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Hon. Paul Calandra, Minister of Municipal Affairs and Housing
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th floor
Toronto, Ontario
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February 27, 2025

**Subject: Consolidated City of Toronto Comments
Request for a Minister's Zoning Order for Affordable Housing and
Mixed-use Development in the City of Toronto
ERO #: 025-0118
1635 Lawrence Avenue West**

These comments are in reference to the Environmental Registry of Ontario (ERO) posting regarding a request for a Minister's Zoning Order (MZO) to permit a multi-tower mixed-use development containing affordable housing located at 1635 Lawrence Avenue West in Toronto.

The comments below reference the materials shared with the City of Toronto by the Ministry of Municipal Affairs and Housing (MMAH) via Dropbox link on January 10, 2025, as well as the ERO posting made on January 28, 2025. It includes comments from the Development Review Division, City Planning Division, Parks and Recreation Division, Environment, Climate and Forestry Division, as well as the Housing Secretariat.

Development Review Division – COMMUNITY PLANNING

1. The City of Toronto is in receipt of multiple plans depicting the proposed development:
 - a. Plans dated June 14, 2023, prepared by Sweeny & Co Architects, depict five towers ranging in height from 28-45 storeys
 - b. Plans dated April 11, 2024, prepared by Sweeny & Co Architects, depict four towers ranging in height from 38-42 storeys
 - c. Plans dated May 31, 2024, prepared by Sweeny & Co Architects, depict four towers, ranging in height from 32-42 storeys

Further, none of the above-referenced plans correspond with the description of the proposal on the ERO, which refers to a development containing four towers

ranging in height from 30-42 storeys. This poses a challenge to providing comments on this proposed MZO and for providing clarity to the public.

2. Since MMAH staff have been unable to confirm which is the correct set of plans under consideration for this MZO, all comments provided herein, unless otherwise specified, are applicable to all above-referenced plans.
3. The subject site is designated Mixed Use Areas as per the City of Toronto Official Plan. An Official Plan Amendment is not required to permit the proposed high-density mixed-use development.
4. The subject site is zoned Commercial Residential – CR 1.0 (c1.0; r0.0) SS3 (x43) within City of Toronto Zoning By-law 2013-569. Mixed Use Buildings are only permitted where the R value is greater than 0. An amendment to the City's Zoning By-law is required.
5. A portion of the site is located within the Toronto and Region Conservation Authority (TRCA) Regulation Limit. Development limits must be accurately defined and depicted on all plans and TRCA must be consulted. Please consult TRCA comments (provided separately).
6. The subject site features a boundary along Black Creek Drive, ostensibly making it a corner site. However, Black Creek Drive does not feature sidewalks or transit service currently. Further, the site's frontage along Black Creek Drive is dominated by TRCA regulated ravine lands.
7. Only one Toronto Transit Commission (TTC) bus route directly serves the site – 52 Lawrence Avenue West (952 Express). The subject site is not served by higher-order transit or located within a Major Transit Station Area. The Weston GO/UP Express Station is approximately 1.6 kilometres away and the future Mt. Dennis Station is approximately 1.8 kilometres away.
8. The subject site is not located in an area with existing or planned tall buildings within the immediate context. While some form of high-density mixed-use development is generally appropriate for this under-utilized site designated Mixed Use Areas, the scale of the proposed four or five tower development concept is excessive and far exceeds the planned density that the site can accommodate, given its limited transit access and as per the City's planning policies and guidelines described below.
9. As per Chapter 4.5 of the City of Toronto Official Plan, while Mixed Use Areas will absorb significant growth in retail and housing, not all Mixed Use Areas will experience the same scale or intensity of development.
10. As per the City of Toronto Official Plan, development in Mixed Use Areas will "locate and mass new buildings to provide a transition between areas of different development intensity and scale, as necessary to achieve the objectives of this Plan, through means such as providing appropriate setbacks and/or a stepping

down of heights, particularly towards lower scale Neighbourhoods” (4.5.2.c). It also states that developments will “locate and mass new buildings so as to adequately limit shadow impacts on adjacent Neighbourhoods, particularly during the spring and fall equinoxes” (4.5.2.d). The proposal’s heights and massing which do not appropriately step down to the Neighbourhood areas to the north and south of the site could cause shadow and other impacts.

