

September 10, 2025

Alexa Legge, Planner
Development Review – Toronto & East York District
Toronto City Hall
100 Queen Street West, 18th Floor
Toronto, ON M5H 2N2

Dear Ms. Legge,

**Re: *Official Plan & Rezoning Application File No. 24 241176 STE 19 OZ
Addendum to Planning and Urban Design Rationale (November 2024)
2451-2495 Danforth Avenue, City of Toronto***

We are the planning consultants for FCHT Holdings (Ontario) Corporation, a subsidiary of First Capital REIT (the “owner”), with respect to the above-noted Official Plan Amendment (OPA) and rezoning application for the lands municipally known as 2451-2495 Danforth Avenue in the City of Toronto (the “subject site”).

On November 13, 2024, an OPA and rezoning application (City File No. 24 241176 OZ) was submitted to permit the redevelopment of the subject site with a residential/mixed-use development. The application was deemed complete on December 16, 2024.

The OPA and rezoning application originally contemplated the redevelopment of the subject site with one building that includes a 13-storey (52.4 metres, including a 6.0-metre mechanical penthouse) mid-rise element and a 35-storey (122.0 metres, including a 6.0-metre mechanical penthouse) tower element, connected by a 2-storey podium. The proposal provided 41,251 square metres of gross floor area (GFA), inclusive of 939 square metres of retail GFA, 2,258 square metres of a potential grocery store and 38,054 square metres of residential GFA (620 residential units), resulting in a density of 5.54-floor space index (FSI). The proposal also included a privately owned, publicly accessible open space (POPS) in the eastern portion of the subject site. This generally summarizes the first proposal, referred to herein as the “Original Proposal”.

Since the initial submission, we received comments on the application from various City departments and external agencies and have had several meetings with City Staff to discuss the comments on the Original Proposal. Bousfields Inc. (“Bousfields”) has also been involved in the discussions and has worked closely with the owner and consulting team to revise the Original Proposal, as described and submitted herein (the “Revised Proposal”). We note that the Community

Consultation Meeting (CCM) was also conducted on March 20, 2025. The Revised Proposal also considers comments received from the public during the CCM.

The purpose of this addendum letter is to provide an overview of the revisions and an analysis of the Revised Proposal as prepared by Superkul within the context of the applicable planning framework. Subject to the additional comments and discussion set out herein, the findings and analysis set out in our November 2024 Planning and Urban Design Rationale report (referred to herein as the “2024 Rationale Report”) continue to be relevant and accurate with respect to the Revised Proposal.

As set out below, it is our opinion that the Revised Proposal is appropriate and desirable in land use planning and urban design terms. This Revised Proposal will continue to facilitate the residential/mixed-use intensification of an underutilized site located on an *Avenue* and designated *Mixed Use Areas* and is within the Main Street and Danforth GO Protected Major Transit Station Areas (PMTSAs). The redevelopment of the subject site is supported by the planning and urban design framework established by the applicable planning documents, specifically the Provincial Planning Statement, and the City of Toronto Official Plan, both of which promote intensification of underutilized sites with access to municipal infrastructure and higher-order transit.

Description of Revised Proposal

As noted above, Bousfields, the owner and the consulting team have met multiple times with City Staff to discuss the Original Proposal. Meetings were conducted on April 24, 2025, and on June 26, 2025. As a result, the Revised Proposal represents a vision which reflects the feedback and conversations held to date and seeks to complete the redevelopment plans for an underutilized site with a high-density residential/mixed-use development.

In this respect, the Revised Proposal continues to contemplate a building with mid-rise and tall elements, connected by a shared podium. The Revised Proposal also continues to provide a POPS space in the eastern portion of the subject site.

However, in response to comments received from City Staff, various changes have been made with respect to built form, massing and height, in particular to the tower element (Building A). The key revisions that have been made to the Original Proposal are outlined below.

