

December 23, 2021

David Cox
Director, Development & Construction
Primaris Management Inc.
26 Wellington Street East, Suite 400
Toronto, ON M5E 1S2

RE: 145 Wellington Zoning By-law Amendment Resubmission – Response to Comments

Dear Mr Cox,

1.0 INTRODUCTION

BA Group has been retained by Primaris Management Inc. to provide transportation advisory services in support of the proposed mixed-use development on the lands municipally known as 145 Wellington Street West in the City of Toronto (the 'Site'). The Site is located at the northwest corner of the Wellington Street West and Simcoe Street intersection.

This letter forms part of a Zoning By-law Amendment (ZBA) re-submission that is being made to the City. The update letter provides:

- A review of the changes in transportation related elements of the development plan,
- Responses to comments provided by the Development Engineering staff (dated July 13, 2021)

2.0 DEVELOPMENT PROGRAM

The transportation related aspects of the proposed development plan remains generally consistent to the July 2020 application, with minor changes to the development program including a reduction to the proposed number of units and a reduction to the proposed parking supply. A summary of the changes to the proposed development programme are summarized in **Table 1**.

TABLE 1 DEVELOPMENT PROGRAM SUMMARY

	August 2020	Current Proposal	Net Change
Residential Units	472 units	428 units	- 44 units
Office	14,635 m ²	14,119 m ²	- 516 m ²
Retail	147 m ²	145 m ²	- 2 m ²
Vehicle Parking	47 Resident Spaces 0 Visitor Spaces 47 Total Spaces	34 Resident Space 5 Visitor Spaces 39 Total Spaces	- 13 Resident spaces +5 Visitor Spaces -12 Total Spaces
Loading	1 Type 'G' ; 1 Type 'B' ; 2 Type 'C'	1 Type 'G' ; 1 Type 'B' ; 2 Type 'C'	No Change
Bicycle Parking	542 Bicycle Parking Spaces	536 Bicycle Parking Spaces	- 6 spaces

3.0 VEHICULAR PARKING CONSIDERATIONS

3.1 CHANGES TO PROPOSED VEHICLE PARKING STANDARDS

Since the August 2020 Zoning By-law amendment submission a number of changes have been made to the proposed underground parking garage, resulting in an overall decrease of 12 parking spaces. The site is now proposing a total of 39 (including a total of 34 residential spaces and 5 visitor spaces).

The proposed parking standard include a residential parking ratio of 0.08 parking spaces per unit. The proposed residential parking ratio of 0.08 spaces per unit is modestly lower than the 0.09 parking spaces per unit, and a visitor parking supply of 5 parking spaces. The proposed 5 visitor spaces are in line with comments received from City of Toronto Transportation Services staff.

3.2 THE CITY OF TORONTO ZONING BY-LAW REVIEW

In a January 2021 staff report – Proposed Review of Parking Requirements for New Development – City of Toronto staff provided justification for undertaking a review of the Zoning By-law 569-2013 and the minimum (vehicle and bicycle) parking requirements contained within. Planning and Housing Committee approved the launch of this review and in February 2021, staff provided an update on the process in February 2021 (February 10, 2021 presentation “Review of Parking Requirements for New Developments”), public consultation sessions were held in June 2021 and September 2021 and a final report to council was delivered in December 2021.

Staff stipulated that the “review should be guided by the principle that parking standards should allow only the maximum amount of automobile parking reasonably required for a given use and minimums should be avoided except where necessary to ensure equitable access, such as for accessible parking or in areas which would be difficult to serve with transit.” Generally, the staff report represents a definitive shift in the public position of City of Toronto staff with regards to Zoning By-law 569-2013 minimum parking requirements and their enforcement. The most notable of the positions stated within the report is that the minimum parking requirements do not advance the policies of the City’s Official Plan to reduce auto-dependence and support non-auto modes of transportation.

In the September 2021 public consultation sessions, City staff presented their proposed changes to the Zoning By-law in the September 2021 public meetings, which included

1. Enlarging parking policy areas
2. Eliminating most minimum parking minimums City-wide
 - a. Maintain a requirement for visitor parking
 - b. Adjust calculation for required accessible parking
3. Increase the use of maximum parking limits across the City
4. Increasing short-term bike parking requirements
5. Introducing payment-in-lieu of bike parking policy to fund bike share infrastructure

It should be noted that while these changes to the Zoning By-law are not in-force, they have been approved by Council in a vote on December 15th, 2021, pending completion of the statutory appeal period (as per the Planning Act). These changes represent a significant shift in City staff’s approach to parking and demonstrate the importance being placed on reducing auto-dependence and supporting active modes of travel throughout the City.



3.3 TRANSPORTATION DEMAND MANAGEMENT

Through further refinement of the site plan approval process, an updated list of Transportation Demand Management (TDM) strategies is being proposed for the subject site. The proposed TDM strategies are outlined in **Table 2**.