11. As per the City of Toronto’s Tall Building Design Guidelines, a separation distance between tall towers on the same site of 25 metres or greater, measured from the exterior wall of the buildings, excluding balconies, should be provided. This minimum separation distance is not being achieved in the 5-tower concept (Plans dated June 14, 2023, prepared by Sweeny & Co Architects).
12. As per the City of Toronto’s Tall Building Design Guidelines, tower floorplates should be limited to 750 square metres or less per floor, including all built areas within the building, but excluding balconies. This must be confirmed.
13. As per the Tall Building Design Guidelines, tall building towers are to be set back 12.5 metres or greater from the side and rear property lines or centre lines of an abutting lane. Tower 4 appears to feature an insufficient setback of 4.3 metres to the eastern property line (Plans dated April 11, 2024, prepared by Sweeny & Co Architects), and Building A – Tower 2 and Building B – Tower 3 (Plans dated June 14, 2023, prepared by Sweeny & Co Architects), also appear to have insufficient setbacks to the eastern property line. This poses significant challenges to the future development potential of the adjacent Mixed Use Areas lots along Olympia Drive.
14. As per Section 3.1.3.4 of the City of Toronto Official Plan development will locate vehicular access and ramps to minimize impact and improve the safety and attractiveness of the public realm. This should be achieved by consolidating driveways and curb cuts, and limiting new vehicular access between the front face of a building and the public street or sidewalk. Access to the site should be consolidated from Olympia Drive. Access should not be provided from Lawrence Avenue West.
15. The section of Lawrence Avenue West fronting the site is now adopted as an Avenue, as per a Toronto City Council decision on February 5, 2025. As per associated Official Plan Amendment 778, the planned built form of Avenues is mid-rise, except where existing and planned subway, light rail transit, and GO Transit rail stations can potentially support greater intensification. Generally, development with greatest height and scale should be located at higher order transit stations.
16. As per the City of Toronto’s Growing Up Guidelines, a minimum of 10% of residential units should be three-bedroom, whereas only 8.5% are proposed per the Architectural Plans (Plans dated May 31, 2024, prepared by Sweeny & Co Architects).

17. As per the City of Toronto's Growing Up Guidelines, two-bedroom units should be 90 square metres and three-bedroom units should be 106 square metres to be functional and supportive of families. The proposed unit sizes have not been provided on any of the plans.
18. Community Planning staff are of the opinion that the maximum number of tall buildings the site can accommodate while meeting City policies and achieving the intent of the Tall Building Design guidelines would be 3 tall buildings. This would still result in a significant number of residential units. Please refer to comments from Urban Design staff for more information.
19. Community Planning staff have conducted a preliminary, high-level review of the proposed draft zoning order and offer the following comments:
- a. 3c) – non-residential buildings are permitted. The subject site is designated Mixed Use Areas in the Official Plan. While use of the site exclusively for non-residential uses is acceptable, the zoning order should specify what these uses are.
 - b. 4.3 – A maximum interior floor area for eating establishments and take-out eating establishments should be included.
 - c. 4.7 – The maximum number of towers should not be listed in the by-law, it should be represented through a diagram.
 - d. 4.9 – Tower floorplates should not exceed 750 square metres, in accordance with the Tall Building Design Guidelines.
 - e. 4.11 – Heights of various portions of the building should be expressed through a diagram.
 - f. 4.12 – The minimum height of the first storey of a building should be 4.5 metres to ensure viability of retail.
 - g. 4.14 – Permitted projections and encroachments should be split into separate groups. Maximum projections/encroachments should be expressed in metres.
 - h. 4.15 – Mechanical Penthouses should not cover 100% of the roof.
 - i. 4.16 – The minimum number of three-bedroom dwelling units should be broken out separately.
 - j. 4.18 – Vehicle access should not be permitted from Lawrence Avenue West.
 - k. 4.19-23 – The appropriateness of the proposed parking rates and other provisions must be reviewed in consultation with Transportation Review staff.
 - l. 4.24-26 – The appropriateness of the proposed loading space provisions must be reviewed in consultation with Transportation Review staff.
 - m. 4.7-31 – The appropriateness of the proposed bike parking provisions must be reviewed in consultation with Transportation Review staff.
 - n. 4.32, 33 – Blanket exemptions to regulations in the By-law should not be provided, the order should describe what alternative regulations should apply instead.

