and landing are also being extended to provide barrier free access to the development, including 50 Park Road, and to better integrate with the right-of-way improvements and design along Park Road.

The new construction maintains a modernist architectural expression along Park Road and generally reflects the existing condition, consisting of a modern tower form that meets the ground; however, the lower levels have been designed and articulated to create visual breaks in the massing that respond to the existing heritage building and the scale of Park Road.

The ground level, mezzanine and Level 2 feature extensive glazing and brick cladding on the vertical elements, creating a visually distinct yet cohesive design transition from the conserved 50 Park Road building to the new construction. A one-storey brick element, containing stacked parking facilities, extends to the south where the base building interfaces with the 3½-storey semi-detached dwellings at 34-36 Park Road.

The ground floor is set back approximately 2.88 to 2.99 metres from the east lot line (the limit of Park Road as widened), allowing for a sidewalk zone of between approximately 8.54 and 8.95 metres along Park Road. To the south, the base building is set back approximately 0.94 metres from the south lot line with a varied setback to the angled west lot line. The north portion of the ground floor, corresponding to the conserved building at 50 Park Road, is set back between approximately 3.7 to 7.0 metres from the north lot line adjacent to Lawren Harris Park.

In terms of programming, the northern portion of the base building, consisting of the conserved heritage building at 50 Park Road, will contain approximately 633 square metres of flexible non-residential space on two levels, with pedestrian access directly from Park Road via the existing entrance. The new construction is comprised of residential uses on the ground floor, including the main residential lobby, which is accessed directly from the expanded sidewalk along Park Road, as well as vehicular parking and loading facilities, which are wholly integrated into the base building and screened from public view (see **Figure 9**).

Above, the Mezzanine Level is comprised of open-to-below areas, a management office above the residential lobby, a 3-bedroom suite in the northwesterly portion of the new building and stacked parking facilities located along the southern edge.

At Level 2, the massing is set further back, with a setback of 5.1 metres from the east lot line along Park Road as widened. To the south, Level 2 is set back 5.5 metres from the south lot line further defining the scale of the base building. Towards the north, the outdoor amenity terrace at Level 2 of the new building projects approximately 2.0 metres over the roof of the 50 Park Road building. Towards the west, the massing is articulated with a series of notches that respond to the angular shape of the property.

In terms of programming, Level 2 is comprised of a large indoor amenity space with outdoor amenity terraces along the north, west and south sides of the building.

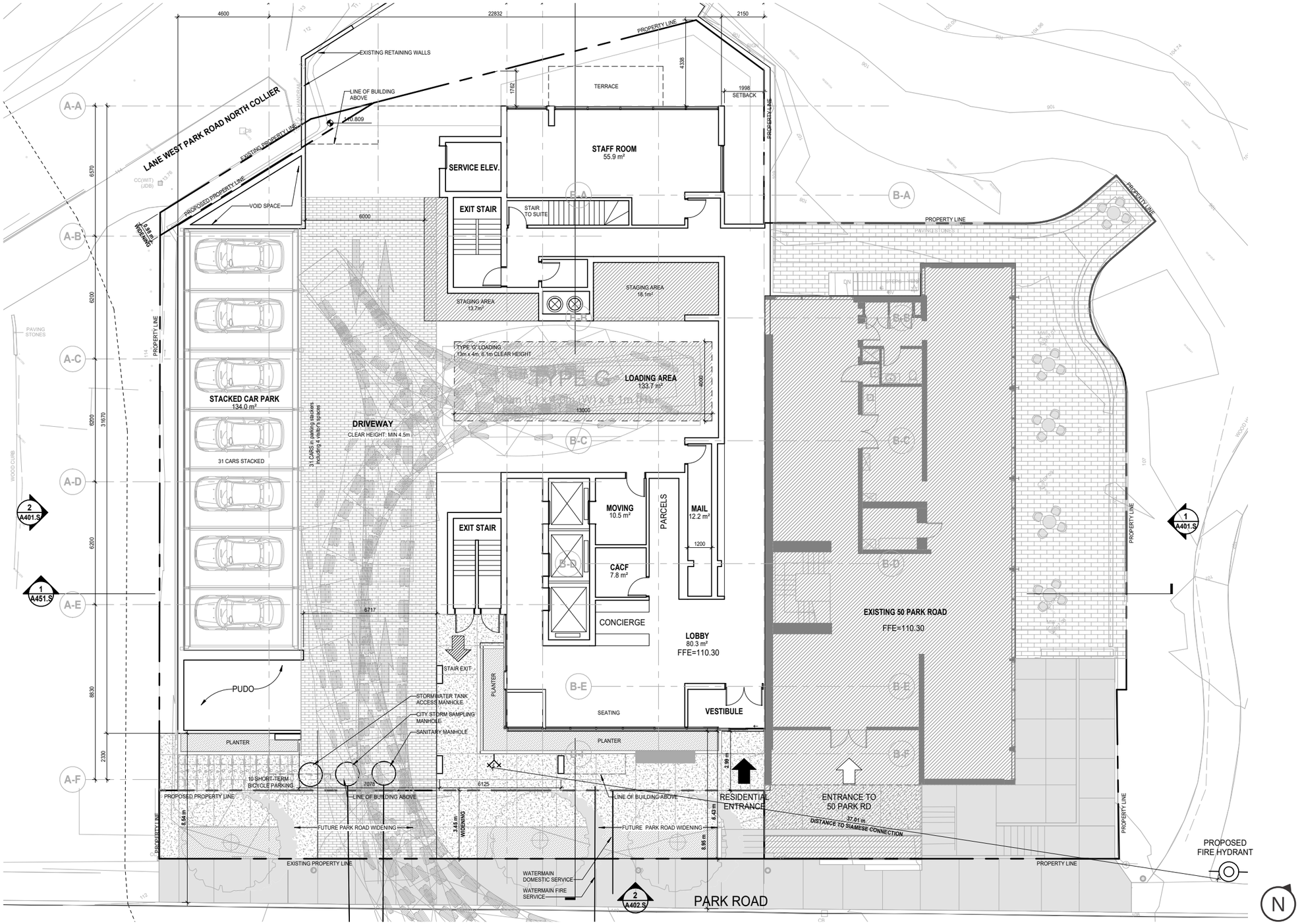


Figure 9 - Ground Floor Plan (BDP Quadrangle Architects)

Tower (Levels 3-31)

The tower element has been sited and designed to respect the scale and materiality of the 50 Park Road building, while creating a built form that is compatible with the existing and planned context. In this regard, the tower massing is articulated with vertical and horizontal elements that visually break up the massing and provide for additional visual distinction between the conserved heritage building and the new construction (see **Figure 10**).

In addition, the built form is oriented towards the south end of the site and provides appropriate setbacks from Park Road, limiting the massing impacts on the 50 Park Road building and the public realm, including Lawren Harris Park to the north.

In this respect, the tower is set back approximately 16.9 metres from the north lot line, resulting in substantial separation between the tower and Lawren Harris Park. In keeping with the projecting outdoor amenity terrace below at Level 2, the main tower volume continues to cantilever over the roof of 50 Park Road; however, the extent of the projection is reduced to approximately 1.4 metres.

Along Park Road, the tower cantilevers beyond the lower levels of the building and is set back a minimum of 0.55 metres from the east lot line (4.0 metres from the existing lot line), pulling the massing away from the public realm. The east façade is articulated with inset balconies that break up the massing and create horizontal bands that respond to the geometric form of 50 Park Road.

Towards the south, the tower is set back 5.5 metres from the south lot line and articulated with inset balconies at the corners and within the central portion of the facade. Towards the west, the tower is set generally built to the lot line and the façade is staggered responding to the angled configuration of the lot line.

Levels 3-4 each include 9 residential units and Levels 5-31 each include 10 residential units. The proposed rental replacement units are dispersed throughout Levels 3-14 and all of the units within the building include private inset balconies that are approximately 2.0 metres deep.

Above Level 31, the mechanical penthouse is proposed to be two levels in height (6.0 metres) and is sited towards the south, allowing for a large outdoor amenity terrace on the roof level and a stepping down in building height toward the north.

The tower element is generally rectangular in shape but is articulated on all four sides, with inset balconies at the corner. The tower is oriented east-west to maximize views to Lawren Harris Park and sky views from the street, with a floor plate size of approximately 792 square metres (gross construction area).

Unit Distribution and Amenity Space

The proposed development includes a total of 289 residential dwelling units, including 40 rental replacement units. Overall, the proposed unit mix includes: 12 studio units (4%), 170 one-bedroom units (59%), 77 two-bedroom units (27%) and 30 three-bedroom units (10%).

Of the total proposed dwelling units, the plans indicate that 39 will be rental replacement units (13% of the total proposed units). As mentioned above, the plans will be revised at a later date to include one additional rental replacement unit in order to replace the existing rental unit within the triplex at 38 Park Road. Once revised, the proposal will include a total of 40 rental replacement units and 249 new market rental units.

The proposed rental replacement units will replace the existing rental units at a 1:1 ratio, with units of a similar size, bedroom type and rent level as they are replacing. The details regarding rental replacement are outlined in the Housing Issues Report prepared by Bousfields Inc. (submitted under separate cover).

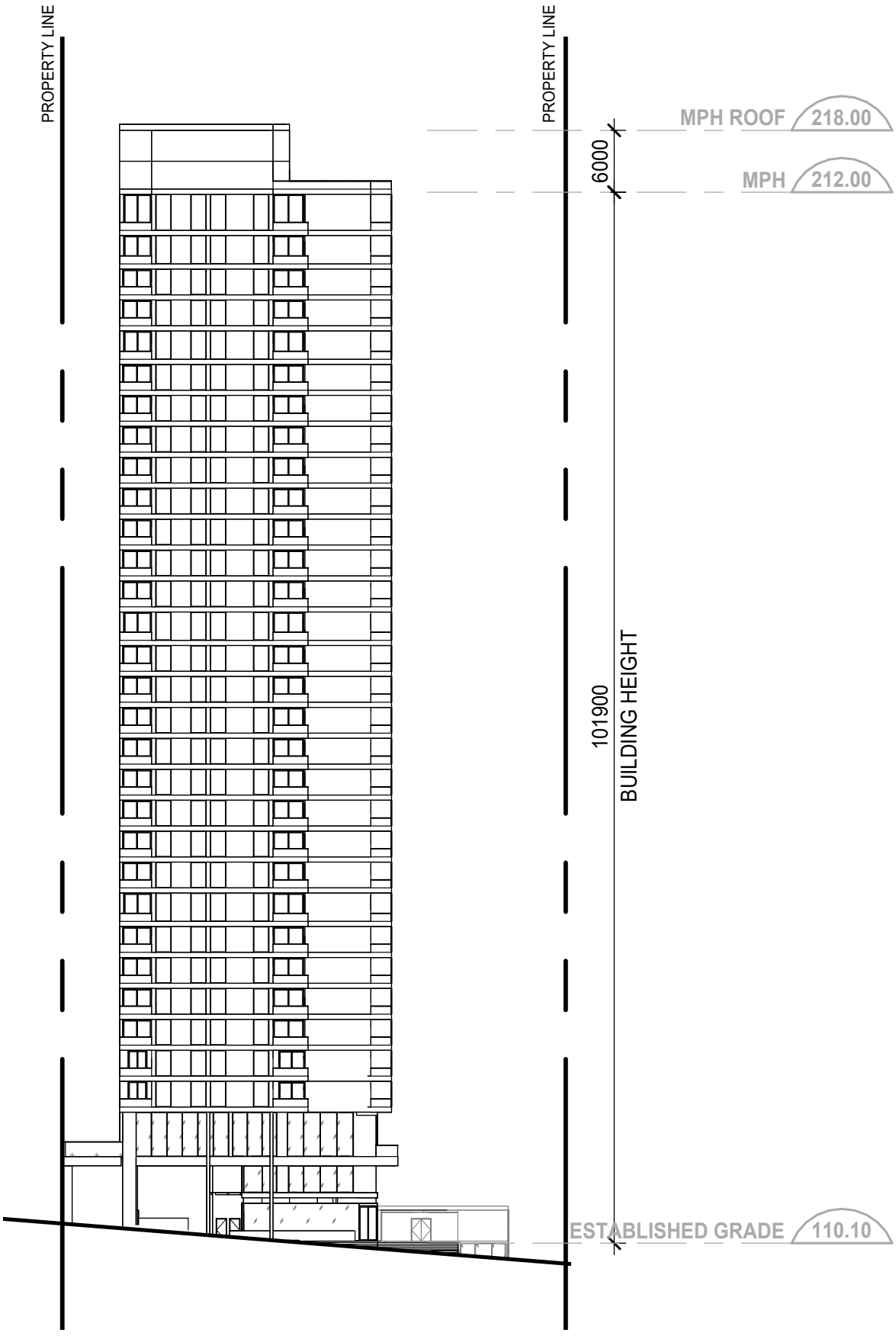


Figure 10 - Simplified East Elevation (BDP Quadrangle Architects)

The location and design of the rental replacement units will be discussed with the City and the existing tenants through the detailed review of the proposal and, accordingly, is subject to change through the development process.

As it relates to amenity space, a total of 1,156 square metres of amenity space will be provided, representing a ratio of 4.0 square metres per dwelling unit. The residential amenity space includes 578 square metres of indoor amenity space and 578 square metres of outdoor amenity space.

The proposed indoor amenity spaces are proposed on Level 2 and on the roof level. Additional indoor amenity is provided at the basement level in the form of a pet wash area. All outdoor amenity terraces within the tower are contiguous to indoor amenity space and will be landscaped with high-quality plantings and decorative lighting.

In addition to the common outdoor amenity areas, the proposal would introduce a new outdoor seating area along the north side of 50 Park Road that would serve non-residential uses and provide an active edge along the park.

Access, Parking and Loading

Vehicular access to the subject site will be provided via a single driveway located towards the southerly portion of the site. The driveway will facilitate access to the internalized loading area and parking facilities, including a pick-up/drop-off space (PUDO) at grade.

Vehicular parking is proposed to be provided in a stacked parking system that will operate with 5 levels of parking, including an above-grade (mezzanine) level, an at-grade level, and three levels below grade. The parking system contains space for 31 vehicular parking spaces and is integrated into the massing of the building. Of the 31 proposed vehicle spaces, 27 are proposed for residents and 4 are proposed for residential visitors. On that basis, the proposed vehicle parking supply meets the minimum parking requirements set out in City-wide Zoning By-law 569-2013.

As noted in the Housing Issues Report, the residential parking supply equates to approximately 0.1 spaces per unit; this ratio will be applied equally to the rental replacement units and the market rental units, ensuring equal access to parking for the returning tenants and the new residents. Returning tenants with an existing parking space who do not receive a replacement parking space will be provided with compensation.

The proposed development will include a total of 319 bicycle parking spaces within the basement and sub-basement levels. Currently, the existing 40 Park Road building has no bicycle parking. The basement level contains a long-term bicycle locker room with 36 stacked and 14 oversized bicycle parking spaces and a bicycle repair area, as well as a short-term bicycle locker room with 14 vertical and 34 stacked bicycle parking spaces. The balance of the basement level contains a garbage room, maintenance room and a pet wash. The sub-basement contains two bicycle locker rooms, one in the northerly portion of the building with 105 long-term bicycle parking spaces and one in the southerly portion with 106 stacked bicycle parking spaces.

The proposal includes one Type 'G' loading space located internally within the base of the building, out of view from the public realm.

3.2 Key Statistics

A summary of the proposed development is set out in **Table 1**.

Table 1 - Key Development Statistics

Site Area	
Gross Site Area	1,764.0 square metres
Net Site Area (excluding road and laneway widening)	1,648.0 square metres
Existing Units	**40 rental units**
40 Park Road	39 rental units
38 Park Road	1 rental unit
Height	**31 storeys**
Metric (top of roof)	101.9 metres
Metric (top of mechanical)	107.9 metres
Gross Floor Area	**25,041.0 square metres**
Residential	24,408.5 square metres
Non-Residential	632.5 square metres
Density	
Gross Site Area	14.2 FSI
Unit Mix (Total)	**289 (incl. 39 rental replacement units)***
Studio	12 (4%)
1-Bedroom	170 (59%)
2-Bedroom	77 (27%)
3-Bedroom	30 (10%)
Amenity Space	**1,156 square metres (4.0 m^2/unit)**
Indoor Amenity	578 square metres (2.0 m^2/unit)
Outdoor Amenity	578 square metres (2.0 m^2/unit)
Vehicle Parking Spaces	**31 spaces**
Residential Spaces	27 spaces
Visitor Spaces	4 spaces
Bicycle Parking Spaces	**329 spaces**
Long-Term	261 spaces
Short-Term	58 spaces
Publicly-Accessible	10 spaces
Loading Space	1 Type 'G'

* The plans will be revised in a subsequent submission to include one additional rental replacement unit to replace the existing rental unit at 38 Park Road, bringing the total number of rental replacement units to 40.

3.3 Required Approvals

The proposal requires an amendment to the City of Toronto Official Plan in order to permit the proposed height and mix of uses. The proposed Official Plan Amendment would redesignate the subject site from *Neighbourhoods* to *Mixed Use Areas* and would amend the Downtown Secondary Plan by redesignating the site to *Mixed Use Areas 2* to permit the proposed built form, and would exempt the site from the policies set out in Site and Area Specific Policy 211 (SASP 211).

The proposed Official Plan Amendment would also amend Map 3 of the Official Plan to change the planned right-of-way width of Park Road from 20 metres to "Non-uniform width, to be retained as existing at the time of Plan adoption" between Rosedale Valley Road and Church Street.

The proposal also requires an amendment to the in-force City-wide Zoning By-law 569-2013, as amended, in order to rezone the subject site from R (Residential) to CR (Mixed Commercial-Residential) to implement the proposed *Mixed Use Areas* designation and to increase the permitted height and density, as well as to revise other development regulations as necessary to permit the proposed development.

A Rental Housing Demolition application is also required to permit the demolition of the existing 40 rental dwelling units. All 40 rental units would be replaced within the new development.

A Site Plan Approval application will also be required, which will be submitted at a later date.



4 Policy & Regulatory Context

4.1 Overview

As set out below, the proposed mixed-use development is supportive of numerous policy directions as set out in the Provincial Planning Statement, the City of Toronto Official Plan and the Downtown Secondary Plan, all of which promote and encourage intensification within built-up urban areas, particularly in areas that are well served by municipal infrastructure, including higher-order public transit.

4.2 Bill 17 - Protect Ontario by Building Faster and Smarter Act, 2025

On May 12, 2025, the Province of Ontario introduced Bill 17, *Protect Ontario by Building Faster and Smarter Act, 2025*, which includes changes to numerous statutes with the goal of removing unnecessary barriers to building housing. Along with Bill 17, the provincial government released a technical briefing which provides more information on initiatives currently being advanced.

Some of the legislative changes relevant to the subject site include:

- permitting building setback reductions of up to 10% (i.e. a building may be 10% closer to a lot line) without the need to seek a variance from the Committee of Adjustment;
- limiting the scope of permitted studies required for complete applications; and
- setting a 5 per cent maximum rate and 25-year maximum affordability period for lands subject to Inclusionary Zoning, within Protected Major Transit Station Areas.

Numerous additional changes to the *Planning Act*, the *Development Charges Act* and the *Transit Oriented Communities Act* are proposed. Bill 17 received Royal Assent on June 5, 2025 and is now in force.

4.3 Bill 23 / 2023 Housing Action Plan

On October 25, 2022, the Province of Ontario introduced Bill 23, the *More Homes Built Faster Act, 2022*, which proposed legislative changes to facilitate and streamline the construction of new homes over the next 10 years to address Ontario's housing crisis. Bill 23 received Royal Assent on November 28, 2022. The Bill amended various pieces of legislation to promote and permit the construction of 1.5 million homes by 2031, including 285,000 units in the City of Toronto. The intent of these legislative changes is to provide a long-term strategy to increase housing supply and provide attainable housing options as the population of Ontario continues to grow.

In response to the Province's Housing Supply Action Plan, City Council at its meeting on December 14, 2022 directed staff to develop a "2023 Housing Action Plan" for the 2022-2026 term of Council to enable market, non-market and mixed housing production in order to achieve or exceed the provincial housing target of 285,000 new homes over the next 10 years. The Housing Pledge was subsequently confirmed by Council on May 10, 2023. The Housing Action Plan, as endorsed by Executive Committee on March 21, 2023 and by Council on May 10, 2023, specifically includes measures to amend the Zoning By-law to increase zoning permissions on major streets and to review the *Avenues* and *Mixed Use Areas* policies.

4.4 Provincial Planning Statement (2024)

On August 20, 2024, the Ministry of Municipal Affairs and Housing released the Provincial Planning Statement ("PPS"), 2024, which came into effect on October 20, 2024. The 2024 PPS replaces the Provincial Policy Statement (2020) and the Growth Plan for the Greater Golden Horseshoe (2019).

The 2024 PPS provides policy direction on matters of Provincial interest related to land use planning and development and applies to all decisions in respect of the exercise of any authority that affects a planning matter made on or after October 20, 2024. In accordance with Section 3(5) of the *Planning Act*, all decisions that affect a planning matter are required to be consistent with the PPS. In this regard, Policy 6.1 provides that the PPS "shall be read in its entirety and all relevant policies are to be applied to each situation".

As compared with the 2020 PPS and the 2019 Growth Plan, the 2024 PPS is intended to reduce and streamline planning rules, simplify approvals to build homes and eliminate duplication between planning documents. It emphasizes flexibility, with the intent of helping get more homes built across the province, while continuing to protect agricultural lands, cultural heritage and natural areas.

Chapter 1 of the PPS sets out the Province's current vision for Ontario, emphasizing the importance of building housing to serve a fast-growing province:

> *"More than anything, a prosperous Ontario will see the building of more homes for all Ontarians. This is why the province has set a goal of getting at least 1.5 million homes built by 2031. Ontario will increase the supply and mix of housing options, addressing the full range of housing affordability needs. Every community will build homes that respond to changing market needs and local demand. Providing a sufficient supply with the necessary mix of housing options will support a diverse and growing population and workforce, now and for many years to come."*

Chapter 1 goes on to describe Ontario's land use planning framework, stating that this framework and the decisions that are made within it:

> *"... shape how our communities grow and prosper. Prioritizing compact and transit-supportive design, where locally appropriate, and optimizing investments in infrastructure and public service facilities will support convenient access to housing, quality employment, services and recreation for all Ontarians. Cultural heritage and archaeology in Ontario will provide people with a sense of place. And while many Ontarians still face a complex range of challenges, municipalities will work with the Province to support the long-term prosperity and well-being of residents through the design of communities responsive to the needs of all Ontarians. " (Our emphasis.)*

Key policy directions that continue to be expressed in the PPS are to build complete communities with a mix of housing options and to promote efficient development and land use patterns.

Policy 2.1.6 provides that planning authorities should support the achievement of complete communities by, among other things, accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses, recreation, parks and open space, and other uses to meet long-term needs.

With respect to housing, Policy 2.2.1(a) states that planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by establishing and implementing minimum targets for the provision of housing that is affordable to low- and moderate-income households.

Policy 2.2.1(b) directs that this shall also be done by permitting and facilitating all housing options required to meet the social, health, economic and well-being requirements of current and future residents, and all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with Policy 2.3.1.3 (see below).

Further, Policies 2.2.1(c) and (d) direct that an appropriate range and mix of housing options and densities shall be provided by promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation, and by requiring transit-supportive development and prioritizing intensification in proximity to transit, including corridors and stations.

Section 2.3 of the PPS contains policies related to "settlement areas". As it relates to the subject site, Policy 2.3.1.1 states that, within settlement areas, growth should be focused in, where applicable, "strategic growth areas", including "major transit station areas". Policy 2.3.1.2 goes on to state that land use patterns within settlement areas should be based on densities and a mix of land uses which: efficiently use land and resources; optimize existing and planned infrastructure and public service facilities; support active transportation; and are transit-supportive, as appropriate.

Policy 2.3.1.3 directs planning authorities to support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.

Section 2.4 includes policies related to "strategic growth areas" and "major transit station areas", which are relevant to the subject site. Strategic growth areas are defined as nodes, corridors, and other areas within settlement areas that have been identified by municipalities to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form. Strategic growth areas include, among other areas, major transit station areas, existing and emerging downtowns, and other areas where growth or development will be focused. Lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors may also be identified as strategic growth areas.

Policy 2.4.1.1 encourages planning authorities to identify and focus growth and development in strategic growth areas. Policy 2.4.1.2 provides that, to support the achievement of complete communities, a range and mix of housing options, intensification and more mixed-use development, strategic growth areas should be planned: to accommodate significant population and employment growth; to accommodate and support the transit network and provide connection points for inter-and intra-regional transit; and to support affordable, accessible and equitable housing.

Policy 2.4.1.3 provides that planning authorities should, among other things, identify the appropriate type and scale of development in strategic growth areas and the transition of built form to adjacent areas, and permit development and intensification in strategic growth areas to support the achievement of complete communities and a compact built form.

With respect to major transit station areas, Policy 2.4.2.1 directs planning authorities to delineate the boundaries of major transit station areas on higher order transit corridors through a new official plan or official plan amendment adopted under Section 26 of the *Planning Act*, which shall define an area within an approximately 500 to 800-metre radius of a transit station and that maximizes the number of potential transit users that are within walking distance of the station.

The PPS defines a "major transit station area" as "the area including and around any existing or planned higher order transit station or stop within a settlement area … Major transit station areas generally are defined as the area within an approximate 500 to 800-metre radius of a transit station". In turn, "higher order transit" is defined as "transit that generally operates in partially or completely dedicated rights-of-way, outside of mixed traffic, and therefore can achieve levels of speed and reliability greater than mixed-traffic transit. Higher order transit can include heavy rail (such as subways, elevated or surface rail, and commuter rail), light rail, and buses in dedicated rights-of-way".

In this regard, the subject site is located within three "major transit station areas" as defined by the PPS given its proximity to the Bloor-Yonge Subway Station and the Rosedale Subway Station on TTC's Line 1 and the Bay Subway Station on Line 2. Further, in accordance with the similar policy directions previously included in the Growth Plan, the City of Toronto has delineated the boundaries of a number of major transit station areas. The subject site is located within proposed Protected Major Transit Station Areas ("PMTSA's") associated with the Bay, Bloor-Yonge and Rosedale Subway Stations as set out in Site and Area Specific Policies ("SASP's") 599, 600 and 719, as discussed in greater detail in Section 4.9 of this Report.

Policy 2.4.2.2 of the PPS provides that, within major transit station areas on higher order transit corridors, planning authorities shall plan for a minimum density target of 200 residents and jobs combined per hectare for those that are served by subways. Further, implementation Policy 6.1.12 clarifies that density targets represent minimum standards and planning authorities are encouraged to go beyond these minimum targets, where appropriate, except where doing so would conflict with any policy of the PPS or any other provincial plan.

In this regard, Policy 2.4.2.3(a) encourages planning authorities to promote development and intensification within major transit station areas, where appropriate, by planning for land uses and built form that supports the achievement of minimum density targets.

Section 2.9 of the PPS addresses energy conservation, air quality and climate change. Policy 2.9.1 directs planning authorities to plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that: support the achievement of compact, transit-supportive, and complete communities; incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities; support energy conservation and efficiency; promote green infrastructure, low impact development, and active transportation; protect the environment and improve air quality; and take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the impacts of a changing climate.

Chapter 3 of the PPS includes policies related to infrastructure and facilities. Generally, the infrastructure policies set out in Chapter 3 place an emphasis on the need to integrate planning for infrastructure and public service facilities with land use planning and growth management.

Policy 3.1.1 provides that infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs, and that planning for infrastructure and public service facilities shall be co-ordinated and integrated with land use planning and growth management so that they are financially viable over their life cycle, leverage the capacity of development proponents, where appropriate, and are available to meet current and projected needs.

The need to make good use of existing infrastructure is emphasized by Policy 3.1.2, which provides that, before consideration is given to developing new infrastructure and public service facilities, the use of existing infrastructure and public service facilities should be optimized, and opportunities for adaptive re-use should be considered, wherever feasible.

Section 3.9 addresses the need for public spaces, including parks, trails and open space. Policy 3.9.1 promotes the development of healthy, active communities by planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate active transportation and community connectivity.

Section 4.1 includes policies regarding natural heritage. Policy 4.1.1 provides that natural features and areas shall be protected for the long term, while Policy 4.1.2 provides that the diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved. Policy 4.1.8 prohibits development and site alteration on adjacent lands to natural heritage features significant wetlands, significant woodlands and significant valleylands unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.

Given that the subject site is adjacent to the *Natural Heritage System*, a Scoped Natural Heritage Impact Study (NHIS) has been prepared by Dillon Consulting in order to address these policies, as discussed below in Section 5.9.

With respect to cultural heritage, Policy 4.6.1 states that built heritage resources and cultural heritage landscapes shall be conserved. In this regard, Policy 4.6.3 states that planning authorities shall not permit development and site alteration on adjacent lands to "protected heritage property" except where the heritage attributes of the protected heritage property will be conserved. In this regard, the existing 2-storey office building at 50 Park Road is designated under Part IV of the *Ontario Heritage Act* and is located within the South Rosedale Heritage Conservation District. The subject site is also adjacent to a number of other heritage properties, which are located on the north side of Collier Street and are listed on the City's Heritage Register. A Heritage Impact Assessment (HIA) has been prepared by ERA Architects to address the foregoing policies, as summarized in Section 5.8 of this report.

With respect to implementation, Policy 6.1.6 requires that planning authorities keep their zoning by-laws up-to-date with their official plans and the Provincial Planning Statement by establishing permitted uses, minimum densities, heights and other development standards to accommodate growth and development. Where a planning authority must decide on a planning matter before its official plan has been updated to be consistent with the Provincial Planning Statement, or before other applicable planning instruments have been updated accordingly, Policy 6.1.7 directs that it must still make a decision that is consistent with the Provincial Planning Statement.

For the reasons set out in Sections 5.1, 5.2, 5.3, 5.8 and 5.9 of this report, it is our opinion that the proposed development and, in particular, the requested Official Plan Amendment and Zoning By-law Amendment are consistent with the PPS, specifically the policies that seek to optimize the use of infrastructure and to encourage growth and intensification in strategic growth areas, particularly major transit station areas, as well as to protect natural heritage and conserve cultural heritage resources.

4.5 City of Toronto Official Plan

The Official Plan for the amalgamated City of Toronto was adopted on November 26, 2002 and was approved by the Ontario Municipal Board on July 6, 2006. Numerous amendments to the Official Plan have subsequently been approved, including amendments arising out of the Official Plan Review initiated in 2011 and 2020.

On April 18, 2024, City Council adopted OPA 718 which deleted and replaced Chapter 1 of the Official Plan. OPA 718 came into full force and effect as of May 16, 2024. Key planning priorities identified in the amended Chapter 1 include advancing reconciliation, taking action on climate change and its impacts, addressing housing demand, and removing barriers.

With respect to addressing housing demand, Chapter 1 acknowledges that there is immense pressure on housing and recognizes the need to "[look] beyond the height and look of buildings and toward making the best use of space to enable more housing where it is needed the most". The Official Plan further indicates that opportunities for new housing supply will be distributed in all neighbourhoods and the Plan will seek to ensure that they include a mix of housing types and affordability.

Policy 5.6(1) states that the Plan should be read as a whole "to understand its comprehensive and integrated intent as a policy framework for priority setting and decision making". Policy 5.6(1.1) provides that the Plan is more than a set of individual policies and that "all appropriate policies are to be considered in each situation", the goal being to "appropriately balance and reconcile a range of diverse objectives affecting land use planning in the City".

Growth Management Policies

Chapter 2 (Shaping the City) outlines the City's growth management strategy. It recognizes that:

"Toronto's future is one of growth, of rebuilding, of reurbanizing and regenerating the City within an existing urban structure that is not easy to change. Population growth is needed to support economic growth and social development within the City and to contribute to a better future for the Greater Toronto and Hamilton Area (GTHA). A healthier Toronto will growth from a successful strategy to attract more residents and more jobs to the City."

To that end, Policy 2.1(3) provides that Toronto is forecast to accommodate 3.65 million residents and 1.98 million jobs by the year 2051. The marginal note regarding Toronto's growth prospects makes it clear that the population and employment figures are neither targets nor maximums; they are minimums:

> *"The City of Toronto is forecast to grow to 3.65 million residents and 1.98 million jobs by the year 2051. The Provincial Growth Plan forecast represents 831,000 additional residents and 371,000 additional jobs after 2016. This Plan takes the current Growth Plan forecast as a minimum expectation. The policy framework found here prepares the City to realize this growth, or even more, depending on the success of this Plan in creating dynamic transit oriented mixed use centres, corridors, and other manners of intensification." (Our emphasis.)*

The growth management policies of the Official Plan direct growth to identified areas on Map 2 (Urban Structure), which include *Centres*, *Avenues*, *Employment Areas* and the *Downtown and Central Waterfront*, where transit services and other infrastructure are available. On Map 2, the site is identified as being within the *Downtown and Central Waterfront* (see **Figure 11**).

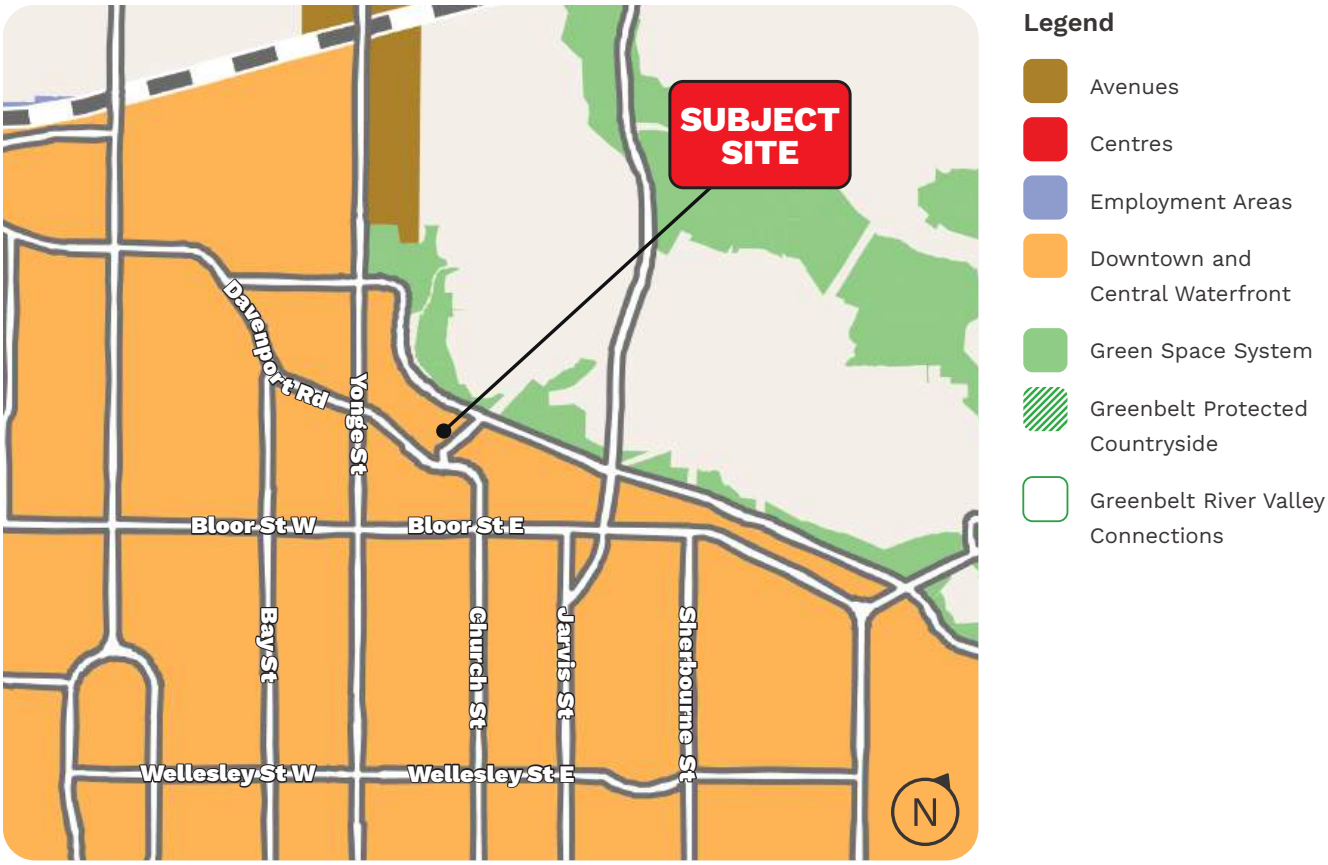


Figure 11 - Toronto Official Plan Map 2 - Urban Structure

In Chapter 2 (Shaping the City), one of the key policy directions is Integrating Land Use and Transportation (Section 2.2). The Official Plan states that:

> *"... future growth within Toronto will be steered to areas which are well served by transit, the existing road network and which have a number of properties with redevelopment potential. Generally, the growth areas are locations where good transit capacity can be provided along frequent bus and streetcar routes and at higher-order transit stations. Areas that can best accommodate this growth are shown on Map 2: Downtown, including the Central Waterfront, the Centres, the Avenues and the Employment Areas. A vibrant mix of residential and employment growth is seen for the Downtown and the Centres ..." (Our emphasis).*

It further provides that:

> *"The integration of transportation and land use planning is critical to achieving the overall aim of increasing access to opportunities throughout the City. Transportation accessibility – a measure of the ease of reaching activity locations – has two components: mobility (transportation) and proximity (land use). Increasing mobility by providing modal choice, and/or increasing the speed, timeliness or directness of travel allows more trips to be made within a given time, whereas increasing proximity through greater mixing of uses and/or higher densities achieves the same effect by shortening trip lengths. The policies of this Plan reflect the importance of mutually supportive transportation and land use policies that combine the mechanisms of mobility and proximity to maximize access to opportunities."*

Policy 2.2(2) provides that "growth will be directed to the *Centres*, *Avenues*, *Employment Areas* and the *Downtown* as shown on Map 2" and sets out a number of objectives that can be met by this strategy, including:

- using municipal land, infrastructure and services efficiently;
- concentrating jobs and people in areas well served by surface transit and higher-order transit stations;
- promoting mixed use development to increase opportunities for living close to work and to encourage walking and cycling for local trips;
- offering opportunities for people of all means to be affordably housed;
- facilitating social interaction, public safety and cultural and economic activity;
- improving air quality and energy efficiency and reducing greenhouse gas emissions; and
- protecting neighbourhoods and green spaces from the effects of nearby development.

