



BOUSFIELDS INC.

Project No. 18240

September 4th, 2020

John Duncan
Planner
City Planning – Toronto and East York District
Toronto City Hall
100 Queen Street West
Toronto, Ontario M5H 2N2

Dear Mr. Duncan,

***RE: Addendum to July 2019 Planning and Urban Design Rationale
Rezoning Application Resubmission & Site Plan Approval Submission
145 Wellington Street West***

As you are aware, we are the planning consultants to 145 Wellington Portfolio Inc. with respect to its property at 145 Wellington Street West (the “subject site”).

This letter has been prepared as an addendum to our July 2019 Planning and Urban Design Rationale report, in order to address revised plans enclosed with this resubmission. This addendum provides a summary of revisions made to the proposal to respond to comments received from the City and other commenting agencies, as well as to review the Provincial Policy Statement, 2020, which came into effect on May 1, 2020.

The rezoning application for the subject site was submitted in July 2019 to permit the demolition of the existing 13-storey office building and the redevelopment of the site with new mixed-use 65-storey tower containing residential, office and retail uses. A total gross floor area (GFA) of 50,565.2 square metres was proposed, including a retail/commercial GFA of 160.2 square metres and an office GFA of 14,639.8 square metres, resulting in an overall density of 34.12 FSI. A total of 476 units were proposed, of which almost 60 percent would be family-sized two- and three-bedroom units.

Since the time of application, we have reviewed the technical circulation comments, met with staff and the community on a number of occasions, gathered feedback on the project website, and have made a number of key revisions in response to the feedback provided. Those key revisions include:

- reducing the proposed gross floor area (GFA) from 50,565.2 to 50,325.5 square metres, and the overall density from 34.12 to 33.95 FSI;
- recalculating the existing GFA as per the City-wide Zoning By-law No. 569-2013 definition, resulting in a slight reduction in non-residential GFA from 14,800 square

metres (of which 14,378.1 square metres was office) to 14,540.4 square metres (of which 14,118.5 square metres is office);

- providing for an increase in office and non-residential GFA over what exists on the site today (from 14,118.5 to 14,504.1 square metres of office uses and from 14,504.4 to 14,662.9 square metres of total non-residential uses), whereas previously the proposal matched the existing GFA (as calculated);
- reducing the number of dwelling units from 476 to 472 by removing 4 one-bedroom units, thereby increasing the proportion of family-sized units from 57 to 58 percent, well above the 40 percent required by the Downtown Secondary Plan;
- increasing the westerly setback at grade from 4.5 to 6.0 metres (5.0 metres to the columns) to provide for additional space for pedestrians at grade;
- slightly reducing the easterly tower setback (by 5 centimetres), from 9.45 to 9.40 metres;
- significantly narrowing the curb cut access, reducing the amount of tapering proposed and allowing for the sidewalk widening along Wellington Street West to extend to approximately 8 to 8.5 metres along the majority of the site's northerly frontage;
- introducing a new artistic structure for wind mitigation purposes at the second storey height along Simcoe Street, resulting in improved wind conditions, with all mitigation measures located on private property;
- at the top of the proposed tower, articulating the proposed mechanical penthouse so that it is better integrated into the design of the building;
- extending the office elevator so that it serves Floor 13, whereas previously it stopped at Floor 12;
- identifying office amenity on Floor 13, with shared stair access to the rooftop outdoor amenity space on Floor 14;
- reducing the number of parking spaces from 66 to 47, based on additional parking analysis from BA Group;
- introducing knockout panels in the underground garage for a potential future PATH connection to the east; and
- making internal revisions/refinements to mechanical and servicing spaces.

This addendum letter concludes that, with these design revisions, the proposed development is consistent with the 2020 PPS 2020 and continues to conform with the 2019 Growth Plan for the Greater Golden Horseshoe and the Official Plan. Further, the proposal continues to be appropriate from the perspectives of intensification, land use policy, height, massing, density, built form, housing policy and heritage, as otherwise set out in our July 2019 Planning and Urban Design Rationale report. Subject to the additional comments set out herein, the findings and analysis set out in our July 2019 report continue to be relevant and accurate.

A summary setting out a comparison of the revised design to the original proposal is provided in **Table 1** below.