20. The development will be required to demonstrate compliance with Tier 1 of the Toronto Green Standard, Version 4. It is strongly encouraged to consider Tiers 2 and 3. To enroll in these Tiers, please contact Environmental Planning at sustainablecity@toronto.ca

Development Review Division – ENGINEERING REVIEW

21. The total number of residential units and commercial gross floor area (GFA) are not consistent with the submitted Addendum letter dated June 16, 2023, submitted Functional Servicing Report and Stage 1 Stormwater Management Report, dated May 2024 prepared by Valdor Engineering Inc. and submitted architectural plan.
22. Detailed comments will be provided at the time of a formal submission to the City. Please see below comments that were provided with the Pre-application Consultation checklist dated March 14, 2024, to be addressed in the submitted studies:

Functional Servicing and Stormwater Management Report

23. Development statistics (units, type of unit, number of storeys) in the report must be consistent with submitted architectural plans.
24. All necessary sewer and water analyses must be in accordance with the Design Criteria for Sewers and Watermains, January 2021, the Sewer Capacity Assessment Guidelines, July 2021 and Water Supply for Public Fire Protection Manual (2000) by the Fire Underwriters Survey (FUS). Please reference the latest version in the report.
25. Section 2.3 – The diameter of the domestic water service connections in the report must be provided.
26. Section 2.2 and fire flow calculation references FUS version 1999. Required fire flow calculation must be in accordance with the current version of the FUS manual 2020 in Appendix C.
27. Section 2.2 indicates the flow test was completed on September 23, 2021. Date of flow test must be within 2 years of submission of report.

Letters must be attached in Appendix B of the report from the architect and consulting civil engineer indicating what Construction Type and Construction Coefficients the building's design falls into, based on the different construction type and construction coefficient, vertical opening/communications properly protected, sprinkler system.

28. Appendix A, Equivalent population calculation - Type and number of residential units/ retail GFA must be consistent with the submitted architectural plan.

Landscape, impervious area and roof building area in Appendix E must be consistent with the submitted architectural plan.

29. Change to storm and sanitary sewer drainage patterns must be identified and confirmed through analyses that such changes would have no adverse effects on the sewer system.
30. If the buildings are to have one shared Storm Water Management (SWM) facility with only one storm connection, the internal mechanical piping for each point tower, the shared base building are to be separated with sampling ports for each system upstream of the connection point to the SWM facility. Please clarify this in Section 4.0.
31. A plan to show proposed sedimentation and erosion controls should be provided.
32. A manual to outline the general maintenance and cleanout information/procedures for stormwater management facilities should be provided.
33. Overland and emergency overland flow routes on the drainage plan should be provided.
34. A manufactured Treatment Device Summary Form including supporting documentation should be provided.
35. Section 4.1–2 - A summary of the 100-year HWL elevation and depth, freeboard available, required storage volume and provided storage volume for both active and dead storage volume for proposed tank and cistern should be provided.
36. A summary table under stormwater management at the end of the Section should be provided in the report with the following:
 - a. The calculated allowable release rate
 - b. The actual release rate
 - c. The required storage
 - d. The provided storage
 - e. The roof release rate
 - f. The roof storage provided
 - g. The orifice tube size
 - h. The oil grit separator size (including TSS% removal & Annual runoff treated).
37. Section 4.1–2 - Report must include a detailed discussion for all the storm outlets, mitigative measures in the event of complete system failure for the minor (piped) flow, where and how major overland flow will occur for the entire site and confirm that the buildings on site and the adjacent properties will not be flooded.
38. Section 4.3 – A letter from a qualified landscape architect if irrigation is proposed to help achieve the required water balance targets must be attached. The letter

must include irrigation calculations and the utilized landscape areas for irrigation should only be the areas within the private subject site and match the post development drainage plans and the landscape plans. The landscape architect must recognize that the irrigation season in Toronto is only from May to September for a maximum number of 153 days and letter must clarify on how the water balance requirements will be achieved during the non-irrigation season. The consultant can evaluate the water balance requirements on an average annual basis. The water balance requirements for the site when evaluated on an annual basis should be shown to be equal to or greater than 50% Toronto annual rainfall (Toronto annual rainfall per WWFMG = 840 mm). Furthermore, Figure 1A on page 8 of the WWFMG can be used to convert daily rainfall depth in mm to % of total AARD. Based on this, approximately 5mm of daily rainfall depth is approximately equal to 50% of total AARD (420mm).

39. The consultant must verify in the report that they have included in the analysis:
- a. The analysis correctly represents the sewer system, including any recent sewer construction/upgrades.
 - b. Flow rates from all recent/proposed development, including new builds, sites where zoning has been completed and where applications are currently in progress.
 - c. Best efforts have been made to include all flows from Private Water discharge agreements in the sewer shed.

The sanitary calculations, design sheets, drainage plans, etc. must clearly indicate the address/location of each new development along with the development statistics/flows accounted for in the analysis. Domestic and groundwater flow rates from all existing and development pipeline estimate, such as approved, active, and under review development applications must be provided clearly in the design sheets and drainage plan. Proposed upgrade must also assess and recommend any additional upsizing needed to accommodate future land-use population assumptions based on EA study (Area 16) assumptions for Planning Horizon Projection, Secondary Plan/Community Planning Estimates, and proposed Development scenario, whichever is greater.

