



April 27, 2022

Tommy Karapalevski, Planner
Community Planning – Toronto & East York District
18th Floor East Tower, 100 Queen Street West
Toronto, Ontario M5H 2N2

Dear Mr. Karapalevski,

**Re: *Planning and Urban Design Rationale Addendum Letter
152 – 164 Bathurst Street and 623 – 637 Richmond Street West
Zoning By-law Amendment Resubmission
File No. 21 181257 STE 10 OZ***

We are the planning consultants for Toronto (Bathurst & Richmond) LP (“the Owner”), with respect to the above-noted lands at the southwest corner of Bathurst Street and Richmond Avenue West herein referred to as the “subject site”. On behalf of our client, we are submitting material in support of the Zoning By-law Amendment application (File No. **21 181257 STE 10 OZ**), originally filed on June 25, 2021 which seeks to permit the redevelopment of the subject site for a mid-rise building, with retail uses at grade.

As part of the initial application, we prepared a Planning and Urban Design Rationale (June 2021). This Planning and Urban Design Addendum Letter (the “Addendum”) outlines changes to the proposal since the initial application, herein referred to as the “Revised Proposal”. The Revised Proposal incorporates feedback from City Planning Staff and other reviewing divisions, as well as addresses comments received through the public consultation process. In particular, the proposed heights of the stepped elements to the west have been reduced from 3, 6 and 9 storeys to 3, 4 and 6 storeys. Additional setbacks and stepbacks have also been adjusted to further define the base building and tower elements and outdoor amenity areas have been relocated.

The Addendum concludes that the design of the Revised Proposal continues to be appropriate from a policy perspective, particularly given the subject site’s location within the *Mixed Use Areas* designation and its proximity to municipal infrastructure, notably existing public transit routes along Queen Street West and King Street West as well as future Ontario Line stations at Queen/Spadina and King/ Bathurst. Subject to the additional comments outlined below, the findings and analysis in our June 2021 Planning and Urban Design Rationale continue to be relevant and accurate.

APPLICATION BACKGROUND

A Zoning By-law Amendment Application was filed in June 2021. The original applications proposed to demolish the majority of the existing buildings on site, with the exception of 164 Bathurst Street which has been identified by Heritage Preservation Services for retention. The proposal incorporates the heritage elements of 164 Bathurst Street into the proposal's base building. The original proposal was comprised of approximately 522 square metres of at-grade retail space and 217 residential units, resulting in a density of 8.19 times the area of the lot. The building incorporated multiple stepbacks from the westerly lot line to transition to the *Neighbourhoods*-designated area to the west as well as to St. Mary Catholic Elementary School which is located to the immediate west. Stepbacks were also incorporated into the south to provide appropriate separation distance from the existing apartment building to the south at 140 Bathurst Street. Vehicular access was provided from Richmond Street West at the northwest corner of the site.

A Community Consultation Meeting (CCM) was held virtually on January 17, 2022, with representatives in attendance from the applicant team, City Staff, the Councillor's office and the local community. Common themes discussed at the CCM included the height and massing of the building, traffic and parking, construction, noise and the provision of affordable housing.

A full set of comments on the Zoning By-law Application have been received, and meetings have been held with City Staff to discuss the feedback and potential resolutions. Most recently, a detailed design meeting was held on March 30, 2022 with City Planning and Urban Design Staff to discuss the built form and massing comments. In particular, the City requested revisions to the overall height of the building as well as the height of the streetwall along Richmond Street West and increased tower separation distances to the apartment to the south. A fulsome description of the revised proposal is provided below.

REVISED APPLICATION

The Revised Proposal maintains a tall mid-rise built form that frames the intersection of Bathurst Street and Richmond Street West, while reducing the height of stepped elements towards the *Neighbourhoods* designation to the west in addition to improvements to the proportionality of the building in relation to adjacent street frontages.

Building Height

The overall height of the building has been reduced from 64.9 metres (including mechanical penthouse but excluding elevator overrun) to 59.9 metres (including mechanical penthouse but excluding elevator overrun) as per direction

received from City Planning and Urban Design Staff. To accommodate the decrease in building height, certain floor-to-ceiling heights were decreased from 3.2 metres to 2.95 metres. This has resulted in a decrease of overall building height, however, given the opportunity to include some residential units on the same level as the mechanical penthouse, the building has increased to 18-storeys from the previous 17-storeys. As a result, the building is considered an 18-storey structure.