Under Section 2.2.1 ("*Downtown*: The Heart of Toronto"), the Plan recognizes that the *Downtown*, with its recognizable skyline, is Toronto's image to the world and to itself. It is the oldest, most dense and most complex part of the urban landscape, with a rich variety of building forms and activities.

Policy 2.2.1(1) provides that the Downtown Toronto Urban Growth Centre will be planned to "optimize the public investment in higher order transit within the Centre" and thus should exceed the minimum combined gross density target of 400 residents and jobs per hectare set out in the Growth Plan (our emphasis).

The Plan also notes that mixed use is a key ingredient to the successful functioning of *Downtown* that creates "accessibility through proximity" and that every home built within the *Downtown* offsets the need for in-bound commuting each day. Policy 2.2.1(2) provides that "*Downtown* will continue to be shaped as the largest economic node in the city and the region" by accommodating development that "provides a full range of housing opportunities for *Downtown* workers and reduces the demand for in-bound commuting".

The Plan states that *Downtown* is seen as an attractive place to live and that new housing in the *Downtown* makes an important contribution to the economic health of the City. Policy 2.2.1(4) provides that the quality of the *Downtown* will be improved by, among other matters: supporting the development of complete communities; developing buildings that are shaped, scaled and designed to enhance liveability; and providing a diverse range and mix of housing options, including affordable housing, to accommodate the needs of all household sizes.

Policy 2.2.1(5) provides that the architectural and cultural heritage of *Downtown* will be preserved by designating buildings, districts and open spaces with heritage significance and by working with owners to restore and maintain historic buildings. Policy 2.2.1(6) states that design guidelines specific to districts of historic or distinct character will be developed and applied to ensure new development respects the context of such districts in terms of the development's fit with existing streets, setbacks, heights and relationship to landmark buildings.

Transportation Policies

The introductory text in Section 2.4 "Bringing the City Together: A Progressive Agenda of Transportation Change", notes that:

"The transportation policies, maps and schedules of the Plan make provision for the protection and development of the City's road, rapid transit and interregional rail networks. The Plan provides complementary policies to make more efficient use of this infrastructure and to increase opportunities for walking, cycling, and transit use and support the goal of reducing car dependency throughout the City... Reducing car dependency means being creative and flexible about how we manage urban growth. We have to plan in 'next generation' terms to make walking, cycling, and transit increasingly attractive alternatives to using the car and to move towards a more sustainable transportation system."

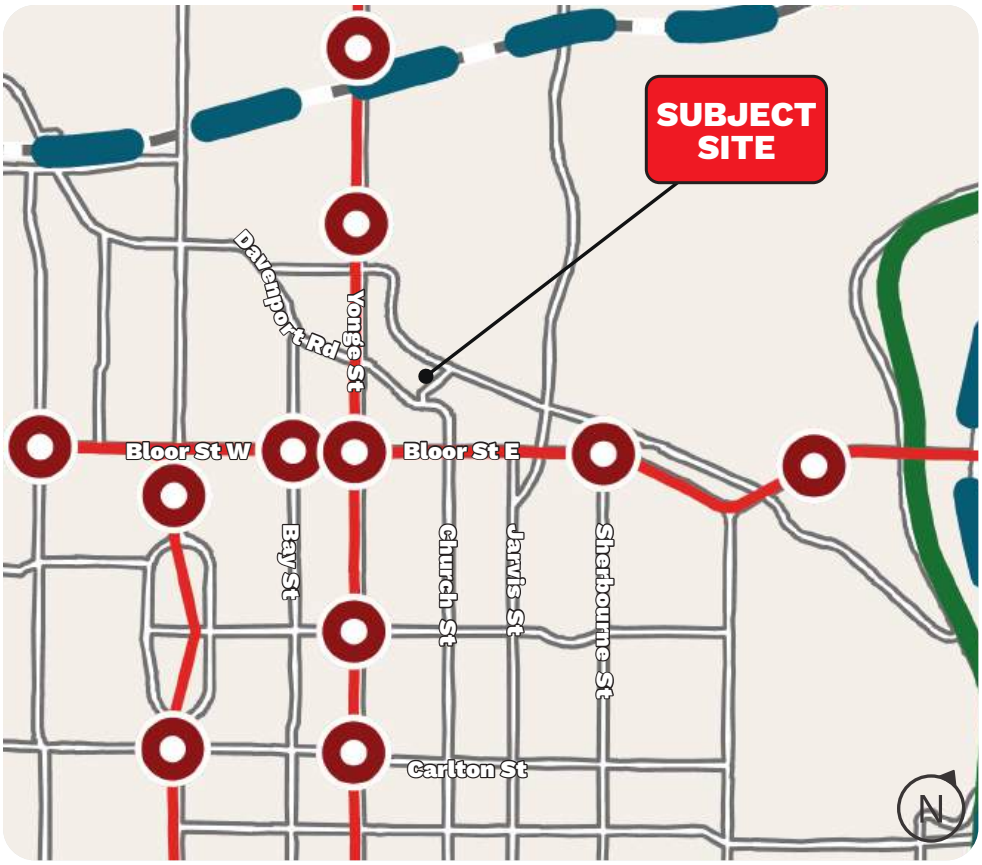
In this regard, the Line 1 and Line 2 Subway Lines are identified on Map 4 (Higher Order Transit Corridors) and Map 5 (Surface Transit Priority Network) (see **Figure 12** and **13**).

Policy 2.4(4) directs that planning for new development in targeted growth areas be undertaken in the context of reducing auto dependency and the transportation demands and impacts of such new development will be assessed in terms of the broader social and environmental objectives of the Plan's reurbanization strategy.

Policy 2.4(8) further provides that, for sites in areas well served by transit (such as locations around higher-order transit stations), consideration will be given to establishing minimum density requirements (in addition to maximum density limits), establishing minimum and maximum parking requirements, and limiting surface parking as a non-ancillary use.

Furthermore, Policy 2.4(9)(a) directs that better use will be made of off-street parking by "encouraging the shared use of parking and developing parking standards for mixed use developments which reflect the potential for shared parking among uses that have different peaking characteristics".

Regarding the City's network of streets and laneways, Policy 2.2(5)(a) provides that streets and laneways will be maintained and developed to support the growth management objectives of the Plan by developing the network of rights-of-way shown on Map 3 by acquiring over time the conveyance of land for widening as a condition of site plan approvals. In this regard, Map 3 of the Official Plan shows a planned 20-metre right-of-way width for Park Road between Church Street and Rosedale Valley Road and identifies Rosedale Valley Road as having a "non-uniform width, to be retained as existing at the time of adoption of the Official Plan" (see **Figure 14**).



Legend

Existing

TTC Subway and LRT Lines

GO Rail Lines

Expansion Elements

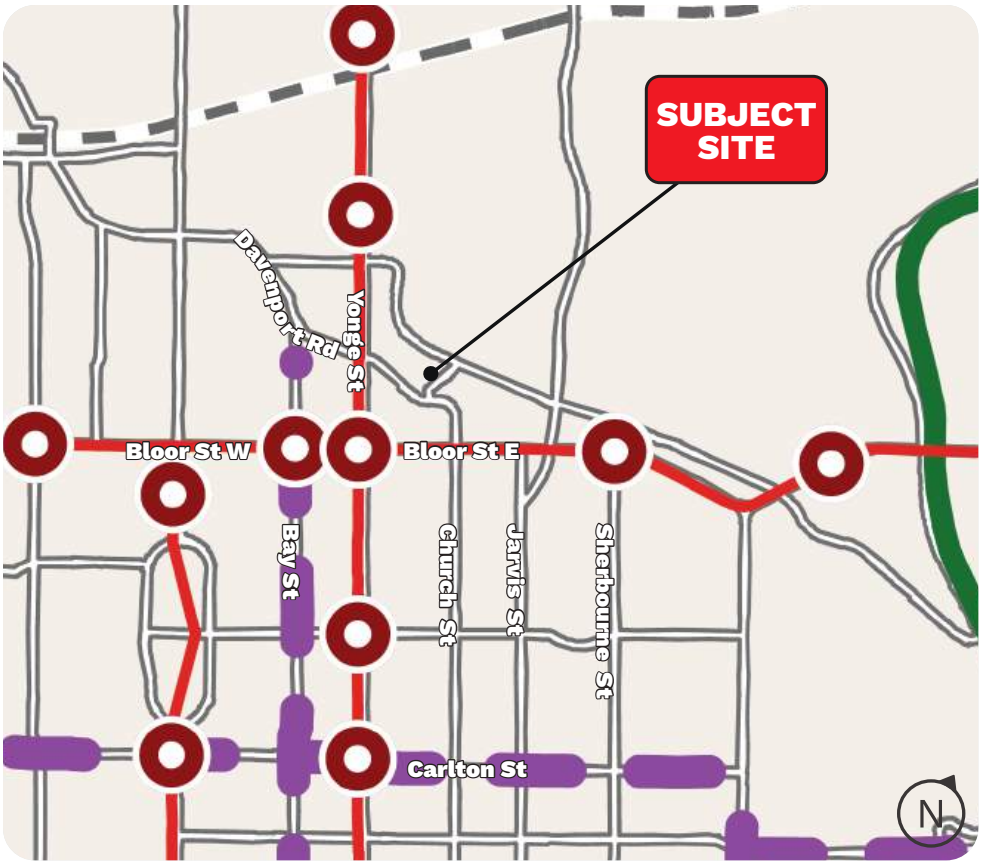
Transit Corridors

Transit Corridor Alignment To Be Determined

GO Rail Station on Existing Line

Some stations on expansion elements are identified in Secondary Plans

Figure 12 - Toronto Official Plan Map 4 - Higher Order Transit Corridors



Legend

Existing

TTC Subway and LRT Lines

GO Rail Lines

Expansion Elements

Transit Priority Segments

Figure 13 - Toronto Official Plan Map 5 - Enhanced Surface Transit Network

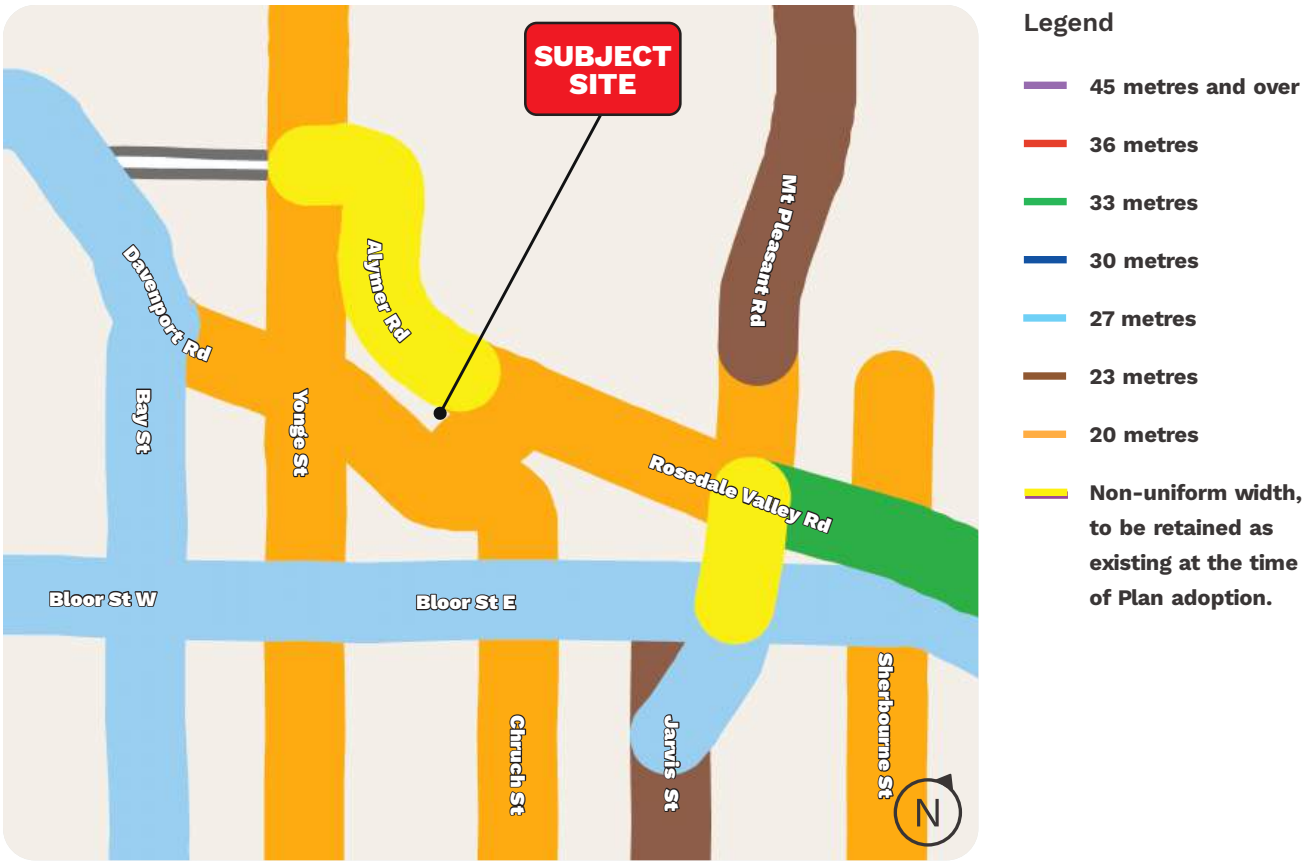


Figure 14 - Toronto Official Plan Map 3 - Right-of-Way Widths Associated with Existing Major Streets

Land Use Policies

The subject site is designated *Neighbourhoods* on Map 18 (see **Figure 15**). Surrounding lands to the southeast, south and west (including the 15-storey apartment building at 66 Collier Street) are also designated *Neighbourhoods,* while the lands to the west, north and east are designated *Natural Areas*. Lands further south, generally south of Collier Street and Church Street, are designated *Mixed Use Areas*, including the property at 717 Church Street, located approximately 40 metres from the subject site.

The City is currently undertaking a review of the *Neighbourhoods* policies of the Official Plan in the context of the Expanding Housing Options in Neighbourhoods (EHON) initiative, which includes the EHON Major Streets Study. As a result of the Major Streets Study, City Council adopted Official Plan Amendment 727 ("OPA 727") on June 27, 2024, which amended Section 4.1 of the Official Plan to add permission for additional housing types along Major Streets within *Neighbourhoods*, specifically to allow apartments up to 6 storeys. OPA 727 was appealed to the Ontario Land Tribunal, which issued a decision in January 2025 approving substantial portions of the amendment.

The introductory text in Section 4.1, as amended by OPA 727, states that *Neighbourhoods* contain a full range of residential uses within lower scale buildings, as well as parks, schools, local institutions and small-scale stores and shops serving the needs of area residents. Lower scale residential buildings in Toronto's *Neighbourhoods* consist of detached houses, semi-detached houses, duplexes, triplexes and various forms of townhouses as well as interspersed walk-up apartments with or without elevators that are four storeys or less, except along major streets where apartments may be no higher than six storeys.

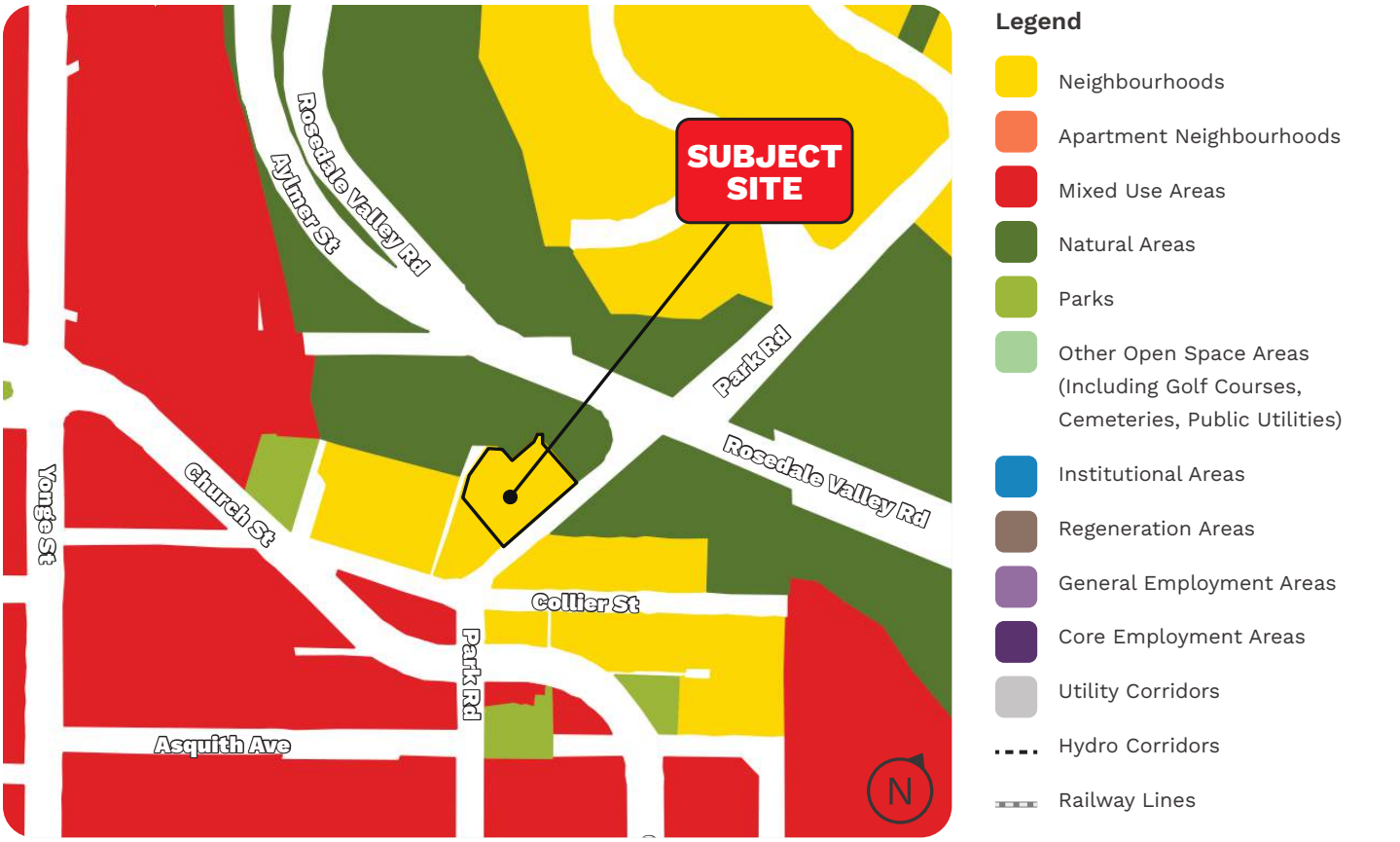


Figure 15 - Toronto Official Plan Map 18 - Land Use Plan

Section 4.1 also notes that, while communities experience constant social and demographic change, the general physical character of Toronto's residential *Neighbourhoods* endures. Physical changes to our established *Neighbourhoods* must be sensitive, gradual and "fit" the existing physical character. A key objective of the Official Plan is that new development respect and reinforce the general physical patterns in a *Neighbourhood*.

Policy 4.1(1) provides that *Neighbourhoods* are considered physically stable areas made up of residential uses in lower scale buildings such as detached houses, semi-detached houses, duplexes, triplexes and townhouses, as well as interspersed walk-up apartments that are no higher than four storeys, except along major streets where apartments may be no higher than six storeys. Parks, low scale local institutions, home occupations, cultural and recreational facilities and small-scale retail, service and office uses are also provided for in *Neighbourhoods*.

As described above, Park Road is identified as a Major Street on Map 3 of the Official Plan. Policy 4.1(7), as amended, states that properties in *Neighbourhoods* that are located along major streets shown on Map 3 may intensify beyond the prevailing building type and be assembled to include the development of townhouses and apartment buildings provided the development meets the criteria set out in Sections 4.1(5)(a), (h) and (i), 4.1(12) and 4.1(13).

The subject site is located on a Major Street and is developed with a mix of uses, including a 2-storey office building, a 3½-storey multi-unit dwelling and an 8-storey apartment building, which exceeds the 6-storey height that was recently introduced for lands within *Neighbourhoods* along Major Streets. It is noted that Policy 4.1(4) provides that apartment buildings that were legally constructed prior to the approval date of the Official Plan are permitted.

Policy 4.1(5) sets out development criteria in *Neighbourhoods*. Specifically, development in established *Neighbourhoods* will respect and reinforce the existing character of each geographic neighbourhood, including:

- patterns of streets, blocks and lanes, parks and public building sites;
- prevailing size and configuration of lots;
- prevailing heights, massing, scale, density, and dwelling type of nearby residential properties;
- prevailing building types;
- prevailing location, design, and elevations relative to the grade of driveways and garages;
- prevailing setbacks of buildings from the street or streets;
- prevailing patterns of rear and side yard setbacks and landscaped open space;
- continuation of special landscape or built-form features that contribute to the unique physical character of the geographic neighbourhood; and
- conservation of heritage buildings, structures and landscapes.

This policy goes on to provide that "**lots fronting onto a major street shown on Map 3 and designated *Neighbourhoods* are to be distinguished from lots in the interior of the block** adjacent to that street in accordance with Policy 6 i**n order to recognize the potential for a more intense form of development along major streets** to the extent permitted by this Plan" (our emphasis).

The policy states that lots fronting onto a major street, and flanking lots to the depth of the fronting lots, are often distinguishable from the lots in the interior of the geographic neighbourhood due to characteristics such as:

- different lot configurations;
- better access to public transit;
- adjacency to developments with varying heights, massing and scale; or
- direct exposure to greater volumes of traffic on adjacent and nearby streets.

The policy states that such factors may be taken into account when considering intensification on these sites.

The policy further provides that the physical character of the geographic neighbourhood includes both the physical characteristics of the entire geographic area in proximity to the proposed development (the broader context) and the physical characteristics of the properties that face the same street as the proposed development in the same block and the block opposite the proposed development (the immediate context). Proposed development within a *Neighbourhood* will be materially consistent with the prevailing physical character of properties in both the broader and immediate contexts. In instances of significant difference between these two contexts, the immediate context will be considered to be of greater relevance.

Within the context of these general policies, the *Neighbourhoods* designation also includes specific policies for infill development. In this respect, the introductory text notes the following:

> *"Scattered throughout many Neighbourhoods are properties that differ from the prevailing patterns of lot size, configuration and orientation. Typically, these lots are sites of former non-residential uses such as an industry, institution, retail stores, a utility corridor, or are lots that were passed over in the first wave of urbanization. In converting these sites to residential uses, there is a genuine opportunity to add to the quality of Neighbourhood life by filling in the "gaps" and extending streets and paths. Due to the site configuration and orientation, it is often not possible or desirable to provide the same site standards and pattern of development in these infill projects as in the surrounding Neighbourhood."*

Policy 4.1(9) outlines particular development criteria for infill development on sites that vary from the local lot pattern in terms of lot size, configuration and/or orientation. In these circumstances, infill development within *Neighbourhoods* will:

- have heights, massing and scale that are respectful of those permitted by zoning for nearby residential properties, while taking into account the existing form of development on the infill property;
- have setbacks from adjacent residential properties and public streets that are proportionate to those permitted by zoning for adjacent residential properties, while taking into account the existing form of development on the infill property;
- provide adequate privacy, sunlight and sky views for occupants of new and existing buildings by ensuring adequate distance and separation between building walls and using landscaping, planting and fencing to enhance privacy where needed;
- front onto existing or newly created public streets wherever possible, with no gates limiting public access;
- provide safe, accessible pedestrian walkways from public streets; and
- locate, screen and wherever possible enclose service areas and garbage storage and parking, including access to any underground parking, so as to minimize the impact on existing and new streets and on residences.

Policy 4.1(10) states that where development is proposed on a site with an existing apartment building in *Neighbourhoods*, the new development must be grade-related and must also meet the criteria regarding infill development in *Apartment Neighbourhoods*.

Policy 4.1(12), which was added by OPA 727 and is now substantially approved, outlines development criteria for the intensification of *Neighbourhoods* along Major Streets. With the exception of the policies that are underlined below, which have not yet been approved, Policy 4.1(12) states that, "for properties in *Neighbourhoods* that are located along major streets shown on Map 3, development proposing intensification beyond the prevailing building type and lot patterns of the geographic neighbourhood" will:

- be encouraged to include a diverse mix of housing types and sizes to increase housing options in *Neighbourhoods*, including larger family-sized units;
- be supported to assemble lots along major streets to accommodate more intense forms of development;
- **have setbacks that generally meet those permitted by zoning for adjacent residential properties, unless the established development pattern along the major street is predominantly reversed lot frontages, in which case the front yard setback along the major street will be determined in accordance with Policy 13;**

- break up façades through means such as massing, setbacks and/or architectural articulation;
- provide adequate privacy, sunlight and sky views for occupants of new and existing buildings by ensuring adequate separation distance between building walls, through appropriate balcony and terrace locations in relation to abutting properties, and by using landscaping, planting and fencing to enhance privacy where needed;
- **locate, screen and wherever possible enclose service areas, garbage storage, and parking when required to minimize impact on adjacent properties;**
- provide safe, accessible pedestrian walkways from public street(s);
- consolidate and minimize driveways on major streets and use other streets or laneways for access where possible; and
- **be considered for minor variances to applicable setbacks if it is demonstrated to be necessary to accommodate tree preservation.**

Policy 4(13) addresses properties in *Neighbourhoods* that are located along major streets shown on Map 3 and have a reversed or flanking frontage onto a major street. Since the subject site does not have a reversed or flanking frontage onto a major street, Policy 4(13) is not applicable.

The proposed Official Plan Amendment would redesignate the site from *Neighbourhoods* to *Mixed Use Areas* to permit the proposed height and mix of uses. The *Mixed Use Areas* designation permits a broad range of commercial, residential and institutional uses in single use or mixed-use buildings, as well as parks and open spaces and utilities. The Plan envisions that development in *Mixed Use Areas* will create a balance of high quality commercial, residential, institutional and open space uses that reduces automobile dependency, meets the needs of the local community and provides for new jobs and homes for Toronto's growing population on underutilized lands.

The introductory text in Section 4.5 states that the intent of the *Mixed Use Areas* designation is to achieve a multitude of planning objectives by combining a broad array of residential uses, offices, retail and services, institutions, entertainment, recreational, and cultural actives, and parks and open spaces. In particular, the intent is that:

> *"Torontonians will be able to live, work, and shop in the same area, or even the same building, giving people an opportunity to depend less on their cars, and create districts along transit routes that are animated, attractive and safe at all hours of the day and night."*

Policy 4.5(2) sets out a number of criteria for development within *Mixed Use Areas,* 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*;
- locating and massing new buildings so as to adequately limit shadow impacts on adjacent *Neighbourhoods*, particularly during the spring and fall equinoxes;
- locating and massing new buildings to frame the edges of streets and parks with good proportion and maintaining sunlight and comfortable wind conditions for pedestrians on adjacent streets, parks and open spaces;
- providing an attractive, comfortable and safe pedestrian environment;
- providing good site access and circulation and an adequate supply of parking for residents and visitors;
- locating and screening service areas, ramps and garbage storage to minimize the impact on adjacent streets and residence; and
- providing indoor and outdoor recreation space for building residents in every significant multi-unit residential development.

Section 2.3 outlines the City's policies regarding *Neighbourhoods*, which are identified as stable but not static. Section 2.3.1 discusses healthy neighbourhoods and notes that:

"By focusing most new residential development in the Downtown, the Centres, along the Avenues, and in other strategic locations, we can preserve the shape and feel of our neighbourhoods. However, these neighbourhoods will not stay frozen in time. The neighbourhoods where we grew up and now raise our children help shape the adults and the society we become. Some physical change will occur over time as enhancements, additions and infill housing occurs on individual sites. A cornerstone policy is to ensure that new development in our neighbourhoods respects the existing physical character of the area, reinforcing the stability of the neighbourhood."

In Section 2 (Shaping the City), Policy 2.3.1(1) states that *Neighbourhoods* are low rise and low density residential areas that are considered to be physically stable. Development in *Neighbourhoods* will be consistent with this objective and will respect and reinforce the existing physical character of buildings, streetscapes and open space patterns in these areas.

Policy 2.3.1(3) provides that developments in *Mixed Use Areas* that are adjacent or close to *Neighbourhoods* will be compatible with those *Neighbourhoods*; provide a gradual transition of scale and density, as necessary to achieve the objectives of this Plan through the stepping down of buildings towards and setbacks from those *Neighbourhoods*; maintain adequate light and privacy for residents in those *Neighbourhoods*; orient and screen lighting and amenity areas so as to minimize impacts on adjacent land in those *Neighbourhoods*; locate and screen service areas, any surface parking and access to underground and structured parking so as to minimize impacts on adjacent land in those *Neighbourhoods*, and enclose service and access areas where distancing and screening do not sufficiently mitigate visual, noise and odour impacts upon adjacent land in those *Neighbourhoods*; and attenuate resulting traffic and parking impacts on adjacent neighbourhood streets so as not to significantly diminish the residential amenity of those *Neighbourhoods*.

As well, given that the proposal involves an Official Plan Amendment, Policy 5.3.1(3) is relevant. It states that amendments to the Official Plan that are not consistent with its intent will be discouraged, and that Council must be satisfied that any development permitted under an Official Plan Amendment is compatible with its physical context and will not affect nearby *Neighbourhoods* or *Apartment Neighbourhoods* in "a manner contrary to the neighbourhood protection policies of this Plan".

To that end, the policy states that, when considering a site specific amendment to the Official Plan, consideration shall be given as to whether the application should be evaluated within the immediate planning context or whether a broader review and possible area specific policy or general policy change are required. In this case, Community Planning reviewed the proposal through the pre-application consultation process and identified the requirement for an Official Plan Amendment, but did not request a broader review, an area-specific policy or general policy changes. The foregoing policies are addressed in Section 5.2 of this report.

Public Realm Policies

The Official Plan contains policies that emphasize the public realm as the fundamental organizing element of the city and its neighbourhoods, acknowledging its important role in supporting population and employment growth, health, liveability, social equity and overall quality of life. The public realm is a key shared asset that draws people together and creates strong social bonds at the neighbourhood, city and regional level. The public realm and the buildings that frame it convey our public image to the world and unite us as a city, contribute to the City's cultural heritage and are fundamental to defining our urban form and character.

Section 3.1.1 sets out policies applying to the public realm, including streets, parks, open spaces and public buildings. Policy 3.1.1(1) indicates that the public realm is comprised of all public and private spaces to which the public has access.

Policy 3.1.1(2) states that the public realm will, among other things, provide the organizing framework and setting for development; foster complete, well-connected walkable communities and employment areas that meet the daily needs of people and support a mix of activities; provide a comfortable, attractive and vibrant, safe and accessible setting for civic life and daily social interaction; provide opportunities for passive and active recreation; and be functional and fit within a larger network. Policy 3.1.1(3) provides that the City will seek opportunities to expand and enhance the public realm in order to support the needs of existing and future populations.

Policy 3.1.1(6) recognizes that City streets are significant public open spaces which connect people and places and support the development of sustainable, economically vibrant and complete communities. New and existing City streets will incorporate a "Complete Streets" approach, by balancing the needs, priorities and safety of all users and uses within the right-of-way, including pedestrians, cyclists and motorists, together with ensuring space for street furniture and green infrastructure; improving the quality and convenience of active transportation options; and serving as community destinations and public gathering places.

Policy 3.1.1(10) states that lanes provide an important function as off-street access for vehicles, parking and servicing. As part of the public realm, lanes will be public and opportunities for lane enhancements should be identified as part of the development approval process. Where appropriate, lanes should be designed with consideration for safe, accessible and comfortable pedestrian and cyclist movement.

Policy 3.1.1(13) states that the design of sidewalks and boulevards will provide safe, attractive, interesting and comfortable spaces for users of all ages and abilities through:

- the provision of well-designed and co-ordinated tree planting, landscaping, amenity spaces, setbacks, green infrastructure, pedestrian-scale lighting, street furnishings and decorative paving;
- the location and design of utilities within streets, within buildings or underground, in a manner that will minimize negative impacts on the natural pedestrian and visual environment and enable the planting and growth of trees to maturity; and
- the provision of unobstructed, direct and continuous paths of travel in all seasons with an appropriate width to serve existing and anticipated pedestrian volumes.

Policy 3.1.1(14) indicates that design measures that promote pedestrian safety and security will be applied to streetscapes, lanes, parks and other public and private open spaces.

Policy 3.1.1(16) states that the preservation, long-term growth and increase in the amount of healthy trees will be a priority of all development.

Built Form Policies

The Official Plan recognizes the importance of good urban design, not just as an aesthetic overlay, but as an essential ingredient of city building. It demands high quality architecture, landscape architecture and urban design, both within the public realm and within the privately developed built form.

In putting forward policies to guide built form, the Plan states that the scale and massing of buildings should be conceived not only in terms of individual building sites and programs, but also in terms of how sites, buildings and their interface with the public realm fit within the existing and/or planned context of the neighbourhood and the city. The Plan recognizes that, as intensification occurs in the *Downtown* and elsewhere throughout the city, there is an extraordinary opportunity to build the next generation of development that will fit into, reinforce and strengthen the many diverse contexts and character areas of Toronto, enhancing liveability and quality of life for existing and new residents, workers and visitors.

Section 3.1.3 sets out principles that speak to the relationship between the location and organization of development, its massing and appropriate amenity within the existing and planned context to inform the design of built form and ensure each new building will promote and achieve the overall objectives of the Plan.

Policy 3.1.3(1) directs that development will be located and organized to fit with its existing and planned context. It will frame and support adjacent streets, lanes, parks and open spaces to promote civic life and the use of the public realm, and to improve the safety, pedestrian comfort, interest and experience, and casual views to these spaces from the development by:

- generally locating buildings parallel to the street with consistent front yard setbacks;
- locating main building entrances on the prominent building facades so that they front onto a public street, park or open space, are clearly visible and directly accessible from a public street;
- providing ground floor uses, clear windows and entrances that allow views from and, where possible access to, adjacent streets, parks and open spaces;
- preserving existing mature trees wherever possible and incorporating them into the development site; and
- providing comfortable wind conditions and air circulation at the street and adjacent open spaces to preserve the utility and intended use of the public realm, including sitting and standing.

Policy 3.1.3(3) requires development to protect privacy within adjacent buildings by providing setbacks and separation distances from neighbouring properties and adjacent building walls containing windows.

Policy 3.1.3(4) requires development to locate and organize vehicle parking, vehicular access and ramps, loading, servicing, storage areas and utilities to minimize their impact and improve the safety and attractiveness of the public realm, the site and surrounding properties by, among other things:

- using shared service areas where possible within development blocks including public lanes, shared private driveways and service courts;
- consolidating and minimizing the width of driveways and curb cuts across the public sidewalk;
- integrating services and utility functions within buildings where appropriate;
- providing underground parking, where appropriate; and
- limiting new surface parking and vehicle access between the front face of a building and the public street or sidewalk.

Policy 3.1.3(5) directs that development will be located and massed to fit within the existing and planned context, define and frame the edge of the public realm with good street proportion, fit with the character, and ensure access to direct sunlight and daylight on the public realm by: providing streetwall heights and setbacks that fit harmoniously with the existing and/or planned context; and stepping back building mass and reducing building footprints above the streetwall height.

Policy 3.1.3(6) requires development to provide good transition in scale between areas of different building heights and/or intensity of use in consideration of both the existing and planned contexts of neighbouring properties and the public realm. In this regard, Policy 3.1.3(7) states that transition in scale will be provided within the development site and measured from shared and adjacent property lines. Further, where development includes, or is adjacent to, a park or open space, Policy 3.1.3(8) provides that the building should be designed to provide good transition in scale to the parks or open spaces to provide access to direct sunlight and daylight.

Policy 3.1.3(9) directs that the design of new building facades visible from the public realm will consider the scale, proportion, materiality and rhythm of the façade to:

- ensure fit with adjacent building facades;
- contribute to a pedestrian scale by providing a high quality of design on building floors adjacent to and visible from the public realm;
- break up long facades in a manner that respects and reinforces the existing and planned context; and
- ensure grade relationships that provide direct access and views into and from the public realm.

Policy 3.1.3(10) requires that development will promote civic life and provide amenity for pedestrians in the public realm in order to make areas adjacent to streets, parks and open spaces attractive, interesting, comfortable and functional by providing:

- improvements to adjacent boulevards and sidewalks including sustainable design elements, which may include landscaping, permeable paving materials and street furniture;
- co-ordinated landscape improvements in setbacks to enhance local character, fit with public streetscapes, and provide attractive, safe transitions between the private and public realms;
- weather protection such as canopies and awnings; and
- landscaped open space within the development site.

Policy 3.1.3(11) encourages new indoor and outdoor amenity spaces provided as part of multi-unit residential developments to be high-quality, well-designed, and consider the needs of residents of all ages and abilities over time and throughout the year. Policy 3.1.3(13) provides that outdoor amenity spaces should:

- be located at or above grade;
- have access to daylight and access to direct sunlight, where possible;
- provide comfortable wind, shadow and noise conditions;
- be located away from and physically separated from loading and servicing areas;
- have generous and well-designed landscaped areas to offer privacy and an attractive interface with the public realm;
- accommodate existing and mature tree growth; and
- promote use in all seasons.

Section 3.1.4 of the Official Plan recognizes that Toronto is a complex city built over many decades with a diversity of uses, block, lot and building type patterns. The Official Plan further notes that three scales of building types — Townhouse and Low-Rise Apartments, Mid-Rise and Tall Buildings — for residential, office and mixed-use intensification have emerged in the recent period of development.

