



September 6, 2023

Via Digital Delivery

Joanna Kimont, Senior Planner
Community Planning
Toronto and East York District
City of Toronto
Toronto City Hall, 100 Queen Street West
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Toronto, ON M5H 2N2

Dear Ms. Kimont,

**Re: Addendum to Planning and Urban Design Rationale Report
147 Spadina Avenue, Toronto
Rezoning File No. 21 208078 STE 10 OZ and Site Plan Approval File No. 21
236578 STE 10 SA**

As you are aware, we are the planning consultants for HM RB (147 Spadina) LP (“Hullmark”), the owners of the property located at the northeast corner of Spadina Avenue and Richmond Street West, municipally known as 147 Spadina Avenue. The subject site is currently occupied by a 2-storey building containing ground floor retail uses and offices on the second floor, which occupies virtually the entire property.

A Zoning By-law Amendment (File No. 21 208078 STE 10 OZ) was submitted on September 9, 2021 and a Site Plan Approval application (File No. 21 236578 STE 10 SA) was submitted on November 8, 2021. The initial proposal involved intensification of the subject site with a 25-storey building, including 14-storey base building with an 11-storey tower above, for an overall height of 85.8 metres (including mechanical penthouse). A total gross floor area of 19,849 square metres was proposed, which included 19,415 square metres of residential space and 434 square metres of retail space, with a total of 223 dwelling units.

This letter has been prepared as an addendum to our September 2021 Planning and Urban Design Rationale report to address the revised plans which are being submitted to the City concurrently with this letter. This letter also addresses comments received in response to circulation of the application and input from the community consultation meeting held on January 26, 2022.

While the revised proposal is similar to the initial proposal, certain refinements have been made to address feedback received from City staff as well as the neighbours to

the north and east of the subject site. This addendum letter concludes that the revised proposal is appropriate and desirable in land use planning and urban design terms. The proposed development will continue to intensify an underutilized site located within an “urban growth centre” and a “major transit station area” as defined by the Growth Plan. The revised proposal will support growth within a “strategic growth area” and will fit harmoniously with the existing and planned built form context.

Subject to the additional comments set out herein, the findings and analysis set out in our original Planning and Urban Design Rationale report continue to be relevant and accurate.

Overview of Initial Proposal

In addition to the summary provided above, the initial proposal included significant improvements to the public realm including a 2.1 metre pedestrian clearway on both Spadina Avenue and Richmond Street. The initial proposal also introduced public realm improvements along Spadina Avenue such as new street planting and an outdoor patio area for the proposed at-grade commercial/retail uses. One new street tree was proposed in addition to the existing four street trees (which will be removed and replaced) in boulevard trenches along Spadina Avenue.

Description of Revised Proposal

The revised proposal is similar to the initial proposal in terms of its overall height and massing; it now proposes a 24-storey building, with a reduced 13-storey base building and an 11-storey tower above, for an overall height of 82.8 metres (including mechanical penthouse). The frontage along on Spadina Avenue responds to the street’s canyon form and the heritage built form character of the King-Spadina area, and more specifically, the historic Garment/Fashion District.

As compared to the initial proposal, the revised building massing proposes smaller building floor plates throughout the building, especially at Levels 3-21, as a result of increased setbacks and stepbacks as described in detail below. As a result of the reduction in tower height and massing, the revised proposal will include a total gross floor area (“GFA”) of approximately 16,373.1 square metres (a reduction of over 3,400 square metres or 17.5%), including 16,021.8 square metres of residential GFA and 351.3 square metres of retail GFA, resulting in an overall density of 15.20 FSI. A summary of the statistical changes is provided in Table 1 below.

Height and Massing Changes

As noted above, several changes have been made to the proposed building setbacks and stepbacks to enhance the relationship of the proposed building to the public realm

and the adjacent buildings, including the District Lofts residential/mixed use building to the east and the commercial building at 161 Spadina Avenue to the north.

Ground Floor

At the ground floor, the entrances to the commercial spaces along Spadina Avenue and Richmond Street West were previously inset at the corner with the remaining portion of the south wall built to the property line. The southwest corner of the ground floor is no longer inset and now aligns along Spadina Avenue and Richmond Street West creating a more traditional rectangular footprint at the ground floor. A setback of approximately 4.0 metres is now provided at the ground level along the entire Richmond Street West frontage, to create a widened sidewalk zone of 6.16 metres along Richmond Street West.

Base Building

The additional 4.0 metre setback from Richmond Street is continued at Level 2. At Level 3, the building setback is reduced to 1.0 metre and the levels above cantilever over the first two levels.

At the northeast corner of the building, the notch at Levels 3 and above has been extended to the south, resulting in a consistent 5.5 metre setback from the east lot line for the northerly portion of the building and a considerably larger outdoor amenity area at Level 3.