Transition Elements

With regard to built form changes, the proposal has incorporated multiple reductions in height to better transition to lower scale *Neighbourhoods* to the west, whilst providing for enhanced separation from the existing apartment building to the south. The west facing façade of the previous proposal included stepped elements of 3, 6 and 9-storeys allowing for the tower portion of the building to be setback a total of 13.5 metres from the west lot line. The Revised Proposal's configuration to the west now consists of 3, 4 and 6-storey elements. The first stepback at Level 3 has increased from 3.0 metres to 3.5 metres while the Level 4 stepback has increased from 1.5 metres to 2.7 metres to create more proportionate transition elements to the existing low-rise dwelling to the west. Finally, Level 6 provides a stepback of 7.0 metres to the tower façade. The total separation of the Tower is 13.2 metres, which is a very minor reduction from the previous 13.5 metres, however, the terraced elements provide a more suitable transition.

With regard to transition to the south, the former 3 and 9-storey elements have been revised to 3, 7 and 9 storeys. A 2.0 metre stepback is provided at Level 4 to create an outdoor amenity terrace. Level 5 cantilevers over this amenity terrace. Level 7 steps back 4.35 metres to create private unit terraces. The most significant revision to the south façade is the stepping back of Levels 7, 8, and 9 to align the middle portion of the building more closely with the tower floorplate. The revised proposal provides for a 20 metre separation distance from Levels 7 to 9 to the existing apartment building at 142 Bathurst Street, whereas the previous separation was 15.6 metres, resulting in an additional separation of 4.4 metres. In terms of tower separation, the tower is set back 22.7 metres from the apartment building and provides a 10.0 metre setback to the south lot line.

Streetwall Height

Streetwall proportions along Bathurst Street have remained similar to the original proposal including a 6-storey streetwall of 21.8 metres, with stepbacks of 1.5 metres at both Level 7 and Level 10. With regard to Richmond Street West, Levels 5 and 6 have been recessed by 1.5 metres to better articulate a 4-storey (11.8 metre) streetwall element along Richmond Street West. In addition, the materiality of the façade above Level 4 has also been substituted with metal cladding from

prefabricated brick in order to further break up the mass of the building further and distinguish the base, middle and tower components.

Layout and Mechanical Penthouse

Another significant change to the Revised Proposal is the inclusion of an integrated mechanical penthouse that occupies the northern half of Level 18. The remaining southern portion of the floorplate will contain 6 residential units. As previously mentioned, the proposal is now considered to be an 18-storey building given there are residential units on the MPH Level. The previous proposal contemplated a mechanical penthouse, indoor amenity area and adjacent outdoor amenity terrace that overlooked 142 Bathurst to the south. The revised proposal has relocated the outdoor amenity terrace and allowed for increased opportunities for green roofs.

Amenity Area

The revised proposal relocates the indoor amenity area on Levels 2 and 4. Level 2 provides an amenity area of approximately 72.6 square metres while Level 4 provides an indoor amenity area of approximately 451.9 square metres that wraps the northeast portion of the podium overlooking Bathurst Street and Richmond Street West. An additional indoor amenity area of approximately 204.4 square metres is provided on Level 4, located at the southwest corner of the podium.

In terms of outdoor amenity, the revised proposal has removed a number of the outdoor terraces given the significant reduction in building mass and reconfiguration of the rooftop level. An outdoor amenity terrace of approximately 155.1 square metres is located adjacent to the indoor amenity areas on Level 4. The terrace is partially covered by the cantilever on Level 5 above. It should be noted that the overall amenity space ratio is 4.19 square metres per unit and each unit will have access to a private outdoor balcony or terrace space.

Vehicle Access and Parking

In terms of vehicle access, the proposed driveway location has remained unchanged and will continue to be located at the northwest corner of the site from Richmond Street West. Two layby spaces are provided for short term drop-off and food delivery services, in addition to four outdoor bicycle parking spaces. The underground ramp is maintained along the southern edge of the subject site and provides access to two levels of underground parking. With regard for parking spaces, the residential parking has been decreased by 10 spaces from 51 to 41 residential spaces. The reduction of 10 spaces has been reallocated to service the visitor parking which has increased from 18 to 28 spaces.