The Official Plan states that tall buildings are the most intensive form of growth and come with both opportunities and challenges. When the quality of architecture and site design is emphasized, tall buildings can become important city landmarks, help to make the city's structure visible, and contribute positively to the skyline. Tall buildings play a role in achieving residential and office growth ambitions in specific areas across the city. However, not every site is appropriate for a tall building. Tall buildings should only be considered where they can fit into the existing or planned context, and where the site's size, configuration and context allows for the appropriate design criteria to be met.

Policy 3.1.4(8) states that tall buildings should typically be designed to consist of three parts — a base, a tower and a top — carefully integrated into a single whole. For the base portion, Policy 3.1.4(9) provides that it should respect and reinforce good street proportion and pedestrian scale, and be lined with active, grade-related uses.

For the tower portion, Policy 3.1.4(10) directs that it should be designed to:

- reduce the physical and visual impacts of the tower onto the public realm;
- limit shadow impacts on the public realm and surrounding properties;
- maximize access to sunlight and open views of the sky from the public realm;
- limit and mitigate pedestrian level wind impacts; and
- provide access to daylight and protect privacy in interior spaces within the tower.

Policy 3.1.4(11) indicates that the objectives in Policy 3.1.4(10) should be achieved by:

- stepping back the tower from the base building;
- generally aligning the tower with, and parallel to, the street;
- limiting and shaping the size of tower floorplates above base buildings;
- providing appropriate separation distances from side and rear lot lines as well as other towers; and
- locating and shaping balconies to limit shadow impacts.

Finally, Policy 3.1.4(12) directs that the top portion of a tall building should be designed to: integrate rooftop mechanical systems into the building design; contribute to the surrounding skyline identity and character; and avoid up-lighting and excessive lighting.

Heritage Policies

Heritage conservation policies are included in Section 3.1.6 of the Official Plan. The Plan recognizes that the protection, wise use and management of Toronto's cultural heritage will integrate the significant achievements of our people, their history, our landmarks and our neighbourhoods into a shared sense of place and belonging for its inhabitants.

Policy 3.1.6(3) states that heritage properties of cultural value or interest, including Heritage Conservation Districts, will be protected by being designated under the *Ontario Heritage Act* and/or included on the Heritage Register.

Policy 3.1.6(5) provides that proposed development on a property on the Heritage Register will ensure the integrity of the heritage property's cultural heritage value and attributes will be retained, while Policy 3.1.6(6) states that the adaptive re-use of properties on the Heritage Register is encouraged for new uses permitted in the applicable Official Plan land use designation.

Policy 3.1.6(22) states that a Heritage Impact Assessment will address all applicable heritage conservation policies of the Official Plan and will demonstrate conservation options and mitigation measures consistent with Official Plan policies. Policy 3.1.6(23) requires that a Heritage Impact Assessment will evaluate the impact of a proposed alteration to a property on the Heritage Register, and/or to properties adjacent to a property on the Heritage Register. Policy 3.1.6(26) requires that new construction on, or adjacent to, a property on the Heritage Register will be designed to conserve the cultural heritage values, attributes and character of that property and to mitigate visual and physical impact on it.

With regard to Heritage Conservation Districts, Policy 3.1.6(30) states that potential Heritage Conservation Districts will be identified and evaluated to determine their significance and cultural heritage values, in a Heritage Conservation District study. Following therefrom, Policy 3.1.6(31) requires that Heritage Conservation District studies and plans be conducted in accordance with Council adopted guidelines and terms of reference; include protocols for amendment and periodic review; and include provisions addressing the relationship between the Heritage Conservation District Plan and the Official Plan and provincial policy.

Policy 3.1.6(32) requires that site alterations, developments, municipal improvements and/or public works within or adjacent to Heritage Conservation Districts will be assessed through a Heritage Impact Assessment to ensure that the integrity of the districts' heritage values, attributes and character are conserved.

The property at 50 Park Road is designated under Part IV of the *Ontario Heritage Act* through By-law 182-91 (enacted March 25, 1991) and is within the South Rosedale Heritage Conservation District (HCD) Plan. The properties at 38 and 40 Park Road are outside of the HCD Plan and are neither listed nor designated on the City's Heritage Register.

In order to address the foregoing policies, a Heritage Impact Assessment has been prepared by ERA Architects, as summarized in Section 5.8 of this report.

Housing Policies

The Plan's housing policies support a full range of housing in terms of form, tenure and affordability, across the City and within neighbourhoods, to meet the current and future needs of residents (Policy 3.2.1(1)). A full range of housing includes:

> *"... ownership and rental housing, affordable and mid-range rental and ownership housing, social housing, shared and/or congregate-living housing arrangements, supportive housing, emergency and transitional housing for homeless people and at-risk groups, housing that meets the needs of people with physical disabilities and housing that makes more efficient use of the existing housing stock."*

Policy 3.2.1(2) provides that the existing stock of housing will be maintain and replenished while new housing supply is encouraged through intensification and infill that is consistent with the Plan.

The Official Plan also contains policies relating to the protection, replacement and maintenance of the City's rental housing stock. Policy 3.2.1(6) sets out conditions to be addressed in instances where new development is proposed that would result in the loss of 6 or more existing rental units, unless either:

- all of the rents at the time of application exceed "mid-range rents" (Policy 3.2.1(6)(a)); or
- the "supply and availability of rental housing in the City has returned to a healthy state and is able to meet the housing requirements of current and future residents" (Policy 3.2.1(6)(c)).

With respect to the first "pre-condition" set out in Policy 3.2.1(6)(a), the existing rents in the building do not all exceed "mid-range rents". With respect to the second "pre-condition" set out in Policy 3.2.1(6)(c), the policy specifies that the determination is to be made by Council and is based on a number of factors, including whether:

- rental housing in the City is showing "positive, sustained improvement", demonstrated by significant net gains in the supply of rental housing;
- the overall rental apartment vacancy rate for the City has been at or above 3.0% for the preceding four consecutive surveys;
- the proposal may negatively affect the supply or availability of rental housing or rental housing subsectors (including affordable units, units suitable for families and housing for seniors, persons with special needs or students, either on a City-wide basis or within a geographic sub-area or neighbourhood); and
- all provisions of other applicable legislation and policies have been satisfied.

If neither of the two pre-conditions apply, Policy 3.2.1(6)(b) requires that the following matters be secured as a condition of any redevelopment:

- at least the same "number, size and type" of rental housing units are replaced and maintained with rents similar to those in effect at the time the redevelopment application is made;
- controls on the rents of replacement units for a period of at least 10 years (such that the rent at first occupancy is increased by not more than the Provincial Rent Increase Guideline or a similar guideline as may be approved by Council); and
- an acceptable tenant relocation and assistance plan.

The tenant relocation and assistance plan is to address:

- the right to return to occupy one of the replacement units at similar rents;
- the provision of alternative accommodation at similar rents; and
- other assistance to lessen hardship.

The Official Plan housing policies have been addressed in greater detail in the Housing Issues Report prepared by Bousfields Inc., which has been provided under separate cover.

Parks and Open Space Policies

Section 3.2.3 includes parks and open space policies to support the expansion, improvement and maintenance of the City's parks and open space system in a manner which has regard for the diversity and complexity of the City's parks and open space system, as well as the diverse and complex needs of residents and neighbourhoods across the City.

Policy 3.2.3(1) provides that maintaining, enhancing and expanding Toronto's system of parks and open spaces requires actions including:

- adding new parks and amenities, particularly in growth areas and maintaining and improving and expanding existing parks;
- designing high quality parks and their amenities to promote user comfort, safety, accessibility and year-round use and to enhance the experience of "place", providing experiential and educational opportunities to interact with the natural world;
- protecting access to existing publicly accessible open spaces, as well as expanding the system of open spaces and developing open space linkages; and
- promoting and using private open space and recreation facilities, including areas suitable for community or allotment gardening, to supplement the City's parks, facilities and amenities.

Policy 3.2.3(2) provides that parkland acquisition strategies, including decisions about whether to accept parkland or cash as a condition of development, will take into account a range of factors including: the amount of existing parkland as illustrated on Maps 8(A) and (B); parkland characteristics and quality; existing natural features; existing amenities and facilities; population change; and anticipated development, among others. Official Plan Map 8(B) – Local Parkland Provision will be used to require, wherever possible, that new parkland be provided when development occurs in areas of low parkland provision.

Policy 3.2.3(3) states that development impacts from adjacent properties, including additional shadows, noise, traffic and wind, on parks and open spaces will be minimized as necessary to preserve their utility.

Section 3.2.3(5) states that an alternative parkland dedication rate of 0.4 hectares per 300 units will be applied to proposals for residential development (as per Section 415-23 of the Municipal Code) as follows:

- the development proposal is in a priority area where Council has identified a need for parkland and enacted an Alternative Parkland Dedication By-law;
- for sites less than 1 hectare in size (such as the subject site), the parkland dedication will not exceed 10 per cent of the development site, net of any conveyances for public road purposes;
- for sites 1 hectare to 5 hectares in size, the parkland dedication requirement will not exceed 15 percent of the development site, net of any conveyances for public road purposes;
- for sites greater than 5 hectares in size, the parkland dedication requirement will not exceed 20 percent of the development site, net of any conveyances for public road purposes; and
- in no case will the parkland dedication, cash-in-lieu, or combination thereof, be less than 5 per cent of the development site or the value of the development site, net of any conveyances for public road purposes.

The subject site is located within a Parkland Acquisition Priority Area on Map A-5 of the Toronto Municipal Code, and the alternative rate applies.

Notwithstanding the Official Plan policies noted above, the legislative changes that have been brought forward through Bill 23 cap the maximum amount of parkland or cash-in-lieu for sites under 5 hectares at 10% of the land or its value.

Green Space System and Natural Environment Policies

Map 2, Urban Structure, identifies lands within the Rosedale Valley Ravine on the north side of Rosedale Valley Road as being within the *Green Space System* (see **Figure 11**). Map 9 (Natural Heritage) identifies those lands as well as Lawren Harris Park and Hazeldean Park, on the south side of Rosedale Valley Road, as being part of the City's *Natural Heritage System* (**Figure 16**).

Policy 2.3.2 sets out the general framework for Toronto's *Green Space System*. Policy 2.3.2(1) states that actions will be undertaken to improve, preserve and enhance the *Green Space System* by: improving public access and enjoyment of lands under public ownership; restoring, creating and protecting a variety of landscapes; and establishing partnerships in the stewardship of lands and water. The *Green Space System* will be expanded by acquiring linkages between parks and open spaces, where feasible (Policy 2.3.2(3)(a)).

The Plan's Natural Environment policies in Section 3.4 prioritize the protection, restoration and enhancement of natural features and functions as part of city-building decisions, as well as careful assessment of the impacts of new development on nearby natural heritage systems. They also direct that proposals for new development may need to be accompanied by a study assessing their impact on the natural environment.

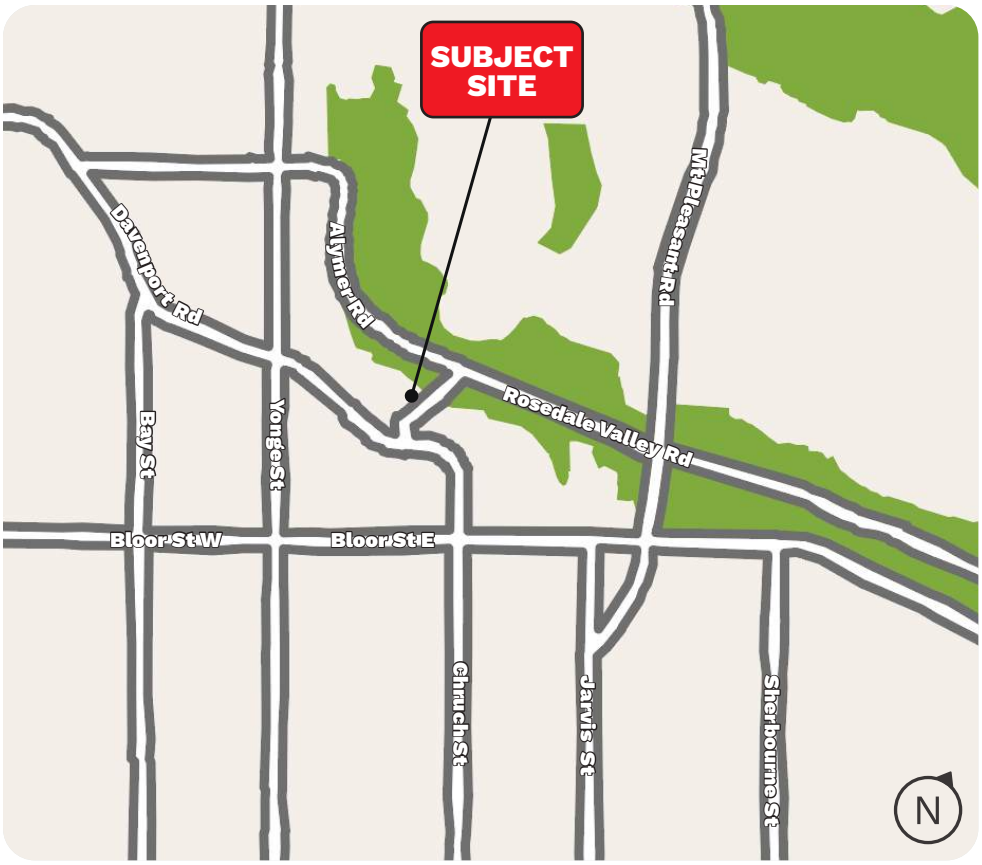


Figure 16 - Toronto Official Plan Map 9 – Natural Heritage System

Policy 3.4(1) states that, to support strong communities, public and private city-building activities and changes to the building environment will be environmentally friendly, based on, among other items, sustaining, restoring and enhancing the health and integrity of the natural ecosystem by paying particular attention to locations of habitat for native flora and fauna, landforms, ravines, watercourses, wetlands and the shoreline and associated biophysical processes and natural linkages between the natural heritage system and other green spaces; and reducing the risks to life, health, safety, property and ecosystem health that are associated with flooding, unstable slopes, erosion and contaminated lands.

Policy 3.4(8) requires that development will be set back by at least 10 metres, or more if warranted by the severity of existing or potential natural hazards, to the top-of-bank and toe-of-slope of valleys, ravines and bluffs, other locations where slope instability, erosion, flooding or other physical conditions present a significant risk to life or property, and other locations near the shoreline which may be hazardous if developed. In our opinion, the foregoing policy is not applicable in this case based on Dillon's determination that there are no valleylands or ravines, based on the evaluation of the features against the applicable definitions.

Policy 3.4(11) states that development is generally not permitted in the natural heritage system. Where the underlying land use designation provides for development in or near the natural heritage system, development will recognize natural heritage values and potential impacts on the natural heritage ecosystem as much as is reasonable and will minimize adverse impacts and when possible, restore and enhance the natural heritage system.

Policy 3.4(13) requires all proposed development in or near the natural heritage system to be evaluated to assess the development's impacts on the natural heritage system and identify measures to mitigate negative impact on and/or improve the natural heritage system, taking into account the consequences for:

- terrestrial natural habitat features and functions including wetlands and wildlife habitat;
- known watercourses and hydrologic functions and features;
- significant physical features and land forms;
- riparian zones;
- buffer areas and functions;
- vegetation communities and species of concern; and
- aquatic features and functions.

The above-noted policies are further discussed and evaluated in the Scoped Natural Heritage Impact Study, prepared by Dillon Consulting, dated July 2025, as discussed below in Section 5.9.

Implementation Policies

Policy 5.3.2(1) of the City of Toronto Official Plan provides that, while guidelines and plans express Council policy, they are not part of the Plan unless the Plan has been specifically amended to include them, and do not have the status of policies in the Official Plan adopted under the *Planning Act*. This policy is relevant with respect to the interpretation and application of the urban design guidelines discussed in Section 4.11 below.

4.6 Downtown Secondary Plan

On July 27, 2018, the City of Toronto Council enacted By-law 1111-2018, adopting Official Plan Amendment (OPA) 406, which includes a new Downtown Secondary Plan (the "Downtown Plan") and associated amendments to Section 2.2.1 and Map 6 of the Official Plan. On August 2, 2018, the City submitted OPA 406 to the Minister of Municipal Affairs and Housing for approval under Section 26 of the *Planning Act*. On June 5, 2019, the Minister issued a decision with respect to OPA 406, which included a number of significant modifications to the Downtown Plan and brought it into full force and effect.

Unlike lands within the *Mixed Use Areas* designation, the Downtown Plan does not expand on, or modify, the policies that already apply to *Neighbourhoods* under the City of Toronto Official Plan. Policy 1.7 of the Downtown Plan states that the provisions of the Official Plan, which set out the policies applicable to *Neighbourhoods*, and development criteria within *Neighbourhoods* will continue to apply to *Neighbourhoods* in the *Downtown* unless such policies are in conflict with an applicable Secondary Plan or Site and Area Specific Policy.

As noted above, the application proposes to amend the City of Toronto Official Plan to redesignate the subject site from *Neighbourhoods* to *Mixed Use Areas*. Lands to the south of Church Street, as well as the site at 717 Church Street, are designated *Mixed Use Areas 2 – Intermediate*.

Complete Communities

Section 3 of the Downtown Plan sets out goals for the *Downtown*, including the achievement of complete communities. Policy 3.3 provides that new buildings will fit within their existing and planned context, conserve heritage attributes, expand and improve the public realm as a community benefit, create a comfortable microclimate, provide compatibility between differing scales of development, and include indoor and outdoor amenities for both residents and workers.

Policy 3.5 provides that *Downtown* will be inclusive and affordable, with a range of housing that meets the requirements of a diverse population with varied needs, including accessible and supportive services for vulnerable populations, as provided for by the Plan.

The Downtown Plan also includes a goal of connectivity, and, in that regard, Policy 3.6 provides that the development of *Downtown* will integrate land use planning with planning and investment infrastructure and community service facilities, including integrated service delivery through community hubs, by all levels of government. The Plan recognizes rapid transit as a first priority for major transportation investments and, in order to optimize provincial investment in rapid transit, seeks to align rapid transit with growth by directing growth to existing and planned major transit station areas.

With regard to responsibility for the creation of complete communities, Policy 3.17 recognizes that strong partnerships and communication between the city, agencies, the development industry and community-based organizations will provide the basis for implementation of the Plan with a collective understanding of, and responsibility for, building a liveable *Downtown* made up of complete communities. Further, Policy 3.18 states that given the predominance of small development sites *Downtown*, coordination and collaboration between such property owners will aid in achieving complete communities and liveability.

Growth Management

Section 4 of the Downtown Plan outlines how growth will be directed and distributed. Policy 4.1 encourages growth within the *Downtown*, in particular on lands designated *Mixed Use Areas 1*, *Mixed Use Areas 2*, *Mixed Use Areas 3*, *Regeneration Areas* and *Institutional Areas*, and states that other areas of *Downtown* will have "more modest levels of growth, in keeping with the applicable policies".

Section 5 of the Downtown Plan includes policies that relate to linking growth and infrastructure, with the goal of achieving complete communities. Policy 5.1 states that development will support and contribute to the achievement of complete communities by providing for growth and through the provision of development charges under the *Development Charges Act, 1997* and/or as a community benefit under Section 37 of the *Planning Act*, as may be applicable.

In order to support the City, other levels of government and other public agencies in the delivery of community service facilities, parkland, green infrastructure and physical infrastructure in providing for complete communities, Policy 5.2 provides that a Complete Community Assessment will be required as part of "significant and large scale development applications" within certain *Mixed Use Areas* designations and the *Regeneration Area* designation. Policy 5.2 does not apply to the subject site and the City did not require a Complete Community Assessment in connection with this application.

Land Use

Section 6 sets forth the land use policies of the Plan which are intended to promote a balanced approach to growth by defining an appropriate built form scale and mix of uses to reflect the character of diverse neighbourhoods, while promoting the vitality of complete communities and a prosperous economy.

With respect to development in proximity to existing and planned rapid transit stations as shown on Map 41-4, Policy 6.34 provides that development in such areas will prioritize mixed-use development, and that these areas will be planned to accommodate higher density development to optimize the return on investment and increase the efficiency and viability of existing and planned transit service levels. The subject site is located in proximity to several existing and planned rapid transit stations, including Bloor-Yonge Station, Bay Station and Rosedale Station, as shown on Map 41-4 (see **Figure 17**).

More specifically, Policy 6.35 provides that lands within 500-800 metres of all existing or planned rapid transit stations within the *Downtown* will be planned to be transit-supportive and, where appropriate, to achieve multi-modal access to stations and connections to major trip generators. Development within such areas is to be supported, where appropriate, by:

- planning for a diverse mix of uses of sufficient intensity to optimize support for existing and planned transit service levels;
- fostering collaboration between public and private sectors;
- providing alternative development standards; and
- prohibiting built form that would adversely affect the optimization of transit infrastructure.

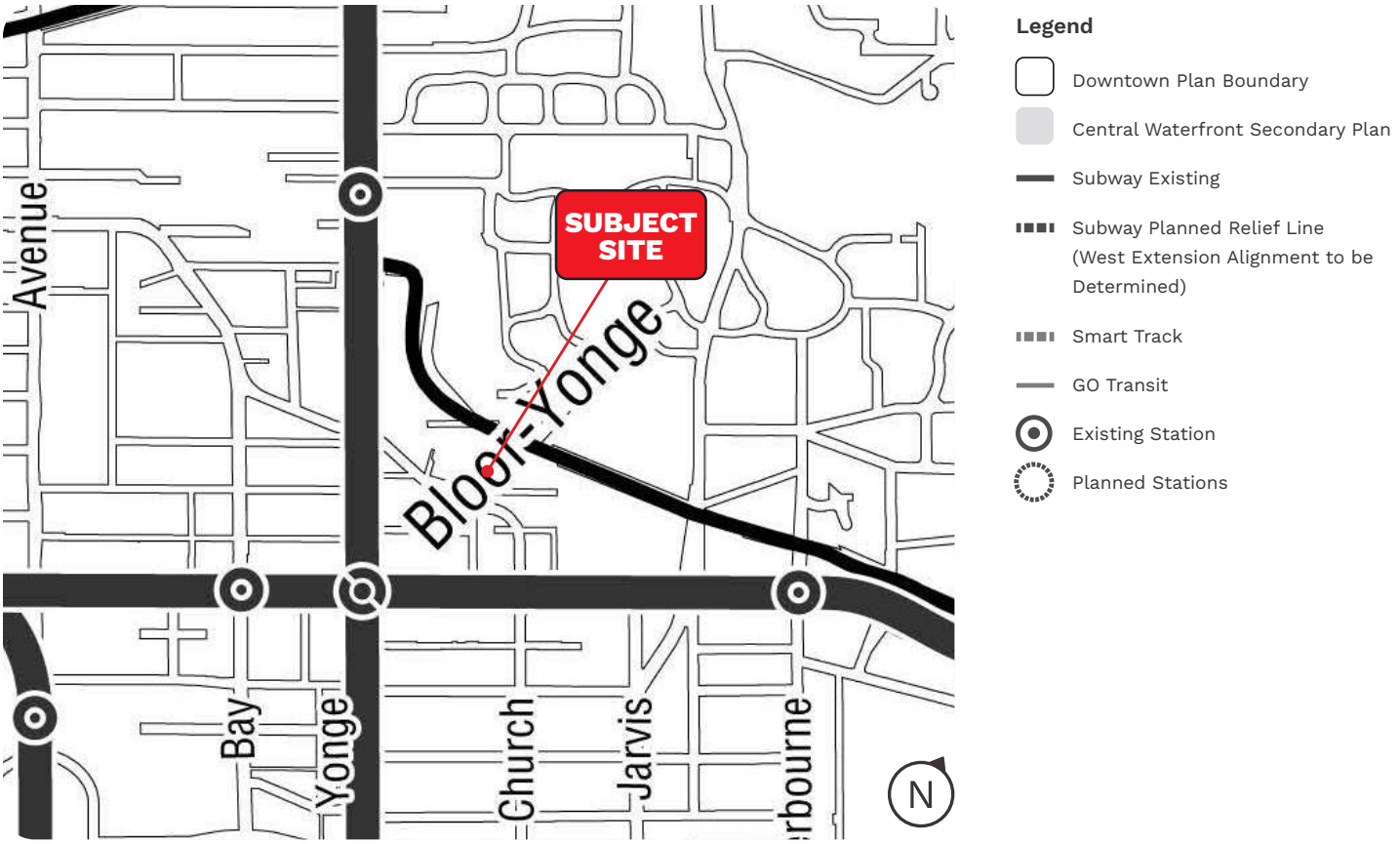


Figure 17 - Downtown Plan Map 41-4: Existing and Planned Rapid Transit Stations

In this respect, the subject site is approximately 265 metres radius distance (360 metres walking distance, representing a 4- to 5-minute walk) northeast of the nearest entrance to the Bloor-Yonge Subway Station. Additionally, the subject site is located approximately 500 metres northeast of the Bay Station on Line 2 and approximately 525 metres southeast of the Rosedale Subway Station on Line 1.

Policy 6.37 provides that a study may be undertaken by the City that will result in a Site and Area Specific Policy (SASP) for lands within 500-800 metres of a planned rapid transit station for the purposes of implementing Policy 6.36, which will set out, among other matters, the appropriate land use mix; public realm improvements and priorities; contextually appropriate built form scale and type; and necessary infrastructure. However, Policy 6.38 provides that development may proceed in advance of a study referred to in Policy 6.37, provided that the supporting documentation in the application includes consideration of the matters identified in Policy 6.37, including appropriate land use mix, connecting, expanding and improving the public realm, contextually appropriate built form scale and type demonstrating compatibility with surrounding sites, and necessary infrastructure.

Parks and Public Realm

With respect to the public realm, Policy 7.2 provides that expansions and improvements to the public realm will be accessible, inclusive and welcoming to all people who live, work, learn and visit *Downtown*.

Policy 7.3 provides that the planning, design and development of parks and the public realm will be encouraged by a number of objectives, including: creating functional, interesting and engaging spaces that are connected, safe, comfortable, multi-functional and accommodate people of all ages and abilities year-round; encouraging public life through site-specific placemaking and pedestrian amenities that foster social interaction, including but not limited to seating, landscaping, active uses at grade, way-finding, public art and programming; creating a seamless relationship between streets, parks and other elements of the public realm; and providing new and improved pedestrian and cycling connections to and through parks and the public realm in and adjacent to *Downtown* through streetscape improvements, bridges, trails and bikeways.

The Downtown Parks and Public Realm Plan sets out a vision for parks, open spaces and streets, proposing a framework to re-imagine, transform and grow public space and are identified on Maps 41-6 to 41-11, inclusive, of the Downtown Plan. Policy 7.5 states that the Downtown Parks and Public Realm Plan is a guideline which shall inform decisions of the City to improve the quality, quantity and connectivity of parks and the public realm and will guide development review.

Policy 7.7 states that the Core Circle is a circuit of public spaces that connects existing natural features around *Downtown*, including the Rosedale Valley, Don River Valley and the ravine system, among others. Further, the introductory text states that enhancing the natural character in and along the edges of the Cire Circle will be encouraged, with access and use balanced with the need to sustain the long-term health of the natural systems. In this regard, the subject site is identified as within the Core Circle (Schematic Boundary) on Map 41-6 – Core Circle (see **Figure 18**).

Policy 7.9 states that the ecological functions and natural features of the Rosedale Valley and Don River Valley Ravines will be recognized and protected. Further, Policy 7.11 directs that development adjacent to parks, open spaces and natural areas within the Core Circle will improve physical and visual access to the Core Circle using elements such as stairs, ramps, bridges, signage, viewpoints, interpretation elements and other means, as appropriate. In accordance with Policy 7.13, access and enjoyment of natural features will be enhanced and protected by adequately limiting shadows as necessary to preserve their utility and ecological health.

The subject site is also located within the Ramsden Park-Yorkville Park District as shown on Map 41-8 (see **Figure 19**). Policy 7.22 provides that a Park District is a grouping of neighbourhood parks, streets and other open spaces including laneways, school yards, church yards and ravines, which will be designed to form a cohesive public realm network providing access to a wide range of experiences and programs that support community and civic life. Policy 7.23 further provides that the parks, open spaces and streets that form the Park Districts will be:

- designed to create a legible and distinct identity, or reinforce an existing identity where there is cultural heritage value;
- designed to form a cohesive and connected network;
- improved and expanded to support growing communities; and
- animated through community programming, public art and other means to create vitality and vibrancy in these spaces.

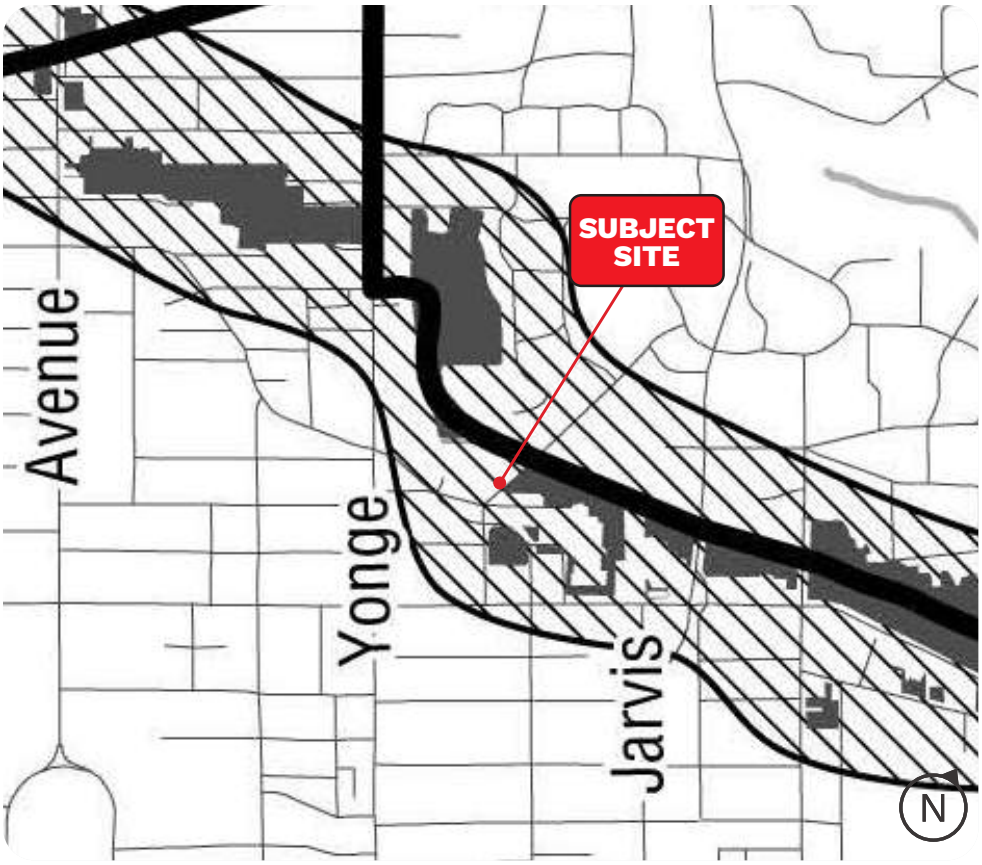


Figure 18 - Downtown Plan Map 41-6: Core Circle

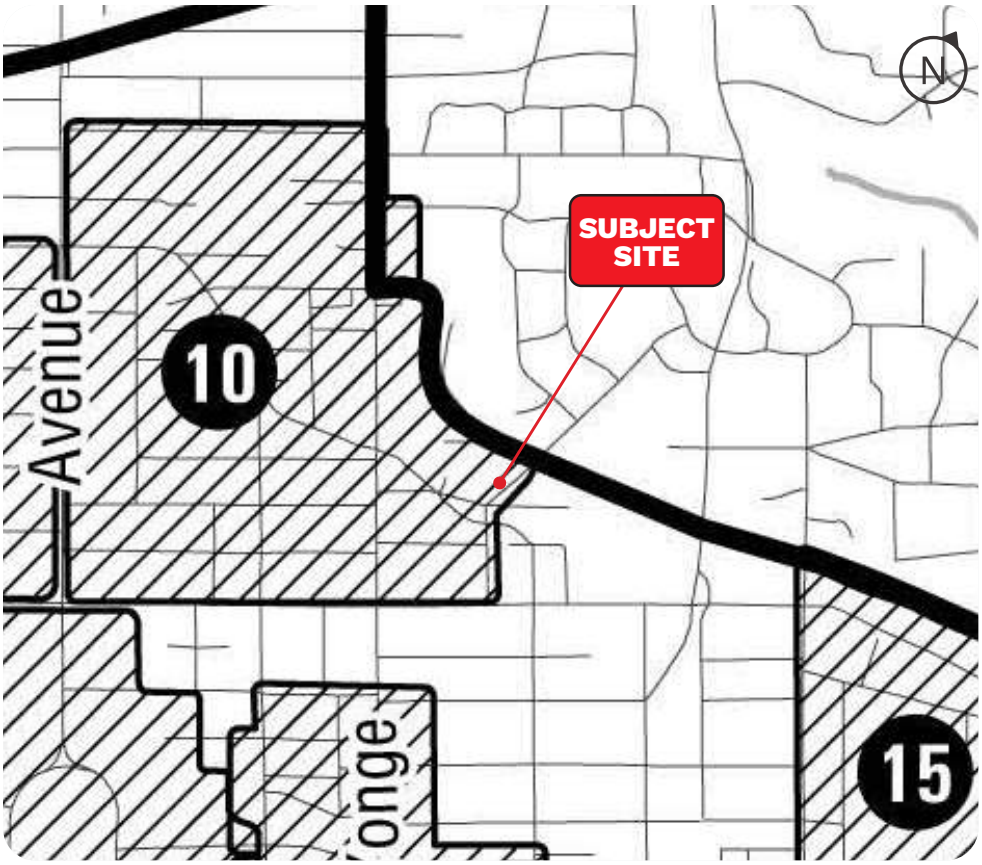


Figure 19 - Downtown Plan Map 41-8: Park Districts

Mobility

The Downtown Plan identifies the importance of creating a walkable *Downtown* and prioritizes the enhancement of the pedestrian experience as a key objective. In this regard, the mobility policies aim to make walking the first travel mode choice for trips throughout *Downtown* through enhancements to the pedestrian network, including wider sidewalks with adequate pedestrian clearways and streetscape enhancements. In particular, Policy 8.4.1 provides that pedestrian and public realm improvements will improve pedestrian safety, comfort and accessibility, especially for the most vulnerable.

Policy 8.5 provides for pedestrian and public realm improvements to be achieved over time through the provision of community benefits as part of development by enhancing and increasing space adjacent and in proximity to development sites and re-allocating space within the public street right-of-way as informed by design guidelines for Complete Streets as developed and applied by the City.

With respect to laneways, Policy 8.11 provides that laneways that can accommodate pedestrian use, without compromising their primary role for vehicular access and servicing, will be designed as safe and accessible walking routes by: discouraging cut-through motor vehicle traffic and designing for slower vehicle speeds; implementing design features to improve the attractiveness of the laneway; implementing safety measures for pedestrians including lighting for personal security; ensuring that development includes amenities and design features that support laneways with active ground-floor uses, clear glazing and entrances where appropriate; and expanding and improving the network of laneways wherever appropriate.

With respect to parking and curbside management, Policy 8.27 provides that development will generally be required to limit and/or consolidate vehicle access points and will be encouraged to provide facilities for passenger pick-up/drop-off, loading and parking in off-street locations and/or within building footprints, in order to free up on-street curbside and public realm space and improve safety of pedestrians and cyclists. Policy 8.29 adds that pick-ups and drop-offs, loading and parking activity shall be encouraged off-street wherever reasonable and practical to free up curbside space.

Built Form

The Downtown Plan includes a number of built form policies in Section 9. Policy 9.1 provides that development will be encouraged to:

- enhance the liveability of the building's surroundings;
- contribute to liveability by reasonably limiting uncomfortable wind conditions and providing access to sunlight, natural light, openness, and sky view; expanding and improving the public realm; maintaining adequate privacy; providing high-quality amenity spaces; and conserving heritage;
- demonstrate design excellence of the building and surrounding public realm;
- demonstrate a high standard of heritage conservation; and
- include high-quality, durable materials and sustainable and resilient building practices.

Policy 9.2 provides that the City may request, as a community benefit, provisions for an improved and expanded public realm including but not limited to: widened sidewalks and walkways; parks and open spaces; POPS; street trees and other landscaping; street furniture; public art; landscaped open spaces; patios; retail displays; access to transit and transit shelters; cycling amenities and pedestrian weather protection.

Policy 9.5 provides that the City may request, as a community benefit, the conveyance of an easement over a development site within 6 metres from the closest public street curb, or such greater or lesser distance as may result from the considerations set out in Policies 9.6 and 9.7, the existence of a property on the Heritage Register on-site.

Policy 9.8 provides that base buildings will generally be designed to achieve the following design objectives:

- relate to the scale and proportion of adjacent streets, parks and open spaces;
- fit compatibly within the existing and planned context of neighbouring streetwall heights;
- relate to the height, scale and built form character of the existing context of both streets when located on a corner lot;
- animate and promote the use of adjacent streets, parks and open spaces by such means as providing active uses at grade;
- incorporate appropriate glazing;
- encourage tree planting, where appropriate; and
- include high-quality materials and design elements that fit with neighbouring buildings and contribute to a pedestrian scale.

Policy 9.9 provides that development will generally provide a transition from the base building to relate to adjacent properties with a lower-scale planned context, as may be required to achieve the objectives of the Plan, while Policy 9.10 requires that development on sites that include or are adjacent to properties on the Heritage Register will include base buildings that are compatible with the streetwall height, articulation, proportion, materiality and alignment.

Policy 9.11 through 9.16 relate to physical determinants of intensity and scale. Policy 9.11 directs that, although existing and approved buildings form part of the existing and planned context, the siting, massing, height and design of a building on one site will not necessarily be a precedent for development on an adjacent or nearby site. Policy 9.12 states that tall buildings will not be permitted on sites within *Neighbourhoods* (the requested Official Plan Amendment will redesignate the site to *Mixed Use Areas*).