Podium

- The podium element continues to be 2- to 3-storeys (9.6 metres and 14.1 metres, respectively) in height along the majority of the Danforth Avenue frontage. However, the height of the podium increased to 8 storeys (29.9 metres) at the base of the tower element (Building A).
- The 2-storey element of the podium is set back a minimum of 1.0 metre from Danforth Avenue on Levels 1 to 3, however, a stepback of 2.5 metres is provided on Level 4 of the podium element at the base of Building A, maintaining a 3-storey streetwall along Danforth Avenue.
- Levels 5 to 8 of the podium element (Building A) are set back approximately 3.5 metres from the newly established north lot line (due to the road widening), 13.8 metres from the south lot line and 24.1 metres from the mid-rise element to the west.
- The podium element continues to be 2 storeys (9.6 metres) in height along Westlake Avenue and setback a minimum of 4.2 metres from the street (Building B).

Building A – 29-storey Tower

- The height of the building has been reduced from 35 storeys (122.0 metres, including a 6.0-metre mechanical penthouse) to 29 storeys (103.6 metres, including a 6.0-metre mechanical penthouse).
- Above Level 8, the tower steps back an additional 2.5 metres, providing a 5.4-metre setback from the new north lot line, as well as setbacks of 12.9 metres from the east lot line and 13.1 metres from the south lot line. Also above Level 8, the tower steps back 10.6 metres from the west, providing a separation distance of 37.0 metres between the tower element (Building A) and the mid-rise element (Building B).
- A minimum separation distance of 37.0 metres is provided between the tower element (Building A) and mid-rise element (Building B).
- The tower floorplate size has increased from 778 square metres gross construction area (GCA) to 850 square metres GCA.

Underground Parking (P1-P2)

- The setback of the underground parking has increased from 2.3 metres to 5.3 metres from the south lot line, in an effort to protect the existing trees along the south side of the subject site.
- The area of conveyance of the corner rounding at the intersection of Danforth Avenue and Westlake Avenue is now provided at the underground parking levels.

The above provides a summary of the changes to the built form, massing, and height of the proposed development. By virtue of the built-form changes, there are various other components that have changed in the Revised Proposal including, the overall GFA, amenity space, vehicular and bicycle parking etc. A summary setting out a comparison of the revised proposal to the original proposal is provided in **Table 1** below.

Table 1 – Statistical Comparison

| | Original Proposal (November 2024) | Revised Proposal (September 2025) |
|-------------------------------|--|---|
| Site Area | 7,724 m² | 7,724 m² |
| POPS Area | 354.0 m ² | 354.0 m ² |
| Total Gross Floor Area | 41,251.7 m² | 42,493.2 m² |
| Residential GFA | 38,054.4 m ² | 39,273.3 m ² |
| Non-Residential GFA | 3,197.3 m ² | 3,219.9 m ² |
| Density | 5.54 FSI | 5.62 FSI |
| Building A Height | 35 storeys (122.0 m, incl. 6.0 m MPH) | 29 storeys (103.6 m, incl. 6.0 m MPH) |
| Building B Height | 13 storeys (52.4 m, incl. 6.0 m MPH) | 13 storeys (52.4 m, incl. 6.0 m MPH) |
| Total Units | 620 units | 620 units |
| Bachelor | 139 units (22%) | 95 (15%) |
| One-bedroom | 266 units (43%) | 312 (50%) |
| Two-bedroom | 152 units (25%) | 151 (24%) |
| Three-bedrooms | 62 units (10%) | 61 (10%) |
| Four-bedrooms | 1 (0%, due to rounding) | 1 (0%, due to rounding) |
| Total Amenity Space | 2,840.1 m² (4.5 m² /unit) | 2,540.5 m² (4.09 m² /unit) |
| Indoor Amenity | 1,265.9 m ² (2.0 m ² /unit) | 1,240.1 m ² (2.0 m ² /unit) |
| Outdoor Amenity | 1,574.2 m ² (2.5 m ² /unit) | 1,300.4 m ² (2.09 m ² /unit) |

| | | |
|---------------------------------|-------------------|----------------------------|
| Total Vehicle Parking | 278 spaces | 254 spaces |
| Residential | 190 spaces | 177 spaces |
| Non-Residential (incl. visitor) | 86 spaces | 77 spaces (inc. car share) |
| Car-Share | 2 spaces | 2 spaces |
| Total Bicycle Parking | 714 spaces | 714 spaces |
| Short-term | 146 spaces | 147 spaces |
| Long-term | 568 spaces | 567 spaces |
| Loading Spaces | 1 Type 'A' | 1 Type 'A' |
| | 1 Type 'B' | 1 Type 'B' |
| | 1 Type 'C' | 1 Type 'C' |
| | 1 Type 'G' | 1 Type 'G' |