40. Section 3.3, the report indicates that the catchment and sewer shed for the surrounding combined sewer network was modelled using Infoworks ICM. This area is surrounded by the sanitary sewer network. This should be confirmed and revised accordingly.
41. The report must confirm that the flow estimation components, assumptions, I & I under dry and WWF conditions and WWF mitigation measures for the development site are in compliance with Sewer Capacity Assessment Guidelines, July 2021.
42. Pre-development and post development sanitary drainage plans to support all analyses must be provided.

- 43. A functional plan showing proposed upgrade to existing sewer with layout and details of proposed upgrade must be provided.
- 44. The latest Servicing Report Groundwater Summary Form (December 2017 version) should be used in the report.
- 45. A final Hydrological Assessment Report, Hydrological Review Summary Form and relevant certification letters, such as a letter from the owner, structural engineer and mechanical engineer for proposed water-tight foundation should be attached.

Servicing Report Groundwater Summary

- 46. The page number of the report should be provided and the type of sewer should be identified in the form.
- 47. The diameter of the receiving sewer is identified as 300 mm in the report on page 8. The form and page number of the report should be revised.
- 48. The page number of the report for total allowable peak flow rate during a 100 year storm event to storm sewer should be provided.
- 49. Total flow = 52.12 L/s (sanitary flow) + 0 L/s (groundwater flow rate) as 52.12 L/s on page 4 should be indicated.
- 50. The page number of the report if the water quality meets the receiving sewer bylaw limits should be provided.
- 51. If the site is not proposing a groundwater infiltration gallery, N/A should be indicated in the form.
- 52. Water-tight letters should be provided in the report and should be appended accordingly. Reference Appendix number in the form.

Development Review Division – TRANSPORTATION REVIEW

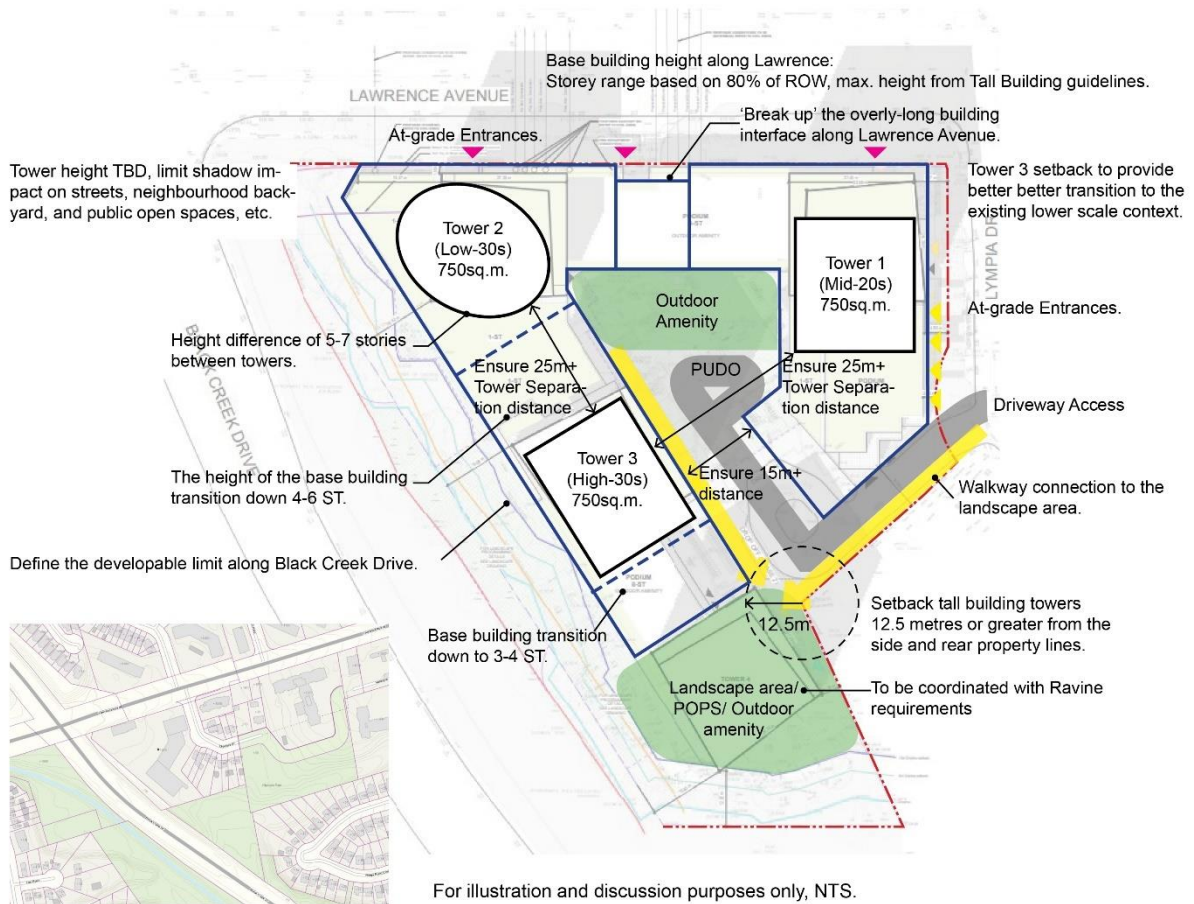
- 53. There is no additional land for a road widening required for Lawrence Avenue West. The requirement of a 30 metre wide right-of-way has been satisfied, there is no additional land required for a road widening for Olympia Drive. This road is not identified in the Official Plan as a road to be widened.
- 54. The sidewalk must be upgraded along all site frontages. A minimum of 2.1 metre sidewalk-wide pedestrian clearway along Lawrence Avenue West, Olympia Drive and Black Creek Drive site frontage within the right of way is required.