Policy 9.13 states that tall building floor plates should be designed to adequately limit shadow impacts of the tower on the public realm and neighbouring properties and maintain adequate sky view from the public realm. Policy 9.14 states that development will be located and massed to define and frame the edges of the public realm with good street proportion, providing for comfortable sun and wind conditions on the public realm and neighbouring properties by stepping back building mass and/or limiting building floor plates above the streetwall height to allow daylight and sunlight to penetrate to the street and lower building levels.

To that end, Policy 9.15 states that, in a tall building, a storey which contains residential units but does not form part of a base building will generally have a maximum floor plate size of 750 square metres above the base building. Further, increases to the 750 square metre floor plate size may be appropriate where the impacts of the larger floor plate, including but not necessarily limited to shadow, sky view and wind are addressed.

With respect to shadow impact, Policy 9.17 provides that development will seek to "adequately limit" shadows on sidewalks, parks, open spaces, natural areas and institutional spaces "as necessary to preserve their utility".

With respect to wind impact, Policy 9.20 provides that buildings will be sited, massed and designed to mitigate and reasonably limit wind impacts on the public realm, including streets and sidewalks, parks and open spaces and POPS, having regard for the use of such areas. Policy 9.21 requires development to address microclimatic conditions for people on adjacent streets and sidewalks, parks and open spaces by adequately limiting shadow and uncomfortable wind conditions, as necessary to preserve their utility, which may be achieved with, among other things: reducing the floorplates of tall building elements above the base building; reducing the overall height and scale of buildings; and reorienting, reducing the size of and/or setting back tall building elements on the site.

With respect to transition, Policy 9.22 provides that development may be required to provide built form transition where necessary to create a more liveable environment in the public realm, while defining and distinguishing areas of different character, intensity and planned contexts. Policy 9.23 adds that transition in scale can be achieved by geometric relationships and design methods in different combinations including angular planes, stepping height limits, location and orientation of the building, the use of setbacks and stepbacks of building mass, separation distances, and other means to achieve compatibility. Policy 9.24 further provides that development may be required to incorporate transition in scale to achieve built form compatibility when it is, among other things, of a greater intensity and scale than the adjacent and surrounding planned context or adjacent to a property designated under Part IV of the *Ontario Heritage Act* or adjacent to existing or planned parks and open spaces.

Policy 9.25 addresses built form adjacencies, providing that a review may be required to determine if any transition to the planned context is required to achieve compatibility. Potential transition measures include, for tall to low-rise adjacencies, the application of a separation distance, stepping down of heights and an angular plane, and informed by the City's Tall Building Design Guidelines; for tall to mid-rise adjacencies, the application of a separation distance and noticeable stepping down of height; and, for tall to tall adjacencies, the application of a separation distance, orientation of the tower portions of the building and, as appropriate, through stepping down of heights.

Policy 9.26 provides that transition may be required between development and adjacent streets, parks or open spaces to provide access to sunlight and sky views as well as establish a human scale and that, where such transition is necessary, tall building development may achieve transition through appropriate setbacks and stepbacks. Policy 9.27 adds that, where transition is desirable to achieve compatibility, it will generally be provided within the development site.

With respect to tall buildings, the Downtown Plan states that the *Downtown* skyline is part of the city's identity and is a well-known image that represents Toronto around the world and that tall buildings are visible from greater distances and from a multitude of vantage points and, as such, should be designed with their contribution to the overall skyline in mind. A well-composed skyline is one in which not every tall building is designed as a landmark building. The Plan goes on to provide that tall building proposals will consider how the proposal fits within and complements the overall *Downtown* skyline.

Housing

The Downtown Plan notes that the provision of housing to a wide range of residents that is affordable, secure, of an appropriate size, and located to meet the needs of people throughout their life cycle is essential to the creation of complete communities.

Policy 11.1 provides that, in order to achieve a balanced mix of unit types and sizes and support the creation of housing suitable for families, development containing more than 80 new residential units will include:

- a minimum of 15 per cent of the total number of units as 2-bedroom units;
- a minimum of 10 per cent of the total number of units as 3-bedroom units; and
- an additional 15 per cent of the total number of units as a combination of 2-bedroom and 3-bedroom units, or units that can be converted to 2- and 3-bedroom units through the use of accessible or adaptable design measures.

Implementation

Policy 14.1 provides that implementation plans, strategies and guidelines will be adopted to advance the vision, goals and policies of the Downtown Plan. These implementation plans, strategies and guidelines, while they express Council policy, are not part of the Plan unless the Plan has been specifically amended to include them, in whole or in part, and do not have the status of policies in the Downtown Secondary Plan.

In our opinion, for the reasons set out in Sections 5.1 to 5.7 of this report, the proposed development and, in particular, the proposed Official Plan Amendment and Zoning By-law Amendment, conform with the Downtown Secondary Plan.

4.7 Site and Area Specific Policies 211 and 225

The site is subject to two Site and Area Specific Policies under Chapter 7 of the Official Plan, i.e. Site and Area Specific Policy 211 (SASP 211) and Site and Area Specific Policy 225 (SASP 225), as described below.

Site and Area Specific Policy 211

The site is subject to Site and Area Specific Policy 211 (SASP 211). SASP 211 applies to the Bloor-Yorkville/North Midtown Area, bounded by Avenue Road, Bloor Street, Sherbourne Street, Rosedale Valley Road, Yonge Street and the CP Rail line, and sets out policies regarding the overall context, the character of specific areas, the public realm and urban design (see **Figure 20**).

Policy 211 recognizes that the Bloor-Yorkville/North Midtown area is comprised of a broad mix of districts, with different intensities, scales and heights in a diversity of building forms. As the north edge of *Downtown*, it is to provide a transition in density and scale from the more intensive use and development forms to the south.

The subject site is identified on Map 1 of Policy 211 as being within the Asquith-Collier *Neighbourhood*, which includes the lands north of Asquith Avenue and Church Street, including the recently approved 28-storey building at 717 Church Street. Policy 211(a) requires new development in the Ramsden Park, Yorkville Triangle and Asquith-Collier *Neighbourhood*s to respect and reinforce the stability and the established low-rise character of the area, containing tree-lined streets and houses of two and three storey height, consistently set back from the street line. It also requires new development to be contextually similar and appropriate to the individual settings, patterns of development, unique features, architectural and landscape character, and heritage significance within the area.

Map 2 of Policy 211 illustrates "Built Form Height Peaks and Ridges" (see **Figure 21**). The associated policies provide that the scale of buildings along the northern portions of Avenue Road, Yonge Street and Davenport Road are "intended to have lower heights than within the 'Height Ridges'" and that the scale of buildings in these areas should be compatible with the adjacent *Neighbourhoods* shown as "Low-Rise Areas" on Map 2. The subject site is not located within a "Height Peak" or a "Height Ridge" and is located within a "Low Rise Area" as shown on Map 2.

In addition, Policy 211(a) requires developments near the Asquith-Collier *Neighbourhood* to be designed with sufficient setbacks and transitions in scale, through means such as angular planes and step-downs in height, to adequately limit shadow, wind and privacy impacts upon nearby residences and the public realm. The policy further provides that mixed use development near the *Neighbourhood* will be designed to adequately limit negative impacts on nearby residences with respect to, among other matters, noise, traffic, odours, intrusive illumination and the location and visibility of access and service areas.

As mentioned above, the proposed Official Plan Amendment seeks to redesignate the subject site to *Mixed Use Areas*. Policy 211(b) addresses new developments within *Mixed Use Areas* and directs that new development adjacent to "Low Rise Areas", including *Neighbourhoods*, should be of a lesser scale and be contextually appropriate and compatible with these areas. Accordingly, development in *Mixed Use Areas* adjacent or near to these "Low Rise Areas" will be designed to "adequately limit shadow, wind and privacy impacts upon these lower-scale areas through distance separation and transitions in scale including means such as angular planes and step-downs in heights".

Policy 211(d) addresses the public realm. It recognizes that pedestrian activity is a vital component of the Bloor-Yorkville/North Midtown area and, accordingly, provides that the amenity of public sidewalks, walkways, access and views to open space and parks will be maintained and enhanced and any additional shadowing or uncomfortable wind conditions on these public spaces will be minimized as necessary to preserve their utility. New development is required to provide high quality, co-ordinated streetscape and open space improvements to promote pedestrian amenity, orientation, access, greening and confidence in public safety.

Policy 211(e) requires new buildings to achieve "a harmonious relationship to their built form context" through building height, massing, setbacks, roofline, and sensitively integrated vehicle access and loading. The Bloor-Yorkville/North Midtown Urban Design Guidelines are to be used to provide direction for reviewing development applications in the area and are to be read in conjunction with the urban design policies of the Official Plan. The Bloor-Yorkville/North Midtown Urban Design Guidelines are discussed below in Section 4.11.

Site and Area Specific Policy 225

SASP 225 applies to lands north and south of Bloor Street between Park Road and Avenue Road. The policy provides an overview of locations where pedestrian walkways, at or below grade, and new parks are encouraged. The SASP does not propose any pedestrian routes or walkways on or in the vicinity of the subject site.

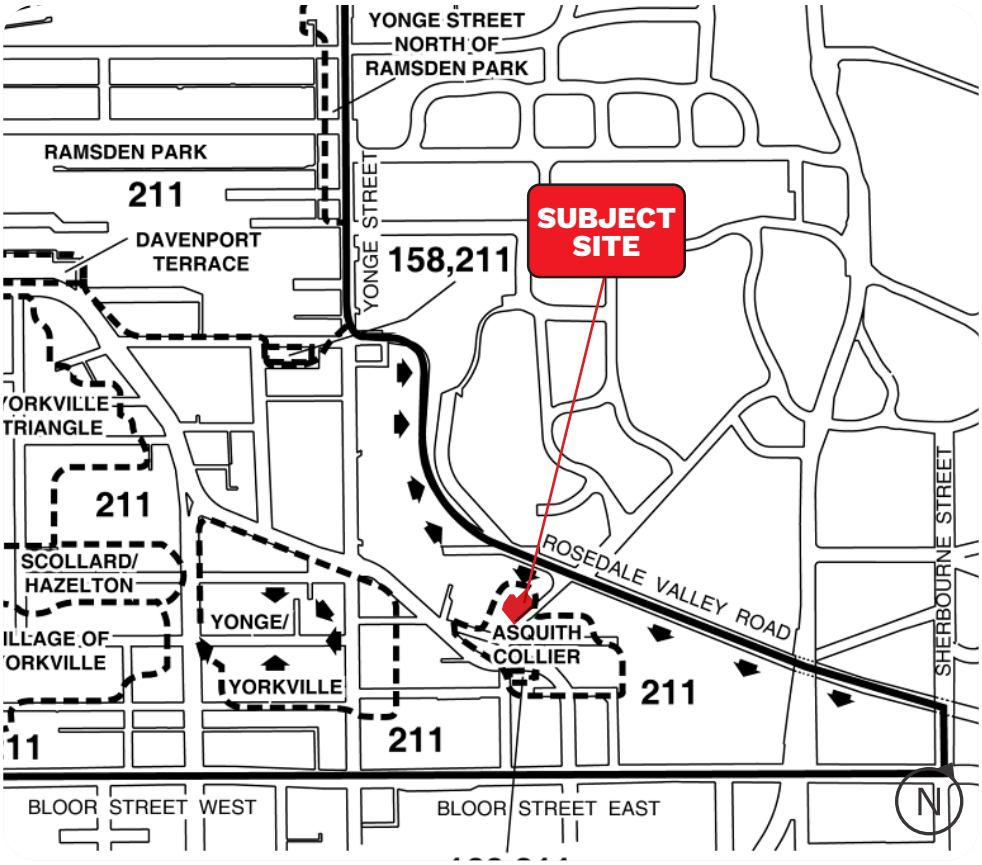


Figure 20 - SASP 211, Map 1 – Neighbourhoods, Areas of Special Identity and Designated Views

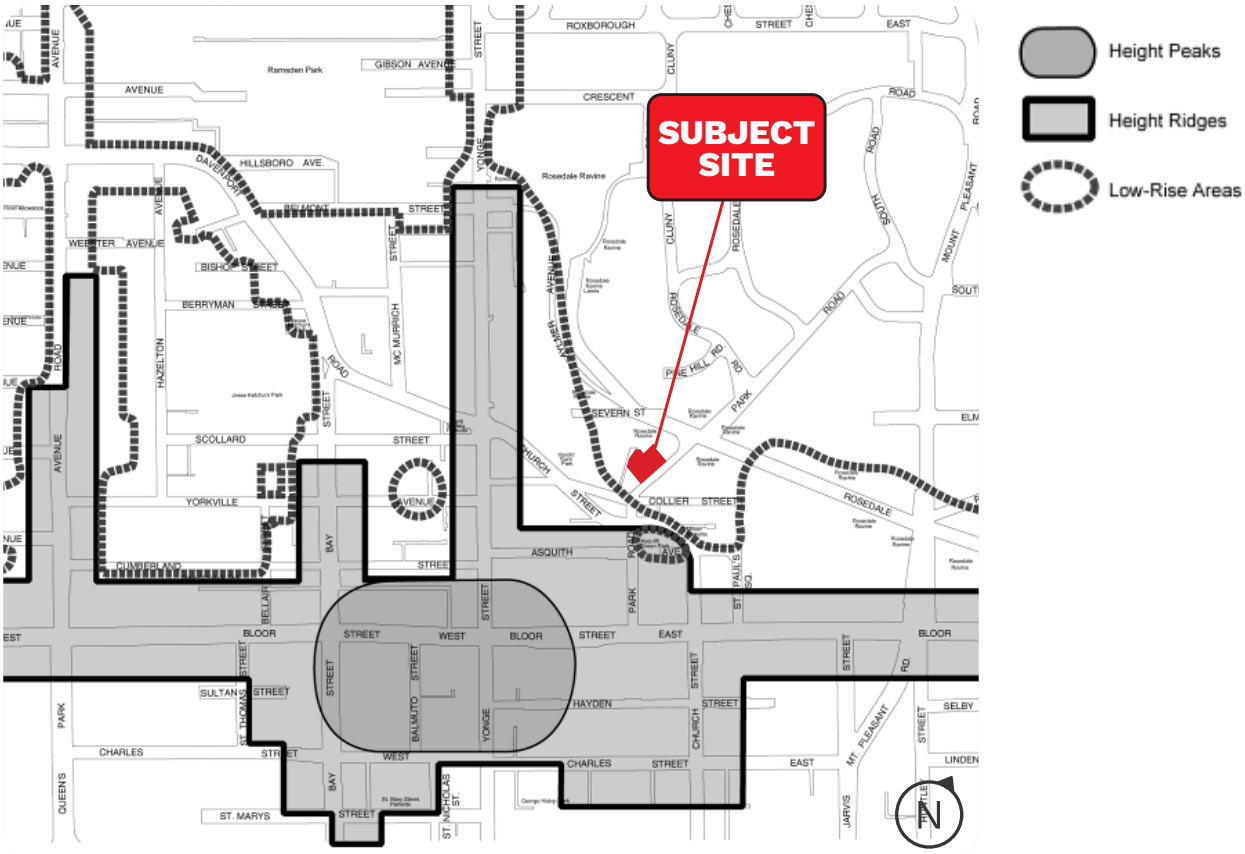


Figure 21 - SASP 211, Map 2 – Built Form Height Peaks and Ridges

4.8 Site and Area Specific Policy 517 (Official Plan Amendment 352)

On November 9, 2016, as part of the TOcore study which ultimately led to the Downtown Plan, City Council adopted Official Plan Amendment No. 352 ("OPA 352"), which introduces Site and Area Specific Policy 517 ("SASP 517") applying to the Downtown area, generally bounded by Bathurst Street, Lake Ontario, the Don River, Rosedale Valley Road and the CP Rail line.

Concurrently, City Council enacted By-law 1106-2016 to amend By-law 438-86 with respect to tall building setbacks in the "Toronto Downtown" area in order to implement OPA 352. A companion by-law, By-law No. 1107-2016, was enacted on the same date to amend By-law 569-2013. OPA 352, as well as By-laws 1106-2016 and 1107-2016, were appealed to the Local Planning Appeal Tribunal (LPAT) by numerous parties.

On November 25, 2020 and February 2, 2021, City Council approved modifications to OPA 352 and the Zoning By-laws in order to resolve the appeals. On March 15, 2021, the LPAT held a Settlement Hearing to consider the modified instruments, and a decision was issued on May 28, 2021, approving modified versions of OPA 352, By-law 1106-2016 and By-law 1107-2016.

The purpose of SASP 517 is to provide direction for *Downtown* tall building development with respect to setbacks from the building face of the tower to adjacent lot lines and an adequate separation distance between towers. These directions are intended to ensure that individual tall buildings on a site and the cumulative effect of multiple tall buildings within a block contribute to building strong healthy communities by fitting in with the existing and/or planned context.

SASP 517 provides that the Zoning By-law will contain minimum numerical standards with respect to tall building setbacks from property lines and separation distances between towers on the same site. Relief from these standards may be permitted through rezoning or minor variance provided that appropriate space between towers will:

- provide a high-quality, comfortable public realm;
- consider development potential, where appropriate, of other sites within the block;
- appropriately limit shadow impacts on the public realm and surrounding properties;
- provide appropriate access to natural light and protect privacy for occupants of tall buildings;
- provide appropriate pedestrian-level views of the sky between towers as experienced from adjacent streets, parks and open spaces; and
- appropriately limit and mitigate the impacts of uncomfortable wind conditions on streets, parks, open spaces and surrounding properties.

In the review of minor variance or rezoning applications, the existing and planned context of a site will be considered, including but not limited to the following considerations:

- the use of the proposed tall building and adjacent properties;
- the physical relationship between tall buildings, including the extent to which the buildings can be located, oriented and designed to mitigate impacts; and/or
- the development potential, where appropriate, of other sites within the block, including agreements, such as limiting distance agreements, heritage easement agreements, or air rights agreements, between landowners and the City.

In addition, SASP 517 sets out the following directions:

- not every site can accommodate a tall building;
- where a block is comprised of multiple small sites, a comprehensive block planning process may be used to locate and design tall buildings to meet the intent of the SASP; and
- the policies in the SASP are not intended to apply to mid-rise buildings and may be applied to other tall building typologies that differ from the tower-base form, where appropriate.

4.9 Proposed Official Plan Amendments No. 524 and 570

On February 3, 2022, Toronto City Council adopted Official Plan Amendment 524 ("OPA 524"), which established a framework to facilitate transit-supportive development through the delineation of Protected Major Transit Station Areas ("PMTSA's"). Subsequently, on July 22, 2022, Council adopted Official Plan Amendment 570 ("OPA 570").

OPA 524 establishes Site and Area Specific Policies ("SASP's") for 16 "protected major transit station areas" corresponding with the existing subway stations in the *Downtown*, while OPA 570 establishes SASP's for 57 PMTSA's associated with the existing and planned subway, LRT and GO stations across the City. OPA 524 and OPA 570 have not yet been approved by the Minister of Municipal Affairs and Housing pursuant to Section 26 of the *Planning Act* and are therefore not yet in force.

As adopted by City Council, OPA 524 includes SASP's 599 and 600, which delineate the boundaries of the Bay and the Bloor-Yonge PMTSA's, respectively (see **Figure 22, 23** and **24**). The SASP's provide that existing and new development within the Bay and the Bloor-Yonge PMTSA's is planned for a minimum population and employment target of 900 residents and jobs combined per hectare, with a minimum density of 0.9 FSI or three units specified for the subject site, reflecting its current *Neighbourhoods* designation. The *Mixed Use Areas* designation south of Collier Street is assigned a minimum density of 2.5 FSI.

As adopted by City Council, OPA 570 includes Site and Area Specific Policy 719, which delineates the boundaries of the PMTSA associated with the Rosedale Subway Station. The SASP provides that existing and new development with the Rosedale PMTSA is planned for a minimum population and employment target of 200 residents and jobs combined per hectare, with a minimum density of 0.9 FSI or three units specified for the subject site.

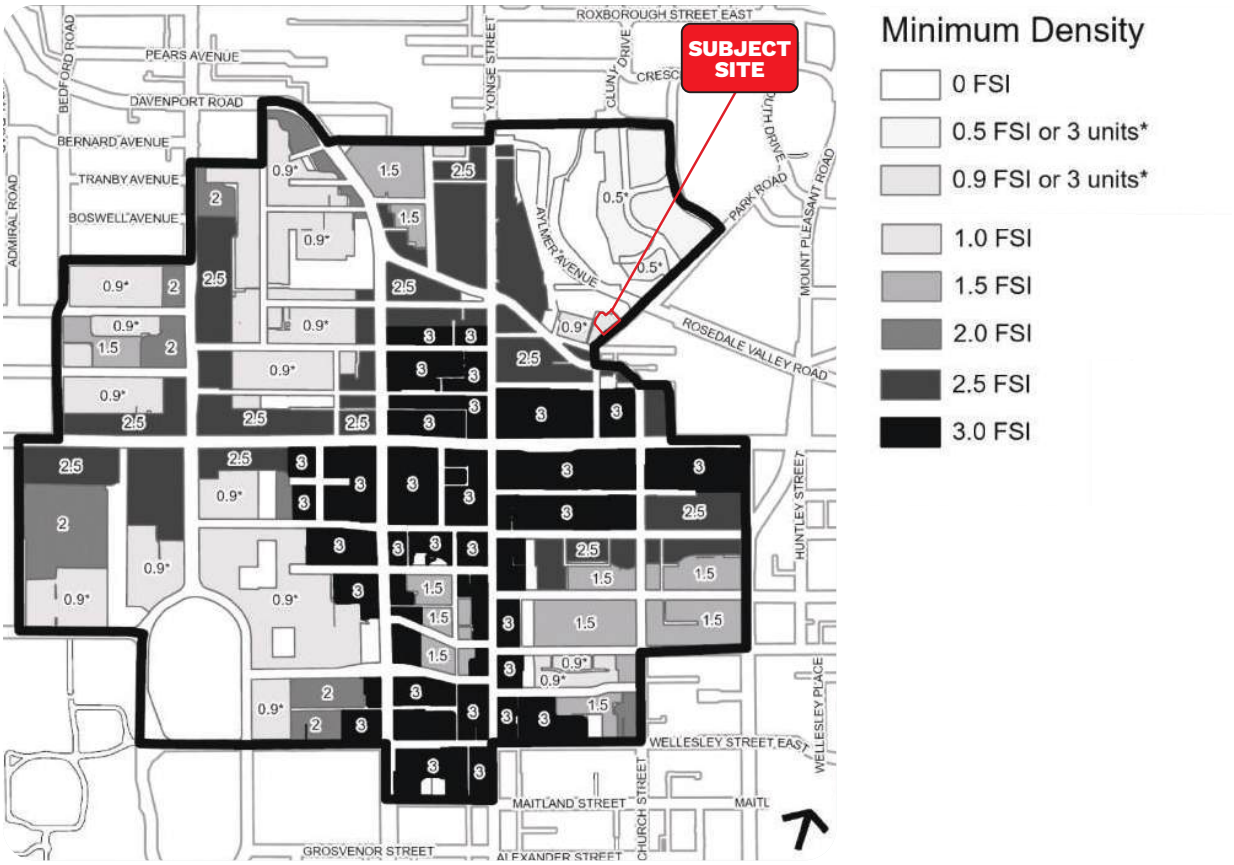


Figure 22 - SASP 599, Map 2 – Minimum Densities, Bay PMTSA

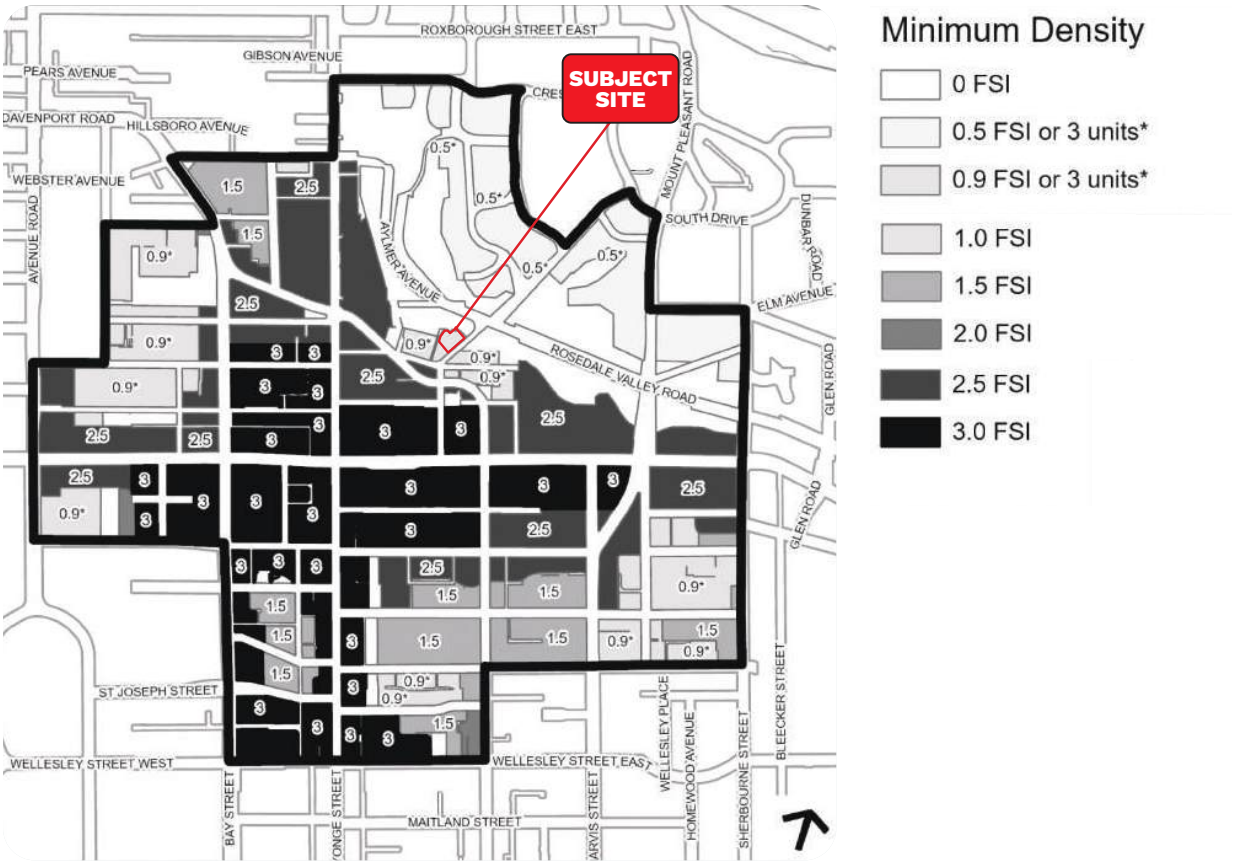


Figure 23 - SASP 600, Map 2 – Minimum Densities, Bloor-Yonge PMTSA

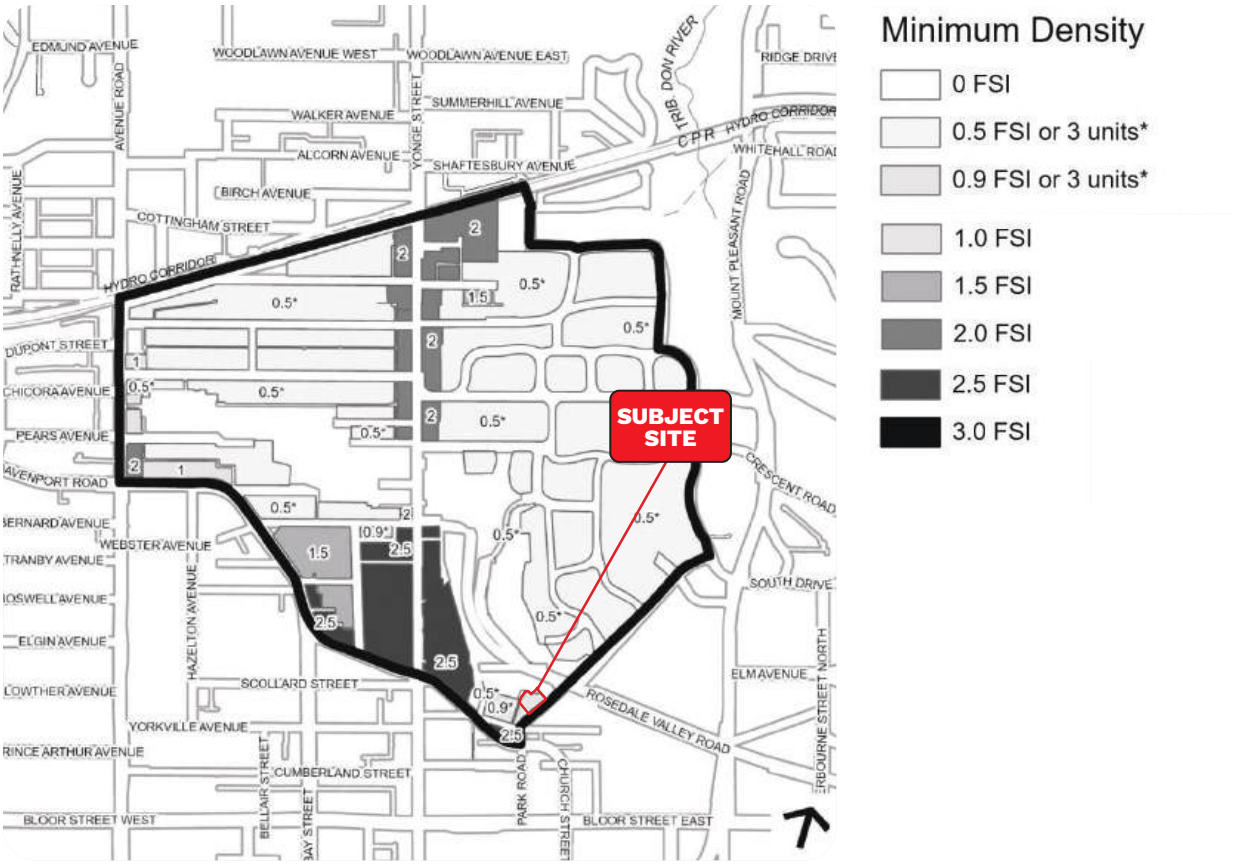


Figure 24 - SASP 719, Map 2 – Minimum Densities, Rosedale PMTSA

4.10 Zoning

The new City-wide Zoning By-law No. 569-2013 was enacted by City Council on May 9, 2013. It was appealed to the Ontario Municipal Board in its entirety; however, substantial portions of the by-law have now been approved and are in full force and effect.

Under City-wide Zoning By-law 569-2013, as amended, the majority of the subject site is zoned R (f5.0; d1.0) (x863), with a maximum permitted height of 13.0 metres. A small portion of the northwest corner of the property at 50 Park Road is located within the ON (Open Space - Natural Zone), which permits a number of public uses such as parks, public utility and transportation, as well as agricultural uses (see **Figures 25** and **26**).

The R (Residential) zone permits dwelling units in a range of residential building types, including detached and semi-detached dwellings, townhouses, duplexes, triplexes and fourplexes, as well as apartment buildings, with a maximum density of 1.0 FSI. Permitted non-residential uses include community centres, day nurseries, libraries, tourist homes and retail stores (in apartment buildings with 100 or more dwelling units, limited to a maximum of 25 to 70 square metres depending on the number of units).

The f5.0 component of the zoning requires a minimum lot frontage of 5.0 metres. Exception R 863 permits nursing homes, retirement homes and religious residences in buildings originally constructed or used as a detached house, a semi-detached house or a townhouses. It also provides that Sections 12(1) 232 and 12(5) (h) of former City of Toronto Zoning By-law 438-86, as amended, continue to prevail.

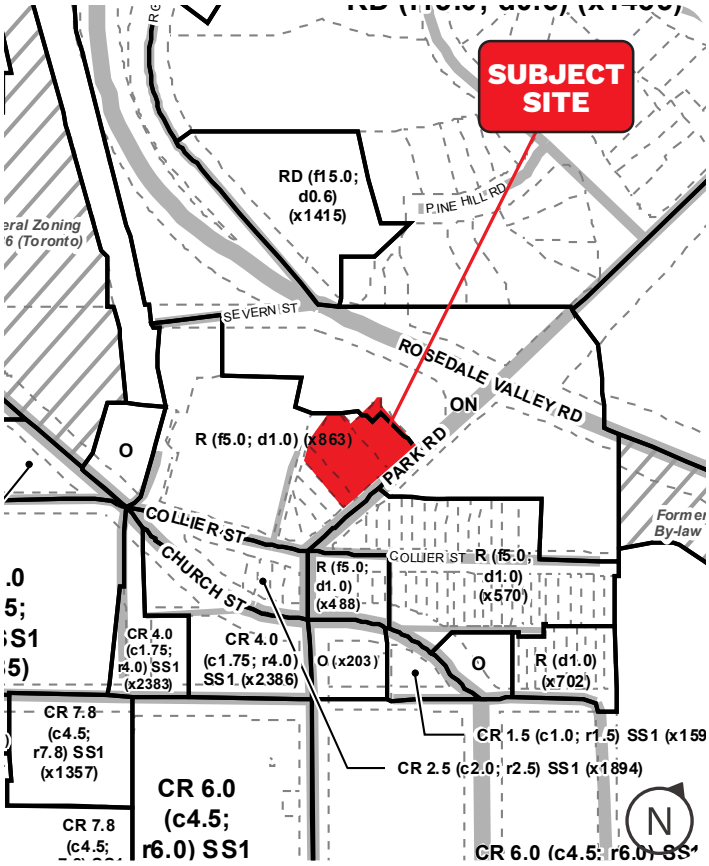


Figure 25 - By-law 569-2013 - Zoning

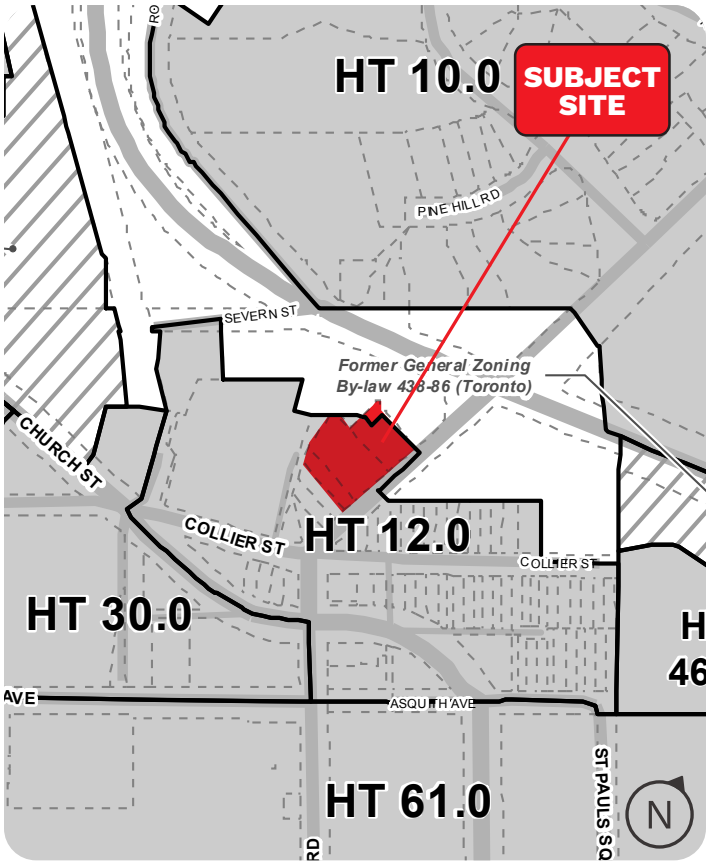


Figure 26 - By-law 569-2013 - Heights

Section 12(1) 232 permits the use of a lot for a commercial purposes or purposes if the same commercial purpose or purposes were permitted on the lot on February 25, 1975; the building or structure was lawfully on the lot and lawfully used in whole or in part for the same commercial purpose or purposes on January 31, 1976; and the non-residential gross floor area used for the same commercial purpose or purposes does not exceed the non-residential gross floor area so used on January 31, 1976. The former office building use at 50 Park Road would be permitted by this exception. Section 12(5) (h) does not apply to the subject site.

The site is also subject to Article 600.10.10, which was introduced by By-law 1107-2016 (see Section 4.8 above), and includes regulations regarding tower setbacks in the *Downtown* area. As amended and approved by the OLT on May 28, 2021, it includes the following relevant provisions:

- every building with a height of greater than 36 metres shall be no closer than:
  - 3.0 metres to a lot line abutting a street that is a public highway and 12.5 metres to the centre line of that street for the portions of the building that collectively enclose the entirety of a storey higher than 24 metres above grade;
  - 12.5 metres to the centre line of an abutting public lane for the portions of the building that collectively enclose the entirety of a storey higher than 24 metres above grade; and
  - 12.5 metres to a lot line having no abutting street or public lane for the portions of the building that collectively enclose the entirety of a storey higher than 24 metres above grade;
- every building with a height of greater than 36 metres shall be no closer than 25 metres to each building with a height greater than 36 metres on the same lot for the portions of the buildings that collectively enclose the entirety of a storey higher than 24 metres above grade;
- if a line projected at a right angle from a main wall of a building with a height of greater than 36 metres intercepts another main wall of the same building, those main walls shall be separated by a minimum of 25.0 metres for the portions of the buildings that collectively enclose the entirety of a storey higher than 24 metres above grade;
- window projections, exterior stairs and access ramps are not permitted to encroach into the required setbacks or separation distances; and
- elements which are permitted to project into the required separation distances include balconies, canopies and awnings, exterior cladding, architectural features, eaves and mechanical equipment (each with a specified maximum projection).

By-law 608-2024 - Expanding Housing Options in Neighbourhoods Initiative

On June 27, 2024, City Council adopted By-law 608-2024, which amended By-law 569-2013, in order to implement Official Plan Amendment 727 (as described above in Section 4.5). By-law 608-2024 was appealed to the OLT in its entirety; however, substantial portions of the by-law were approved by the Ontario Land Tribunal decision and order issued January 13, 2025.