Evolving Policy Framework

Since the preparation of the 2024 Rationale Report in November of 2024, there have been policy updates including the approval of Official Plan Amendment 540 (OPA 540) which delineates the Main Street PMTSA and Danforth GO PMTSA, by the province, with modifications, the adoption of Official Plan Amendment 778 (OPA 778) by City Council, amending the City of Toronto Official Plan policies with respect to *Avenues* and the adoption of the 2024 Mid-Rise Building Design Guidelines.

The section below provides an overview of the updated policy context.

Ontario Regulation 54/25 (Bill 23, *More Homes Built Faster Act*, 2022)

As noted in our 2024 Rationale Report, on October 25, 2022, the Province of Ontario introduced Bill 23, *More Homes Built Faster Act*, 2022, which introduced legislative amendments to facilitate and streamline the construction of 1.5 million new homes by 2031 to address Ontario's housing crisis. Bill 23 received Royal Assent on November 28, 2022.

Bill 23 amended Section 16(15) of the *Planning Act*, which authorized the Minister of Municipal Affairs and Housing by regulation to establish limits on the percentage of units and gross floor area that municipalities can require as affordable housing, and a maximum period those units must remain affordable.

To implement the amendment of Section 16(15) of the *Planning Act* (as per Bill 23), on May 12, 2025, the Province filed Ontario Regulation 54/25 Inclusionary Zoning (O.Reg. 54/25) limiting the number of affordable housing units to be

provided through inclusionary zoning in PMTSAs to 5 percent of the total residential units or 5 percent of the total floor area of all residential units that are part of the development or redevelopment, not including common areas. O.Reg. 54/25 also established the period of time for which affordable housing units would be maintained as affordable to a maximum of 25 years.

Provincial Approval of Official Plan Amendment 540

As noted in our 2024 Rationale Report, Official Plan Amendment 540 (OPA 540) was adopted by City Council on July 19, 2022. OPA 540 introduced new Site and Area Specific Policies for 23 PMTSAs, corresponding to existing and planned subway, light-rail transit and GO stations across the City, including Main Street and Danforth GO PMTSAs (SASP 621 and SASP 623, respectively). At the time of writing our report, the Minister had not yet made a decision on OPA 540, however, on August 15, 2025, the Province approved six Official Plan Amendments, with modifications delineating 120 MTSA and PMTSAs across Toronto, including OPA 540 and OPA's 524, 537, 540, 544, 570 and 575. Decisions were deferred for 12 MTSA and PMTSAs. As well, the Province did not make a decision on OPA 482, which would delineate two additional PMTSAs.

OPA 540, as modified, amends Section 5.6 of the Official Plan and adds Policy 5.6(16) and provides that population and employment targets are a cumulative measure of planned density across the entire delineated area. Individual developments within a delineated MTSA or PMTSA are not required to meet the population and employment targets.

It also adds Policy 5.6(17) which states that despite Policy 7, minimum development densities within the delineated area of a PMTSA are to be applied together with all appropriate policies of the Official Plan, applicable Secondary Plans or Chapter 7 Site and Area Specific Policies, including matters of heritage, built form and public realm, servicing, natural areas, parks and other open spaces and others.

OPA 540 adds a new Chapter to the City of Toronto Official Plan (Chapter 8, Major Transit Station Areas and Protect Major Transit Station Areas). The policies of this Chapter implement a framework to facilitate transit-supportive development through the delineation of MTSA and PMTSAs across the City.