Density

The total gross floor area (“GFA”) of the proposal has been reduced from approximately 15,615 square metres to approximately 14,370.79 square metres which reduces the overall density from 8.19 to 7.56 FSI. **Table 1** below provides a comparison of the Original Proposal to the Revised Proposal.

Table 1 – Application Statistics Comparison

	Original Proposal (June 2021)	Revised Proposal (April 2022)
Site Area	1,969.38 square metres	1,969.38 square metres
Gross Floor Area		
Residential	15,615.71 square metres	14,370.79 square metres
Commercial	522.19 square metres	517.11 square metres
Total	16,137.90 square metres	14,887.90 square metres
Floor Space Index	8.19	7.56
Building Height	59.9 metres (+ 5.0 MPH) 64.9 metres Total	59.9 metres (+ 0.0 MPH) 59.9 metres Total
Storeys	17-storeys	18-storeys
Residential Units		
Studio	18 (18%)	19 (9.0%)
1 Bedroom	96 (44%)	97 (45.9%)
2 Bedroom	81 (37%)	73 (34.5%)
3 Bedroom	22 (10%)	22 (10.4%)
Total	217	211
Amenity Space		
- Indoor	439.36 sq. m (2.0 sq. m/unit)	729.10 sq. m (3.45 sq.m/unit)
- Outdoor	442.76 sq. m (2.0 sq. m/unit)	155.19 sq.m (0.73 sq.m/unit)
Total	882.12 square metres (4.0 sq.m/unit)	884.29 square metres (4.19 sq.m/unit)
Parking Spaces		
- Residential	51 spaces	41 spaces
- Visitor	18 spaces	28 spaces
Total	69 spaces	69 spaces
Bicycle Parking Spaces		
Residential		
- Short-term	22 spaces	22 spaces
- Long-term	214 spaces	190 spaces
Retail		
- Short-term	5 spaces	3 spaces
- Long-term	3 spaces	3 spaces
Total	244 spaces	218 spaces
Loading Space	1 Type ‘G’ Loading Space	1 Type ‘G’ Loading Space

Updates to Planning Policy and Regulatory Context

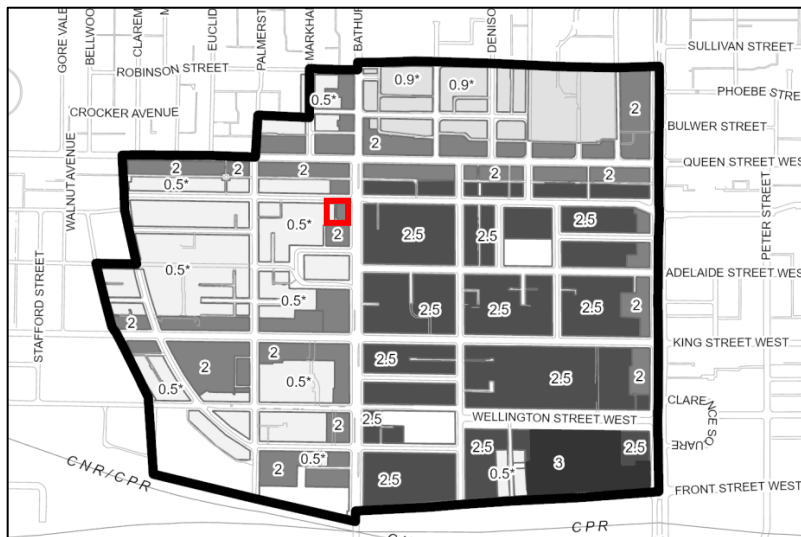
Draft Official Plan Amendment 570: Protected Major Transit Station Areas

In June 2020, the City Planning Division initiated a Growth Plan Conformity exercise and Municipal Comprehensive Review ("MCR") which includes the delineation of approximately 180 potential Major Transit Station Areas (MTSAs) to meet Provincial minimum intensification requirements. A subset of Major Transit Station Areas (MTSAs) will be identified as Protected Major Transit Station Areas (PMTSAs), where the Council-approved inclusionary zoning policy framework can be implemented.

Draft Official Plan Amendment 570 ("OPA 570") was brought forward for consideration by Planning and Housing Committee on March 25, 2022. The accompanying staff report dated March 4, 2022 recommended that City Planning be authorized to use the draft Official Plan Amendment as the basis for consultation and to bring forward a Final Report by July 5, 2022.