In particular, for lots abutting a major street, such as the subject site, there is no longer a maximum density for townhouses or apartment buildings, provided there are 60 dwelling units or less. The provisions of By-law 608-2024 that would increase the permitted height for an apartment building on a lot abutting a Major Street to 6 storeys and 19.0 metres remain under appeal.

4.11 Urban Design Guidelines

4.11.1 Bloor-Yorkville/North Midtown Urban Design Guidelines

The Bloor-Yorkville/North Midtown Urban Design Guidelines (June 2004) were approved by Council in July 2004. The goal of the Guidelines is to improve the quality of the environment in Bloor-Yorkville/ North Midtown and to ensure that elements that contribute to the special character of the diverse parts of the area are retained and enhanced.

The main planning objectives include:

- enhancement of Areas of Special Identity and the Precincts and Corridors identified in the guidelines;
- protection of low-rise, pedestrian-oriented mixed-use areas from adverse impacts of high-rise development;
- protection of residential areas from adverse impact of commercial and/or higher density development;
- enhancement and protection of historic buildings;
- improvement of publicly accessible areas (streets and open spaces); and
- excellence in urban design, architecture and landscaping in private developments.

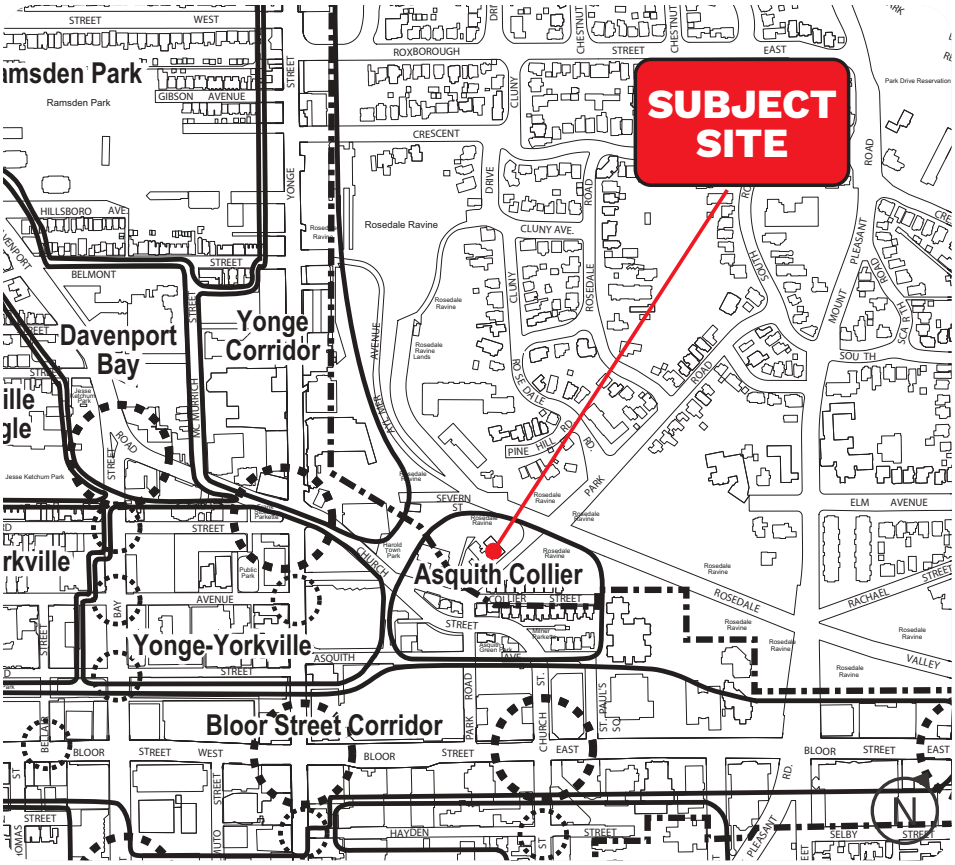
The Guidelines emphasize that designs differing from the guidelines may be considered, subject to meeting the general intent and objectives of the guidelines.

It is noted that, while some of the mapping in the Guidelines shows features on the subject site, the Study Area boundaries run along the south limit of Collier Street east of Park Road and just north of Church Street west of Park Road, and exclude the subject site.

Structure Plan

The subject site is located within the Asquith-Collier Precinct, which is addressed in Section 3.1.5 of the Guidelines (see **Figure 27**). The boundaries of the Precinct include the low-rise residential uses fronting on Collier Street and Asquith Avenue to the southeast, the 15-storey apartment building at 66 Collier Street to the west and the 28-storey residential building (under construction) at 717 Church Street, the approved 42-storey building at 820 Church Street and the older 17-storey building at 40 Asquith Avenue.

In describing the Precinct, Section 3.1.5 states that Asquith-Collier is a stable, low-density residence area where physical change is expected to be sensitive and gradual. New development should respect characteristics described for the Ramsden Park Precinct in Section 3.1.4, including the 2- and 3-storey character of the area with attached and detached houses, generally built of brick, with minimal variances considered for height increases. In addition, new development is encouraged to be compatible with or built in the Victorian style.



Legend

- Study Area
- Precinct and Corridor
- Area-Wide Gateway
- Sub-Area Gateway

Figure 27 - Precincts and Corridors

Heritage

Section 3.3 speaks to the preservation and enhancement of built heritage resources within the area. Figure 8 of the Guidelines depicts listed and designated heritage buildings in Bloor-Yorkville/ North Midtown, including 50 Park Road, which is a "Designated Property", as well as the properties along both sides of Collier Street, to the southeast of the subject site, which are "Listed Properties". The Guidelines state that heritage buildings are to be protected and enhanced and that adjacent developments should complement and feature historic structures. While heritage buildings can be incorporated and integrated within new developments, where possible, the integrity of the entire original structure should be maintained and restored.

Views and Key Sites

Section 3.4 identifies significant views that should be protected and reinforced, and where visual terminus treatments should be located (building entries, structural elements, banners and public art). On the Views and Key Sites map (Figure 9 of the Guidelines), a vista is shown looking south from Rosedale Valley Road at Severn Street to and beyond the subject site.

Open Space Network

Figure 10 of the Guidelines (Open Space Network Plan) identifies the lands north and west of the subject site as Green Open Space as part of the Rosedale Ravine (see **Figure 28**).

The Guidelines identify a range of opportunities to improve and expand the public network of parks, open spaces, pedestrian links, forecourts, courtyards and the quality of the pedestrian environment along the existing road network. Key initiatives include:

- enhancing existing open spaces;
- providing additional mid-block pedestrian connections;
- enhancing streetscapes through tree planting, paving material, street furniture, landscape planters, lighting standards and public art;
- incorporating forecourts and sidewalk widening for sidewalk/street activities, such as cafes and spill-out retail;
- encouraging new developments to incorporate public squares and green spaces as part of their design, such as the creation of the Yonge-Yorkville Park at 18 Yorkville Avenue; and
- creating well designed open spaces which complement adjacent spaces.

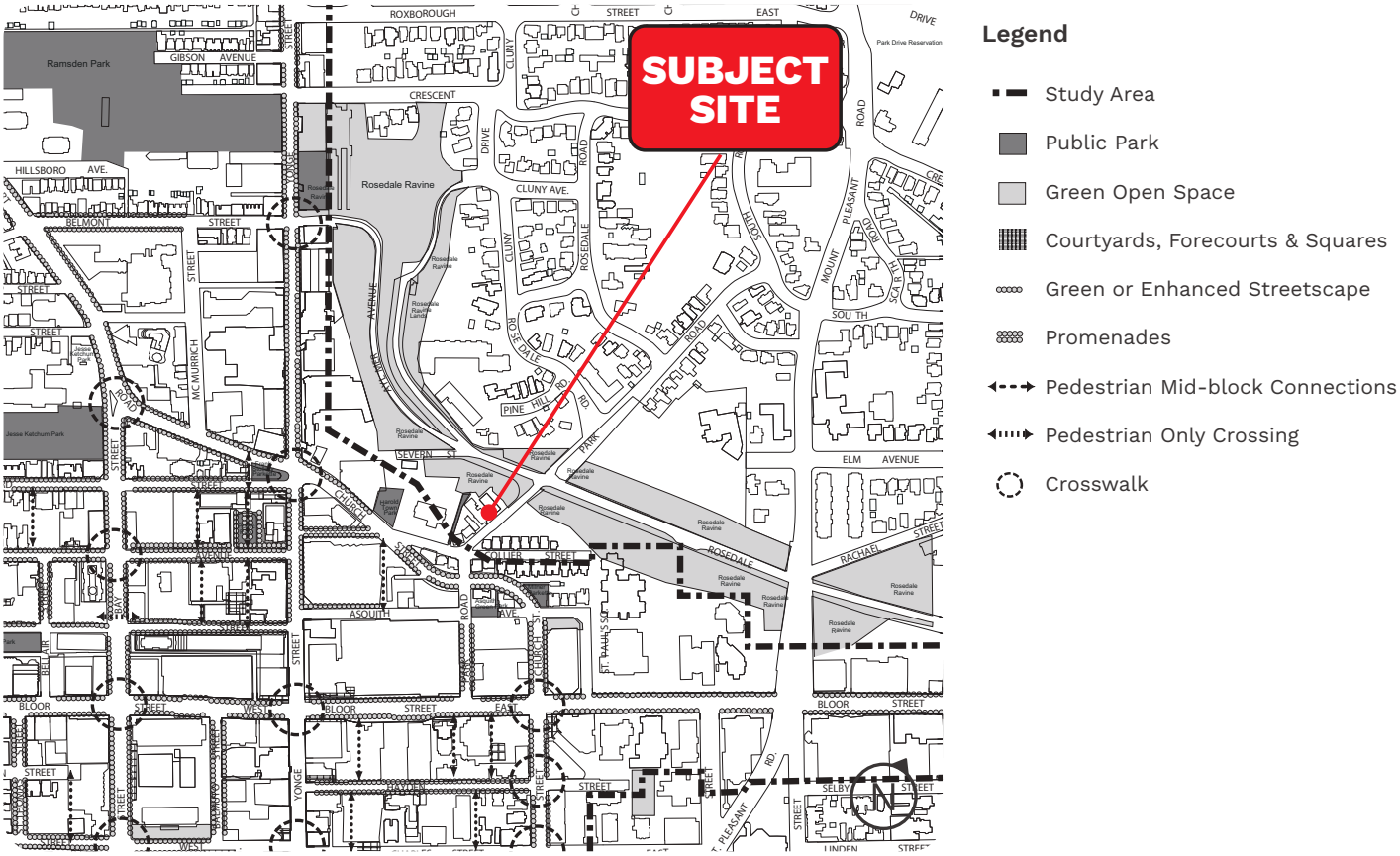


Figure 28 - Open Space Network Plan

Street Character Types

Section 3.7 characterizes the Street Character Types based on the existing and anticipated patterns of pedestrian and vehicular traffic. Park Road adjacent to the subject site is identified as a Connector Street (see **Figure 29**).

The Guidelines indicate that Connector Streets have a wide-reaching function for vehicular traffic but are less traveled by pedestrians. Most often, vehicular traffic will be moving at higher speeds than on the other streets. There is a greater onus on the streetscape design and treatment to maintain comfort levels for the pedestrian. Further, pedestrian traffic is relatively light and a positive pedestrian experience will rely on the effectiveness of the streetscaping treatment.

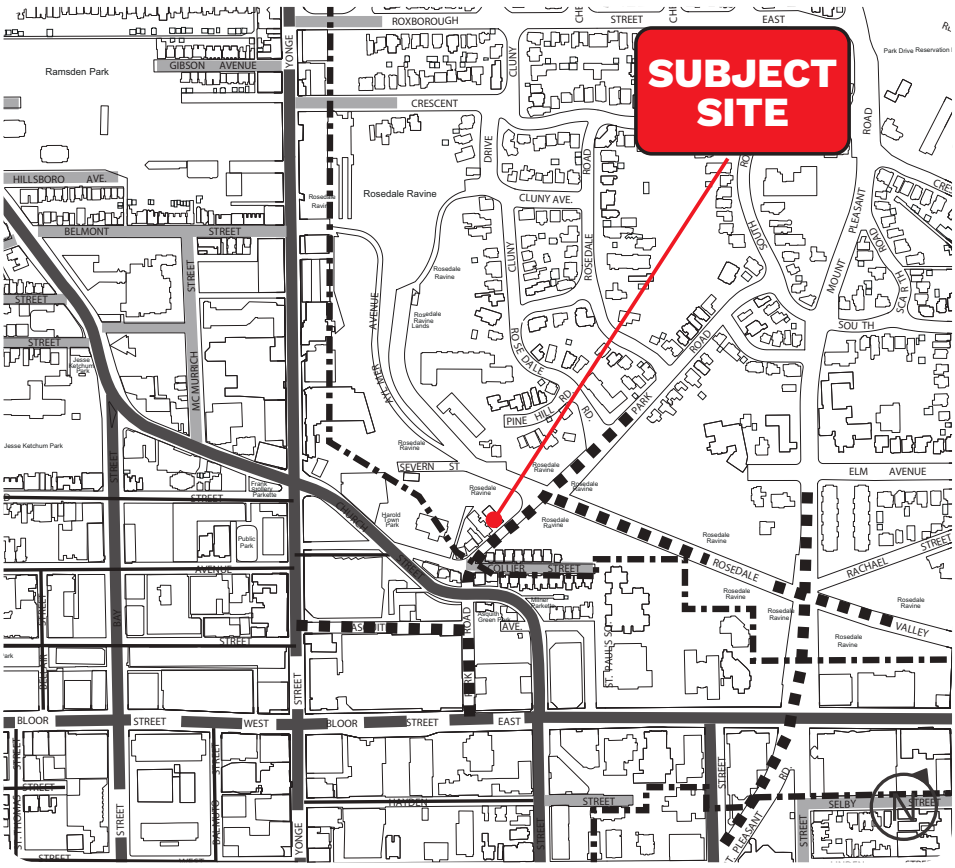


Figure 29 - Street Character Types

Built Form

The Guidelines outline a hierarchy of built form, corresponding to three public realm scales: the pedestrian scale, the street wall scale and the urban scale. Built form guidelines are provided for each of these scales tailored to the Built Form Framework.

In this regard, the subject site is identified as within a Low-Rise Residential Neighbourhood (see **Figure 30**). The Guidelines state that these are stable and established low-rise residential areas, particularly sensitive to dramatic change and that development in adjacent areas must ensure no adverse impacts.

In terms of streetwall, Guideline 4.2.1 states that, in general, a street wall of a new building should align with those of the neighbouring buildings or have the same setback as the predominant buildings on the block. In some instances, the street wall alignment may be compromised in order to achieve a wider, landscaped sidewalk. It further states that it is critical that the street wall has the highest quality of architectural design and materials, especially at the ground and second floors, and should in general not exceed a 1:1 relation of height to street width.

Section 4.3 sets out urban scale design considerations. With regard to heights, the Guidelines identify a "height peak" around the Yonge/Bloor intersection and descending "height ridges" along the main corridors of Yonge Street, Bloor Street and portions north of Bloor Street as well as portions of Bay Street and Avenue Road. The subject site is located within a Low-Rise Area (see **Figure 31**). With regard to shadows, Section 4.3.2 identifies the subject site, as well as the Rosedale Valley Ravine, as Areas Sensitive to Building Shadows, and states that these areas must be protected from undue overshadowing by proposed buildings (see **Figure 32**).

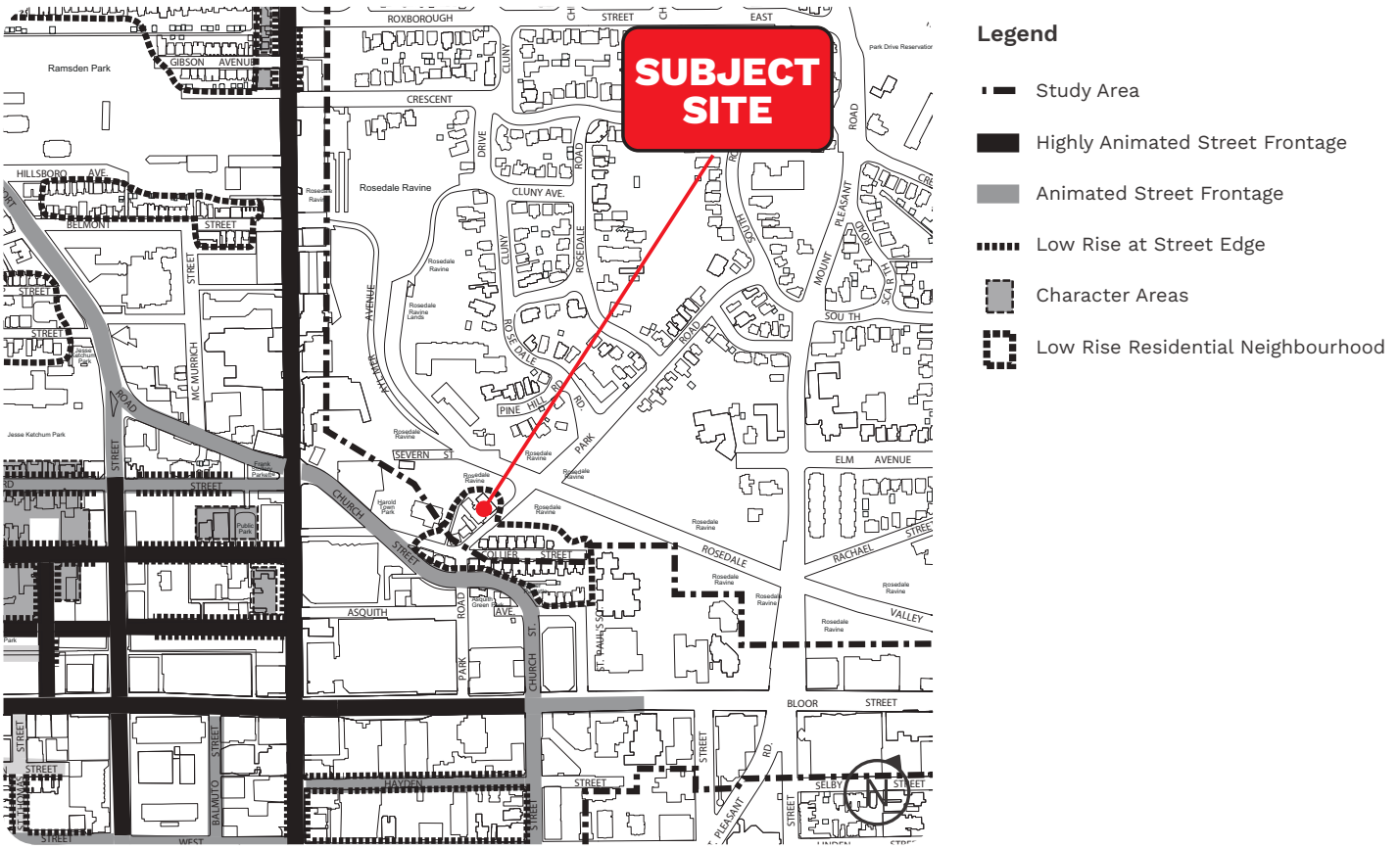


Figure 30 - Built Form Framework

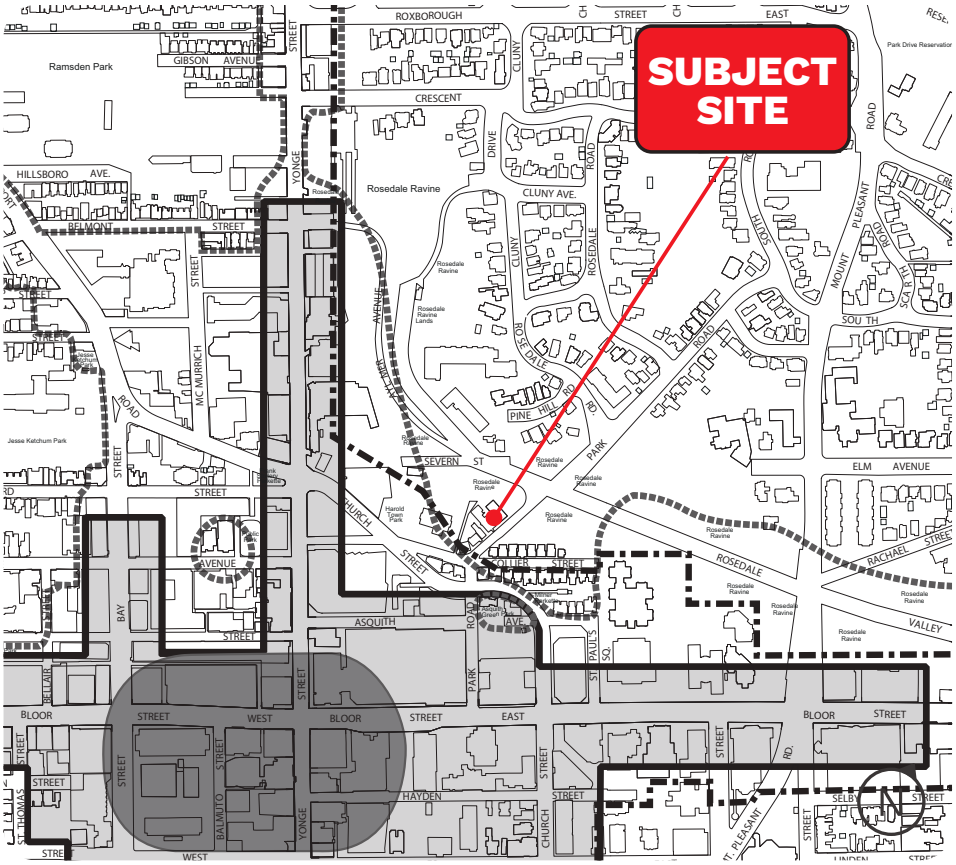


Figure 31 - Built Form Height Peaks and Ridges

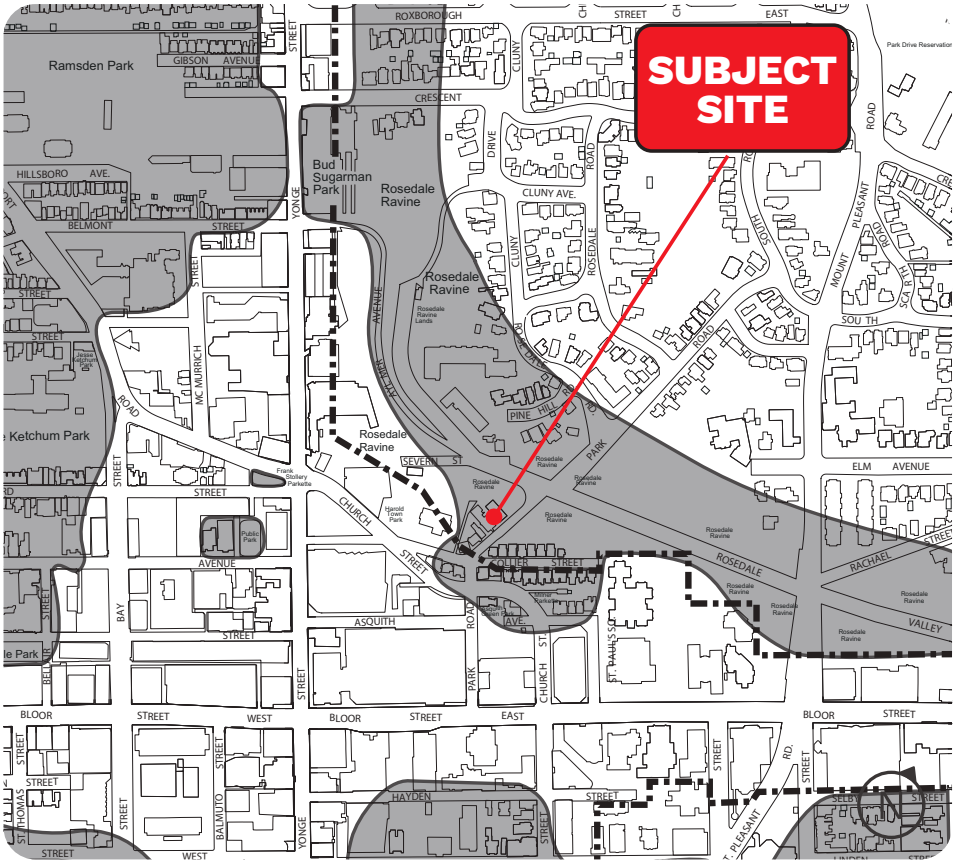


Figure 32 - Areas Sensitive to Building Shadows

Section 4.3.4 outlines built form design criteria for high-rise buildings as follows:

> *"Point towers are generally the preferred form for high-rise building, in areas which can accommodate them, because they have a reduced negative impact on the streetscape. The shadow and visual impact is relatively less of an issue and in some cases point towers may be a preferred form to larger massed slab buildings."*

Design criteria are set out for high-rise proposals as follows:

- Point towers should be placed on a podium that represents the scale of the street wall (3-6 storeys).
- The towers should maintain floor plate sizes to allow for slender towers that permit adequate sky views and minimize shadow impacts.
- The width of the point tower that fronts on a street should be slender to permit adequate sun penetration onto the public realm.
- The placement of the point towers should be staggered from adjacent towers with a 1:1:1 relationship between floor plate size and distance between buildings.
- Slab buildings may be permitted within the height ridges.

The Design and Architectural Quality Guidelines (Section 4.4) note that the area has a history of well-designed buildings representing almost every architectural era; accordingly, new developments should be mindful of ensuring excellence in design and in the use of high-grade materials. Design and architectural quality should address principles such as good building composition, building entrances with a "sense of arrival", and mechanical penthouses that are integrated into the architectural treatment of roofs. Rooftop gardens/terraces are encouraged, and signage is to be carefully integrated into buildings. Finally, architectural compatibility with the historical context of the Village of Yorkville is to be achieved through building proportions, vertical and horizontal rhythms and the use of similar materials and colourings.

4.11.2 Tall Building Design Guidelines

On May 7, 2013, City Council adopted the City-Wide Tall Building Design Guidelines (March 2013), which update and replace the "Design Criteria for the Review of Tall Building Proposals" (2006).

The document specifically notes that the Tall Building Design Guidelines are "intended to provide a degree of certainty and clarity of common interpretation, however, as guidelines, they should also be afforded some flexibility in application, particularly when looked at cumulatively".

The Tall Building Design Guidelines include sections related to site context, site organization, tall building massing and pedestrian realm. Among other matters, the Guidelines recommend that tower floor plates be limited to 750 square metres and that tall building towers be set back 12.5 metres from side and rear property lines and provide a separation distance of 25 metres between towers on the same site.

The proposed massing and urban design are addressed in relation to the relevant design guidelines in Sections 5.6 and 5.7 of this report.

4.11.3 Growing Up: Planning For Children in New Vertical Communities

In 2015, the City initiated a study entitled *Growing Up: Planning for Children in New Vertical Communities* ("Growing Up Guidelines") and produced draft guidelines to direct how new development can better function for larger households. A staff report summarizing the study process and draft guidelines was adopted by Planning and Growth Management Committee on May 31, 2017, and the report and recommendations were considered by City Council at its meeting on July 4, 2017, and adopted without amendments. On July 28, 2020, a final recommendation report was presented to City Council, and the updated Growing Up Guidelines were adopted.

The intent of the Guidelines is to provide for a better integration of family supportive design into the planning of new multi-unit residential developments. The Guidelines are organized at three scales, based on the recognition that each scale contributes positively to how a family experiences living in a vertical community:

- **The Neighbourhood Scale**: At the neighbourhood scale, the Guidelines focus on children's experience in the city, promoting independent mobility, access to parks, schools and community facilities.
- **The Building Scale**: At the building scale, the Guidelines seek to increase the number of larger units, encourage the design of functional and flexible amenity and common spaces, and promote flexible building design for changing unit layouts.
- **The Unit Scale**: At the unit scale, the Guidelines focus on the size and functionality of spaces to ensure dwelling units can accommodate a family's daily needs. Considerations include ensuring inclusivity for larger and multi-generational households, supporting a range of household types and sizes, and providing sufficient room for families to gather and share meals as well as bedrooms that can comfortably accommodate more than one child.

The use of the term "large units" in the Guidelines refers to two- and three-bedroom units that comply with the design parameters set out in the Guidelines. Large units are intended to meet the needs of households with children, as well as multi-generational families, seniors, and groups of students and/or adults who live together. The guidelines seek to achieve a minimum of 25% two- and three-bedroom units, comprised of 15% two-bedroom units and 10% three-bedroom units.

Section 2.0 of the Guidelines focuses on the design of new buildings. Topics covered in this section include building configuration, typology, design and construction, circulation areas and shared spaces, as well as storage and utility needs. Section 3.0 provides guidelines specific to unit design.

In our opinion, the proposal is generally in keeping with the Growing Up Guidelines, as outlined in Section 5.3 of this report.

4.11.4 Pet Friendly Design Guidelines

The Pet Friendly Design Guidelines were developed in 2019, through a collaborative process involving consultation and engagement with a broad range of stakeholders. The purpose of the document is to guide new developments in a direction that is supportive of a growing pet population. The document is intended to complement other city initiatives to create and design high-quality pet friendly amenities in private development, including the building, private internal and external open spaces and living spaces.

The Guidelines apply city-wide to all new multi-unit residential buildings that are required to provide amenity space as a condition of their development approval. As guidelines, they are intended to provide direction and guidance, but should be afforded some flexibility in application, and balanced against broad city building objectives.

Similar to the Growing Up Guidelines, the Pet Friendly Guidelines are guidelines are structured at three scales: the neighbourhood, the building and the dwelling unit. At the neighbourhood scale, the guidelines encourage new developments to support their on-site pet population with amenities and spaces to meet their needs and reduce the burden on public parks and open spaces, especially in dense neighbourhoods characterized by multi-unit, high-rise buildings where parks and green spaces are heavily used.

At the building scale, the Guidelines provide direction as to the types, sizes and general configuration of amenity spaces for pets, and specifies how shared spaces, green spaces, building systems and the public realm can be designed to support pets, their owners and other residents of multi-unit buildings in high-density neighbourhoods. The types of dedicated amenities that could be provided to support pets and their owners include pet relief areas, off-leash areas, pet wash stations and POPS. The Guidelines direct that the appropriate size and range of pet amenities in a proposed building be closely considered together with the allocation and configuration of other amenities and also be determined in conjunction with an assessment of current and future anticipated usage, existing and future demographics, and existing neighbourhood facilities.

Finally, the unit scale looks at choices in materials, unit layout, indoor space, outdoor patio space and storage that can enhance a pet's environment and meet day-to-day needs.

The proposal incorporates pet friendly design measures in the form of a pet wash area within the basement level and is directly adjacent to a City park. The pet wash can be accessed from grade at the rear of the building, facilitating direct access to the park for residents and their dogs.

4.12 Ravine and Natural Feature Protection By-law

On October 3, 2002, City Council enacted By-law 838-2002, to adopt a new City of Toronto Municipal Code Chapter 658, Ravine Protection. On May 27, 2008, By-law 513-2008 was enacted by City Council to make technical amendments to improve clarity and consistency to Chapter 658.

The Ravine and Natural Feature Protection By-law is a tool to protect important natural features that are vulnerable to degradation due to the removal of trees, changes in grade or lack of management. Ravine and Natural Feature Protection areas include ravines, buffer areas beyond the edges of slope features, tableland forests greater than 0.5 hectares, environmentally sensitive areas, areas of natural and scientific interests, and public golf courses near ravines.

Key provisions of Municipal Code Chapter 658 include requirements for:

- a permit to injure, destroy or remove any tree on land in a protected area;

- an application to injure or destroy a tree, place or dump fill or refuse and to alter the grade of land; and
- Council approval to injure or destroy a tree or alter the grade of land if the tree is a heritage tree or is healthy and the management of the tree has not been addressed through submission of plans to the satisfaction of the General Manager.

The Ravine and Natural Feature Protection By-law is further discussed and evaluated in the Scoped Natural Heritage Impact Study, prepared by Dillon Consulting, dated July 2025, and discussed below at Section 5.9.

4.13 Toronto Region and Conservation Authority Regulation

The subject site is located within the TRCA's Regulation Limit (O. Reg. 41/24) (see **Figure 33**). Accordingly, a permit is required from the TRCA for any development or site alteration.

The Living City Policies for Planning and Development in the Watersheds of the TRCA (2014) guide the implementation of TRCA's legislated and delegated roles and responsibilities in the planning and development approvals process. Living City Policy 8.4.7(a) addresses development setbacks and states that development within a regulated area shall be set back 10 metres from the long-term stable top of slope, stable toe of slope, regulatory flood plain, meander belt and any contiguous natural features and areas that contribute to the conservation of land.

The relevant policies are further discussed and evaluated in the Scoped Natural Heritage Impact Study, prepared by Dillon Consulting, dated July 2025, and discussed below at Section 5.9. As requested by the TRCA, a separate Concept Development Application was made in advance of submission of the Official Plan and Zoning By-law Amendment application, which included a Slope Stability Assessment.

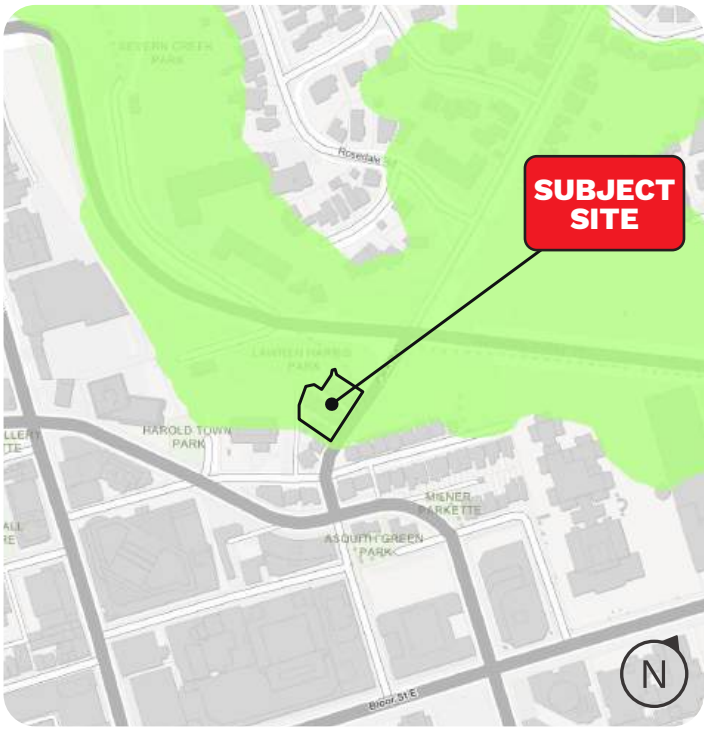


Figure 33 - TRCA Regulation Limit

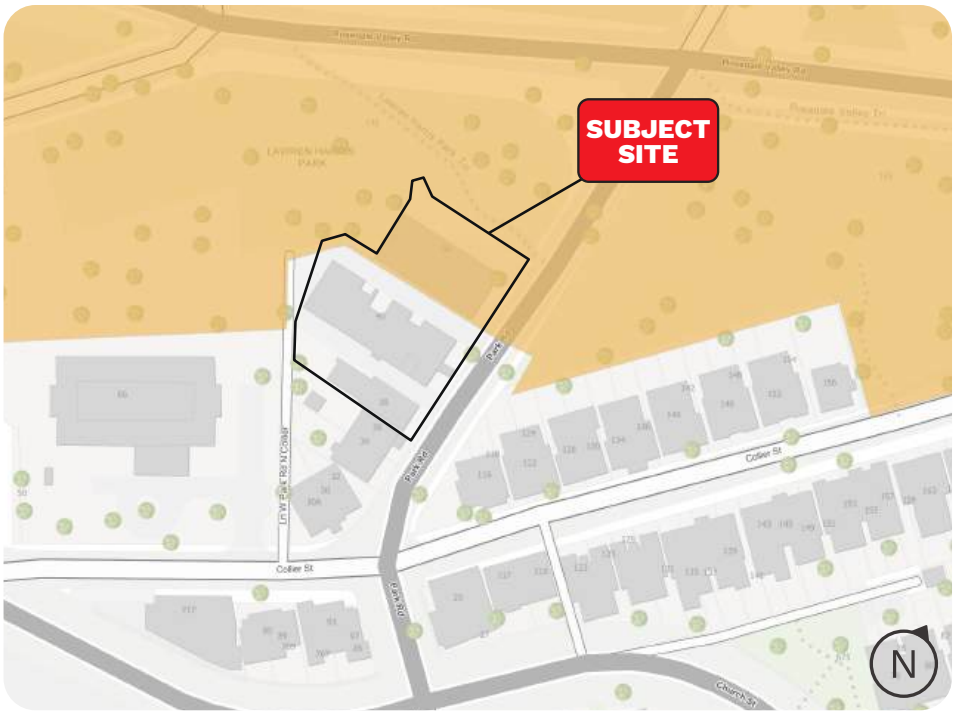
4.14 South Rosedale Heritage Conservation District Plan

The property at 50 Park Road is located within the South Rosedale Heritage Conservation District (the "South Rosedale HCD"), which was adopted by Toronto City Council in February 2003 and enacted under By-law 115-2003 (see **Figure 34**). The remainder of the subject site, at 38-40 Park Road, is adjacent to the South Rosedale HCD. As noted previously, 50 Park Road is also designated under Part IV of the *Ontario Heritage Act*.

The South Rosedale HCD Plan describes the District's architectural character and categorizes properties within the HCD according to their contribution to this defined character. The categories are:

- Category A: Buildings that are individually outstanding and have actual or potential national or provincial significance.
- Category B: Buildings that are noteworthy for their overall quality and have city-wide significance.
- Category C: Buildings which contribute to the heritage character and context of the neighbourhood.
- Unrated: Buildings which are not of national, provincial, city-wide or contextual heritage significance and do not contribute to the heritage character of South Rosedale or they are buildings which are too recent to be accurately evaluated for their heritage value.

As explained in the Heritage Impact Assessment prepared by ERA Architects, the building at 50 Park Road is not identified as a category 'A', 'B', or 'C' building in the South Rosedale HCD Plan and is therefore considered an "unrated" building. Given this context, the Heritage Impact Study concludes the proposed development does not present a negative impact on the cultural heritage value of the District. It further explains that, as the new construction is primarily located outside the HCD, the South Rosedale HCD Plan policies and design guidelines related to additions or new construction within the District do not directly apply.