It adds that the Site and Area Specific Policies of this Chapter set out minimum requirements that reflect existing policies of the Plan unless amended by Council as part of a local area study. The policies of this Chapter are not to be read in isolation or to the exclusion of other relevant policies in this Plan. Any amendment to the delineation or policies of the PMTSAs will require the approval of the Minister

as defined under the *Planning Act*, as amended, in accordance with Section 16(18) of the *Planning Act*, as amended.

OPA 540 adds a new Section 5, and new policies under Chapter 8 including Policy 8.5(1) which provides that in addition to the *Centres, Avenues, Employment Areas* and the *Downtown* specified in Policy 2.2.2, growth will be directed to delineated MTSA's and PMTSA's.

Policy 8.5(2) provides that Secondary Plans contained in Chapter 6 and Site and Area Specific Policies contained in Chapter 7 apply to areas subject to PMTSA's and MTSA's, except in the case of a conflict, where whichever policies provide greater densities will prevail.

Policy 8.5(3) provides that the City will review Chapter 8 policies and minimum density targets as part of its regular Official Plan review or as part of local infrastructure reviews to ensure that they meet the intended purpose to plan for and manage growth along with creating complete communities including the delivery of necessary infrastructure.

Policy 8.5(6) speaks to special policy areas, and in particular lands within *Apartment Neighbourhoods, Mixed Use Areas* and *Regeneration Areas*. The policy provides that within delineated MTSA's and PMTSA's, for lands designated *Apartment Neighbourhoods, Mixed Use Areas* or *Regeneration Areas*, City-initiated zoning will permit a floor-space-index (FSI) of:

- 8 FSI or more where the lands are located within 200 metres of an existing or planned transit station, or;
- 6 FSI or more where lands are located within 200-500 metres of an existing or planned transit station.

The Chief Planner of the City of Toronto has indicated that he expects that the City will bring forward a Zoning By-law that will implement the Ministerial approval of OPA 540 which, in this case, given the fact that the subject site is between 120-274 metres from the Main Street Station could allow for densities in excess of 6 FSI.

With the provincial approval of OPA 540 and OPAs 524, 537, 540, 544, 570 and 575, the City of Toronto has communicated that its inclusionary zoning policies are now in effect for the approved PMTSA's, including Main Street and Danforth GO PMTSA.

Official Plan Amendment 778

On January 23, 2024, the Planning and Housing Committee adopted a report from Planning Staff titled Housing Action Plan: Avenues Policy Review and corresponding Official Plan Amendment 778 (OPA 778), which was adopted by City Council with amendments on February 5, 2025. OPA 778 was subsequently appealed to the Ontario Land Tribunal (OLT), but as of March 14, 2025, as confirmed by the OLT on July 31, 2025, OPA 778 is in force and effect. Only site-specific appeals remain.

Among other matters OPA 778 deletes Section 2.2.3 (Avenues: Reurbanizing Arterial Corridors) and replaces it in its entirety with a new Section 2.2.3 (Avenues: Creating Complete Communities Along Strategic Transit Corridors). The updated section includes new preamble text that emphasizes that *Mixed Use Areas* along *Avenues* with existing or planned higher order transit stations offer unique opportunities where redevelopment at a greater scale may be appropriate. Furthermore, it provides that existing and planned subway, light rail transit, and GO rail stations can potentially support greater intensification along *Avenues*.

OPA 778 includes new Policies 2.2.3 (1) through (8) that continue to emphasize growth and intensification along *Avenues* and provides that heights may go beyond the height and scale of a mid-rise building in *Mixed Use Areas* when located within a 500- to 800-metre walking distance of an existing or planned subway station, light rail transit station, or GO rail station. Furthermore, along *Avenues*, the revised policies direct the greatest height, and scale should be focused at the station.

Policy 2.2.3(1) states growth and intensification will be directed to *Avenues* as shown on Map 2 to: concentrate jobs and housing in areas well served by public transit, accommodate and contribute to complete communities that meet the daily needs of all people; and provide a full range of housing, including affordable housing.

