



EPRA/LPRO Concerns Re: 2400- 2444 Yonge Street

Dear Councillor Colle,

The Lytton Park Residents Organization (LPRO) and Eglinton Park Residents Association (EPRA) wish to consult with you as soon as possible regarding the upcoming LPAT mediation for the proposed development on Yonge Street, from the north edge of Anne Johnston Health Station to Roselawn. We are very concerned by this proposed development, which is situated on the boundary of our two residents groups. The proposal is inconsistent with the City of Toronto Official Plan, Yonge-Eglinton Secondary Plan and the Tall Building Design Guidelines. We understand that permitted building heights in the Secondary Plan Area have increased; however this application is even taller. It is the first in Ward 8 that fails to comply with the direction provided in the new Secondary Plan (OPA 405).

We look forward to speaking with you about this application shortly.

Executive Summary

Our main concerns with the proposal are:

- 1) Excessive tower height
- 2) Excessive base building height
- 3) Excessive tower floor plate
- 4) Inadequate tower setbacks
- 5) Inadequate on-site parkland dedication

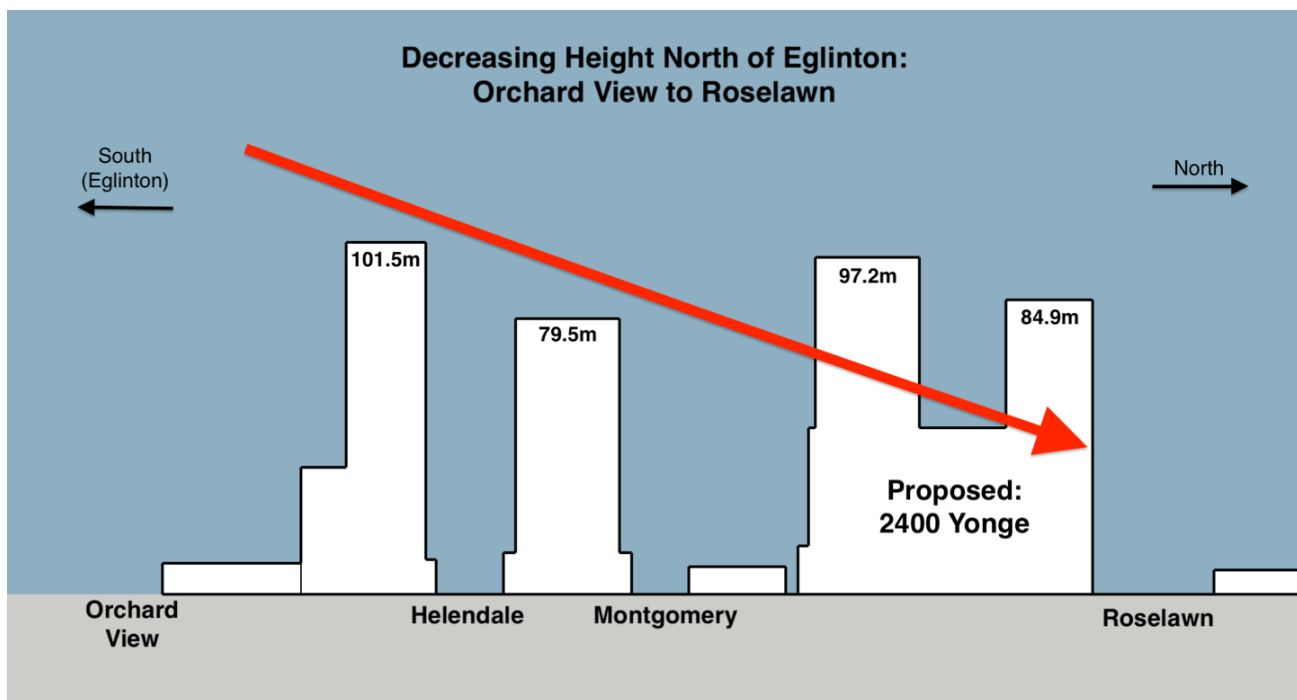
Consequences of the current proposal being approved:

- a) Precedent for inappropriate tower heights on Yonge Street
- b) Precedent for failing to comply with height transition policy in Secondary Plan
- c) Precedent for inappropriate base building heights on Yonge Street
- d) Precedent for inadequate tower setbacks from Yonge Street
- e) Precedent for inadequate tower-to-Neighbourhood separation
- f) Severe shadow impacts on the Neighbourhood
- g) Severe shadow impacts on Yonge Street
- h) Significant loss of sky view
- i) Lack of regard to adjacent heritage buildings
- j) Missed opportunity for park at Yonge and Roselawn (proposed in Secondary Plan)

Each of our five main concerns are elaborated on below:

1) Excessive Tower Height

Both the existing built form and new Secondary Plan support a height peak at the intersection of Yonge and Eglinton with building heights decreasing in all directions. This is of even greater importance on the west side of Yonge Street, north of Eglinton where there are Neighborhoods adjacent to Yonge Street. The proposed building is shown within the existing context below.