Table 1 – Statistical Comparison

	Original Submission (July 2019)	Resubmission (September 2020)
Site Area	1,482.1 m ²	1,482.1 m ²
Total Gross Floor Area:	50,565.2 m ²	50,325.5 m ²
• Residential	35,765.2 m ²	35,662.6 m ²
• Retail	160.2 m ²	158.8 m ²
• Office	14,639.8 m ²	14,504.1 m ²
Density	34.12 FSI	33.95 FSI
Total Units	476 units (100%)	472 units (100%)
	136 one-bedroom (29%)	132 one-bedroom (28%)
	68 one-bedroom plus den (14%)	68 one-bedroom plus den (14%)
	119 two-bedroom (25%)	119 two-bedroom (25%)
	102 two-bedroom plus den (21%)	102 two-bedroom plus den (22%)
	51 three-bedroom (11%)	51 three-bedroom (11%)
Indoor Amenity Space	1,460.9 m ² (3.07 m ² /unit)	1,524.5 m ² (3.23 m ² /unit)
Outdoor Amenity Space	583.6 m ² (1.23 m ² /unit)	555.9 m ² (1.18 m ² /unit)
Vehicular Parking Spaces	66 spaces	47 spaces
• Residential	66 spaces	47 spaces
• Commercial/Visitor	0 spaces	0 spaces
Bicycle Parking Spaces	546 spaces	541 spaces
• Res. Long-Term	430 spaces	425 spaces
• Res. Short-Term	48 spaces	48 spaces
• Office Long-Term	30 spaces	30 spaces
• Office Short -Term	33 spaces	33 spaces
• Retail Long-Term	1 space	1 space
• Retail Short-Term	4 spaces	4 spaces
Loading Spaces	1 Type 'B' 1 Type 'G' 2 Type 'C'	1 Type 'B' 1 Type 'G' 2 Type 'C'

Provincial Policy Statement (2020)

On February 28, 2020, the Ministry of Municipal Affairs and Housing released the Provincial Policy Statement, 2020, which came into effect on May 1, 2020 (the “2020 PPS”).

The PPS provides policy direction on matters of Provincial interest related to land use planning and development. 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 4.2 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 2014 PPS, the 2020 PPS includes an increased emphasis on encouraging an increase in the mix and supply of housing, protecting the environment and public safety, reducing barriers and costs for development and providing greater certainty, and supporting the economy and job creation.

Part IV of the PPS sets out the Province’s vision for Ontario, and promotes the wise management of land use change and efficient development patterns:

“Efficient development patterns optimize the use of land, resources and public investment in infrastructure and public service facilities. These land use patterns promote a mix of housing, including affordable housing, employment, recreation, parks and open spaces, and transportation choices that increase the use of active transportation and transit before other modes of travel. They support the financial well-being of the Province and municipalities over the long term, and minimize the undesirable effects of development, including impacts on air, water and other resources. They also permit better adaptation and response to the impacts of a changing climate, which will vary from region to region.”

One of the key policy directions expressed in the PPS is to build strong communities by promoting efficient development and land use patterns. To that end, Part V of the PPS contains a number of policies that promote intensification, redevelopment and compact built form, particularly in areas well served by public transit.

In particular, Policy 1.1.1 provides that healthy, liveable and safe communities are to be sustained by promoting efficient development and land use patterns; accommodating an appropriate affordable and market-based range and mix of residential types, employment, institutional, recreation, park and open space, and other uses to meet long-term needs; and promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments and standards to minimize land consumption and servicing costs.

Policy 1.1.3.2 supports densities and a mix of land uses which efficiently use land, resources, infrastructure and public service facilities and which are transit-supportive, where transit is planned, exists or may be developed. Policy 1.1.3.3 directs planning authorities to identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing

options through intensification and redevelopment, where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities.

In addition, Policy 1.1.3.4 promotes appropriate development standards, which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety.

With respect to employment, Policy 1.3.1 provides that planning authorities shall promote economic development and competitiveness by, among other things, providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs, and encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities, with consideration of housing Policy 1.4.

In that respect, Policy 1.4.3 requires provision to be made for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents by, among other matters, permitting and facilitating all types of residential intensification and redevelopment; promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities and support the use of active transportation and transit; and requiring transit-supportive development and prioritizing intensification in proximity to transit, including corridors and stations.