55. The Site Plan should feature a single access point from Olympia Drive. This adjustment aims to minimize the traffic impact and align with the City's Official Plan.
56. City of Toronto standards and requirements regarding all dimensions required and number of parking spaces and the loading spaces required for this Site must be complied with.
57. A Traffic Impact Study is required.
58. All Toronto Green Standards requirements for the site must be satisfied.

City Planning Division – URBAN DESIGN

59. Given the existing and planned context, lack of higher order transit, and applicable planning policies and guidelines, the subject site cannot accommodate such density and number of towers; a 3-tower option was suggested by the City to the applicant in the pre-application consultation stage.
60. The City previously provided a site plan layout and massing option for the proponent to consider through the Pre-Application Consultation checklist issued March 14, 2024, incorporating key comments and markup below:
 - a. The number and height of towers should be reduced to better fit the existing and planned context, ensure appropriate transitions in scale, and maintain sunlight and daylight access throughout the site, proposed amenities, and surrounding public realm.
 - b. Suggested tower heights for three-tower concept are as follows: Tower 1 – mid-20s storeys, Tower 2 – low-30s storeys, and Tower 3 – high-30s storeys. A height difference of 5 to 7 storeys between adjacent towers for height variance should be provided.
 - c. A minimum 3 metre tower setback from the base building should be provided.
 - d. Floorplate sizes of the proposed tower floor plates and the separation distance between all towers should be clarified.
 - e. The lack of tower setbacks from the abutting east Mixed Use Areas site, which has additional tower potential, must be addressed, as well as setbacks from the southeast lot line in accordance with the Tall Building Design Guidelines.
 - f. The east tower should be shifted further back from the street frontage to improve the transition to the existing lower-scale context.
 - g. The base building heights should align with the Tall Building Design Guidelines, incorporating a massing transition from the prominent intersection of Black Creek Drive and Lawrence Avenue West to the adjacent natural heritage lands.
 - h. Articulation should be introduced to break up the overly long building frontage.

- i. The servicing area within the built form should be internalized to minimize visual impact on the public realm and enhance pedestrian safety.
- j. The central amenity space should be revised, as its current location remains in shadow all day, which is not acceptable.



61. A Wind Tunnel Study is required to assess wind conditions, ensure pedestrian safety and comfort, and confirm that any necessary wind mitigation can be addressed during the zoning stage. Comfortable wind conditions must be provided at entrances, public streets, parks and open spaces, and care should be taken to ensure wind conditions are appropriate for the intended use of the space during all seasons.
62. A Sun/Shadow Study is required to demonstrate how the proposed tall buildings protect access to sunlight and limit the shadowing of neighboring properties. The as-of-right shadow impact of the Zoning By-law approved building height should be included. Sunlight is to be maximized on Neighborhoods, public realm, parks, and open space areas.

City Planning Division – TRANSPORTATION PLANNING

63. All access points for the site are to be consolidated into a single entry to improve public realm and pedestrian/vehicular safety. Lawrence Avenue West is identified as a Transit Priority Segment on Map 5 of the Official Plan and is served by the 52 and 952 Lawrence buses. Currently, there are two existing driveway accesses on Olympia Drive, which are approximately 33 metres apart. This arrangement can lead to unsafe conditions, as the close proximity of multiple access points increases the likelihood of vehicle conflicts, and difficulties with turning movements, especially during peak hours. Consolidating the driveways will reduce potential traffic conflicts and improve traffic flow. To minimize disruption to these services, we request a single vehicular access from Olympia Drive.