Draft Official Plan Amendment 570 would introduce Site and Area Specific Policies for 57 "protected major transit station areas".











The subject site is situated within proposed SASP 761 and 762, which applies to the King-Bathurst and Queen-Spadina Protected Major Transit Station Areas. The proposed SASPs provide that existing and new development is planned for a minimum population and employment target of 400 residents and jobs combined per hectare, with a minimum density of 2.0 FSI specified for the eastern (majority) of the subject site and 0.5 FSI or 3 units for the western portion of the subject site, within the *Neighbourhoods* designation.



Draft SASP 761 – King-Bathurst PMTSA



Draft SASP 762 – Queen-Spadina PMSTA

Minimum Density		
 0 FSI	 1.0 FSI	 2.5 FSI
 0.3 FSI or 3 units*	 1.5 FSI	 3.0 FSI
 0.5 FSI or 3 units*	 2.0 FSI	 3.5 FSI
 0.9 FSI or 3 units*		

*Option to provide a minimum of 3 units instead of minimum FSI only applies to lands designated Neighbourhoods in the Official Plan.

PLANNING ANALYSIS

Intensification and Land Use

In our opinion, the Revised Proposal continues to represent the appropriate redevelopment of an underutilized site along two Major Roads and located within a proposed ‘protected major transit station area’ (PMTSA). The proposal will contribute a high quality building that retains heritage features and appropriately transitions to the *Neighbourhoods* designated areas to the west and existing apartments to the south.

The Revised Proposal will continue to contribute to the achievement of numerous policy objectives that promote intensification and a range of housing choices within built-up urban areas, specifically in a *Mixed Use Area* that is well-served by existing and proposed transit infrastructure. In particular, the proposal will contribute towards the minimum employment and population target of 400 jobs and residents per hectare as identified in Draft SASP 761 and 762.

Moreover, from an Official Plan perspective, strong policy support is expressed for new housing on *Avenues*, (i.e., Bathurst Street). The Revised Proposal will fit harmoniously with the existing context at the intersection of Bathurst Street and Richmond Street West as well as with the evolving context as demonstrated through recent approvals in the corridor. Finally, with regard to land use, the proposal continues to support the Official Plan’s direction for *Mixed Use Areas* as one of four land use designations that is intended to accommodate the majority of the increased jobs and population.

Built Form, Height and Density

As discussed in the Revised Proposal section above, the built form has been significantly altered to accommodate an appropriate transition and interface with adjacent streets and buildings. More specifically, the west façade of the proposal has incorporated 3, 4 and 6-storey elements, compared to the previous 3, 6 and 9 storey condition. The revised stepping establishes a 4-storey streetwall height of 11.8 metres adjacent to *Neighbourhoods*. It is acknowledged that the maximum height for the adjacent *Neighbourhoods*-designated area, as per the Former City of Toronto Zoning By-law 438-86, is 18.0 metres. From a scale perspective, the 11.8 metre element will provide a more appropriate height relationship between the proposal and the existing 2-storey semi-detached dwellings to the immediate west. The property to the west of the existing semi-detached dwellings is a local elementary school and it is unlikely that this site will redevelop in the immediate future. It is our opinion that, based on this context, the condition between the proposed development and low-rise dwellings to the west is appropriate.

In addition to the stepping along the western façade, Levels 7, 8, and 9 have been recessed to more closely reflect the dimensions of the tower component of the building which has resulted in additional separation from the existing apartment building at 142 Bathurst Street. The proposed development provides for a separation distance of 22.7 metres to the apartment to the south and 10.0 metres to the south property line. In terms of future development to the south, it is our opinion that a future tower development is achievable on the site at 142 Bathurst Street, however, the tower could be sited at the southwest corner of the site and would be able to achieve the minimum 25.0 metre tower separation distance as recommended by the Tall Building Design Guidelines. The positioning and siting of a future tower could accommodate a 17.0 metre setback to its north lot line as illustrated in **Figure 3** allowing for a cumulative separation distance of 27.0 metres.