At the southeast corner of the building, a 5.5 metre by 3.15 metre deep notch has been introduced at Level 7-13, which will align with the south façade of the District Lofts.

The initial proposal included a 1.0 metre deep window well along the north wall at Levels 3-13, with windows facing north. The revised proposal has eliminated the window well; instead, the north façade will be designed with a party wall condition adjacent to the 161 Spadina Avenue property.

Tower

At Level 14, the revised plans step back the building on all four sides, creating a 40.75 metre high street wall. On the roof of Level 13, an outdoor amenity area is proposed along the Spadina Avenue frontage, with private terraces to the north, east and south.

At Level 15 and above, the tower will generally align with Level 14, except that the central portion of the west façade cantilevers over the outdoor amenity space by 2.0 metres, resulting in a 3.0 metre setback from Spadina Avenue.

Increased tower setbacks and setbacks are provided on all four sides, as follows:

- a 5.5 metre setback from the east property line (previously 2.5 to 3.0 metres);
- a 3.0 metre setback from the north property line (previously 2.5 to 3.0 metres);
- a 3.0 metre setback from the west property line, with increased setbacks of 5.0 metres at the northwest and southwest corners (previously 2.5 to 3.0 metres); and
- a 4.15 metre setback from the south property line (previously 2.5 to 3.0 metres).

Floor-to-floor heights have been adjusted throughout the building, including the introduction of a taller 4.0 metre floor-to-floor height at Level 14, within which indoor amenity space is proposed, opening onto the outdoor amenity space. The elimination of the 25th floor has resulted in a reduction of the building height from 85.8 metres to 82.8 metres (including the mechanical penthouse). In combination with the proposed building setbacks, the building would now be contained entirely within a 45-degree angular plane measured from the north side of Queen Street West. In turn, as outlined later in the letter, the reduction in building height will further reduce shadow impacts on Queen Street.

Unit Types

The number of units has remained essentially unchanged, despite the decrease in residential gross floor area (increasing from 223 to 226 units). While the number of studio and one-bedroom units has increased from 122 to 150, the building continues to include 53 two-bedroom units (23%) and 23 three-bedroom units (10%), for a combined 33% large units suitable for families with children.

Amenity Space

The size of the outdoor amenity space on Level 3 has been substantially increased from 45.7 metres (27.3 metres at the northeast corner and 18.2 square metres in the central light well) to 90.4 square metres, creating a larger consolidated outdoor amenity space adjacent to the indoor amenity space on Level 3. As well, an outdoor amenity area of 153.2 square metres has been introduced at Level 14, in combination with a new indoor amenity area at that level.

While indoor amenity space continues to be provided on Levels 2 and 3, it has been slightly reduced in size to 628.07 square metres (445.7 square metres on Level 2 and 182.3 square metres on Level 3) and has been replaced in part by a new indoor amenity space on Level 14 (104.3 square metres). The total amenity space is now proposed to be 975.8 square metres (4.33 square metres per unit), including 732.2

square metres of indoor space (3.24 square metres per unit) and 243.5 square metres of outdoor space (1.08 square metres per unit).

Table 1 – Application Statistics Comparison

	Original Application (September 2021)*	Revised Application (September 2023)
Site Area	1,080.8 square metres	1,080.8 square metres
Building Height	25 storeys 79.8 metres plus a 6.0 metre mechanical penthouse	24 storeys 76.8 metres plus a 6.0 metre mechanical penthouse
Total Gross Floor Area	19,849 m ²	16,373.1 m ²
Residential	19,415 m ²	16,021.8 m ²
Retail	434 m ²	351.3 m ²
Density (FSI)	18.36	15.15
Total Residential Units	223 Units	226 Units
Studio	11 units (5%)	22 units (10%)
One-Bedroom	111 units (50%)	128 units (57%)
Two-Bedroom	68 units (30%)	53 units (23%)
Three-Bedroom	33 units (15%)	23 units (10%)
Residential Amenity Space	942 square metres (4.22 sq.m./unit)	975.8 square metres (4.33 sq.m./unit)
Indoor Amenity Space	896 square metres	732.2 square metres
Outdoor Amenity Space	46 square metres	243.6 square metres
Total Vehicular Parking	26 spaces (includes 2 accessible spaces)	29 spaces (includes 2 accessible spaces)
Bicycle Parking Spaces	248 spaces	258 spaces
Resident Long-Term Spaces	222 spaces	232 spaces
Resident Short-Term Spaces	26 spaces	26 spaces
Loading Spaces	1 Type 'G'	Consistent with initial proposal

Evolving Policy Framework

King Spadina Secondary Plan – OPA 486

As described in Section 4.8 of our Planning and Urban Design Rationale report, City Council adopted Official Plan Amendment No. 486 (OPA 486) on January 29, 2020, being an updated King-Spadina Secondary Plan. OPA 486 would have the effect of replacing the majority of the 1996 King-Spadina Secondary Plan, aside from Section 13 (Site and Area Specific Policies). OPA 486 was appealed to the OLT by numerous parties, and was not in effect at the time of the subject application.