Policy 2.2.3(2) states that *Avenues* policies apply to lands or development with frontage on *Avenues* as shown on Map 2 and the right-of-way of *Avenues*.

Policy 2.2.3(3) provides that to achieve growth and intensification on *Avenues*, development along *Avenues*:

- will be up to the height and scale of a mid-rise building in *Mixed Use Areas* and *Apartment Neighbourhoods*; and,
- may go beyond the height and scale of a mid-rise building in *Mixed Use Areas* when located within a 500- to 800-metre walking distance of an existing or planned subway station, light rail transit station, or GO rail

station as shown on Map 4. The greatest height and scale should be focused at the station.

Policy 2.2.3(4) states that activating the ground floor of buildings along *Avenues* is important to enable equitable, convenient access to the amenities that serve the daily needs of all residents. To achieve this objective, development along *Avenues* will provide appropriate uses that activate the ground floor and minimize ground floor residential uses in *Mixed Use Areas* and be encouraged to include a variety of unit space sizes that activate the ground floor in *Mixed Use Areas*.

Policy 2.2.3(7) states that to facilitate sustainable, complete communities that are attractive to residents and businesses, *Avenues* will:

- include public realm and streetscape improvements, including green infrastructure;
- have publicly accessible spaces and buildings that are universally accessible to all;
- include transportation improvements such as transit priority measures, improved connections to higher-order transit stations, new or improved laneways and shared off-street parking facilities, cycling improvements, and new walkways;
- contribute to an attractive, safe and comfortable pedestrian environment that encourages walking and strengthens local retailing; and,
- be served by adequate parks, community services and facilities, and water and sewer infrastructure.

Policy 2.2.3(8) provides that the land use designation policies in Chapter Four of the Official Plan apply to and prevail on lands broadly shown on Map 2 as *Avenues*.

2024 Mid-Rise Building Design Guidelines

As noted in our 2024 Rationale Report, the City has updated the Mid-Rise Building Guidelines and released new performance standards on June 13, 2024. Subsequently, on December 22, 2024, City of Toronto Council adopted the 2024 Mid-Rise Building Design Guidelines (“2024 Guidelines”). These updated guidelines contribute to the overall design objectives including establishing engaging and animated public realms, pedestrian-oriented and transit supportive design, compact built form with well-proportioned street edges, and contextually sensitive design approaches.

The updated 2024 Guidelines provide that the Mid-Rise Building Design Guidelines are intended to be read together with, and to implement, the relevant Official Plan policies, applicable Zoning By-laws, Heritage Conservation District Plans, area-specific Urban Design Guidelines and the Toronto Green Standard, as well as other applicable regulations, policies and guidelines. The 2024 Guidelines apply to the design, review and approval of new mid-rise developments. The 2024 Guidelines will be applied through the evaluation of development proposals and design alternatives in Official Plan Amendments, Zoning By-law Amendments, Plans of Subdivision and Site Plan Approval applications.

The 2024 Guidelines should be weighed across the board with other City guidelines to determine whether a development application has successfully met the overall intent of the applicable guidelines, policies and the Official Plan. Moreover, the Guidelines are intended to provide direction for all mid-rise developments in the City of Toronto to ensure that new mid-rise built form fits with their existing and planned context. The direction in the 2024 Guidelines is related to principles such as sustainability and climate resilience, architectural and urban design excellence, and housing accessibility and affordability

As compared to the 2010 Guidelines, the 2024 Guidelines include several key changes including:

- increasing the maximum height for mid-rise buildings from 11 storeys to 14 storeys (45 metres) adjacent to streets with a 45-metre right-of-way width;
- providing consideration for additional height, taller than the adjacent right-of-way widths, on deep sites;
- removing the application of both the front and rear angular planes, simplifying building massing and limiting stepping/terracing, while still requiring certain setbacks and stepbacks to ensure appropriate building massing;
- introducing new or revising certain setback and stepback requirements to ensure buildings continue to be articulated and different building elements continue to be defined;
- reducing or increasing side yard setbacks based on the context and adjacencies;
- providing a minimum separation distance of 20 metres for mid-rise buildings, or building elements taller than 6 storeys;
- increasing flexibility in building massing by promoting a performance-based approach rather than prescriptive standards, helping to simplify built form with potential for increased gross floor area and opportunities for additional residential units; and

- introducing detailed public realm objectives, including guidance for sidewalk/pedestrian zones, prioritizing new tree planting and preserving existing mature trees.