Legend

Designated District

Figure 34 - South Rosedale HCD Location Map

4.15 City-Initiated Secondary Plan Review – Bloor-Yorkville Area

At its meeting on April 4, 2017, Toronto and East York Community Council directed City Planning Staff to prepare a new Site and Area Specific Policy (SASP) for the Bloor-Yorkville Area. The proposed SASP evolved into a Secondary Plan Study. The study area is generally bounded by Avenue Road to the west, the CP railway corridor to the north, Yonge Street/ Rosedale Valley Road/ Sherbourne Street to the east, and Charles Street to the east.

The Secondary Plan will build upon the existing policy direction outlined in the in-force Site and Area Specific Policies 211 and 225, and the updated policies in the recently approved Downtown Plan. The proposed Secondary Plan will provide area-specific policy direction to ensure that growth and investment in the Bloor-Yorkville area are effectively managed as the number of residents and workers continues to grow. The Secondary Plan aims to provide:

- a consistent boundary of the Bloor-Yorkville area;
- a clear urban structure that provides built-form direction;
- character areas with specific policies; and
- improvements to the public realm throughout the area.

The Secondary Plan will take form of a City-initiated Official Plan Amendment. A draft of the proposed Secondary Plan was anticipated to be brought forward to Community Council in the late second quarter of 2022. However, at the time of writing this report, a draft has not yet been released.



5 Planning & Urban Design Analysis

5.1 Intensification

Residential/mixed-use intensification on the subject site is appropriate, desirable and in keeping with the policy framework set out in the Provincial Planning Statement, the City of Toronto Official Plan and the Downtown Plan, all of which support intensification on sites which are well-served by municipal infrastructure, particularly higher-order transit.

The subject site is located within the northeastern portion of the *Downtown* and is in an area that is well served by higher-order transit. In this regard, the subject site is located within convenient walking distance of three higher-order transit stations, including Bloor-Yonge Subway Station (within an approximate 265 metre radius), Bay Subway Station (an approximate 500 metre radius) and Rosedale Subway Station (an approximate 525 metre radius).

Accordingly, the site forms part of a "major transit station area" and is located within a "strategic growth area", as defined by the Provincial Planning Statement. Strategic growth areas are the focus for accommodating intensification and higher-density mixed uses in a more compact built form.

The Provincial Planning Statement directs that the boundaries of major transit station areas are to be delineated in a manner that maximizes the number of potential transit users that are within walking distance of the station (our emphasis). The subject site falls within the proposed Protected Major Transit Station Areas (PMTSA's) associated with the Bloor-Yonge, Bay and Rosedale Subway Stations, as set out in Official Plan Amendments No. 524 and 570, which are awaiting Provincial approval.

Pursuant to Site and Area Specific Policies 600 (Bloor-Yonge), 599 (Bay) and 719 (Rosedale), the proposed PMTSA's are planned for minimum population and employment targets of 900, 900 and 200 residents and jobs combined per hectare, respectively, and specify a minimum density of 0.9 FSI or three units specified for the subject site, reflecting its current *Neighbourhoods* designation. The *Mixed Use Areas* designation south of Collier Street is assigned a minimum density of 2.5 FSI. The proposed development would assist in achieving the minimum targets for the PMTSA's.

From an Official Plan perspective, strong policy support is expressed for new housing in the *Downtown*, intended to minimize in-bound commuting and expand the range of housing opportunities. Policy 2.2.1(1) provides that the *Downtown* Toronto Urban Growth Centre will be planned to "optimize the public investment in higher order transit within the Centre" and thus should exceed the minimum combined gross density target of 400 residents and jobs per hectare set out in the 2019 Grown Plan (our emphasis). As well, the Official Plan encourages "a full range of housing opportunities" in the *Downtown*.

Furthermore, Policy 2.4(4) of the Official Plan provides that, in targeted growth areas, planning for new development will be undertaken in the context of reducing auto dependency. In addition, Policy 2.4(8) of the Official Plan provides for intensified development, with minimum density requirements and limits on parking, for sites in areas such as this which are well serviced by transit, such as locations around higher-order transit stations and along major transit routes.

Based on the Provincial and municipal direction to optimize the use of land and resources, the existing use of the subject site represents an underutilization of land and infrastructure. The site is occupied by a low-rise residential dwelling, an aging 8-storey apartment building and a low-rise office use and, in this regard, is underutilized. Optimizing the use of land and infrastructure on the subject site is consistent with both good planning practice and overarching Provincial and City policy direction, subject to achieving appropriate built form relationships. Residential/mixed-use intensification on the subject site would support transit ridership and provide the opportunity for residents to live close to work or to commute by multiple mobility options, including walking, cycling and public transit.

Further, the subject site is located along a Major Street. As set out in Policies 4.1(1), 4.1(5) and 4.1(7) of the in-force Official Plan, lands fronting onto major streets may be considered for a more intense form of development than what would otherwise be permitted on interior lots. In this regard, the subject site is distinct from the properties within the interior of the *Neighbourhood*, given the existing mix of uses on the subject site including the presence of an 8-storey apartment building, its proximity to developments with varying heights and scale, better access to public transit and direct exposure to greater volumes of traffic. The scale of intensification proposed can be achieved in a form that is compatible with the immediate context, and in a manner that also allows for the retention and integration of the existing heritage building and the implementation of significant public realm improvements along Park Road.

In our opinion, the current use of the site represents an underutilization of land and infrastructure in proximity to existing higher-order transit. The City has acknowledged that *Neighbourhoods* are important for meeting future housing demand - they house 50% of Toronto's population, span one-third of the City's land area, and hold 80% of its residential area. The City's Expanding Housing Options in Neighbourhoods (EHON) initiative, as described in Section 4.5 above, is indicative of the City's recognition of the overarching policy framework and the ongoing need to facilitate additional intensification and residential growth within the 35% of the City's land base that is currently designated as *Neighbourhoods*.

Within the policy context outlined above, it is our opinion that the subject site is underutilized in its current form. Mixed-use intensification on the subject site will more efficiently utilize the site and will optimize the use of land and infrastructure by providing new housing in a transit-supportive compact built form, non-residential uses that will serve the neighbourhood, and an improved public realm. In this regard, residential intensification on the subject site can take advantage of the wide range of shops, restaurants, recreational facilities, public parks, and cultural facilities available within the *Downtown*, more specifically within the Bloor-Yorkville/North Midtown area.

Further, residential intensification will support transit ridership, assist in reinforcing the role of the *Downtown* as a desirable living area and contribute to the achievement of population forecasts for the City as set out in the Official Plan.

In the non-policy sidebar within Section 2.1 of the Official Plan, it is noted that, by making better use of existing urban infrastructure and services before introducing new ones on the urban fringe, reurbanization helps to reduce demands on nature and improves the livability of the urban region by: reducing the pace at which the countryside is urbanized, preserving high quality agricultural lands; reducing reliance on the private automobile, reducing greenhouse gas emissions and reducing consumption of non-renewable resources.

5.2 Land Use

The introduction of new residential uses on the subject site, as well as 40 rental replacement units, together with non-residential uses, is desirable and appropriate in land use terms. The proposed development will create new homes on a site in the *Downtown* that is currently developed with a 3½-storey multi-unit dwelling, an aging 8-storey apartment building and a 2-storey office building.

The proposal also includes non-residential uses at 50 Park Road, which are yet to be determined. The building was and is currently being used as an office. Although that is the most likely future scenario, the space could also work in whole or in part for uses such as a gallery, co-working space, café or restaurant.

The existing mix of land uses on the site does not conform with the current *Neighbourhoods* designation. In this regard, historically, the office uses located at 50 Park Road have had a broad regional or Provincial focus (i.e. the Ontario Association of Architects and, latterly, DuToit Allsop Hillier) and were not local-serving. In addition, the existing apartment building at 40 Park Road has exceeded the historical 4-storey height limit in the *Neighbourhoods* designation and continues to exceed the new 6-storey height limit applicable to *Neighbourhoods* fronting on Major Streets. Accordingly, the redesignation of the subject site to *Mixed Use Areas* would better reflect the existing and historical mix of uses on the site.

Further, the proposed *Mixed Use Areas* designation would reflect the proposed mix of land uses on the subject site, including residential and non-residential uses. In our opinion, the proposed mix of uses would be supportive of overarching policy directions which seek the achievement of complete communities, which among other things, offer and support opportunities for people of all ages and abilities to conveniently access the necessities of daily living, including a mix of land uses including a range and mix of housing options within compact building forms with convenient access to public transit. In our opinion, the proposal supports the achievement of complete communities by providing new housing options in a compact form that is walkable to higher-order transit services, public parkland, recreational trails and community services and facilities.

As a result, it is our opinion that the redesignation of the subject site is both appropriate and desirable.

Proposed Official Plan Amendment

The proposed Official Plan Amendment seeks to redesignate the subject site from *Neighbourhoods* to *Mixed Use Areas* to accommodate a greater level of intensification along a Major Street in the form of the proposed 31-storey building with a mix of uses that is similar to that which currently exists on the site. The proposed Official Plan Amendment includes a corresponding amendment to the Downtown Secondary Plan to designate the site as *Mixed Use Areas 2*. Finally, it also provides for an exemption from the applicable height policies in SASP 211, as described below.

In our opinion, the proposed redesignation of the site from *Neighbourhoods* to *Mixed Use Areas* is both appropriate and desirable given:

- its location in the *Downtown* and fronting on a Major Street;
- its position within three PMTSA's and its proximity to the Bloor-Yonge Subway Station (a 4- to 5-minute walk);
- the existing mix of uses and building types that already occupy the site;
- the presence of existing buildings both on and adjacent to the subject site, which already exceed the maximum permitted height within *Neighbourhoods*, including the 8-storey building on the subject site and the 15-storey building at 66 Collier Street;

- its existing and planned context made up of a mix of mid-rise and tall buildings, including the 28-storey Park Road Condos development at 717 Church Street, which is also located within the Asquith-Collier neighbourhood and designated *Mixed Use Areas;*
- its adjacency to Lawren Harris Park and intervening streets, which create a buffer and physical separation from the low-rise *Neighbourhoods* to the north; and
- its size and configuration, affording it the ability to limit impacts on adjacent properties through built form transition and separation.

The proposed Official Plan Amendment is in keeping with provincial and municipal policies that promote intensification in proximity to higher-order transit and seek to optimize the use of existing and planned infrastructure. Further, the size and depth of the subject site can accommodate the proposed tall building form, which will be well separated from the *Neighbourhood* to the north (approximately 85 metres from the closest properties fronting on Pine Hill Road) and physically separated and visually buffered by Rosedale Valley Road and the Rosedale Valley Ravine system.

In our opinion, the proposal would be compatible with nearby residential *Neighbourhoods* as well as the broader context as described above. The proposed *Mixed Use Areas* designation that is being sought for the subject site would be in keeping with the character of the surrounding area, which includes a range of multi-unit buildings, including apartment buildings up to 15 storeys in height. Moreover, the proposed *Mixed Use Areas* designation and *Mixed Use Areas 2* designation are in keeping with other lands within the Asquith-Collier area, namely the property at 717 Church Street, which is currently under construction for a 28-storey mixed-use building.

The *Neighbourhoods* designation is intended to be a non-growth designation; it neither facilitates nor encourages revitalization and intensification, contrary to the objectives set out in the Provincial Planning Statement, as described in Section 5.1 above. The subject site is located within the *Downtown*, within three PMTSA's and within a 4- to 5-minute walk of the Bloor-Yonge Subway Station. In our opinion, the proposed mixed-use development and the proposed *Mixed Use Areas* designation will help achieve the objectives of the PPS and the Official Plan in intensifying areas such as these that are well-served by existing infrastructure, including public transit. It would do so by attracting high quality residential and non-residential uses and providing new homes for Toronto's rapidly growing population.

It is our opinion that the requested amendment conforms with Policy 5.3.1(3) of the Official Plan. In particular, the proposed Official Plan Amendment is consistent with the general intent of the Official Plan and the resulting development will be "compatible with its physical context" and will not affect "nearby *Neighbourhoods* or *Apartment Neighbourhoods* in a manner contrary to the neighbourhood protection policies of this Plan".

In this respect, "compatible" does not mean "identical to" or even "similar to", but rather means the ability to co-exist without unacceptable impacts of one upon the other. The detailed analysis of built form impacts in Section 5.6 demonstrates that the proposal would not result in any unacceptable impacts.

With respect to the "neighbourhood protection" policies in Section 4.1, the *Neighbourhoods* policies, as amended by OPA 320 and OPA 727, already recognize the potential for a greater scale of development along the Park Road frontage as compared to development within the interior of the *Neighbourhood*. In particular, as compared to lots within the interior, the site is located along a Major Street shown on Map 3, has a different lot configuration and depth and has direct exposure to greater volumes of traffic on adjacent or nearby streets (Park Road, Rosedale Valley Road and Church Street). As discussed above in Section 4.5, the City has recently approved policies through OPA 727 that will facilitate additional intensification of lands designated *Neighbourhoods* along Major Streets.

The redesignation of the subject site from *Neighbourhoods* to *Mixed Use Areas* is appropriate and supports the City's goal of expanding housing options in *Neighbourhoods*, particularly along Major Streets. From a broader City-wide perspective, there are several examples of Official Plan Amendments that have been approved involving redesignations of sites fronting on, or directly adjacent to, Major Streets within the *Neighbourhoods* designation, including:

Table 2 - Examples of Redesignation of Neighbourhoods to Mixed Use Areas

Address	OPA No.	Description
306-310 Gerrard Street East	OPA 693	OPA to redesignate the site from *Neighbourhoods* to *Mixed Use Areas* to permit a 10-storey mixed-use building containing office, retail and residential uses.
316-336 Campbell Avenue	OPA 621	OPA to redesignate the site from *Neighbourhoods* to *Mixed Use Areas* to permit a 26-storey mixed-use building.
287-291 Christie Street	OPA 600	OPA to redesignate a portion of the site from *Neighbourhoods* to *Mixed Use Areas* to permit a 6-storey mixed-use building.
466-468 Dovercourt Road	OPA 520	OPA to redesignate a portion of the site from *Neighbourhoods* to *Mixed Use Areas* to permit construction of a 6-storey mixed-use building.
491 Glencairn Avenue and 278, 280 and 282 Strathallan Wood	OPA 502	OPA to redesignate a portion of the site from *Neighbourhoods* to *Mixed Use Areas* to permit an 8-storey mixed-use building.
1141 Bloor Street West and 980 Dufferin Street	OPA 489	OPA to redesignate a portion of the site from *Neighbourhoods* to *Mixed Use Areas* and *Parks* to permit four tall buildings of 19, 22, 34 and 37 storeys.
2490-2514 Yonge Street, 10-12 Castlefield Avenue, and portions of 20 Castlefield Avenue and 567 Duplex Avenue	OPA 477	OPA to redesignate a portion of the site from *Neighbourhoods* to *Mixed Use Areas* to permit a 14-storey mixed-use building.
187-193 Parliament Street	OPA 402	OPA to redesignate a portion of the site from *Neighbourhoods* to *Mixed Use Areas* to permit an 11-storey mid-rise building.
650-652 Kingston Road & 2 Main Street	OPA 390	OPA to redesignate the site from *Neighbourhoods* to *Mixed Use Areas* to permit construction of a 7-storey mixed-use building.
231-237 College Street and 177-189 Huron Street	OPA 277	OPA to redesignate a portion of the site from *Neighbourhoods* to *Mixed Use Areas* to permit a 17-storey mixed-use building.

Address	OPA No.	Description
333 College Street and 303 Augusta Avenue	OPA 247	OPA to redesignate a portion of the site from *Neighbourhoods* to *Mixed Use Areas* to permit an 11-storey mixed-use building.
1955-1985 Yonge Street, 3 Belsize Drive and 18-22 Millwood Road	OPA 137	OPA to redesignate a portion of the site from *Neighbourhoods* to *Mixed Use Areas* to permit an 8-storey mixed-use building.
1304-1318 King Street West and 143-145 Cowan Avenue	OPA# to be assigned	OPA to redesignate the site from *Neighbourhoods* to *Mixed Use Areas* to permit construction of an 18-storey mixed-use building.

The proposed *Mixed Use Areas 2* designation in the Downtown Plan is reflective of the proposal's intermediate scale providing a transition between the taller building forms around the Bloor/Yonge "Height Peak" and the low-rise areas to the north and southeast. Policy 6.25 of the Downtown Plan provides that development within *Mixed Use Areas 2* will include building typologies that respond to their site context, including mid-rise and some tall buildings, while Policy 6.26 states that the scale and massing of buildings will be compatible with the existing and planned context of the neighbourhood, including the prevailing heights, massing, scale, density and building type. In our opinion, the proposed 31-storey tower is compatible with the existing and planned context and the proposal has been massed to respect and respond to the site's unique built form context.

With respect to the proposed exemption from SASP 211, it is noted that the description of the character of the Asquith-Collier *Neighbourhood* (i.e. "tree-lined streets and houses of two and three storey height, consistently set back from the street line") does not apply to the subject site or generally to the lands west of Park Road, which also includes the recently approved 28-storey building at 717 Church Street. Accordingly, the policy requirement that all new development will be "contextually similar" is not appropriate. In that respect, it is noted that the City required only a rezoning to permit the 28-storey building at 717 Church Street; no Official Plan Amendment was required to exempt the property from SASP 211.

It is our opinion that the proposed development of the subject site conforms with Policy 5.6(1.1) of the Official Plan, which notes that "all appropriate policies are to be considered in each situation" and that the goal of the Official Plan "is to appropriately balance and reconcile a range of diverse objectives affecting land use planning in the City". In this regard, the proposed development represents an appropriate balance between the intensification-related objectives of the *Mixed Use Areas*, particularly those along major streets such as Park Road, and the neighbourhood protection policies for *Neighbourhoods* through the inclusion of stepbacks, setbacks and a terracing down of heights.

5.3 Housing

From a housing perspective, the proposal will support Provincial and City policies that seek to provide housing options and affordability by expanding the range of housing types and densities through residential intensification. In this regard, residential intensification on the subject site will assist the City in achieving its Housing Target of 285,000 new homes by 2031.

In our opinion, the proposal is in keeping with Policies 3.2.1(1) and 3.2.1(2) of the Official Plan. In this respect, the proposal will provide for a full range of housing to meet the current and future needs of residents and will provide new housing supply in the area. In addition to replacing all of the existing rental housing stock on the subject site (40 units), the proposal provides for a net gain of 249 rental dwelling units, making a meaningful contribution to the supply of housing in the *Downtown*. Upon full build-out, the subject site will contain 289 dwelling units.

The subject site currently contains 40 rental apartment units, including 12 studio units, 24 one-bedroom units and 3 two-bedroom units within the existing apartment building at 40 Park Road and 1 one-bedroom unit within the triplex at 38 Park Road. The proposed development represents an important opportunity to reconstruct these units with more desirable layouts and living conditions, including ensuite laundry and modern mechanical systems and air conditioning, and replacing the existing units with higher quality apartments at similar rents. As well, the replacement units will benefit from new amenity space and bicycle parking, which are not currently available for the existing units.

It is currently contemplated that the replacement units will include the same unit mix as the units within the existing building. These new rental units, together with the proposed 249 new rental units, will add to the City's rental housing stock and provide a greater range of housing options for *Downtown* residents.

The proposed unit mix for the new units and rental replacement units, combined, is in accordance with the targets specified in Policy 11.1 of the Downtown Secondary Plan and Section 2.1 of the Growing Up Guidelines. In total, the proposal contains 77 two-bedroom units (27%) and 30 three-bedroom units (10%), in contrast to the existing 40 Park Road building which has no three-bedroom units. The remainder of the building includes 12 studio units (4%) and 170 one-bedroom units (59%). Of the 145 new one-bedroom units that are proposed, 9 will be designed as convertible units through adaptable design measures, meeting the unit mix requirements of the Downtown Secondary Plan.

As the subject site has existing rental units that will be replaced as part of the proposed redevelopment, a detailed Housing Issues Report (HIR) addressing Policy 3.2.1(6) of the Official Plan has been prepared in accordance with the terms of reference specified in the Toronto Development Guide. The HIR concludes that the rental replacement proposal outlined in the Housing Issues Report conforms with Policy 3.2.1(6) of the Official Plan.

In addition to the foregoing, the owner is committed to ongoing discussions with the City and the existing tenants in order to arrive at an appropriate tenant relocation and assistance plan. Based on the foregoing, it is our opinion that the Rental Housing Demolition and Conversion application is in accordance with Chapter 667 of the Municipal Code and maintains the intent and purpose of the Official Plan's rental housing replacement policies and, accordingly, should be approved.

5.4 Public Realm

The proposal will facilitate improvements to the streetscape along Park Road through the dedication of a 3.45-metre road widening across the frontages of 38 and 40 Park Road to provide a meaningful expansion of the public realm. The proposed road widening will support the creation of a comfortable, attractive and vibrant streetscape while enhancing the physical character of Park Road, which contributes to the identity of the surrounding neighbourhood.

The existing sidewalk along Park Road is located along the curb edge and is narrow, with an average width of approximately 1.75 metres. There are no street trees and telephone poles are located immediately adjacent to the sidewalk. Furthermore, in the case of 50 Park Road, the existing staircase encroaches into the right-of-way. The proposed road widening would allow for expanded sidewalks across the frontage of 38-40 Park Road that are approximately 2.5 metres wide and would create an expanded sidewalk zone with a minimum width of 8.54 metres (measured from the curb to the building face at the ground floor). The sidewalk zone is proposed to be enhanced with high-quality plantings, including three new street trees and would accommodate space for 10 visitor bicycle parking spaces.

Through the expansion of the sidewalk zone, the proposed road widening will support the growth management objectives and public realm policies of the Official Plan by creating additional space for pedestrians and landscaping elements that will enhance and improve the existing streetscape condition.

Policy 2.2(5)(a)(ii) of the Official Plan speaks to the acquisition of land to achieve the designated widths of road rights-of-way through the development review process to extend and alter the widths of pavement, sidewalk and other facilities as necessary within the designated rights-of-way. As discussed in Section 2.4, Park Road has a planned right-of-way width of 20 metres, as shown on Map 3 of the Official Plan. The segment of Park Road adjacent to the subject site has an existing right-of-way width of approximately 10.7 to 10.8 metres.

In this regard, a significant road widening on both sides of Park Road (approximately 9.3 metres in total) would be required to achieve a 20-metre right-of-way. In this respect, the City has advised that a 4.65-metre road widening would be required from the subject site (i.e. one half of the required widening).

As explained in detail in the Transportation Impact Study (TIS) by BA Group (see Section 5.10 below), there are numerous constraints that hinder the ability to achieve an ultimate right-of-way width of 20 metres for Park Road; namely the presence of heritage resources on the subject site and on properties on the east side of Park Road, as well as adjacent City parkland which contains a number of mature trees and retaining wall structures. In particular, the heritage building at 50 Park Road would encroach substantially into a 4.65-metre road widening, making achievement of the full 20 metre width impractical.

As described in detail below, in lieu of the 4.65-metre road widening, the proposal incorporates a 3.45-metre widening across the frontages of 38 and 40 Park Road to facilitate streetscape improvements and provide a meaningful expansion of the public realm. In our opinion, the proposed road widening provides for a balanced approach given the applicable constraints and competing planning objectives. Further details and justification for the proposed approach to the road widening are provided in the TIS.

In order to accommodate the proposed widening, the proposed Official Plan Amendment would amend Map 3 to change the classification of Park Road from a Major Street with a planned right-of-way of 20 metres to a Major Street with 'Non-uniform width, to be retained as existing at the time of Plan adoption'. In our opinion, the proposed amendment to Map 3 is appropriate because:

- it presents an opportunity to balance multiple planning and design objectives, providing for an improved public realm without unduly impacting the site and surrounding properties;
- it maintains the general purpose and intent of the Official Plan, while responding to the Plan's growth management, public realm and heritage policies;
- it affords the ability to maintain the heritage stair structure associated with the building at 50 Park Road, which is designated under Part IV of the *Ontario Heritage Act*;
- widening Park Road beyond the existing two-lane cross section for the purposes of traffic capacity would be expected to have a significant negative impact on the road's existing character;
- the 20-metre right-of-way width that is planned for is not feasible nor desirable;similar amendments to Map 3 of the Official Plan have been approved to accommodate other developments, including:
    - 6500-6550 Lawrence Avenue East (OPA 113): Map 3 was amended to show the segment of Lawrence Avenue East along the frontage of the property as a 30.86-metre right-of-way, whereas Map 3 showed a planned right-of-way of 36 metres; and
- numerous other amendments to Map 3 of the Official Plan have been approved to accommodate a variety of circumstances.

5.5 Height, Massing and Density

In our opinion, and as noted in Section 5.1 above, the subject site is an appropriate location for mixed-use intensification in land use policy terms. From a built form perspective, it is our opinion that the subject site is a contextually appropriate location for a tall building, given:

- its location in the *Downtown*, which is envisioned to absorb much of the new housing in the city;
- its location along a Major Street on Map 3 of the Official Plan;
- its proximity to three subway stations (Bloor-Yonge, Bay and Rosedale Subway Stations), which provide service on Lines 1 and 2 of the TTC;
- its location in Council-approved Site and Area Specific Policies 599, 600 and 719, applying to the Bay, Bloor-Yonge and Rosedale Protected Major Transit Station Areas;
- its existing and planned context made up of a mix of mid-rise and tall buildings, including the 28-storey Park Road Condos building at 717 Church Street, the 15-storey apartment building at 66 Collier Street, the 37-storey Milan Condos building and the approved 42-storey building at 820 Church Street;
- its separation from the low-rise *Neighbourhoods* to the north;
- its topography, which limits the building's visual impacts and the perception of building height; and
- its size and configuration, which is able to accommodate a tower floor plate with appropriate setbacks.

In this respect, it is our opinion that the proposal is in keeping with the anticipated locations for tall buildings as set out in Section 3.1.4 of the Official Plan.

With respect to the broad urban structure, the subject site is located at the edge of the Bloor-Yorkville/North Midtown area, within the northeastern portion of the *Downtown*. SASP 211 provides that the tallest buildings are to be located within the "Height Peak" in the vicinity of the Bloor/Yonge intersection and are to step down in descending "Height Ridges" along Bay Street, Yonge Street, Bloor Street and portions of Avenue Road. The policy does not contain height limits but rather provides that "height and density permissions will **generally diminish** the further one gets from Bloor Street" (our emphasis). It is further noted that these Height Ridges "provide a transition in scale from the 'Height Peak' at Yonge/Bloor and will be developed at a lesser height and physical scale than the Bloor/Yonge Height Peak, and in a form compatible with adjacent areas".

In general, heights around the Yonge/Bloor node (within the "Height Peak" per SASP 211) are the greatest and include developments such as: 1 Bloor Street West (The One) (85 storeys under construction), 1 Bloor Street East at 76 storeys, 2 Bloor Street West at 75 storeys (approved), 19 Bloor Street West at 99 storeys (approved) and 50 Bloor Street West at 71 storeys (approved). Within the "Height Ridge", existing and approved developments along Yonge Street include: 8 Cumberland Street (51 storeys), 1 Yorkville Avenue (58 storeys), 18 Yorkville Avenue (36 storeys), 1 Scollard Street (46 storeys, approved) and 825 Church Street (37 storeys).

The proposed height of 31 storeys is significantly less than the heights within the "Height Peak", which includes towers up to 99 storeys and is less than the heights within the "Height Ridge". In this regard, the proposed development will provide a transition in scale from the "Height Peak" and from the "Height Ridge", consistent with the overall pattern of development (see **Figure 35**).

While the subject site is located outside of a "Height Peak" and a "Height Ridge" and is within the Asquith-Collier neighbourhood as shown in SASP 211, it is our opinion that SASP 211 is outdated. Most of the applicable policies date back to the adoption of former North Midtown Part II Plan on December 15, 1986, although some of the policies were updated in February 2006. Accordingly, SASP 211 predates current planning policies contained within the PPS, the former Growth Plan, the City Official Plan and the Downtown Secondary Plan. As described in Section 2.0 above, the Asquith-Collier neighbourhood is a small pocket of mostly low-rise residential uses, but has for decades had mid-rise and tall buildings within and adjacent to its edges, including the under construction 28-storey (96.6 metre) building at 717 Church Street located 40 metres south of the subject site.

Furthermore, at 31 storeys and 108 metres (inclusive of mechanical penthouse), the proposed height would be compatible with other existing and recently approved developments in proximity to the subject site, including:

- 32 storeys (106 metres) at 931 Yonge Street (approved)
- 32 storeys (108 metres) at 8 Park Road
- 34 storeys (134 metres) at 2 Bloor Street East (Hudson's Bay Tower)
- 37 storeys (124 metres) at 90 Bloor Street East
- 37 storeys (113 metres) at 837 Yonge Street (Milan)
- 42 storeys (141 metres) at 820 Church Street (approved).

All of the above noted towers are located between Yonge Street and Park Road, north of Bloor Street East. Like the subject site and 717 Church Street, the approved 42-storey tower at 820 Church Street is located outside of the "Height Ridge" north of the Bloor/Yonge "Height Peak".

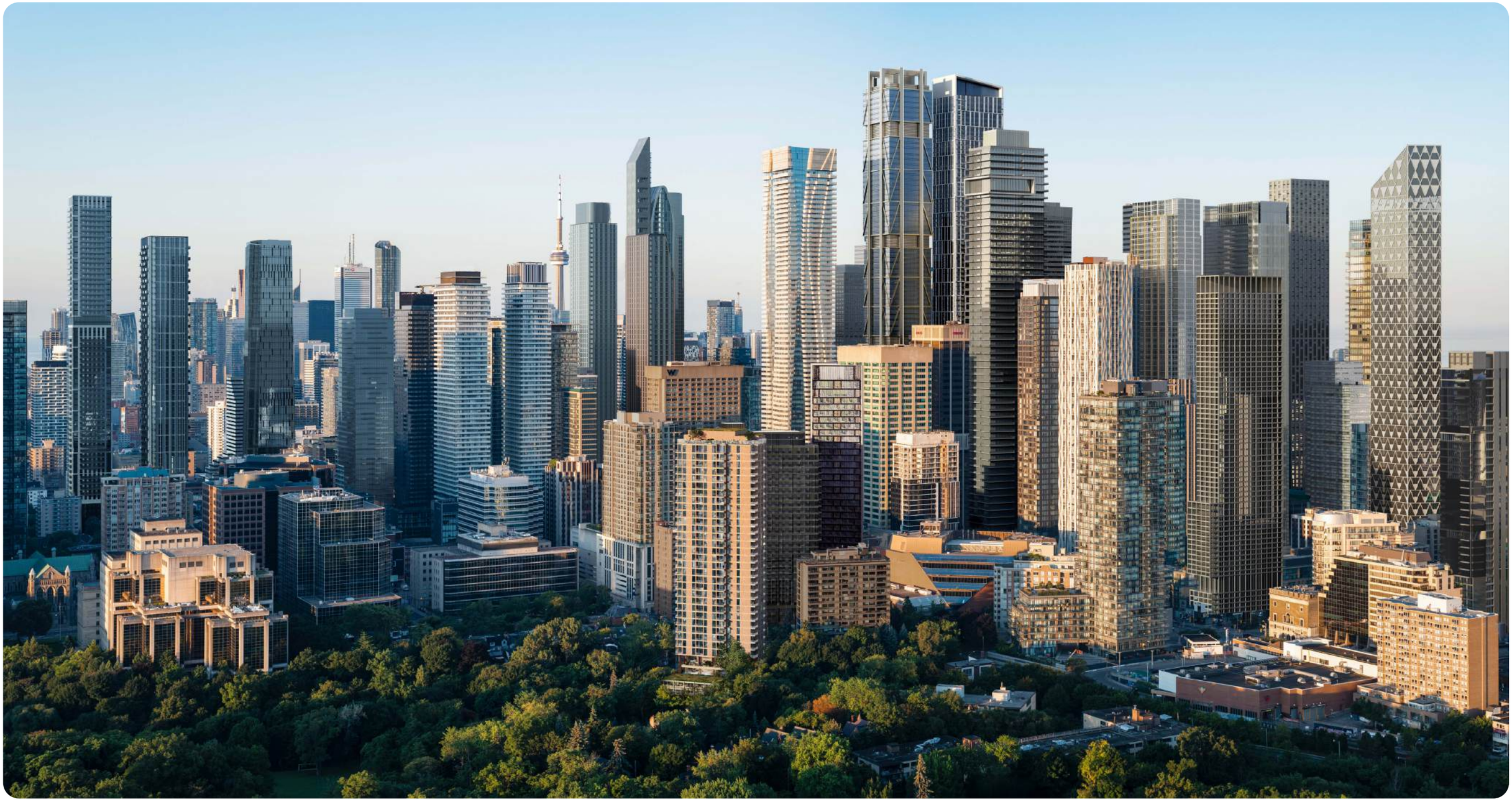


Figure 35 - Architectural Rendering - Bird's Eye View of Proposed Development Looking Southwest

Table 3 below provides a list of recent developments, approvals and proposals inthe Bloor-Yorkville/North Midtown area.

Table 3 - Developments in the Bloor-Yorkville / North Midtown Area

Address	Height (Storeys)	Height (Metres)	Status
15-19 Bloor Street West	99	323	Approved
1 Bloor Street West (The One)	85	309	Under Construction
1 Bloor Street West (The One)	94	328	Approved
80-82 Bloor Street West	78	263	Approved
1 Bloor Street East	76	257	Built
2 Bloor Street West (Cumberland Terrace – Tower C)	75	254	Approved
50 Bloor Street West (Holt Renfrew)	71	230	Approved
11-25 Yorkville Avenue	66	217	Under Construction
27-37 Yorkville Avenue (Yorkville Tower)	65	215	Under Construction
2 Bloor Street West (Cumberland Terrace – Tower B)	64	216	Approved
22-32 Scollard Street/21-25 Davenport Road	62	230	Approved
836-850 Yonge Street and 1-9A Yorkville Avenue (1 Yorkville)	58	183	Built
60 Yorkville Avenue (Four Seasons Hotel)	55	204	Built
826-834 Yonge Street/2-8 Cumberland Street	51	170	Built
44 Charles Street West (Manulife Centre)	51	166	Built
2 Bloor Street West (Cumberland Terrace – Tower A)	50	175	Approved
874-878 Yonge Street and 3-11 Scollard Street	49	167.5	Approved
835-839 Yonge Street	49 41	166 142	Proposed
35 Balmuto Street (Uptown Residences)	48	160	Built
27-37 Yorkville Avenue (Cumberland Tower)	44	142.5	Under Construction

Address	Height (Storeys)	Height (Metres)	Status
820 Church Street	42	141	Approved
1315-1325 Bay Street and 48-58 Scollard Street	41	155	Under Construction
906 Yonge Street	40 23	138 84	Approved
1255 Bay Street	39	132	Approved
90 Bloor Street East	37	124	Built
825 Church Street (Milan)	37	113	Built
18 Yorkville Avenue	36	115	Built
2 Bloor Street West (office tower)	34	149	Built
2 Bloor Street East (Hudson's Bay Tower)	34	134	Built
8 Park Road	32	108	Built
931 Yonge Street	32	106	Approved
38-50 Park Road (Subject Site)	**31**	**108**	**Proposed**
32 Davenport Road (The Yorkville)	31	106	Built
21 Avenue Road	31	100	Built
717 Church Street	28	97	Under Construction
55 Scollard Street (Four Seasons Residences)	26	94	Built
88 Davenport Road (The Florian)	25	88	Built
765-771 Yonge Street	25	84	Under Construction
94 Cumberland Street	25	76	Built

The proposed height is in keeping with the existing and emerging height context along the edge of the Rosedale Valley Ravine, where the *Downtown* tall building character interfaces with the ravine and the low-rise neighbourhoods to the north (see **Figure 36**). To the north and west of the subject site is a cluster of existing, approved and proposed towers, including the 28-storey Park Road Condos building, the 37-storey Milan Condos development, the proposed 41- and 49-storey towers at the Canadian Tire site and the approved 32-storey building at 931 Yonge Street. As noted in Section 2.2, the Park Road Condos building is at a higher elevation than the subject site, resulting in a geodetic height that is only 5.6 metres less than the proposed development.

To the east of the subject site, along or near the ravine edge, are a number of other tall buildings, including a 28-storey residential building at 300 Bloor Street East (The Bellagio), a recently-approved 63-storey building at 350 Bloor Street East, a recently-completed 55-storey mixed-use building at 387 Bloor Street East, a 38-storey residential building at 575 Bloor Street East and a 46-storey residential building at 585 Bloor Street East (Via Bloor 1 and Via Bloor 2).

The proposed 31-storey tower would fit comfortably into this pattern of tall buildings located along the edge of the ravine, where tall buildings can take advantage of long views while minimizing impacts on low-rise neighbourhoods. From the north, the tower will blend into views of the *Downtown* skyline and the Yonge/Bloor height peak.

In terms of massing, the proposal provides for an appropriately scaled tower and podium building form which is in keeping with the built form principles established in the Official Plan, the Downtown Plan and the Tall Building Design Guidelines. The proposed development incorporates a number of distinct elements, including a low-rise base building condition that sensitively incorporates the conserved heritage building at 50 Park Road and a tower element that is articulated with vertical and horizontal elements that create a distinct break in the massing to distinguish the tower from the lower levels of the building at the base.

The new construction responds to the scale of the 2-storey building at 50 Park Road and the adjacent dwellings to the south and southeast. The massing is horizontally and vertically separated from 50 Park Road in order to give prominence to the heritage character of the conserved building. At street level, the design of the base building element extends the architectural expression of 50 Park Road and maintains the existing pedestrian perception of streetwall height. The levels above the ground floor feature extensive glazing and an open design.