A Transportation Impact Study is required and should provide a comprehensive safety review for all modes. The infrastructure requirements for all modes should be reviewed in conjunction with the multi-modal analysis to assess if additional infrastructure improvements are required, namely sidewalk width, intersection improvements, boulevard improvements, cycling infrastructure investments, access conflicts, and transit infrastructure improvements.

64. In accordance with the policies in the City's Official Plan, Toronto Green Standard (TGS) – Version 4, and Guidelines for the Preparation of Transportation Impact Studies (2013), the appropriate Travel Demand Management programs/measures to be implemented on/for the subject site to reduce the single occupancy auto vehicle trips generated by the proposed development should be identified.

65. TDM Measures requested by Transportation Planning include the following:
- a. Provision of at least two car-share vehicles on-site, with all residents and employees offered free membership to the on-site provider.
 - b. Offering a bicycle voucher valued up to \$1,000 to all initial condo unit buyers, along with an agreement with a local cycling store to provide subsidized bicycle maintenance for one year.
 - c. Parking should be unbundled for all unit types, meaning parking spaces are not automatically included in the sale or lease of a unit.
 - d. A pre-loaded transit fare card, with a value greater than a monthly transit pass be provided. For rental apartments, all new tenants receive this fare card permanently, and for office spaces, all new employees receive it permanently.
 - e. Carpool parking spaces be available on-site, comprising 2-5% of the total parking supply.
 - f. Bicycle parking to exceed the minimum requirements by at least 20%, with additional infrastructure such as dedicated bicycle ramps or elevators to facilitate easier access to the bicycle parking.
 - g. A Bike Share Toronto station with a minimum of 12 bicycle parking spaces to be installed on-site, with free membership provided to all residents and employees. Based on the standard ratio of one bike share station per 250 units, this proposal for 2,405 units requires 10 bike share stations.

- h. A bicycle repair station to be provided in a secure bicycle parking room for the use of long term users (residents or employees) and an additional bicycle repair station to be provided in a publicly accessible area.
- 66. In order to comply with current City standards, and requirements of the Accessibility for Ontarians with Disabilities Act (AODA), the site plan and landscape plan must clearly show the provision of a pedestrian clearway that shall be unobstructed and be a minimum of 2.1 metres wide along Olympia Drive, Black Creek Drive and Lawrence Avenue West. The Mount Dennis Secondary Plan and Weston Planning Study focus on improving the public realm and pedestrian safety, including areas along Black Creek Drive. By incorporating wider sidewalks, the development will align with these broader objectives for the area.
- 67. Black Creek Drive is part of the 2025-2027 Near-Term Cycling Network. It is encouraged to connect the site to this network by incorporating bicycle parking and organizing the site to ensure that residents can easily access bicycle parking.
- 68. According to the City of Toronto's Zoning By-law 569-2013, regulation 230.5.1.10(9)(iii), long-term bicycle parking must be distributed across below-ground levels in one-level increments, starting from the first level below ground. This distribution is required when at least 50% of the area on each level is allocated for bicycle parking, continuing until the total number of required bicycle parking spaces is met. This regulation must be satisfied.

City Planning Division – COMMUNITY SERVICES & FACILITIES

- 69. The subject site is within the Mount Dennis Community Services and Facilities (CSF) Study and needs are identified for any proposed Community Benefit Charges. As such, a full CSF Study is not required.

As the proposed community benefit charges would be approximately \$5,550,840 the following community benefits should be considered:

 - a. In kind community space, which the owner is to design, construct, finish and convey to the City at a minimum of 464 square metres (5,000 square feet); and
 - b. A one-time financial contribution.
- 70. The City's minimum requirements for the provision of Community Agency Space are as follows:
 - a. The owner would design, construct, finish and convey to the City a minimum of 465 square metres (5,000 square feet) of community agency space;
 - b. The facility would be conveyed to the City as a freehold unit;

- c. The community agency space would be located at grade with a separate entrance and if not at grade then equipped with separate elevator and stairwell;
- d. The non-profit service provider for the community space would be selected in accordance with the City's Community Space Tenancy Policy;
- e. The Community Space would be constructed, finished, furnished and equipped generally in accordance with the template Community Space Term Sheet;
- f. Prior to the issuance of the first grade building permit the owner would provide a letter of credit in the amount sufficient to guarantee 120 percent of the estimated cost of design, construction and hand over the community agency space to the satisfaction of the Corporate Real Estate Management, the Executive Director, Social Development, Finance and Administration, the Chief Planner and Executive Director, City Planning and the City Solicitor.