These changes are intended to simplify construction, making buildings more economical to build, while also providing for appropriate built form relationships and fit within the existing and planned context of a development site. The 2024 Guidelines encourage a mid-rise form that supports intensification through flexible massing, without compromising access to sunlight and sky view and maintaining pedestrian comfort within the surrounding public realm.

Planning and Urban Design Analysis

Intensification

Consistent with our 2024 Rationale Report, it is our opinion that the proposed residential/mixed-use intensification on the subject site is appropriate, desirable and in keeping with the policy framework set out in the Provincial Planning Statement and the City of Toronto Official Plan, both of which promote of underutilized sites within built-up urban areas, particularly in locations which are well served by existing municipal infrastructure, including higher-order transit. The Revised Proposal continues to redevelop the subject site with an appropriately scaled transit-supportive development and reduce the reliance on a personal automobile.

Additionally, since the initial submission in November 2024, OPA 540 has been approved by the Province, with modifications. As modified, OPA 540 introduces new policies that further emphasize that growth and density are to be prioritized and directed to PMTSAs. In this respect, new Policy 8.5(1) provides that in addition to *Centres, Avenues, Employment Areas* and the *Downtown* specified in Policy 2.2.2, growth will be directed to delineated MTSA and PMTSAs. The subject site is located on an *Avenue* and is within two PMTSAs, Main Street PMTSA and Danforth GO PMTSA.

Furthermore, OPA 540 introduces new Policy 8.5(6) which addresses to lands designated *Apartment Neighbourhoods, Mixed Use Areas and Regeneration Areas* within MTSA and notes that City-initiated zoning will permit a density of 8 FSI or more for lands that are located within 200 metres of an existing or planned transit station. In this respect, the subject site is located within 120 metres (radius distance) from Main Street subway station. As previously noted in this letter, the Chief Planner of the City of Toronto has indicated that he expects that the City will bring forward a Zoning By-law that will implement the Ministerial approval of OPA

540 which could allow for densities in excess of 6 FSI on the subject site. As noted above, the proposed density of the Revised Proposal is 5.62 FSI.

Moreover, as noted in our 2024 Rationale Report, the Revised Proposal will continue to assist the City of Toronto in meeting its housing pledge to achieve or exceed the provincial housing target of 285,000 new homes by 2031.

Land Use

As noted in our November 2024 Rationale Report, the proposed residential/mixed-use development is permitted within the *Mixed Use Areas* designation in the City of Toronto Official Plan and the Commercial Residential CR zoning category in By-law 569-2013, as amended.

Housing

As previously discussed in our 2024 Rationale Report, the proposed redevelopment of the subject site will increase the supply of housing in the City of Toronto. The Revised Proposal continues to provide a mix of housing units that are also of a sufficient size. The Revised Proposal includes 620 units, including 95 studio units (15%), 312 one-bedroom (50%), 151 two-bedroom (24%), 61 three-bedroom (10%) units, and 1 four-bedroom unit (0%, due to rounding). Accordingly, the mix of units conforms with Policy 9.2 of the Main Street Planning Study and meets the recommendation of the Growing Up Guidelines.

Moreover, as noted previously, with the provincial approval of OPA 540 and OPAs 524, 537, 540, 544, 570 and 575, the City of Toronto has communicated that its inclusionary zoning policies are now in effect for the approved PMTSAs, including Main Street and Danforth GO PMTSA.