OPA 486 was recently approved by the OLT on August 14, 2023, with a number of significant modifications. Despite its approval, OPA 486 is not determinative with respect to the subject application because the application pre-dates the approval of the Secondary Plan.

As approved, the updated Secondary Plan identifies the area as a diverse and mixed-use neighbourhood and includes policies and guidance for the public realm and built form, as well as Areas of Special Identity. The subject site continues to be designated *Mixed Use Areas 2* under the Secondary Plan (Map 16-2).

One of the significant modifications to OPA 486 is to Objective 3.1.2. As adopted, it required the greater of the replacement of all existing non-residential gross floor area or a minimum of 25 percent of the total gross floor area as non-residential uses. Objective 3.1.2 was modified to delete the requirement for 25 percent non-residential space; as modified, it seeks to ensure the continued support and enhancement of the cluster of employment in the King-Spadina area by encouraging non-residential gross floor area to be provided on the development site.

Additionally, the policies applicable to the height transition zones on Map 16-4 were modified. The subject site within Height Transition Zone E, for which Policy 6.6.5 states that “a 45-degree angular plane taken from the curb on the north side of Queen Street West will be applied to development. Development will fit beneath the angular plane with only minor projections permitted. The angular plane will not extend beyond the southern boundary of Height Transition Zone E”.

Finally, Policy 6.4 was modified to specify that no net-new shadow is to be cast on the north sidewalk of Queen Street West on March 21st and September 21st from 12:18 p.m.

Official Plan Amendment Nos. 524 and 570 (OPA 524 and 570)

On February 3, 2022, Council adopted Official Plan Amendment 524 (OPA 524), which establishes a framework to facilitate transit-supportive development through the delineation of Major Transit Station Areas (MTSA’s) and Protected Major Transit Station Areas (PMTSA’s). OPA 524 also includes Site and Area Specific Policies for the 16 PMTSA’s associated with the existing subway stations in the Downtown.

On July 22, 2022, City Council adopted Official Plan Amendment 570 (OPA 570), which introduced new Site and Area Specific Policies (“SASP’s”) for 57 Protected Major Transit Station Areas (“PMTSA’s”) corresponding to existing and planned subway, light rail transit and GO Rail stations across the City. The SASP’s introduced

through OPA 524 and OPA 570 contain minimum population and employment density targets for each of the identified PMTSA's.

OPA's 524 and 570 have been submitted to the Minister of Municipal Affairs and Housing for approval pursuant to Section 16(15) of the *Planning Act*. To date, the Minister has not approved OPA's 524 and 570 and, accordingly, they are not yet in force.

OPA 524 includes the subject site within the Osgoode PMTSA (SASP 609). SASP 609 provides that existing and new development within the PMTSA is to be planned for a minimum population and employment target of 1,700 residents and jobs combined per hectare.

OPA 570 includes the subject site within the Queen-Spadina PMTSA (SASP 762). SASP 762 provides that existing and new development within the PMTSA is to be planned for a minimum population and employment target of 400 residents and jobs combined per hectare.

In addition, both SASP 609 and SASP 762 specify a minimum density of 2.5 FSI for the subject site.

Planning Analysis

As described in our September 2021 Planning and Urban Design Rationale report, the proposed mixed-use intensification on the subject site is appropriate and desirable from an intensification perspective, and is supportive of policy directions articulated in the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe, the City of Toronto Official Plan, the Downtown Plan and King-Spadina Secondary Plan, all of which promote intensification on sites that are well served by municipal infrastructure, particularly higher-order public transit. The proposal will redevelop the subject site with an appropriately scaled transit-supportive development.

The subject site is located within 100 metres of the planned Queen-Spadina subway station on the Ontario Line (less than a 2-minute walk) and along the 510 Spadina streetcar/LRT route. The site forms part of a "major transit station area" as defined by the Growth Plan and is located within the Downtown Toronto Urban Growth Centre; accordingly, it is considered a "strategic growth area". Strategic growth areas are a focus for accommodating intensification and higher-density mixed uses in a more compact built form.

While the revised proposal is similar to the initial proposal, important changes have been made to the height and massing. The base building has been reduced from 14

storeys to 13 storeys with an 11-storey tower above, resulting in a slightly reduced overall building height of 82.8 metres (including mechanical penthouse).

Height and Massing

From a built form perspective, the introduction of additional stepbacks and setbacks at the ground floor, base and tower sections will improve the building's relationship with the surrounding built form fabric and, in particular, with District Lofts to the east.