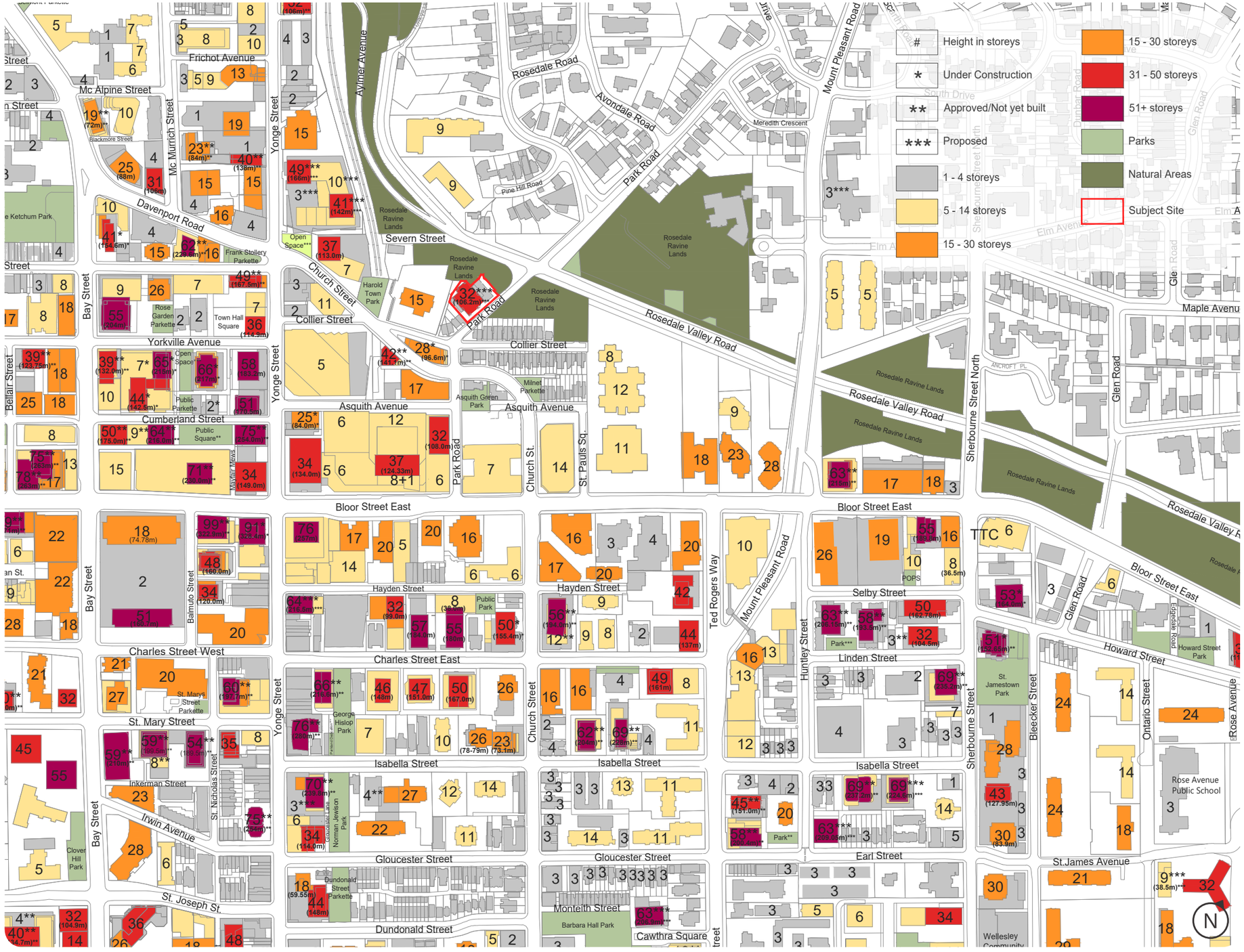


Figure 36 - Height Map

The tower element is sited towards the south end of the subject site, pulling the massing away from Lawren Harris Park and the low-rise dwellings north of Rosedale Valley Road and towards the intersection of Park Road and Collier Street. The cantilevered portion of the tower above 50 Park Road is limited to 1.4 metres in depth and is substantially elevated above the roof, beginning at Level 3, so as to limit the massing impacts of the new construction on the heritage building below, and giving breathing room to the heritage building. Along Park Road, the tower is set back 4.0 metres from the existing east lot line (0.55 metres from Park Road as widened), away from the public realm, and is articulated with inset balconies at the corners to mitigate the visual scale of the building.

In our opinion, the cantilevered portion of the tower is appropriate and desirable in that it will contribute to the optimization of the site, making efficient use of land and infrastructure and creating additional housing options, while resulting in no unacceptable built form impacts.

As discussed in greater detail in Section 5.6 below, the proposed tower achieves an appropriate built form relationships to neighbouring properties and the public realm. In this regard, the tower is set back 5.5 metres from the south lot line, allowing for the potential redevelopment of the properties to the south. While less than the recommended 12.5 metres, the 5.5 metre setback is adequate as the properties to the south cannot reasonably be redeveloped in a tower configuration, as illustrated in the accompanying Block Context Plan (see Section 5.6 below). Towards the west, the tower is generally built to the lot line abutting the public lane as widened. The façade is angled away from the existing 15-storey apartment building at 66 Collier Street, resulting in a diagonal relationship between the buildings which limits light, view and privacy impacts.

In terms of the tower floor plate, it is our opinion that the floor plate size of approximately 792 square metres (gross construction area), while slightly in excess of the 750 square metres recommended by the Tall Building Design Guidelines, is appropriate given the size and configuration of the site, its separation from adjacent properties by the right-of-way of Park Road to the east and the intervening public lane to the west, as well as its minimum tower separation distance of 23.3 metres (corner-to-corner) from the 15-storey apartment building at 66 Collier Street (see **Figure 37**).

Moreover, the Downtown Secondary Plan provides that, while the tower component of a tall building will generally have a maximum floor plate size of 750 square metres, increases to the floor plate size may be appropriate where the impacts of the larger floor plate, including shadow, sky view and wind are addressed. As set out in Sections 5.6 and 5.7 below, the foregoing built form impacts have been appropriately addressed through the siting, design and articulation of the tower floor plate.

Furthermore, the proposed tower floor plate would be in keeping with numerous larger residential floor plates located within the *Downtown*, as outlined in **Table 4**.

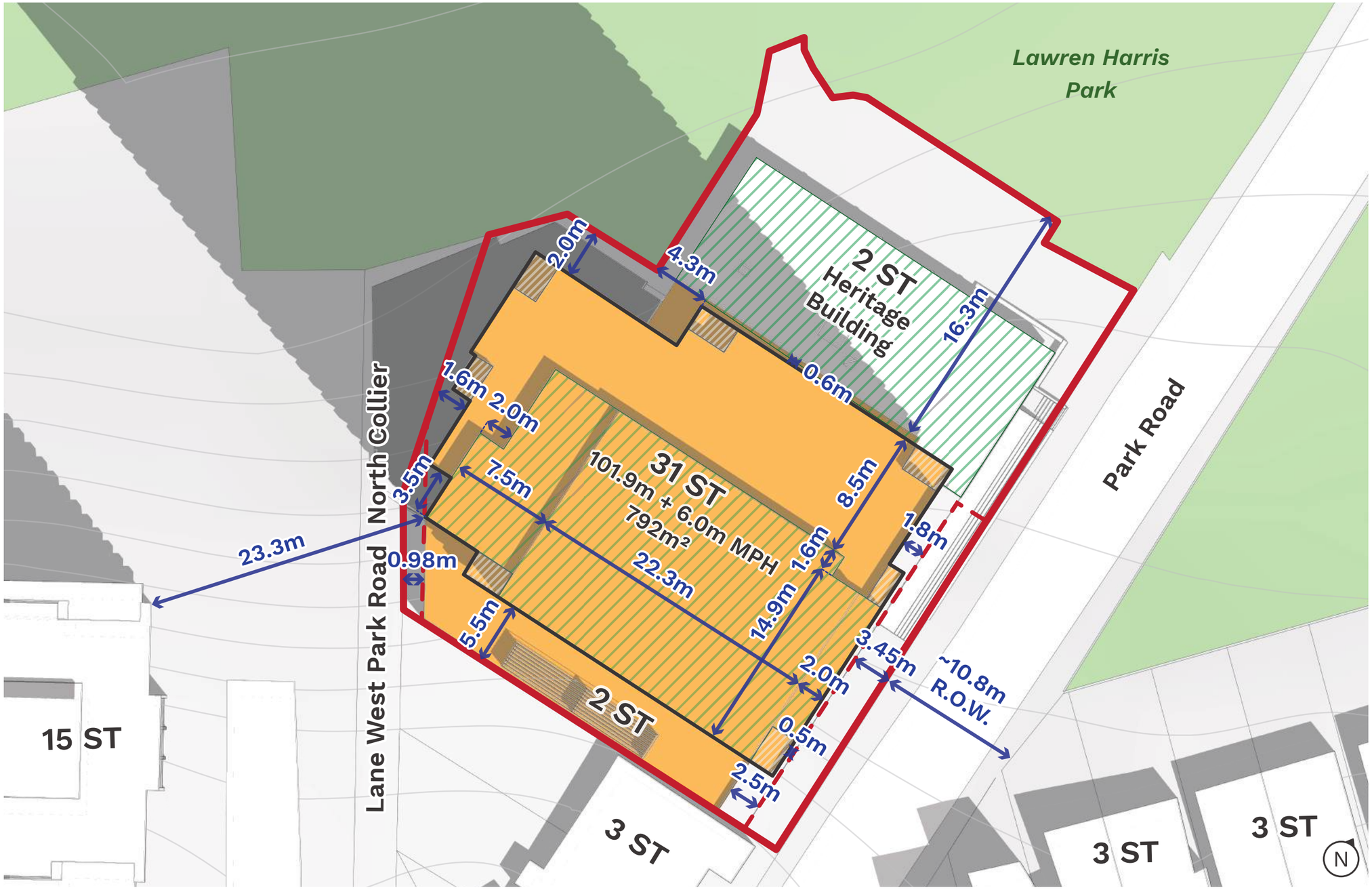


Figure 37 - Setbacks and Separation Distances

Table 4 - Tower Floor Plate Sizes in the Downtown

Address	Floor Plate (m^2)
60 Yorkville Avenue	1,380 (Floors 1-21) 984 (Floors 21-52)
382-388 Yonge Street (Aura)	1,250 (Floors 1-46) 975 (Floors 46-78)
711-717 Bay Street & 44 Gerrard Street West	2,841
633 Bay Street	1,633
22 Edward Street	1,544
38 Elm Street	1,188
43, 49 & 51 Gerrard Street West	1,184
60-66 Isabella Street	1,168
11 Wellesley Street West	1,135
20-26 Lombard Street & 25 Richmond Street East	1,081
197 Yonge Street (Massey Tower)	1,050
27-37 Yorkville Avenue (North Tower)*	1,012
27-37 Yorkville Avenue (South Tower)*	958
11-25 Yorkville Avenue*	1,000 (Floors 10-23) 757-880 (Floors 24-62)
120-130 Harbour Street and 10 York Street	992
50 Bloor Street West**	974
1 Bloor Street West*	956
1 & 23 Bloor Street East, 14 Hayden Street, 709 and 711 Yonge Street	918
55 Charles Street East	880
592 Sherbourne Street (The Selby)	737 (Floors 5-35) 815 (Floors 36-49)
1255 Bay Street**	817 (Floors12-34)
568-580 Jarvis Street and 99-103 Charles Street East	776
836-850 Yonge Street and 1-9A Yorkville Avenue	758

* Under Construction
** Approved/ Not Under Construction

In our opinion, the proposed density of 14.2 FSI is appropriate and desirable. Firstly, it is important and appropriate from a planning policy perspective to optimize the use of land and infrastructure on the site given its location on a Major Street within the *Downtown*, its proximity to existing higher-order transit services on Lines 1 and 2 of the TTC and its position within three defined PMTSA's, which are designated for growth and intensification.

Secondly, it is noted that neither the City of Toronto Official Plan nor the Downtown Plan generally include density limitations and specifically do not do so in the case of the subject site. The Official Plan provides that land use designations are generalized, leaving it to the Zoning By-law to "prescribe the precise numerical figures and land use permissions that will reflect the tremendous variety of communities across the City." Accordingly, it is reasonable to establish an appropriate density for the subject site based on specific built form design, context and urban structure considerations, rather than on the basis of density numbers.

The proposed development will contribute to residential intensification in Downtown Toronto in a manner that conforms with the urban design and built form policies of the Official Plan and Downtown Plan. Within a policy context that promotes intensification, as is the case with the subject site, the optimization of land and infrastructure is a desirable planning outcome, provided that there are no unacceptable impacts either in terms of built form or the adequacy of hard and soft services. As detailed in the following sections of this report, the proposed development has no unacceptable built form impacts, represents good urban design and is supported by hard and soft services with no significant infrastructure capacity concerns.

5.6 Built Form Impacts

In our opinion, the proposed development will not have unacceptable built form impacts on surrounding streets, open spaces or on lower-scale *Neighbourhoods*.

The base building, which includes the heritage building at 50 Park Road, will provide a stepping down of height towards Lawren Harris Park and the low-rise dwellings to the north and east. To the south, the base building incorporates a one-storey element that provides a built form transition to the 3½-storey semi-detached dwellings at 34-36 Park Road. At Level 2, the building is set back 5.5 metres from the south lot line, further defining the scale of the base building and mitigating impacts on the abutting low-rise dwellings. To the north, the base building is comprised of the conserved heritage building at 50 Park Road, which already establishes a built form transition to the park and the low-rise *Neighbourhood* to the north.

The tower has a slender profile and has been strategically massed to limit impacts on nearby *Neighbourhoods* and adjacent parkland. The tower is sited towards the south end of the site in order to direct the massing away from the park and the low-rise area to the north.

Light, View and Privacy

Light, view and privacy ("LVP") impacts are generally addressed through a combination of spatial separation, orientation and mitigating measures between buildings. For the base building, a minimum main window separation distance of 11 metres is specified in Zoning By-law 569-2013 (i.e. a minimum window setback of 5.5 metres from side and rear lot lines or the centreline of a lane).

For tower elements, the City-wide Tall Building Design Guidelines are the standard for addressing LVP impacts for tall buildings. As well, Section 600.10 of By-law 569-2013 (the Downtown Tall Building Setback Overlay) requires a tower setback of 12.5 metres from side and rear property lines, and from the centreline of an abutting street or lane, measured to the external walls of the building (i.e. balconies are permitted within the setback zone). The 12.5 metre tower setback is intended to contribute to the achievement of a 25.0 metre tower separation distance, shared equally by each property. From the front lot line, a 3.0 metre setback is required to the tower element. The foregoing tower setback requirements apply only to the portions of a tall building above 24.0 metres in height if the building is 36.0 metres in height or greater.

Based on the LVP standards and guidelines set out above, we have analyzed the siting of the proposed building in relation to existing and approved buildings in the vicinity, and it is our opinion that the proposal would result in appropriate setbacks and separation distances and acceptable LVP conditions, as described below.

Base Building

The ground floor of the base building is comprised of the main residential lobby area, stacked parking, back-of-house uses and non-residential space within the property at 50 Park Road. The upper levels of the base building (i.e. the mezzanine level and Level 2) contain open-to-below areas, indoor and outdoor amenity spaces, and a management office, as well as one residential unit on the mezzanine level at the northwest corner of the building, which faces north and west, overlooking Lawren Harris Park. The residential unit is set back approximately 2.0 metres from the north lot line and approximately 1.8 metres from the City-owned lands to the west; while less than 5.5 metres, there are no existing or potential future buildings on adjacent lands and therefore there would be no LVP impacts.

The south façade of the base building is proposed to be a blank wall, resulting in a condition that is similar to the existing condition between the existing dwellings at 36 and 38 Park Road.

Based on the foregoing, it is our opinion that there are no LVP issues associated with the base building.

Tower Element

The proposed tower has been carefully designed to mitigate LVP impacts on adjacent properties.

To the west, the tower is generally built to the lot line and interfaces with the City-owned lands to the rear. While less than 12.5 metres, the tower achieves a minimum tower separation distance of 23.3 metres (corner-to-corner) from the 15-storey apartment building at 66 Collier Street. While the proposed tower separation distance is less than 25 metres, the corner-to-corner condition ensures that there are no direct facing window conditions between the residential units in the proposed tower and the existing units at 66 Collier Street. As well, the northerly portion of the east façade of 66 Collier Street consists of a blank wall, with the primary windows facing to the north, away from the proposed building. The separation distance from the closest east-facing windows in the middle of the east façade of 66 Collier Street is approximately 25 metres corner-to-corner.

To the south, the tower is set back 5.5 metres from the south lot line. While the south setback is less than the recommended 12.5 metres, it is our opinion, based on the analysis set out in the Block Context Plan (summarized below), that a tall building would not be achievable on the lands to the south even if the properties at 30-36 Park Road were assembled. The resulting lot area (approximately 749 square metres), in combination with required widenings along Park Road and the public lane, together with the triangular shape of the lot, would not be able to accommodate a viable tower floor plate. Instead, it is our opinion that the assembly would be able to accommodate a mid-rise building in accordance with the Mid-Rise Building Design Guidelines and the EHON Major Streets By-law, which recommend an 11-metre separation distance (i.e. based on 5.5 metre setbacks on adjoining lots). Accordingly, the proposed 5.5 metre setback would allow for a minimum 11-metre facing window condition.

With respect to the low-rise residential uses to the east, the tower element is set back 4.0 metres from the existing east lot line along Park Road (0.55 metres from Park Road as widened) and is further separated by the 10.7 metre right-of-way. In the existing condition, Supplementary Design Guideline #1 of the Downtown Tall Building Guidelines recommends a minimum 20-metre setback from lower-scale neighbourhood properties to provide appropriate transition and mitigate sky view, privacy and overlook. The proposed tower will exceed a 20-metre separation distance from the majority of the properties on the north side of Collier Street due to the angles of Park Road and Collier Street, with the exception of the rear lot lines of 116-128 Collier Street, which will be separated by approximately 15-20 metres from the proposed tower.

Further, the rear yards of the Collier Street properties are screened from view by mature trees and vegetation along the east side of Park Road and maintain further privacy due to their elevation above Park Road. As a result of this context, the resulting LVP impacts on the *Neighbourhoods* to the east and southeast are, in our opinion, adequately limited.

The north-facing residential units within the tower would overlook Lawren Harris Park and would be separated by approximately 60 metres from the closest residential properties to the north (132-138 Rosedale Valley Road). However, these properties are designated *Natural Areas*. The closest lands to the north that are designated *Neighbourhoods* are approximately 85 metres from the proposed tower (i.e. the tablelands portion of the property at 5 Pine Hill Road).

Based on the foregoing, it is our opinion that no unacceptable LVP impacts are anticipated.

Sky View Impacts

In our opinion, the proposed setbacks and tower floor plate size for the proposed tower would not have an unacceptable impact on sky view from the public realm (i.e. from Park Road and Lawren Harris Park) given the urban context of the subject site which includes numerous existing and approved tall buildings.

Viewed from Park Road and the abutting park, the conserved heritage building at 50 Park Road would continue to define the scale along the street with a 2-storey street wall that respects the existing built form character and the right-of-way of Park Road.

The tower is oriented in an east west direction with a tower floor plate size of approximately 792 square metres (gross construction area). The width of the tower along Park Road is slender (approximately 25 metres) and is substantially set back from the north lot line (16.9 metres) to maximize sky view from the park. The tower is articulated with inset balconies that break up the massing and mitigate visual impacts and incorporates materials that distinguish it from the design of the base building below.

While the tower floor plate of 792 square metres slightly exceeds the recommended maximum tower floorplate size in the Tall Building Design Guidelines, from a sky view perspective, the resulting dimensions of the tower maintain a slender point tower configuration, and the resulting massing will not create unacceptable impacts.

Furthermore, Policy 9.16 of the Downtown Plan provides that increases to the 750 square metre floor plate size may be considered when it is demonstrated that the impacts of the larger floor plate, including pedestrian comfort, shadows, transition, sky-view and wind can be addressed. It is our opinion that the orientation and size of the tower will not have an unacceptable impact on sky view from the public realm. Shadow and wind impacts are detailed in the sections below.

Shadow Impacts

A shadow study was prepared by BDP Quadrangle, in consultation with Bousfields Inc., to assess the incremental shadow impacts from the proposed development at the spring and fall equinoxes (March 21st and September 21st), and the summer and winter solstices (June 21st and December 21st) in accordance with the City of Toronto Terms of Reference for Sun/Shadow Studies.

Official Plan Policy 3.1.3(5) requires that new development be located and massed to ensure access to direct sunlight and daylight on the public realm. Policy 3.1.4(10) further provides that the tower portion of a tall building should be designed to limit shadow impacts on the public realm and surrounding properties and maximize access to sunlight and open views of the sky from the public realm. Policy 3.2.3(3) provides that the effects of development from adjacent properties on parks and open spaces, including additional shadows, will be "minimized as necessary to preserve their utility".

Policy 4.5(2)(d) directs that development will locate and mass new buildings so as to adequately limit shadow impacts on adjacent *Neighbourhoods*, particularly during the spring and fall equinoxes. Further, Policy 4.5(2)(e) states that new development will locate and mass new buildings to maintain sunlight for pedestrians on adjacent streets, parks and open spaces.

The Downtown Plan includes additional policy direction with respect to shadowing of open spaces in Policy 7.13, including on Rosedale Valley Ravine which is part of the Core Circle identified on Map 41-6. Section 9 includes policies on "Creating a Comfortable Microclimate", including requirements that development address microclimatic conditions for people on adjacent streets and sidewalks, parks and open spaces by adequately limiting shadow conditions, as necessary to preserve their utility as set out in Policy 9.21.

Policy 9.21 includes measures to help achieve these conditions, including: reducing the floor plates of tall buildings; reducing the overall height and scale of buildings; re-orienting, reducing the size of and/or setting tall building elements on the site; and increasing the space between tall building elements. It should also be noted that Rosedale Ravine is not identified as a Sun Protected Park and Open Space on Map 41-13.

Neighbourhoods

To the north, the closest *Neighbourhoods*-designated lands are located north of the Rosedale Ravine on the south side of Pine Hill Road, approximately 85 metres away from the proposed tower. In this regard, it is noted that the low-rise properties and apartment buildings fronting on Rosedale Valley Road (including the apartment buildings at 120 and 130 Rosedale Valley Road and the low-rise properties at 132-138 Rosedale Valley Road) are designated *Natural Areas*. The *Neighbourhoods* designation applies to the tablelands within the South Rosedale residential area which sit above the Rosedale Ravine.

There is also a smaller pocket of *Neighbourhoods* along Collier Street to the southeast of the subject site. These *Neighbourhoods* have a more direct relationship with the high-rise development that characterizes the Yonge/Bloor intersection as one of the City's pre-eminent nodes in an area that already experiences shadowing from some of the tallest buildings in Toronto. This juxtaposition of scales is a frequent occurrence throughout the *Downtown*.

The Shadow Study demonstrates that, at the spring and fall equinoxes, there will be minimal incremental shadow impacts from the proposal on the *Neighbourhoods* located north of Rosedale Ravine. During the March/September 21 period, shadows reach the properties fronting on the north side of Rosedale Valley Road (designated *Natural Areas*) at 12:18 p.m. At 2:18 p.m., they reach the rear yards of houses fronting on the south side of Pine Hill Road, portions of which are designated *Neighbourhoods*, and largely move off the area around 3:18 p.m. During that period, the shadows move quickly across five properties in total.

There are no shadow impacts during the Spring/Fall Equinox period on the *Neighbourhoods* pocket along Collier Street to the southeast.

Based on the foregoing, it is our opinion the proposed development satisfies the policy criterion with respect to adequately limiting shadow impacts on *Neighbourhoods* in accordance with Policy 4.5(2)(d).

Parks and Open Spaces

The majority of open space areas associated with Rosedale Ravine are designated *Natural Areas* in the City's Official Plan, including Lawren Harris Park directly northwest of the subject site. In the general vicinity of the subject site, Rosedale Ravine is characterized by a dense, mature tree canopy including within Lawren Harris Park which incorporates scattered seating and a pedestrian walkway but no formal active recreation zones. Many areas of the Ravine are not accessible to pedestrians due to grading and vegetation.

The shadow study prepared by BDP Quadrangle demonstrates that the shadow cast by the proposed development will move quickly across Rosedale Ravine throughout the day during the Spring and Fall Equinoxes. Later in the afternoon, its shadows will be mitigated by other existing high rises in the surrounding context. The shadow study also demonstrates that other buildings in the general vicinity cast comparable shadows on open space in this area which is reflective of the general character of built form which is dominated by tall and super tall buildings.

June 21 shadows (i.e. Summer Solstice) produce the shortest shadows during the year due to the position of the sun above the horizon. As a consequence, the shadow cast by the proposal stays on the south side of Rosedale Valley Road and continues to move quickly without any lingering impacts. Furthermore, the proposed tower configuration has a slender profile resulting in a narrow shadow that moves quickly across the area while the tower itself is situated away from the Park.

The Shadow Study demonstrates the proposed tower would result in minor incremental shadow impacts on the playing field of the Branksome Hall campus to the northeast of the subject site (also designated *Natural Areas*). As demonstrated by the Shadow Study, the shadow impacts are limited to one hour on March 21st and September 21st between 4:18-5:18 p.m. and are limited to a small area within the southern portion of the playing field.

Based on the foregoing, it is our opinion that the proposal satisfies the policy criteria set out in Policy 3.2.3(3) of the Official Plan and Policy 7.13 of the Downtown Plan.

Wind Impacts

Policy 4.5(2)(e) of the Official Plan directs that new buildings be massed to maintain comfortable wind conditions for pedestrians on adjacent streets, parks and open spaces.

A Pedestrian Level Wind Study (dated June 16, 2025) was prepared by Theakston Environmental in support of the application. The objective of the study was to quantitatively assess, by model analyses, the pedestrian level wind environment under existing and future conditions with the proposed development and to assess mitigation solutions.

The wind velocities are rated in accordance with the safety and comfort of pedestrians, notably at entrances to the building, sidewalks, courtyards on the property, as well as other buildings in the immediate vicinity. The study involved wind tunnel measurements of physical scale models taken at 78 test points, combined with meteorological data based on historical records of wind speed and direction.

Based on the analysis and the consideration of local climate data, the following was concluded for the proposed condition:

- Park Road, Collier Street, Rosedale Valley Road and Church Street remain comfortable and suitable for the intended use throughout the year and pass the pedestrian level wind velocity safety criteria.
- In terms of neighbouring sites, the Fontainebleu Apartments (130 Rosedale Valley Road) will be comfortable for sitting and for the intended use year-round. The conditions at 66 Collier Street will undergo a subtle improvement in the summer, changing the rating from standing to sitting at the building entrance, while the walkway will change from sitting to standing in the winter. The entrance and walkway at 66 Collier Street will remain comfortable and suitable for the intended uses throughout the year. All analyzed neighbouring sites will remain comfortable for intended use.

- With regard to nearby parks and open spaces, all parks in proximity to the subject site are expected to be suitable for the intended use throughout the year. The conditions of the sports field of Branksome Hall will not change and, as such, the play field will remain suitable for the intended use. Lawren Harris Park will undergo relatively minor changes with conditions changing from sitting to standing at various test sites throughout the year. The study notes that these areas will experience more comfortable conditions than reported with consideration of the existing dense vegetation throughout the park and surrounding area. Hazeldean Park realizes similar conditions to the existing setting, with one test area improving from standing to sitting in the winter. Harold Town Park, located to the southwest of the subject site would experience subtle increases in wind; however the park will experience more comfortable conditions than reported with consideration of the existing dense vegetation throughout the park and surrounding area.
- Internal to the subject site, tested areas including the staff terrace located at grade along the northwestern façade of the proposed building and the walkway adjacent to the north façade of the heritage building are expected to be comfortable for standing or sitting throughout the year. The 'breezeway' associated with the vehicle access driveway is expected to be suitable for walking in the spring and standing through the remainder of the year. All internal site areas pass the pedestrian level wind velocity safety criteria.
- The main residential entrance is expected to be suitable for sitting throughout the year. The main entrance to 50 Park Road is expected to be comfortable for sitting or standing throughout the year. All entrances to the proposed and existing buildings are expected to be comfortable for the intended uses throughout the year.
- The Level 2 and the rooftop outdoor amenity spaces are expected to be suitable for standing in the spring and sitting throughout the remainder of the year. The study recommends consideration of a mitigation plan for the rooftop amenity area which will result in conditions that are suitable for the intended use throughout the year.

Overall, the site and surroundings are predicted to be suitable for standing or sitting throughout the year with localized walking conditions in the spring within the vehicle access 'breezeway'. The study finds that the proposed development will realize wind conditions that are acceptable to a typical urban context.

Block Context Plan

A Block Context Plan ("BCP") was prepared by Bousfields Inc. to provide an illustration and analysis of how the physical form of the proposal fits within the existing and planned context, and to evaluate the proposal within the urban design and built form policy framework of the Official Plan and applicable urban design guidelines. It also identifies conceptual redevelopment sites ("soft sites") within the block and adjacent blocks that may develop in a manner generally consistent with the urban design principles and built form approach on the subject site.

As directed by City staff, the Block Context Plan studied the area bounded by Yonge Street to the west, Bloor Street to the south, St. Paul's Square to the east and Rosedale Valley Road to the north (including some properties on the north side of Rosedale Valley Road).

The demonstrated conceptual soft site massing for the Study Area has regard for the development criteria and built form policies of the Official Plan, the Downtown Plan and key elements of the Tall Building Design Guidelines and the Bloor-Yorkville/ North Midtown Urban Design Guidelines.

Potential soft sites are understood to be underutilized sites where opportunities exist to redevelop into a more intense, urban and transit-oriented land use and built form. This includes properties fronting onto streets within the Study Area that are designated *Mixed Use Areas* and *Apartment Neighbourhoods*, where intensification is planned. Given the fragmented nature of some of the *Neighbourhoods* designated properties in the surrounding area, the analysis also contemplates redevelopment of some *Neighbourhoods* in a more intense form of development. These *Neighbourhoods* properties are unencumbered by heritage listing or designation and are not part of a larger stable residential neighbourhood area (i.e. 30 to 36 Park Road).

Potential redevelopment sites were identified as follows:

- 120 Bloor Street East;
- 160 Bloor Street East;
- 30-36 Park Road;
- 807-823 Yonge Street, 840-876 Church Street and 4-20 Collier Street;
- 885-901 Yonge Street; and
- 909-927 Yonge Street.

Immediately adjacent to the south of the subject site, a land assembly of 30-36 Park Road would produce a site that could accommodate a mid-rise building. Based on our analysis, an assembly comprising the four lots to the south would not be able to reasonably accommodate a tall building. Given the size and geometry of the site, together with the setbacks that would be required, the remaining tower floor plate size would render a tall building development infeasible. In this regard, a tower development with setbacks similar to the proposed development would result in a floor plate of only approximately 267 square metres, which is well below the range of typical tower floor plate sizes in Toronto, based on our experience.

The BCP finds that the property at 66 Collier Street, currently occupied by a 15-storey, 55-unit condominium building, is unlikely to be redeveloped with a future addition or new development as the rear portion of the lot is regulated by the TRCA and consists of an open space area with mature trees.

The subject site is directly across the street from existing *Neighbourhoods* properties with house form buildings fronting onto Collier Street, to the east and southeast. All of the houses along this portion of Collier Street are listed on the Heritage Register and are unlikely to be assembled for future redevelopment. The BCP concludes that no other sites that are directly adjacent to the subject site have bearing on the configuration of the proposed development.

Overall, the Block Context Plan demonstrates that, from a block planning perspective, the proposed development has been appropriately sited and massed on the site so as to be compatible with the height and massing of potential future development in the immediate area. In this regard, the proposal has been designed with appropriate setbacks and separation distances that will generally meet those set out in the Tall Building Design Guidelines and will not preclude the potential for suitable future development on adjacent lands.

Based on the analysis, the BCP demonstrates that the proposed development on the subject site will fit appropriately within the context of the study area and will inform an appropriate scale of future development within the immediate area.

5.7 Urban Design

From an urban design perspective, the proposed redevelopment represents a well-designed addition to the *Downtown*, and in particular, to the Midtown area near the intersection of two of the City's principal streets which represents a height peak. The proposal responds appropriately to the contextual considerations of the subject site and adjacent land uses in a manner that is in conformity with the intent of applicable built form and urban design policies of the Official Plan and the Downtown Secondary Plan. The proposal also has appropriate regard for the Tall Building Design Guidelines.

In urban design terms, the vision for the proposed development is based upon developing a well-integrated residential development that is compatible with the existing and planned context of the area. In this respect:

- From an urban structure perspective, the proposal redevelops an underutilized site in proximity to higher-order transit, specifically an interchange of two subway lines, in a compact built form that responds to the surrounding context, which is characterized by some of the City's tallest buildings, while ensuring an appropriate interface with the open space system associated with Rosedale Ravine.
- The proposed height fits within the existing context of tall buildings which includes a height peak at the intersection of Yonge and Bloor in an area where taller buildings have a more direct relationship with open space and lower scale residential neighbourhoods.
- Within the immediate context, the proposal provides for an appropriate response with respect to the existing low scale residential *Neighbourhoods* pockets to the east, and the larger, more stable residential *Neighbourhoods* to the north of the Rosedale Ravine with an appropriately scaled podium and adequate transition of scale.
- The siting and setbacks of the proposed development have appropriate regard to the existing and planned context, including the lands to the immediate south, which could potentially be redeveloped in a low/mid-rise development form.
- The architectural design of the building is of high quality, retaining and enhancing the heritage attributes located on the subject site.
- From an energy conservation perspective, the new tower will result in significant improvements as compared with the existing buildings at 38 and 40 Park Road, which have few or no energy conservation features. As well, the rehabilitation of the 50 Park Road building will result in enhanced energy performance.
- In addition to a widening of the existing sidewalk zone adjacent to the subject site, a 3.45 metre right-of-way widening will be provided in front of 38 and 40 Park Road for streetscape improvements which will further animate the street frontage and enhance the public realm.

The proposed tower/podium and top configuration is reflective of current policy and design direction in the City of Toronto for tall buildings. In that regard, the lower levels of the development integrate the existing heritage building along Park Road into the overall configuration of the development with appropriate regard for the heritage attributes. The building also includes a single-storey element on the south side. As a means of further visual distinction between the various building elements, the façade at the lower levels is set back with a unique architectural articulation and ample glazing.

The materiality of the building is a combination of masonry veneer and glazing that will provide a positive addition to the skyline which is dominated by glass towers. The configuration of the tower floor plate will contribute to the overall massing articulation of the building. The materiality (i.e. brick) responds to the heritage context of the subject site and is compatible with the surrounding character.

Official Plan

In our opinion, the proposed development is appropriate and desirable in urban design terms and conforms with the applicable urban design policies in the Toronto Official Plan, including in particular Policies 3.1.1(2), 3.1.1(3), 3.1.1(6), 3.1.1(10), 3.1.1(13), 3.1.1(14), 3.1.1(16), 3.1.3(1), 3.1.3(3), 3.1.3(4), 3.1.3(5), 3.1.3(6), 3.1.3(8), 3.1.3(9), 3.1.3(10), 3.1.3(11), 3.1.3(13), 3.1.4(8), 3.1.4(9), 3.1.4(10), 3.1.4(12) and 4.5(2). In detail, the proposal will:

- provide a comfortable, vibrant, safe and accessible setting for daily social interaction through high-quality streetscaping improvements and clearly visible entrances to the residential lobby accessed directly from the public sidewalk;
- locate the building parallel to the street with the main building entrance directly accessible from the public sidewalk;
- provide attractive, safe and comfortable sidewalk zones adjacent to the subject site, within which co-ordinated landscaping, tree planting and decorative hardscaping are incorporated to make these areas attractive, interesting, comfortable and functional for pedestrians throughout all seasons;
- achieve a compatible relationship with the built form context through the consideration of massing, scale and setbacks, as well as architectural character and expression;
- provide appropriate setbacks and separation distances from neighbouring buildings to protect privacy and limit lighting and view impacts;
- provide a massing that fits within the existing and planned context, including a podium condition and tower element, through its scale, proportions, materiality and rhythm of articulation;
- provide a transition in scale to the existing low-rise properties through the integration of a podium condition that respects and reinforces good street proportion and pedestrian scale and adequate separation distance;
- provide high-quality, comfortable and contiguous indoor and outdoor amenity spaces for residents;
- provide all parking spaces and bicycle spaces within the ground floor of the building and underground to minimize impacts on the safety and attractiveness of the public realm;
- provide vehicular, servicing and loading access via one access point to minimize their visual impact; and
- screen service areas, ramps and garbage storage from the public realm by internalizing these functions within the building envelope.

Downtown Plan

It is our opinion that the proposal conforms with the applicable urban design principles of the Downtown Plan as set out below. In our opinion, the proposal will:

- contribute to an improved and expanded public realm by providing setbacks from property lines to adjacent streets and incorporating a range of pedestrian amenities including a landscaped open space located on the north side of the existing building at 50 Park Road as well as streetscape improvements such as widened sidewalks, additional walkways, planters and seating;
- establish a base building that fits harmoniously within the existing and planned context of neighbouring streetwall heights, including high-quality materials that differ from the upper portion of the building to distinguish the lower floors as a podium condition;
- include design elements such as vertical and horizontal framing that define the building and speak to the design of the conserved heritage building while contributing to an appropriate pedestrian scale;
- respect and reinforce the streetwall height, articulation, proportion, materiality and alignment established by the conserved heritage building;

- provide a built form transition to existing and planned contexts through the use of setbacks and stepbacks of the podium condition along Park Road, as well as appropriate separation distances that consider the existing and potential future context of 66 Collier Street to the southwest and 30 to 36 Park Road to the south of the subject site; and
- provide indoor amenity space that incorporates glazing as a primary component of the southern and western walls, while locating the outdoor amenity primarily along the southern, eastern and northern portions of the building and on the rooftop to maximize sunlight and promote use in all seasons.