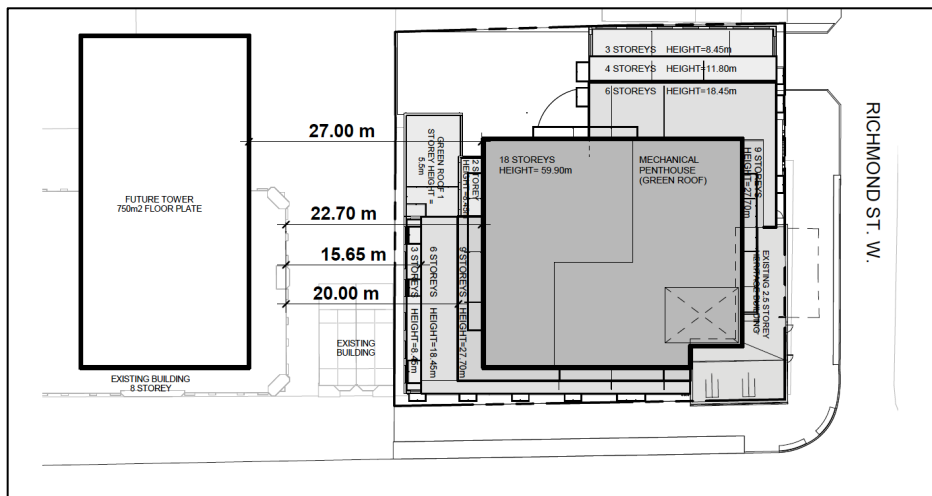


Figure 3 – Proposed Future Development Context

The revised 4-storey (11.8 metre) streetwall element along Richmond Street West is more conducive to the corresponding 20.0 metre right-of-way width and establishes a more comfortable pedestrian scale along this narrower street. The 6-storey (21.8 metre) streetwall along Bathurst Street also relates appropriately to the planned 30.0 metre right-of-way of the street.

With regard to the overall height, the revised building height of 59.9 metres now proposes to include the mechanical penthouse (but excludes the elevator overrun), which has been integrated into Level 18. It is acknowledged that the King-Spadina Secondary Plan applicable to the area on the east side of Bathurst Street, immediately opposite the site, requires a maximum height of 55.0 metres including mechanical elements (but excludes the elevator overrun). Although the subject site is not located within the boundaries of the King Spadina Secondary Plan Area, the built form policies of the Secondary Plan have influenced the height of the proposed development and it is important to have regard for the adjacent built form context.

Through consultation with City Planning and Urban Design Staff, an overall height of 59.9 metres (including MPH but excluding elevator overrun) was deemed appropriate for this subject site given its surrounding context and site characteristics. It should also be noted that applications within the Bathurst Street corridor have been approved for heights of up to 68.5 metres, inclusive of a mechanical penthouse; specifically, a development application at 64-86 Bathurst Street which was approved in October 2021 for a 17-storey mixed-use building at the northwest corner of Bathurst Street and Wellington Street West. As such, it is our opinion that the height of the Revised Proposal, 59.9 metres (including MPH but excluding elevator overrun), is appropriate and desirable.

It is our opinion is that the resulting density of 7.5 FSI is appropriate. Subject to the additional commentary above, the findings and analysis set out in our June 2021 Planning and Urban Design Rationale continue to be relevant and accurate.

CONCLUSION

The Revised Proposal continues to be consistent with numerous provincial policy directions supporting intensification of underutilized sites that are in proximity to municipal infrastructure, in particular higher order transit. In this instance the site is located within two proposed Protected Major Transit Station Areas, King-Bathurst and Queen-Spadina. The subject site is also located predominantly within the *Mixed Use Areas* designation, which is anticipated to accommodate the majority of the City's population growth. Finally, the proposal has frontage on an identified *Avenue* and is therefore defined as a strategic growth area in accordance with the Growth Plan.

From a built form perspective, the Revised Proposal reflects an appropriate height along Bathurst Street within the existing and planned context and represents a desired form of intensification along an *Avenue* as identified in the Official Plan. The revised massing supports an improved transition to the adjacent *Neighbourhoods* designated area to the west and has altered both stepping elements and streetwalls to create more modestly scaled building interface along the site's two frontages.

We trust the enclosed materials are satisfactory for your purposes at this time. Should you have any questions or require clarification or further information with respect to the above, please do not hesitate to contact the undersigned at kcooper@bousfields.ca or Charlie Smith of our office at csmith@bousfields.ca.

Yours very truly,
Bousfields Inc.



Kate Cooper, RPP, MCIP