Parks and Recreation Division – PARKS DEVELOPMENT

- 71. Based on a preliminary review of the documents, the City anticipates pursuing cash-in-lieu of an on-site parkland dedication. If cash-in-lieu is pursued, the amount of cash-in-lieu would be determined in accordance with Chapter 415, Article III of the Toronto Municipal Code. The City reserves the right to change the type of dedication and amount, based on materials provided in future, formal submissions.
- 72. The Sun and Shadow Study prepared by Sweeny & Co Architects (dated 06/14/2023) demonstrates that the proposed development would cast a shadow on Olympia Park from 5:18 PM to 6:18 PM on March 21 and September 21. Per Chapter 3.2.3.3 of the Official Plan, shadowing on the park shall be minimized in order to preserve its utility.
- 73. The Architectural Plans prepared by Sweeny & Co Architects, dated May 31, 2024, demonstrates that a 13.47-metre setback has been proposed between Olympia Park and the adjacent building face of Tower 4, which is acceptable to Parks Development, however, other commenting partners may have additional requirements.

Environment, Climate & Forestry Division – RAVINE & NATURAL FEATURE PROTECTION

The following plans were reviewed by RNFP:

- Site Plan & Zoning Info AZ101 prepared by Sweeny & Co Architects, dated May 31, 2024
- –2 - Partial Underground AZ202 prepared by Sweeny & Co Architects, dated May 31, 2024
- –1 - Partial Underground AZ203 prepared by Sweeny & Co Architects, dated May 31, 2024

- Level 01 – Olympia AZ204 prepared by Sweeny & Co Architects, dated May 31, 2024
- –1 - Partial Underground AZ203 prepared by Sweeny & Co Architects, dated May 31, 2024
- West Elevation along Black Creek Drive AZ401 prepared by Sweeny & Co Architects, dated May 31, 2024
- North Elevation along Lawrence Ave AZ402 prepared by Sweeny & Co Architects, dated May 31, 2024
- East Elevation along Olympia Drive AZ403 prepared by Sweeny & Co Architects, dated May 31, 2024
- Submission Letter prepared by Spotlight Developments, dated June 16, 2023.

74. Underground parking cannot encroach into either the maintenance buffer or the naturalized buffer. Drawings P1 & P2 – Partial Underground AZ202 & AZ203 indicate that the proposed parking will extend into the maintenance buffer and the naturalized buffer. The underground parking should remain within the footprint of the proposed tower in these areas.

75. The entire buffer is required to be naturalized and meet or maximum planting densities outlined below. Site Plan Drawings & Zoning Info AZ101 and Level 01 Olympia AZ204 identify amenity space and landscaping within the buffer. No amenity spaces or hardscape would be permitted within this area.

- Planting densities within the following range:

Site Type	Area (m ²)	Total Plant Quantity	Tree Quantity	Shrub Quantity	Total Plant Density (m ²)
RNFP	10,000	10000	3000	7000	1.00
RNFP	10,000	6500	1950	4550	1.54

Note: The density of vegetation may vary for other community series.

- Stock must be locally sourced to the greatest extent possible
- Site preparation and cleanup
- Pre-planting invasive species control
- Soil amendments
- Edge management
- Terra-seeding with site-suitable native nursery crop at appropriate application rate
- Protection of soils or nursery crop prior to tree and shrub planting (if necessary)
- Tree and shrub planting with site-suitable native species at appropriate densities
- Minimum 2 year post planting maintenance period to include:
 - Mulching
 - Weeding
 - Watering
 - Post-planting invasive species control and monitoring of planted stock
 - Replacement of dead and poor quality stock

76. Reference to a drawing with Landscape details is made on drawings Site Plan & Zoning Info AZ101 and Level 01 Olympia AZ204, however no landscape details were provided.

77. Elevations AZ401-AZ403 identify the underground parking extending beyond the footprint of the towers and into the maintenance and naturalized buffer. No encroachments above or below ground are permitted.
78. All buffer area calculations are to be exclusive of any underground development.
79. An arborist report should be submitted to RNFP for review and approval. The arborist report shall be completed to the minimum standard detailed in the City's document "Guidelines for Completion of an Arborist Report" at www.toronto.ca/trees/ravines and the satisfaction of RNFP.
80. A tree protection plan drawing should be submitted for review. This plan shall show tree protection layout (and phasing if applicable), minimum tree protection zones and tree protection hoarding details in accordance with the City's Tree Protection Policies.
81. A stewardship plan for the subject site should be submitted for review. The stewardship plan shall be prepared to the minimum standard as detailed in the City's "Guidelines for Development of a Stewardship Plan" document.
82. More information about the Ravine & Natural Feature Protection By-law, ravine conservation and stewardship is available from our website at www.toronto.ca/trees/ravines. For more information, please contact Cindy Hignett at 416-392-7187 or Cindy.Hignett@toronto.ca.