TABLE 2 RECOMMENDED SITE TDM MEASURES

Measure	Description	Cost Estimate	Implementation Strategy
Pedestrian Connections	Provide improvements to the pedestrian facilities along site frontages	Integrated into overall development cost.	Construct as part of redevelopment.
Bike Share Contribution	Provide a monetary contribution to the City of Toronto for the expansion of the bike share network.	\$50,000	To be paid to the City.
Bicycle Repair Station	2 Bicycle repair stations within the bike room and in a publicly accessible location	Integrated into overall development cost.	Construct as part of redevelopment.
Membership to bike-share.	Developer will provide a 1-year membership of bike-share service to each new unit for the first year of occupancy.	Cost to be determined	Developer to provide a 1-year membership to bike-share service per new residential unit during the first year of occupancy.
Pre-loaded PRESTO Cards	Provide a PRESTO fare cards to each new unit for the first year of occupancy	\$50 plus cost of fare card per new unit.	Developer to provide a one fare card pre-loaded with \$50 per new residential unit during the first year of occupancy.
Travel Mode Information Packages	Implement marketing programs aimed at new residents to ensure that they are aware of available modal choices in the area.	To be determined.	The development will make these information packages available to residents of the building once it is occupied.

3.4 VEHICLE PARKING SUMMARY

With consideration of the site's transportation context, the ongoing City of Toronto Zoning By-law review of parking requirements and the proposed TDM measures, the proposed parking supply is considered appropriate and can adequately meet the transportation needs of the subject site.



4.0 RESPONSE TO COMMENTS

City Staff have provided comments provided transportation related comments in a memorandum from Development Engineering department (dated July 13, 2021) which included Transportation Services comments. The comments received from City Staff are addressed in the following section. The responses have been organized by comment with a summary discussion provided in each case which refers, as appropriate, to technical materials provided within this letter.

4.1 DEVELOPMENT ENGINEERING (DATED JULY 13, 2021)

ECS Comment Part I – Transportation Services – A.1.1:

Provide Vehicle Manoeuvring Diagrams (VMD), which depict the swept paths required by large trucks to access the proposed loading spaces in an acceptable manner, as discussed above in the memorandum;

Response:

Due to ongoing coordination of the structural elements of the proposed building, vehicle manoeuvring diagrams for the proposed development will be provided as part of the Site Plan Approval process.

BA Group has had a call with City of Transportation Services and Solid Waste Services on December 7th 2021 to discuss the loading considerations for the proposed site. Tabassum Rafique (Transportation Services) and Robert Hanna (Solid Waste Services) each provided confirmation that the vehicle manoeuvring diagrams could be submitted as part of the SPA process instead of the ZBA process. These confirmations were provided via e-mails sent on December 14th, 2021

ECS Comment Part I – Transportation Services – A.1.2:

Provide parking supply for the site according to the minimum parking rates provided in condition B(1.1) below;

B1.1

Provide and maintain a minimum number of parking spaces on the site to serve this development in accordance with the following rates:

<i>Residential</i>	<i>0.09</i>	<i>parking spaces per unit</i>
<i>Residential visitors</i>	<i>A minimum of 5 spaces</i>	
<i>Office and retail</i>	<i>No parking spaces required</i>	

Response:

Parking has been reduced from the previous application as part of changes from the on-going design process. The current site proposal includes a total of 5 visitor parking spaces (as per comments), and residential parking ratio of 0.08 parking spaces per unit. The residential parking is modestly below the 0.09 parking spaces per unit requested by City staff. **Section 3.0** in this letter provides a further details confirming that the proposed parking ratio is considered acceptable for the proposed site.



ECS Comment Part I – Solid Waste Management Services – A.2.3:

Currently, the truck movement diagram shows the truck reversing into the public lane. Solid waste does not allow trucks to reverse into public lanes or roadways. Revised drawings must indicated the collection vehicle’s ability to enter and exit the site in a forward motion with no more than a three-point turn without the need to reverse into the public lane. John spoke to Tabassum (Transportation) Oct 9/19. He recommends that we do not accept reversal into the lane at any time.

Response:

Due to ongoing coordination of the structural elements of the proposed building, vehicle manoeuvring diagrams for the proposed development will be provided as part of the Site Plan Approval process, as discussed in response to comment A.1.1 above.

BA Group has had a call with City of Transportation Services and Solid Waste Services on December 7th 2021 to discuss the loading considerations for the proposed site. Tabassum Rafique (Transportation Services) and Robert Hanna) Solid Waste services each provided e-mail confirmation on December 14th, 2021 that city trucks reversing into the public lane is an acceptable subject to the following condition:

- On-site staff to be available assist as flagmen for the City vehicle on collection days
- Suspended warning sign with flashing beacon on the vehicle ramp to warn motorists of trucks manoeuvring ahead.
- Warning signage facing north and south on laneway with flashing beacons to warn motorists in the laneway that trucks are manoeuvring ahead.

A traffic control signage plan for the laneway indicating the proposed signage locations will be provided as part of a Site Plan Approval application at a later date once the structural elements within the loading area are further coordinated.

* * * * *

We trust the foregoing is in order and provides an appropriate presentation of updated information related to the revised application being made to the City of Toronto.

If you have any questions, comments or require anything further please don't hesitate to contact us.

Sincerely,
BA Consulting Group Ltd.



Vuk Uskokovic
Lead Transportation Designer