Tall Building Design Guidelines

In our opinion, the design of the proposed building is generally in keeping with the applicable guidelines included in the City-wide Tall Building Design Guidelines, as set out below:

Guideline 1.1 - Context Analysis: Evaluate the existing and planned context and demonstrate how the proposed tall building responds to the patterns, opportunities, and challenges within the surrounding area.

- The proposal considers the existing and emerging built form character of the area, including ongoing and future intensification around nearby major intersections and transit stations.

Guideline 1.3 - Fit and Transition in Scale: Ensure tall buildings fit within the existing or planned context and provide an appropriate transition in scale down to lower-scaled buildings, parks, and open space.

- The proposed 31-storey height (107.9 metres) will fit within the existing and planned context, which includes numerous under construction, approved and proposed tall and super tall buildings with heights of up to 99 storeys (approved, not yet built). The podium condition of the building, which includes the conserved heritage building at 50 Park Road, provides a visual transition to the low-rise residential *Neighbourhoods*.

Guideline 1.4 - Sunlight and Sky View: Locate and design tall buildings to protect access to sunlight and sky view within the surrounding context of streets, parks, public and private open space, and other shadow sensitive areas.

- A discussion of shadow impacts is included in Section 5.6 above.

Guideline 1.6 - Heritage Properties and Heritage Conservation Districts: Locate and design tall buildings to respect and complement the scale, character, form and setting of on-site and adjacent heritage properties and Heritage Conservation Districts (HCDs).

- The property municipally known as 50 Park Road is occupied with a 2-storey glass and buff brick modernist office building which is designated under Part IV of the *Ontario Heritage Act*. The proposal conserves and respects the heritage building located on the subject site.

Guideline 2.1 - Building Placement: Locate the base of tall buildings to frame the edges of streets, parks and open space, to fit harmoniously with the existing context.

- The podium element of the proposal is designed to positively relate to the public realm and surrounding context. Through the articulation of the podium condition and setbacks at the ground floor level to provide streetscape improvements within the right-of-way and stepbacks at the mezzanine and second level, it maintains an appropriate and proportionate pedestrian scale that relates to street character and significant grade change along Park Road.

Guideline 2.2 - Building Address and Entrances: Organize tall buildings to use existing or new public streets for address and building entrances. Ensure primary building entrances front onto public streets, are well defined, clearly visible and universally accessible from the adjacent public sidewalk.

- The building will use existing public streets for address and for building entrances. The primary entrances will front onto Park Road and will have direct access to the public sidewalk in a well-defined and clearly visible location.

Guideline 2.3 - Site Servicing, Access, and Parking: Locate "back of house" activities, such as loading, servicing, utilities, and vehicle parking, underground or within the building mass, away from the public realm and public view.

- All building services, including parking and loading, will be located within the building envelope and will be screened from public view.

Guideline 2.5 – Private Open Space: Provide a range of high-quality, comfortable and shared outdoor amenity space throughout the tall building site.

- Indoor and outdoor amenity spaces are located on Level 2 and on the mechanical penthouse floor, providing direct views to Lawren Harris Park and the ravine. The indoor amenity space on Level 2 includes glazing as the primary materiality of three facades which, in addition to the orientation of the building, maximizes sunlight within the space throughout the morning and afternoon. The outdoor amenity space on Level 2 is provided on the northeastern and southwestern sides of the building, maximizing sunlight throughout the morning and afternoon while reducing wind impacts. The amenity space on the mechanical penthouse level primarily faces north and northwest, maximizing sunlight in the afternoon.

Guideline 3.1.1 – Base Building Scale and Height: Design the base building to fit harmoniously within the existing context of the neighbouring building heights at the street and to respect the scale and proportion of adjacent streets, parks and public or private open spaces.

- The podium condition, composed of Level 1, the mezzanine and Level 2 of the proposed development, differ in materiality from the upper portion of the building and define the podium condition, while complementing the conserved two-storey heritage building, which will act as a buffer to Lawren Harris Park. The form and materiality would fit harmoniously within the context of the neighbouring building heights and would respect the scale and proportion of the adjacent streets within the context of the differing topography.

Guideline 3.1.3 – First Floor Height: Provide a minimum first floor height of 4.5 metres, measured floor-to-floor from average grade.

- Level 1 to 2 will have a combined height of 7.7 metres, composed of Level 1 with a height of 4.2 metres and an additional 3.5 metre mezzanine space above to accommodate internal loading and servicing functions.

Guideline 3.1.4 – Façade Articulation and Transparency: Articulate the base building with high-quality materials and design elements that fit with neighbouring buildings and contribute to a pedestrian scale. Provide clear, unobstructed views into and out from ground floor uses facing the public realm.

- The base condition will be treated with high-quality materials that will complement the conserved heritage building and provide visual interest at the pedestrian scale. The base building includes extensive vision glazing and windows to promote clear, unobstructed views into and out from the residential lobby that faces the public realm. The base is treated with brick cladding on the vertical elements, creating a visually distinct yet cohesive design transition from the conserved 50 Park Road building to the new construction. In addition, a one-storey brick element, containing stacked parking facilities, extends to the south where the base building interfaces with the 3½-storey semi-detached dwellings at 34-36 Park Road.

Guideline 3.1.5 – Public-Private Transition: Design the base building and adjacent setback to promote an appropriate level of visual and physical access and overlook reflecting the nature of building use at-grade.

- The grade-related residential lobby will include an entrance facing the proposed landscaped right-of-way widening along the Park Road frontage and along the public sidewalks to promote an appropriate level of visual and physical access. The use of materiality, specifically glazing, will promote overlook into the building and onto the street.

Guideline 3.2.1 – Floor Plate Size and Shape: Limit the tower floor plate to 750 square metres or less per floor, including all built area within the building, but excluding balconies.

- The proposed tower floor plate of 792 square metres (GCA) at Levels 3 to 31 is modestly larger than the recommended 750 square metres (by 5.6%). The proposed floor plate size is appropriate given it is in keeping with those in the surrounding context and there would be no unacceptable impacts on the surrounding area. The tower size, floor plate configuration, separation and shape limit any potential issues related to built form impacts, including those related to access to sunlight and sky view and the maintenance of privacy between residential units.

Guideline 3.2.2 – Tower Placement: Place towers away from streets, parks, open space and neighbouring properties to reduce visual and physical impacts of the tower and allow the base building to be the primary defining element for the site and adjacent public realm.

- The retention of the heritage building located at 50 Park Road and the distinct materiality of the proposed podium condition will create a discernible break between the podium condition and the upper levels, reducing the impact and prominence of the tower when viewed from the adjacent public realm.

Guideline 3.2.3 – Tower Separation: Set back tall building towers 12.5 metres or more from the side and rear property lines or the centre line of an abutting lane. Provide separation distance between towers on the same site of 25 metres or more, measured from the exterior walls of the buildings, excluding balconies.

- The proposed tower provides for a minimum setback of 5.5 metres from the south. Although the Tall Building Design Guidelines recommend a tower setback of 12.5 metres, the adjacent properties to the south (i.e. 30 to 36 Park Road) even when assembled would not produce a site large enough to accommodate a tower.

- To the southwest, the proposed tower would result in a separation of 23.3 metres from the existing 15-storey apartment building at 66 Collier Street measured corner to corner. While less than the recommended 25 metres, the two buildings would be situated in a staggered formation, limiting Light, View and Privacy impacts. This approach is reflective of the recommendations within the Tall Building Design Guidelines which speak to creative solutions, such as offsetting towers/ views, non-parallel walls, or tapering, to increase actual or perceived tower separation distances. Furthermore, the 66 Collier building contains primary windows that face towards the north and south and has limited windows facing east towards the subject site.

Guideline 3.2.5 – Balconies: Design balconies to maximize usability, comfort, and building performance, while minimizing negative impacts on the building mass, public realm, and natural environment.

- The tower includes inset and partially inset balconies on all four elevations. The balconies have been designed to maximize comfort and usability, while reducing negative impacts on building mass.

Guideline 3.3 – Tower Top: Design the top of tall buildings to make an appropriate contribution to the quality and character of the city skyline. Balance the use of decorative lighting with energy efficiency objectives, the protection of migratory birds and the management of artificial sky glow.

- The mechanical penthouse will be incorporated into the building design by way of continuing the design, pattern, and materials used in the tower up to its top, positively contributing to the tall building skyline in the Yonge/Bloor area.

Guideline 4.1 – Streetscape and Landscape Design: Provide high-quality, sustainable streetscape and landscape design between the tall building and adjacent streets, parks and open space.

- The building has been set back to provide streetscape and landscape improvements between the tall building and adjacent streets. A 3.45 metre right-of-way widening will be provided in front of 38 and 40 Park Road to allow for significant streetscape improvements.

Guideline 4.2 – Sidewalk Zone: Provide adequate space between the front of the building and adjacent street curbs to safely and comfortably accommodate pedestrian movement, streetscape elements and activities related to the uses at grade.

- The existing sidewalk width along Park Road is approximately 1.75 metres (average); the proposed widening would allow for expanded sidewalks that are approximately 2.5 metres wide and would contribute to the creation of an expanded sidewalk zone of up to 8.95 metres at grade (as measured from the building face to the curb).
- The proposed building setbacks, coupled with the public boulevards, will provide for a generous amount of space between the front of the building and adjacent street curbs to accommodate pedestrian movement and streetscape improvements.

Guideline 4.3 – Pedestrian Level Wind Effects: Locate, orient and design tall buildings to promote air circulation and natural ventilation, yet minimize adverse wind conditions on streets, parks and open space, at building entrances, and in public and private outdoor amenity areas.

- This guideline has been addressed through the wind assessment, as summarized in Section 5.6 above.

Guideline 4.4 – Pedestrian Weather Protection: Ensure weather protection elements, such as overhangs and canopies, are well integrated into building design, carefully designed and scaled to support the street and positioned to maximize function and pedestrian comfort.

- As indicated in Section 5.6 above, the proposal incorporates measures to ensure comfortable wind conditions for pedestrians within the public realm.

5.8 Heritage

A Heritage Impact Assessment ("HIA") was prepared by ERA Architects in support of the application. The report evaluates potential impacts of the proposed development on the on-site heritage resource at 50 Park Road and adjacent heritage resources on Collier Street. The report finds that the proposed development is consistent with and conforms with the cultural heritage policies of the PPS and Official Plan and aligns with the guidance set out in the *Standards and Guidelines for the Conservation of Historic Places in Canada*.

As noted in the HIA, a Cultural Heritage Evaluation Report (CHER) was prepared for each of the properties at 38, 40 and 50 Park Road. The properties at 38 and 40 Park Road were evaluated under O. Reg. 9/06 and found not to meet the threshold for designation under the *Ontario Heritage Act*; accordingly, their demolition does not present a negative impact on an existing or potential heritage resource.

The report identifies 50 Park Road as being designated under Part IV, Section 29 of the *Ontario Heritage Act* through By-law 182-91 and is within the South Rosedale Heritage Conservation District (HCD). As explained in the HIA, the building at 50 Park Road is not identified as a category 'A', 'B', or 'C' building in the South Rosedale HCD Plan and is therefore considered an "unrated" building. Given this context, the HIA concludes the proposed development does not present a negative impact on the cultural heritage value of the District. It further explains that, as the new construction is primarily located outside the HCD, the South Rosedale HCD Plan policies and design guidelines related to additions or new construction within the District do not directly apply.

The HIA finds that the primary conservation treatment for the property at 50 Park Road is rehabilitation. The building is found to be in fair to good condition, requiring repairs and upgrades to support its continued use. Rehabilitation is found to enable the property to be adapted for a compatible non-residential use within an evolving urban context. Restoration is a secondary conservation treatment within the proposal, including the reinstatement of select character-defining features to their original appearance such as the original width of the main entrance and replacing the existing paved driveway and parking lot with a landscaped area to restore the original site condition.

In terms of impact, the report finds that the heritage attributes that convey the cultural heritage value of 50 Park Road will be conserved through redevelopment. The building is being fully retained in situ and will continue to present as a legible two-storey volume defined by the Modernist design characteristics that contribute to its significance. The majority of the new construction is sited away from the existing structure and allows the original form to remain distinguishable.

With respect to the listed properties to the east of the subject site on the north side of Collier Street, the HIA explains that the properties are located at a higher elevation and are oriented away from the site. As a result, the HIA concludes that there is no direct spatial or visual relationship between the Collier Street properties and the subject site.

The HIA concludes that the proposed development conserves the cultural heritage value of the designated heritage property at 50 Park Road and the adjacent listed heritage properties on Collier Street.

5.9 Natural Heritage

The subject site is located within the City's Ravine and Natural Feature Protection (RNFP) area and the Toronto and Region Conservation Authority (TRCA) Regulated Area. In addition, Lawren Harris Park which abuts the subject site is located within the Natural Heritage System (NHS). Accordingly, a Scoped Natural Heritage Impact Study ("NHIS") was prepared by Dillon Consulting, dated July 2025.

The NHIS assessed the natural features within and adjacent to the study area to determine their ecological function. The study concludes that the subject site does not contain woodland habitat. While the adjacent parkland meets the definition of a woodland, it would not be considered significant given the size of Lawren Harris Park and the breakage with the canopy to the northwest provided by Rosedale Valley Road. Similarly, the absence of a watercourse/fish habitat rules out the change in topography as a valleyland. Additionally, the study finds that the area does not contain wetlands or Areas of Natural or Scientific Interest. The immediate tree coverage in the vicinity of the subject site was ruled out as a Significant Wildlife Habitat and potential Species at Risk habitat.

In terms of slope stability, a geotechnical investigation was undertaken by EXP on November 20, 2024 and a Slope Stability Assessment was prepared, dated June 10, 2025, to assess potential slope stability hazards. Based on this investigation, the NHIS concludes that the geotechnical setback for a long-term stable slope as per TRCA guidelines should not be applicable to the subject site and that there are no existing or proposed slope stability concerns.

With regard to valleylands, the NHIS found that the subject site exists on lands located mid-slope in an area with a gradual change in topography. The existing residential lands were historically constructed on a stepwise plateau which disrupted the natural continuation of the top of bank.

Construction of buildings in the neighbourhood also promoted the addition of fill in the area. Fill was specifically added to the interior of the City-owned lands surrounded by retaining walls; however, this was not required to support the foundation of the existing residential multi-storey building.

Despite the change in grade within the subject site and surrounding study area, the elevation transition does not meet the definition of a valleyland under the TRCA Living City Policies or Natural Heritage Reference Manual, according to the NHIS. The definition states that valleylands "means a natural area that occurs in a valley or other landform depression that has water flowing through or standing for some period of the year". As there are no watercourses within the subject site or surrounding study area, the NHIS rules out the presence of significant valleylands.

The NHIS identifies potential direct impacts from the proposed development, including tree and vegetation removal, diversion of stormwater flows, sedimentation of natural features and disturbance to wildlife. Tree and vegetation removal was found to be minimal and retains the adjacent non-significant woodland and minimizes the impact on the mature parkland trees of Lawren Harris Park. Stormwater management was found to be accommodated by the proposed infrastructure, while sedimentation and disturbance to wildlife were considered to be potentially impacted during site alteration (i.e. during the construction period).

Indirect impacts include anthropogenic disturbance to local wildlife communities adjacent to the proposed development through noise, light, vibration and human presence, and the introduction of exotic and/or invasive species to the surrounding vegetation communities.

Detailed mitigation measures will be finalized in consultation with the TRCA and the City as part of the preliminary and detailed design of the proposed development.

5.10 Transportation

A Transportation Impact Study ("TIS") dated July 2025 was prepared by BA Group in support of the application. The report contains a traffic operations analysis to assess the potential impacts of the proposal, as well as a review of the appropriateness of the proposed widening of Park Road, vehicle parking, bicycle parking, loading and pick-up/drop-off provisions.

Traffic Operations Analysis

The study analyzed the signalized intersections of Church Street/Park Road and Rosedale Valley Road/Park Road and the unsignalized intersections of Church Street/Collier Street, Park Road/Collier Street, Park Road/40 Park Road Driveway and Park Road/Proposed Residential Driveway, under scenarios both with and without the proposal.

Overall, the report finds that the proposed development is forecast to generate a total of 15 and 35 two-way vehicle trips during the weekday morning and afternoon peak hours, respectively. In terms of peak direction of travel (outbound in the AM and inbound in the PM), the estimated number of vehicle trips are approximately 10 and 20 respectively.

Under future total conditions (i.e. including the proposed development), all of the signalized intersections in the vicinity of the subject site are anticipated to operate acceptably. The TIS concludes that traffic generated from the proposal will result in minimal impacts to the signalized intersections of Church Street/Park Road and Rosedale Valley Road/Park Road. The unsignalized intersections are expected to operate acceptably with Level of Service C or better. Site traffic is anticipated to have only a minor impact on operations at these intersections with an approximately 0 percent to 1 percent increase in the overall control delay. On that basis, the TIS concludes the area road network can acceptably accommodate future traffic generated from the proposed development.

Park Road Widening

The study identifies several constraints to widening the existing right-of-way of Park Road to 20 metres to satisfy the Official Plan requirement, including the existing heritage building at 50 Park Road, heritage properties on Collier Street that back onto the east side of Park Road, the presence of City parks immediately adjacent to the roadway and mature trees on the east side of Park Road. The study notes that the existing stairs and lower level at 50 Park Road extend into the Park Road right-of-way, preventing any widening from being applied across the entire subject site and limiting the utility of providing such a widening. It concludes that, given the existing 10.7-metre right-of-way and the heritage and other constraints, widening to 20 metres is not feasible.

The study notes the classification of Park Road as a Minor Arterial Road and the different character of the road as it passes through *Neighbourhoods* and *Natural Areas* north of the subject site, and through *Mixed Use Areas* to the south from Collier Street to Bloor Street. The study finds that widening Park Road beyond the existing two-lane cross section north of Collier Street for the purposes of traffic capacity would be expected to have a significant impact on the road's existing character. Further, as Park Road provides a connection between Church Street (a Major Arterial) and Rosedale Valley Road (a Minor Arterial), this function could instead, the study concludes, be served by a Collector Road, citing nearby examples including Collier Street between Park Road and Church Street, Park Road north toward Mount Pleasant Road and Park Road between Bloor Street and Church Street.

The study concludes that the property access functions and narrow residential character of Park Road, combined with the lack of transit routes, may merit consideration of a lower road classification and therefore a narrower right-of-way width than may otherwise be considered for a Minor Arterial Road. The proposed 3.45-metre right-of-way widening on the non-heritage portions of the subject site would allow for widening that can incorporate improved pedestrian infrastructure and public realm.

Parking

Based on the City-wide vehicle parking policies, the study finds that the proposed parking supply will meet the demands of the site and the requirements of the Zoning By-law. Application of the parking rates in By-law 569-2013 results in a minimum requirement of 4 residential visitor parking spaces and zero resident parking spaces and a maximum total provision of 215 parking spaces.

The proposal provides for 31 vehicle parking spaces, including 27 resident and 4 visitor parking spaces. In terms of accessible parking spaces, based on the recently modified accessible parking requirements in By-law 223-2025, the minimum requirement is 6 accessible parking spaces. The study notes that, due to the constraints on the site, a stacked parking system is proposed to serve the development. The nature of the stacked parking platform system precludes individual parking spaces being allocated to specific users and accessible parking spaces are not provided.

Bicycle Parking

Based on the City's bicycle parking policy direction, the study finds that the proposed on-site bicycle parking supply meets the minimum requirements specified in Zoning By-law 569-2013, as amended by By-law 223-2025. Application of the requirements of Zoning By-law 569-2013, as amended, and the Toronto Green Standard Version 4 results in a minimum requirement of 329 total bicycle parking spaces, inclusive of 261 long-term spaces (of which 13 are required for oversized bicycles), 58 short-term spaces and 10 additional publicly accessible spaces.

The study finds that the proposed on-site bicycle parking supply of 329 spaces, consisting of 261 long-term spaces (inclusive of 14 oversize spaces), 58 short-term spaces and 10 publicly accessible spaces meets the minimum requirements.

Loading

Based on the Zoning By-law requirements for the proposed site, the development is required to provide one Type 'G' loading space. The proposal will provide a Type 'G' loading space in accordance with the By-law requirements, located at grade and central to the building. Access to the enclosed loading facility will be provided via the proposed driveway, accessed from Park Road. The study finds that the proposed loading facilities meet the requirements and will appropriately accommodate the garbage and recycling collection needs of the building.

Pick-Up/Drop-Off

The proposal provides for one short-term pick-up/drop-off ("PUDO") space to be located at-grade on-site. The study finds that the proposed supply is appropriate and will accommodate the majority of the site's short-term/PUDO demands over the course of an entire day.

5.11 Servicing

A Functional Servicing and Stormwater Management Report (dated June 26, 2025) was prepared by Odan/Detech Consulting Engineers in support of the application. The report concludes that the site is serviceable utilizing existing combined sewer and watermain infrastructure adjacent to the site and that stormwater management can be accommodated with on-site storage. The servicing and stormwater management strategies for the proposed development is summarized below.

Water Distribution Assessment

- The existing buildings on the subject site are serviced by 100-millimetre and 38-millimetre water services connected to the existing 400-millimetre watermain on Park Road. The proposed development will be serviced by a 200-millimetre fire service connection and a 150-millimetre domestic service from the 400-millimetre watermain within Park Road. A second fire service is required due to the proposed height, which will be provided via a 200-millimetre service with an isolation valve between the primary and secondary fire mains.
- The City of Toronto has confirmed that the existing 400-millimetre watermain on Park Road has sufficient pressure and flow capacity to service the proposed development.

Wastewater Combined Sewers

- Adjacent to the subject site are combined sewers on Park Road, as follows:
  - West (Municipal Laneway): 300-millimetre storm sewer which connects to 1,500-millimetre combined sewer beneath Park Road; and
  - East (Park Road): existing 1,500-millimetre concrete combined sewer, existing 300-millimetre vitrified clay combined sewer, existing 1,200-millimetre bricked combined sewer.
- All sanitary services for the subject site are connected to the 300-millimetre combined sewer beneath Park Road. Storm services for 38 Park Road are connected to the 300-millimetre storm sewer beneath the municipal laneway, while 40 and 50 Park Road are directly connected to the 300-millimetre combined sewer beneath Park Road.
- All existing combined sewers beneath Park Road ultimately discharge to the 3,000-millimetre trunk sewer beneath Rosedale Valley Road.
- Servicing is proposed using a 300-millimetre sanitary service connection to the combined sewers beneath Park Road. The proposed development will result in an increase of sanitary flow from 0.85 litres per second to 5.72 litres per second, a net increase of 4.87 litres per second. The net increase will be offset through reductions in stormwater flows from the proposed development to the existing combined sewer system.
- The proposal reduces flow to the downstream 3,000-milimetre combined sewer beneath Rosedale Valley Road by 13.53 litres per second during the critical 2-year storm, from 39.25 to 25.72 litres per second. The proposal requires no downstream combined sewer infrastructure upgrades to accommodate the development.

Stormwater Management

- As noted above, storm services for the subject site are discharged into two different outlets: 38 Park Road to the 300-millimetre storm sewer beneath the municipal laneway west of the subject site and 40 and 50 Park Road directly to the 300-millimetre combined sewer beneath Park Road.
- Proposed stormwater management follows the City of Toronto's Wet Weather Flow Management Guidelines for quantity control. Based on the guidelines, the allowable release rate is 20.2 litres per second, with on-site storage required.

- Storm runoff from all above-grade open-to-above surfaces will drain uncontrolled by mechanical storm drains to the 100-year storm tank located in the Basement level and subsequent storage downstream on site. The provided stormwater tank will have a greater volume (141 cubic metres) than the required 100-year storm volume and at the same time satisfies procedure F-5-5.
- In terms of water balance, approximately 7.2 cubic metres of stormwater will be retained on-site and 2.54 cubic metres will be re-used within 72 hours of a 5-millimetre rainfall event.
- The report recommends that the short-term (construction) ground water discharge to the combined sewer implement a suitable pre-treatment, as required. Long-term, the proposed building will be built above the groundwater table with greater than one-metre separation. Foundation drainage will be implemented for infiltrated stormwater runoff. No groundwater from the site will be discharged to municipal sewers; foundation drains will connect to the stormwater tank as controlled flow.

5.12 Community Services and Facilities

The following section provides a summary outlining how the proposal will contribute to the achievement of complete communities and the provision of community services and facilities. The Downtown Plan notes that community service facilities provide a foundation for a diverse range of programs and services that support communities, contribute to the quality of life and act as neighbourhood focal points. In particular, Policy 3.1 recognizes that growth will be accompanied by the community service facilities, parkland, green infrastructure and physical infrastructure required to support complete communities and the health of residents, workers and visitors.

Policy 3.1.1(6) of the Official Plan states that City streets are significant public open spaces which connect people and places and support the development of sustainable, economically vibrant and complete communities.

The proposal will contribute to a complete community by offering a range of residential dwelling unit types on an underutilized site in proximity to higher-order transit. The proposal will also ensure the safe and efficient movement of pedestrians of all ages and abilities by expanding and revitalizing the public realm, while conserving the designated heritage building at 50 Park Road.

The Downtown Community Services and Facilities Strategy identifies community space and facility needs and sets out priorities to support future growth. In order to determine potential impacts to existing community services and facilities, we contacted the Toronto District School Board (TDSB) and the Toronto Catholic District School Board (TCDSB) to determine the number of students that may be generated by the proposed development. Approximate childcare demand was also calculated based on the proposed number of dwelling units. This information is detailed in the following paragraphs.

TDSB Schools Serving the Subject Site

Table 5 outlines the capacities, enrolments and utilization rates for schools within the catchment areas for the TDSB, while **Table 6** outlines the same for the TCDSB. Contact with the School Boards was made in May 2025. In addition to the school data, staff provided the yield factor/pupil yield figures for the proposed development based on the proposed unit mix of the 289 residential units.

Table 5 - Capacity and Enrolment for TDSB Schools

School	Capacity	Full-Time Enrolment	Utilization Rate	Portables
Public Elementary School				
Rosedale Junior Public School (JK-6) 22 South Drive	239	220	92%	-
Deer Park Junior & Senior Public School (7-8) 23 Ferndale Avenue	614	592	96%	-
Public Secondary School				
Jarvis Collegiate Institute (9-12) 495 Jarvis Street	999	614	61%	-
TOTAL	**1,852**	**1,426**	**77%**	**-**

According to the Toronto District School Board Information Request Response dated May 30, 2025, there are two public elementary schools and one public secondary school serving the subject site. Rosedale Junior Public School has a utilization rate of 92 percent, while Deer Park Junior and Senior Public School has a utilization rate of 96 percent. The secondary school, Jarvis Collegiate Institute, has a utilization rate of 61 percent.

Pupil yield of the proposed development – TDSB

- Elementary: 3 (figure provided by TDSB)
- Secondary: 3 (figure provided by TDSB)

Based on the pupil yield factor for dwelling units provided by TDSB staff, the proposed development would yield a total of 6 public school students. Of the 6 projected students, a total of 3 elementary school students would be generated from the proposed development. Based on the capacity provided by TDSB, the schools serving the subject site, Rosedale Junior Public School and Deer Park Junior and Senior Public School, have limited capacity to accommodate the projected students as they are currently operating at 92 percent and 96 percent of capacity, respectively.

Of the 6 projected students, a total of 3 secondary school students are anticipated to be generated from the proposed development. Based on the capacity provided by TDSB, Jarvis Collegiate Institute has sufficient capacity to accommodate the projected students since the school is operating at 61 percent of capacity.

TCDSB Schools Serving the Subject Site

Table 6 - Capacity and Enrolment for TCDSB Schools

School	Capacity	Full-Time Enrolment	Utilization Rate	Portables
Catholic Elementary School				
Our Lady of Lourdes (JK-8) 444 Sherbourne Street	669	551	82.4%	0
Mixed Gender Catholic Secondary Schools				
St. Patrick Catholic (9-12) 49 Felstead Avenue	1,152	943	81.9%	0
St. Mary Catholic Academy (9-12) 66 Dufferin Park Avenue	714	759	106.3%	0
Single Gender Catholic Secondary School				
St. Joseph's College School (9-12 Female) 74 Wellesley Street West	714	563	78.9%	0
Neil McNeil (9-12 Male) 127 Victoria Park Avenue	648	743	114.7%	6
Subtotal - Catholic Secondary School	**3,228**	**3,008**	**93.2%**	**6**
TOTAL	**3,897**	**3,559**	**91.3%**	**6**

According to the Toronto Catholic District School Board Information Request Response dated May 27, 2025, there are one Catholic elementary school and four Catholic secondary schools serving the subject site. The elementary school, Our Lady of Lourdes (JK-8), has a utilization rate of 82.4 percent. Of the four Catholic secondary schools serving the subject site, the mixed gender secondary schools, St. Patrick Catholic (9-12) and St. Mary Catholic Academy (9-12) have utilization rates of 81.9 percent and 106.3 percent, respectively. The single gender secondary schools, St. Joseph's College (9-12, female) and Neil McNeil (9-12, male) have utilization rates of 78.9 percent and 114.7 percent, respectively.

Pupil yield of the proposed development – TCDSB

- Elementary: 3 (figure supplied by TCDSB)
- Secondary: 2 (figure supplied by TCDSB)

Based on the pupil yield figures provided by TCDSB, the proposed development would yield a total of 5 Catholic school students. Of the 5 projected students, a total of 3 Catholic elementary school students are expected to be generated from the proposed development. Given the capacities provided by TCDSB, the 3 projected elementary students would likely be able to be accommodated at Our Lady of Lourdes (JK-8), since the school is operating at 82.4 percent capacity.

Of the 5 projected students, a total of 2 Catholic secondary school students are expected to be generated from the proposed development. Given the capacities provided by TCDSB, the 2 projected secondary students may not be able to be accommodated at St. Mary Catholic Academy (9-12, mixed gender) and Neil McNeil (9-12, male) as they are over capacity at 106.3 percent and 114.7 percent, respectively. St. Patrick Catholic (9-12, mixed gender) and St. Joseph's College (9-12, female) could accommodate future secondary school students as they are operating below capacity at 81.9 percent and 78.9 percent, respectively. It should be noted that secondary students residing in Toronto are not limited by a catchment area and they can attend any TCDSB school within the school board.

In light of the conclusions drawn from the above analysis, it is important to note that it has not been determined if potential students from this development will attend the schools listed in **Table 5** and **Table 6**. This level of detail will occur later in the application review process, when the TDSB and TCDSB determine where prospective students will attend school. Furthermore, considering that the enrolment analysis is based on 2023-2024 school year data, it is possible that, by the time the proposed development is constructed, capacity and available student spaces may change from what has been reported in this report.

Given the nature of the proposed development, both the TDSB and TCDSB will have sufficient time and opportunity to make the necessary adjustments to their catchment area boundaries, adjust the grades offered at different schools and make the necessary capital investments in the area to serve the proposed development as well as the many others that have recently been approved in the Rosedale-Moore Park area. Both Boards will also have time to comment on the proposed development, and work with the applicant to respond to and meet the expected demand associated with the proposed development.

Childcare Demand

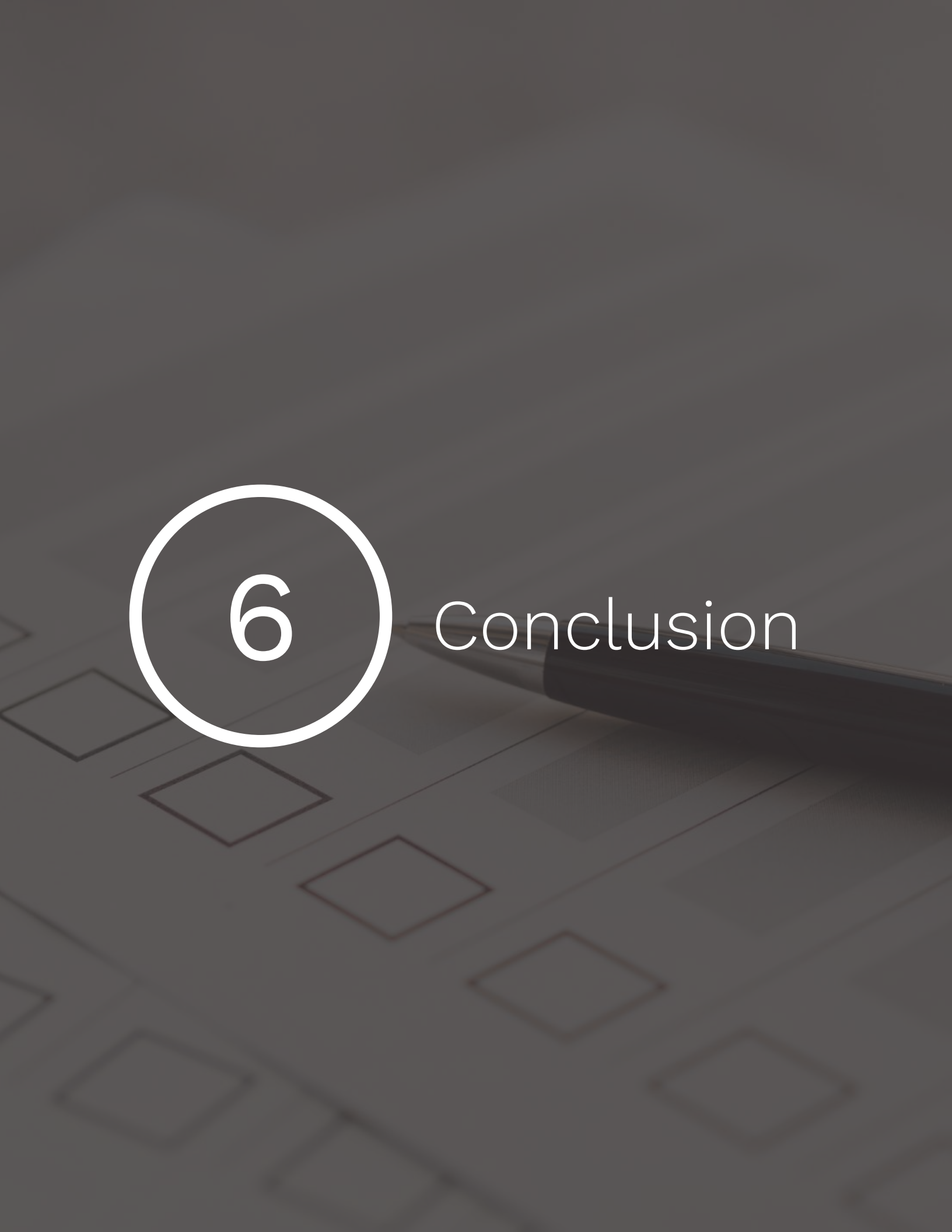
It is estimated that the proposed 289 residential dwelling units will generate demand for approximately 9 childcare spaces. This is based on a residential population increase of approximately 510 people (289 dwelling units multiplied by the Person Per Unit rates for the proposed unit mix), of which 3% would be "children' aged 0-4 as per the 2021 Rosedale-Moore Park Neighbourhood Profile. The projected number of children is then multiplied by the women's labour force participation rate in the Toronto CMA – 63.1%. A further multiplier of 50 percent is used to approximate the number of children needing care at a child care centre.

This is the level of service standard set out by the City's Children's Services Division and is consistently applied to development applications. This methodology is similar to the accepted standard for Community Service and Facilities Studies set out by the City of Toronto in the Application Support Material Terms of Reference when calculating for the approximate amount of childcare spaces required in a neighbourhood.

Summary

Through the development review process, it is anticipated that the applicant will receive comments and feedback from City departments and other commenting agencies with respect to any capacity or accommodation concerns for community services and facilities resulting from the proposal.

It is recommended that on-going consultation with City Staff, along with other service providers in the study area, be completed throughout the review process. This will allow the City, as well as the owner, to determine how best the proposed development can respond to the existing and evolving needs of the Rosedale-Moore Park residential population.



6 Conclusion

The proposed development contributes to the achievement of a number of land use planning and urban design objectives. The proposal represents an important opportunity to redevelop an underutilized site currently containing low-rise uses and an aging apartment building which is in proximity to three higher-order transit stations within the *Downtown* along a Major Street. The proposal will retain the existing heritage building at 50 Park Road in its entirety, breathing new life into the building while incorporating new non-residential uses that will activate the public realm.

In our opinion, intensification of the subject site with a tall mixed-use building is supportive of numerous policy directions set out in the Provincial Planning Statement, the City of Toronto Official Plan and the Downtown Secondary Plan, all of which support redevelopment of sites that are well-served by municipal infrastructure and higher-order transit. The proposal would result in an appropriate level of intensification and increased housing opportunities within walking distance of Bloor-Yonge, Bay and Rosedale Subway Stations.

From a land use planning perspective, there are a number of planning considerations that support the mixed-use intensification of the subject site. The subject site is currently occupied by a mix of uses and developed with a building form that does not conform with the applicable *Neighbourhoods* designation. The proposed redevelopment will appropriately intensify an underutilized site, significantly improve the streetscape along Park Road and provide an architecturally distinctive development that respects the surrounding context, while contributing to the character of the area. In addition, the proposal will add additional housing options to the area. The proposed development will replace the 40 existing rental units and will add 249 new rental housing units to the supply of housing in the *Downtown*.

From a built form and urban design perspective, the proposal is contextually appropriate and will represent a high-quality addition to Park Road and the wider Bloor-Yorkville/North Midtown area and the *Downtown*. The proposal represents an appropriately scaled addition to the area that has been sited and massed with careful regard to the adjacent Lawren Harris Park and the *Neighbourhoods* designated lands to the south, southeast and north. The proposed massing along Park Road is reflective of the existing context and maintains the low-rise character as established by the 2-storey heritage building at 50 Park Road, which has been sensitively incorporated into the design.

The proposal will deliver significant improvements to the public realm, including the creation of high quality non-residential uses along the Park Road frontage and a new outdoor seating along the edge of Lawren Harris Park. As well, the proposal will facilitate the removal of three curb cuts in favour of one consolidated access and will significantly expand the public realm along Park Road through the provision of a 3.45-metre road widening along the frontages of both 38 and 40 Park Road.

For all the foregoing reasons, it is our opinion that the proposed development is appropriate and desirable in planning and urban design terms and, accordingly, we recommend approval of the requested amendments to the Official Plan and Zoning By-law.



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