With respect to public spaces, Policy 1.5.1 supports healthy, active communities by promoting the planning of safe public streets and spaces as well as the planning and provision for a full range and equitable distribution of publicly accessible built and natural settings for recreation, including, among other things, parklands, open space areas and linkages.

The efficient use of infrastructure (particularly transit) is a key element of provincial policy (Section 1.6). Section 1.6.3 states that the use of existing infrastructure and public service facilities should be optimized, before consideration is given to developing new infrastructure and public service facilities. With respect to transportation systems, Policy 1.6.7.4 promotes a land use pattern, density and mix of uses that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.

Policy 1.7.1 of the PPS states that long-term prosperity should be supported through a number of initiatives including: encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and a range of housing options for a diverse workforce; optimizing the use of land, resources, infrastructure and public service facilities; maintaining and enhancing the vitality and viability of downtowns

and mainstreets; and encouraging a sense of place by promoting well-designed built form and cultural planning.

With respect to energy conservation, air quality and climate change, Policy 1.8.1 directs planning authorities to support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions and preparing for the impacts of a changing climate through land use and development patterns which: promote compact form and a structure of nodes and corridors; promote the use of active transportation and transit in and between residential, employment and other areas; and encourage transit-supportive development and intensification to improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion.

While Policy 4.6 provides that the official plan is “the most important vehicle for implementation of this Provincial Policy Statement”, it goes on to say that “the policies of this Provincial Policy Statement continue to apply after adoption and approval of an official plan”. Accordingly, the above-noted PPS policies continue to be relevant and determinative.

In our opinion, the proposed development and the requested Zoning By-law Amendment are consistent with the 2020 PPS, and, in particular, the policies promoting the efficient use of land and infrastructure with new employment and housing uses, in a transit-supportive manner.

Growth Plan Amendment No. 1

On August 28, 2020, Growth Plan Amendment No. 1 came into effect. While it amends the population forecasts in Schedule 3 and makes a number of other more technical changes, it does not change the analysis in our July 2019 Planning and Urban Design Rationale report.

Land Use and Intensification

As set out in Sections 5.1 and 5.2 of our July 2019 Planning and Urban Design Rationale report, mixed-use intensification on the subject site is consistent with the policy directions articulated in the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe and the City of Toronto Official Plan, all of which promote intensification on sites well served by municipal infrastructure, particularly higher-order public transit. The revised proposal, which maintains the same height, slightly reduced density (from 34.12 to 33.95 FSI) and a similar distribution of land uses, will continue to redevelop the subject site with an appropriately scaled transit-supportive mixed-use development.

With respect to office replacement, we note that while the amount of office GFA and total non-residential GFA have both been slightly reduced, this is the result of a recalculation

of the existing GFA on site which determined that the existing non-residential GFA is 14,540.4 square metres rather than 14,800 square metres. In addition, the existing office uses total 14,118.5 square metres as opposed to 14,378.1 square metres. On that basis, whereas previously the proposal was simply to replace the existing office and non-residential GFA as calculated, the revised proposal would actually result in an increase in office GFA (from 14,118.5 to 14,504.1 square metres) and total non-residential GFA (from 14,504.4 to 14,662.9 square metres). As such, the proposal would conform with proposed Policy 3.5.1(9) in OPA 231 and in-force Policies 6.2.1 and 6.2.2 of the Downtown Secondary Plan with respect to the replacement of office and non-residential uses.

With respect to the unit mix, while the majority of the proposed two-bedroom units and proposed three-bedroom units are smaller than the ideal unit size recommendations in the Growing Up Guidelines, we note that the proposed development provides a significantly greater percentage of family-sized units. The Growing Up Guidelines recommend a minimum of 15 percent of the units as two-bedroom units, whereas 47 percent of the units will be two-bedroom and two-bedroom plus den units; similarly, while only 10 percent of the units are recommended to be three-bedroom units, 11 percent of the units will be three-bedroom units. While the individual unit sizes of some of the units will be smaller than the ideal sizes, the proposal will provide a much greater number of larger units than recommended by the Guidelines.

Further, we note that these guidelines were only in draft form at the time of the submission of the application and that, even if they had been in final form at the time, Policy 5.3.2(1) of the 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*. The proposed unit mix conforms with the Official Plan, and more specifically Policy 11.1 of the Downtown Secondary Plan, by providing more than 10 percent of the units as three-bedroom units, more than 15 percent of the units as two-bedroom units, and more than an additional 15 percent of the units as a combination of two- and three-bedroom units.