Environment, Climate and Forestry – URBAN FORESTRY

83. All bylaw protected trees and tree protection zones must be plotted on the Site Plan with other utilities and site elements. For additional information, refer to Application Support Material Terms of Reference for Site Plan.
84. In accordance with Municipal Code Chapter 813 article II (street tree by-law), all trees growing within the public right-of-way require protection or a permit to injure or destroy. If new trees cannot be replanted back onto the road allowance as compensation for street trees proposed for removal, Urban Forestry may not issue a permit to destroy the existing trees and the applicant would need to apply to injure the trees.
85. In accordance with Municipal Code Chapter 813 article III (private tree bylaw), any private trees measuring 30 cm dbh and over as well as smaller trees planted as a component of previous permit conditions will require protection or a permit to injure or destroy.
86. The applicant shall provide the Application to Injure or Remove Trees under Municipal Code Chapter 813 article II and III as part of the initial complete application submission.

87. Buildings and underground building structures should be designed and built with sufficient setbacks from the property lines, proposed and existing public and private roads to allow for the satisfactory planting of large growing shade trees on private and/or city land, as per the City of Toronto's specifications.
88. A double row of trees along Lawrence Avenue West must be provided.
89. Urban Forestry recommends that the proposal demonstrate Tier 1 compliance with the Toronto Green Standard Version 4.0. Only large-maturing trees (preferably native shade tree species) planted with access to the required volume of high-quality soil may be counted towards the TGS tree planting target.
90. Where soil volume for tree planting locations is proposed and Quality Level-B Utility data has confirmed existing utilities, additional Quality Level-A Utility data must be provided. QL-A data provides precise horizontal and vertical utility information, typically obtained by exposure (i.e. "daylighting") using minimally intrusive excavation equipment. The Quality Level of the subsurface utility data should be clearly noted adjacent to the professional stamp of the consulting engineer on all plans and documents as certification of the quality level. The Public Utilities Plan QL-B data should be submitted as a separate plan and as an underlay (in grey) on the Landscape and Planting Plan, the Soil Volume Plan, and any soil cell drawings, if applicable. The Public Utilities Plan QL-A data shall be submitted as a separate report. All utilities and applicable utility clearance requirements shall be used to inform detailed section drawings of the Soil Volume Plan and soil volume statistics calculations.

HOUSING SECRETARIAT

91. Sufficient information is not available to provide detailed comments. Staff typically consider the following criteria as it relates to housing:
- a. Affordable unit sizing, location, tenure, and mix;
 - b. Availability and design of accessible units;
 - c. Target tenant and the amenity space designed for the specific tenant group; and
 - d. Financing programs suitable for the project and overall financial viability: the funding plan for this project as of a year ago didn't suggest a financially viable project. A revised pro forma should be provided for this project.
92. To better conform with the City's Growing Up Guidelines and Affordable Housing Design Guidelines, the amount of one-bedroom units should be decreased and more larger, family-sized units (particularly three and possibly four bedrooms) should be provided.
93. A better balance in the proposed unit mix may be achieved in the base building floors, where the concentration of one-bedroom units is intense.

94. The proposed unit sizes for one- and two-bedroom units generally conform with City guidelines, however, the three-bedroom units are undersized.
95. Because the proposal is advertised as an affordable housing development, additional details would need to be provided to comment on the merits and shortcomings.

Strategic Initiatives, Policy & Analysis – ENVIRONMENTAL PLANNING

96. The site is traversed by the Black Creek valley corridor.
- a. OP 3.4.8, directs that development (including grading and hardscaping) will be set back at least 10 metres from the Top-of-Bank of the valley feature.
97. The subject lands partially overlap with the Natural Heritage System on Official Plan Map 9, and the Ravine and Natural Feature Protection By-law area.
- b. OP policies 3.4.3; 3.4.11; and 3.4.13 direct that a Natural Heritage Impact Study (NHIS) is required 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.
 - c. An ecologically appropriate development setback (including grading and hardscaping) must be established from the edge of natural features to ensure the development is mitigating negative impacts and/or restoring and enhancing the natural heritage system.
 - d. The City's Terms of Reference for completing an NHIS should be consulted. Environmental Planning is available to discuss the required contents if there are any questions.



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