Through the consultation process, representatives of the District Lofts building had expressed concerns regarding privacy for east-facing windows and shadow impacts on the courtyard, which have been addressed in large part through the increased 5.5 metre setback along the east lot line as well as the notches in the northeast and southeast corners above Level 2 and Level 6, respectively.

While the tower setbacks are less than the recommended 12.5 metre setback in the Tall Building Design Guidelines, the intention of the guidelines is to protect for a 25 metre separation between adjacent tall buildings and to protect opportunities for future tall buildings on adjacent sites. In our opinion, the neighbouring properties to the north and east are unlikely to be redeveloped for tall buildings for the reasons set out below.

The District Lofts is a large, architecturally distinctive condominium building and is unlikely to be redeveloped. Development of a tall building on the property at 161 Spadina Avenue is unlikely due to the narrow width of the property (approximately 15.5 metres) and its location adjacent to the Lot Street Lane to the north and east, which essentially precludes a larger lot assembly.

In terms of the overall building height, the reduction from 85.8 metres to 82.8 metres (including mechanical penthouse), in combination with the setback to the tower and the mechanical penthouse, results in the building now fitting entirely beneath a 45-degree angular plane measured from the north side of Queen Street West.

Shadow Impacts

With respect to shadows, a Shadow Study was undertaken for the proposed development by AUDAX and is being submitted to the City concurrently with this letter. The study included a shadow analysis for March 21st, June 21st and September 21st for each hour between 9:18 AM and 6:18 PM to demonstrate incremental shadow impacts from the development at the spring and fall equinoxes and summer solstice.

The Shadow Study shows that the sidewalk on the north side of Queen Street West, west of Spadina Avenue, will experience moving patches of incremental shadow at 9:18 AM and 10:18 AM in different locations between Cameron Street and Spadina

Avenue. At 11:18 AM, there will be patches of moving incremental shadow on the sidewalks of Spadina Avenue at the northwest and southeast corners of Queen and Spadina. By 12:18 PM, shadows are limited to east of Spadina Avenue and fall south of the north sidewalk of Queen Street West. In the afternoon hours, between 1:18 PM and 6:18 PM, there are no new shadows on the public realm resulting from the proposed development. Accordingly, the resulting shadow impacts would conform with the policy direction in the recently approved King-Spadina Secondary Plan.

On June 21st, similar to the equinoxes, the shadows cast by the proposed development generally overlap shadows of existing and approved developments or those that would be cast by the as-of-right building envelope. At 10:18 AM, there are minor incremental shadows on the west side of Spadina Avenue. Between 11:18 AM and 3:18 PM, there will be no areas of new shadow on the public realm resulting from the proposed development. At 4:18 PM, patches of incremental shadow would fall on the sidewalk on the north side of Richmond Street West, moving to the south side at 5:18 PM.

The proposed development will not cast any net new shadows on nearby parks.

Light, View and Privacy

Light, View and Privacy (LVP) impacts are generally dealt with through a combination of spatial separation, orientation and mitigating measures between buildings. In this regard, the underlying CRE zone permits and anticipates the development of streetwall buildings with zero setbacks from the side lot lines to a depth of 25 metres.

Due to the proximity to District Lofts to the east of the subject site, a 5.5 metre setback will now be provided at Level 3 and above, except at Levels 3-13 where it abuts the existing blank wall of the southerly District Lofts building. In this location, the massing matches the existing District Lofts building by building to the lot line with a blank wall. The increased setback to the northeast portion of the building will align with the existing District Lofts courtyard. The proposed tower levels of the development start at a height that is above the height of the District Lofts and would accordingly result in no direct facing window conditions.

In addition, all windows on the north facade at Level 13 and below have been removed to minimize potential privacy impacts.

Conclusion

The proposed development will contribute to the achievement of complete communities and will fit with the existing and planned context of the area. The revised proposal will result in the redevelopment of a 2-storey former institutional building and will introduce 226 new residential units to the supply of housing in the area.

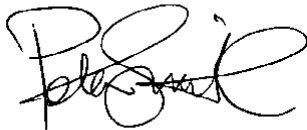
Intensification of the subject site is encouraged by the Provincial Policy Statement, the Growth Plan, the City of Toronto Official Plan and the Downtown Plan given its location within walking distance of existing and planned higher-order public transit.

The conclusions of our Planning and Urban Design Rationale continue to support the proposed development as revised. For the foregoing reasons, it is our opinion that the proposed development and the associated Zoning By-law Amendment application continue to be appropriate and represent good planning and urban design.

We trust that the foregoing is of assistance in reviewing the application resubmission. Please do not hesitate to contact the undersigned if you have any questions or require any clarification.

Yours very truly,

Bousfields Inc.



Peter F. Smith, MCIP, RPP