Height, Massing and Density

As set out in Section 5.3 of our July 2019 Planning and Urban Design Rationale report, the subject site is an appropriate location for a tall building. At the proposed height of 227.55 metres, exclusive of mechanical elements, the proposed tower has been designed and massed to contextually fit within the immediate and surrounding area, while resulting in minimal and acceptable built form impacts on *Neighbourhoods*, parks and other shadow-sensitive areas. The proposed tower would continue to fit harmoniously both within a broad urban structure context and with existing and approved building heights in the vicinity.

With respect to *massing*, as set out in Section 5.3 of our July 2019 Planning and Urban Design Rationale report, the design of the proposal continues to be in keeping with the built form context in the surrounding area, including both the base element that will define the Simcoe and Wellington street edges at an appropriate scale, and the tower that is appropriately sized and oriented on the site. The revised proposal generally maintains the original *massing*, with two notable revisions.

First, along Simcoe Street, additional space for pedestrians has been provided by setting back the building an additional 1.5 metres at grade for a total of 6.0 metres (5.0 metres to the edge of the columns), providing for a public realm width of between 10.15 and 10.35 metres (an increase from 8.65-8.85 metres). Along with the enhanced sidewalk extension proposed along Wellington Street West, both frontages will continue to provide a public realm that is in excess of the 6.0 metre curb to building face distance encouraged by Policy 9.5 of the Downtown Secondary Plan.

Second, the Simcoe Street frontage previously included a number of wind screen structures within the public realm whose purpose it was to reduce wind impacts along the west side of the subject site. The revised development proposes to locate wind mitigation structures on private property only, proposing a semi-porous wind mitigation structure along the second storey wall. The structure will mitigate wind, function as an architectural feature that will enhance the design of the building's podium, and be located away from the pedestrian zone, freeing up space for walking and cycling at grade.

From a density perspective, it is our opinion that the proposed density of 33.95 FSI continues to be appropriate and desirable and represents a modest reduction of 0.17 FSI from the original proposal. From a planning policy perspective, it is important to optimize the use of land and infrastructure on the site given its location within the Downtown Toronto "urban growth centre" and its proximity to streetcar routes and three subway stations, including Union Station.

Built Form

It continues to be our opinion that the proposed development will have no unacceptable built form impacts on surrounding streets, open spaces or properties and, in particular, on lands designated *Neighbourhoods*.

As set out in Section 5.4 of our Planning and Urban Design Rationale report, the Official Plan development criteria applying to the *Mixed Use Areas* designation have a particular focus on potential built form impacts on adjacent lower-scale *Neighbourhoods*. In particular, Policy 4.5.2(c) requires buildings to be located and massed to provide a transition through appropriate setbacks and/or a stepping down of heights towards lower scale *Neighbourhoods*, while Policy 4.5.2(d) requires buildings to be located and massed to adequately limit shadow impacts on adjacent *Neighbourhoods*.

In this respect, the subject site is well separated from the closest Neighbourhoods designations north of Queen Street and west of Bathurst Street; accordingly, there would be no built form impacts on designated *Neighbourhoods*. As a result of the distance separation and intervening existing and approved tall buildings, an appropriate transition will be provided between the proposed building and the closest *Neighbourhoods* designation.

Light, View and Privacy

With respect to light, view and privacy, it is our opinion that, as set out in Section 5.4 of our Planning and Urban Design Rationale report, the location and configuration of the proposed tower on the subject site would not have an unacceptable impact on the light, view and privacy of adjacent existing, planned and potential towers, particularly given that the proposed tower is generally meeting the recommended setbacks. The tower floor plate has increased slightly from 748.9 to 750.3 square metres (gross construction area), which is in line with the 750 square metre floor plate size recommended by the Tall Building Design Guidelines and the general policy direction in the Downtown Secondary Plan. Further, as before, the proposed tower does not have projecting balconies beyond the proposed floorplate.

Shadow Impacts

A revised shadow study has been prepared by Turner Fleischer Architects, assessing the shadow impacts at the spring/fall equinoxes (March/September 21st) and the summer/winter solstices (June/December 21st). The results of the study are generally in line with the results analyzed in our Planning and Urban Design Rationale report given the minimal revisions to the building's massing and given that the building's height remains the same.