The proposed development is 17.7 metres taller than the high rise building to the south, despite being located farther from Yonge and Eglinton. The Yonge-Eglinton Secondary Plan permits buildings of 20- 30 storeys between Orchard View Boulevard and Roselawn Avenue, decreasing in height towards the north. Given that the building is at the north end of this area a height of roughly 20- 25 storeys would conform with the policy. With a maximum height of 97.2 metres, the proposal is roughly the height of a 31 storey building due to the tall floor heights. The proposal does not take into account the decreasing heights moving northward on Yonge Street reflected by approved development applications and the policies of the Secondary Plan. The subject site should be developed with a maximum height of 65- 75 metres (20- 25 storeys).

2) Excessive Base Building Height

According to the City of Toronto Tall Building Guidelines, base buildings are required for new tall buildings to fit within the existing context of the street, to maintain sky view and minimize shadow impacts. The proposed base building height is 49.1 metres and 12 storeys. The first two floors will be double height, which will make the podium appear to be 14 storeys when viewed from the street. The table below summarizes permitted and proposed base building heights.

	Maximum # of Storeys	Maximum Height (metres)
Tall Building Guidelines	7	21.6
Montgomery Square Character Area (Yonge-Eglinton Secondary Plan)	6	20*
Proposed Building	12	49.1

*assumes normal floor heights

The proposed base building represents 227% of the maximum height permitted in the Tall Building Guidelines and roughly 246% of the maximum height permitted in the Montgomery Square Character Area of the Yonge-Eglinton Secondary Plan. The proposed base building does not mitigate the perception of the tall building, match the existing context of the street, nor preserve sky view and sunlight. The proposal fails to meet the objectives of a base building.

3) Excessive Tower Floor Plate

Smaller tower floor plates are required to maximize sunlight and sky view while minimizing shadow impacts. The maximum permitted tower floor plate in both the Tall Building Guidelines and Yonge-Eglinton Secondary Plan is 750m². The development proposal includes two towers with floor plates of 844m² and 860m², well in excess of the maximum permitted. The towers should have a maximum floor plate of 750m². The excessive tower floor plates proposed contribute to the shadow impacts and loss of sunlight and sky view that would result from the proposal.

4) Inadequate Tower Setbacks

The placement of the towers is also of concern. Both the north and south towers have minimum setbacks from Yonge Street between 5 and 6 metres and are setback from the base building between 3 and 3.5 metres. This is not in line with approved developments in the area, which have two to four times the tower setback of this proposal. This is summarized in the table below.

Building	Setback from Yonge Street	Setback from Base Building
2360 Yonge Street at Helendale	22.7 metres	21.2 metres
2384 Yonge Street at Montgomery	20- 23 metres	9.6- 10.3 metres
Proposed: 2400 Yonge Street at Roselawn	5- 6 metres	3- 3.5 metres
2490 Yonge Street at Castlefield	13.8 metres	13.8 metres

The south tower is only 5.4 metres from the south property line. The Tall Building Guidelines require all new tall buildings to be 12.5 metres from adjacent properties. This is even greater importance on the subject site as the adjacent building to the south is a designated heritage building, former Police Station #12. This building forms part of a grouping of 3 heritage buildings significant to the history of North Toronto. The Yonge-Eglinton Secondary Plan states that new tall buildings in the Montgomery Square Character Area should respect and “accentuate” heritage buildings. Both the Secondary Plan and Tall Building Guidelines state that when a tall building site is adjacent to a heritage building, the tall building should include additional separation distance. The proposed placement of the tower is too close to Yonge Street and the south property line, fails to conform with City policies and reflect the context of approved local development applications. Furthermore, the inadequate base building setback from Yonge Street will obstruct the view of Police Station #12 from the north.

5) Inadequate Parkland Dedication

The revised proposal requires an on-site parkland dedication of 755m², but only 414m² is proposed. The developer is proposing to satisfy 55% of the required parkland with an on-site dedication. The Yonge-Eglinton Secondary Plan envisions a public square on the southwest corner of Yonge and Roselawn. The site is large enough to accommodate a park, it is located in the rapidly intensifying Yonge-Eglinton Area, it is located within a parkland priority area and clear direction regarding this site is provided in the Yonge-Eglinton Secondary Plan. The full parkland requirement should be provided on-site with an acceptable location and configuration.

It is the position of EPRA and LPRO that the development as currently proposed is inappropriate for the site. The tower heights, base building heights, tower floor plates and tower placement do not take into consideration the context of the surrounding area, approved development applications, the Official Plan, Yonge-Eglinton Secondary Plan and the Tall Building Guidelines. If approved the development would restrict sunlight and sky view, create

significant shadows on both Yonge Street and the adjacent Neighbourhood, diminish the presence of the adjacent heritage building, set a precedent of overdevelopment and appear from the street as a large slab. EPRA and LPRO believe it would be possible to develop the site with a more appropriate development proposal.

Sincerely,

Eli Aaron
LPRO Director

Tom Cohen
EPRA Chair