However, we offer the following additional comments with respect to shadow impact on David Pecaut Square. Although it is identified as a Sun Protected Park and Open Space in the Downtown Secondary Plan, it is not identified as a Signature Park or Open Space in the Downtown Tall Building Guidelines. For all other parks within the Downtown Guidelines boundaries, Supplementary Design Guideline 2(b) recommends that tall buildings be located and designed to not cast net new shadows between 12:00 noon and 2:00 p.m. on September 21st (our emphasis).

In this regard, the shadow study demonstrates that there will be some incremental shadow impact during the spring and fall equinoxes at 9:18 a.m., with a sliver of impact on an open area at the north side of the square at 10:18 a.m. On both days, the proposed building's shadow will be completely off the square well before 11:18 a.m. At the summer solstice, there will be some incremental shadow on the landscaped open space in the centre of the

square at 9:18 a.m. and 10:18 a.m., and a thin sliver of shadow on the east side of the square at 11:18 a.m.

Based on the foregoing analysis, it is our opinion that the incremental shadow impact on David Pecaut Square is “adequately limited” in accordance with the applicable Official Plan and Downtown Secondary Plan policies, both in terms of its extent relative to the size of the square and its duration, and would not adversely affect the utility of the square. With respect to the guidance provided by the Downtown Tall Building Guidelines, there would be no shadow impact on David Pecaut Square between 12:00 noon and 2:00 p.m. on September 21st.

Sky View

With respect to sky view, it continues to be our opinion that due to the slender tower floor plate, which is in line with the recommended 750 square metre size, and the inset balconies, as well as the 3 metre setback to the north, the proposed tower will have minimal impacts on sky view east or west along Wellington Street West. From Simcoe Street, given the 61.8 metre tower separation between the proposed tower and 160 Front Street, sky view impacts would be minimal.

Wind Impacts

Finally, with respect to wind impacts, an updated Pedestrian Level Wind Study was prepared by NovusSLR assessing the wind impacts at areas of interest, which include those areas which pedestrians are expected to use on a frequent basis, including sidewalks, building entrances and outdoor amenity spaces. The revised study considered the removal of the previously-proposed wind screens at grade in the boulevard and the introduction of the sculptural element attached to the building along Simcoe Street, at the second storey level.

The pedestrian wind conditions were assessed through wind tunnel modelling techniques, and the study, prepared by SLR Consulting, concluded that:

- both the existing and proposed configuration passed the wind safety criterion at all locations, except that in the proposed configuration additional mitigation measures are to be coordinated with respect to the southwest corner of the building;
- wind conditions at the entrances and walkways surrounding the proposed development are generally suitable for the intended usage in the Proposed with Mitigation Configuration;
- on the outdoor amenity terrace on Level 14, wind conditions are windier than desired in most areas in the Proposed with Mitigation Configuration. A Landscape plan will be developed as the project evolves;

- overall, the proposed development with mitigation has a positive effect on pedestrian wind comfort; and
- the number of locations, both at grade and above, with wind comfort suitable fast walking and/or uncomfortable in either season, was reduced from 19 (out of 87) to 15 (out of 89) locations in the Proposed with Mitigation Configuration.

The study provides that as the design continues to evolve through the SPA review process, SLR will work with the design team to refine wind mitigation measures at the southwest corner of the building, as well as on the Level 14 terrace.

Urban Design

From an urban design perspective, the revised scheme continues to fit harmoniously with the surrounding existing and planned built form context, is appropriate and desirable in urban design terms and conforms with the applicable built form and urban design policies of the Official Plan, in particular Policies 3.1.2(1), 3.1.2(2), 3.1.2(3), 3.1.2(4), 3.1.2(5) and 3.1.3(2), as well as Section 9 (Built Form) of the Downtown Secondary Plan, as set out in our July 2019 Planning and Urban Design Rationale report.

Conclusion

Subject to the additional analysis and opinion provided above, the findings set out in our Planning and Urban Design Rationale report dated July 2019 are still relevant and applicable to the revised proposal, and as a result, it is our opinion that the proposed development, as revised, continues to be appropriate and desirable in land use planning and urban design terms and should be approved.

If you have any questions and/or comments regarding this addendum letter, please do not hesitate to contact me or Mike Dror of our office.

Yours very truly,

Bousfields Inc.



Peter F. Smith, B.E.S., MCIP, RPP