In this respect, as discussed in our 2024 Rationale Report, Policy 13 of OPA 557 provides that new development containing residential units and subject to an inclusionary zoning by-law, outlined in Section 5.1.8 of this Plan, will not be approved unless:

- b) for development that is located in IZ Market Area 2 identified on Map 37:
 - i. if a condominium development is proposed, a minimum of 8 percent of the total new residential gross floor area shall be secured as affordable ownership housing or a minimum of 6 percent of the total new residential gross floor area shall be secured as affordable rental housing; or
 - ii. if a purpose-built rental development is proposed, there is no minimum requirement for affordable rental housing.

Policy 16 adds that beginning January 1, 2026, the minimum affordable rental housing required in Policy 13 b) ii. 3 percent for development located in IZ Market Area 2.

However, as noted previously, Ontario Regulation 54/25 Inclusionary Zoning (O.Reg. 54/25) limits the number of affordable housing units to be provided through inclusionary zoning in PMTSAs to 5 percent of the total residential units or 5 percent of the total floor area of all residential units that are part of the development or redevelopment, not including common areas. O.Reg. 54/25 also established the period of time for which affordable housing units would be maintained as affordable to a maximum of 25 years.

With respect to the provision of affordable housing, the Revised Proposal will comply with the requirements of inclusionary zoning as set out by the Province and City. Moreover, the owner and consulting team will work with City Staff to provide affordable units that consider the City's Inclusionary Zoning Implementation Guidelines with respect to unit mix, size, and overall design.

Height, Massing and Density

As previously discussed in our 2024 Rationale Report, from an urban structure perspective, the subject site is an appropriate location for mid-rise and tall building forms given its location on an *Avenue*, its *Mixed Use Areas* designation, its proximity to Main Street subway station and Danforth GO station, its location within the approved Main Street PMTSA (SASP 621) and Danforth GO PMTSA (SASP 623), its frontage along Danforth Avenue, a Major Arterial Street, its overall size and configuration and its relationship to other existing, approved and proposed tall buildings in the Main-Danforth area.

In terms of height, the revised proposal maintains the height of mid-rise Building B at 13 storeys, while reducing the overall height of Building A to 29 storeys. It continues to be our opinion that the proposed development will fit harmoniously into the existing and planned context. In this regard, the proposed mid-rise and tall building elements are appropriate within the current policy context as well as the existing and the emerging built form context.

As stated in our 2024 Rationale Report, from a policy perspective, there is a clear recognition of the importance of allowing for intensification in appropriate locations to realize the public benefits associated with transit-supportive intensification. The proposed scale and form of intensification on the subject site would be consistent with the existing and planned building heights around the Main Street subway station and Danforth GO station. Moreover, OPA 778 recognizes the land use and transportation planning benefits associated with nodal intensification. In this respect, OPA 778 includes new policies that continue to emphasize growth and

intensification along *Avenues*. In particular, Policy 2.2.3 (3), which applies to the subject site, provides that heights may go beyond the height and scale of a mid-rise building in *Mixed Use Areas* when located within a 500- to 800-metre walking distance of an existing or planned subway station or GO rail station.

With respect to massing, the Revised Proposal continues to fit harmoniously with the existing and planned built form context, as it continues to employ a 2- to 3-streetwall along Danforth Avenue, in addition to appropriately sized and oriented mid-rise and tall building elements that have minimal built form and visual massing impacts on the public realm.

The podium continues to be set back a minimum of 1.0 metre from Danforth Avenue at grade, resulting in a total curb to face building setback of approximately 6.4 metres, thereby providing a wide and comfortable landscaped street edge featuring trees and seasonal plantings. Above grade, the podium continues to be 3 storeys in height for Building B, set back 3.0 metres from Danforth Avenue to the newly established lot line and 7.0 metres from Westlake Avenue. With respect to the mid-rise element (Building B), it continues to incorporate a series of stepbacks on Levels 5 and 11, ensuring the provision of good street proportion and limiting the perception of the overall building mass from within the surrounding public realm.

With respect to the podium element of the tall building, the overall height has increased to 8 storeys (29.9 metres). The podium element continues to provide a 2- to 3-storey streetwall along Danforth Avenue. On Level 4, the podium steps back by 2.5 metres, resulting in a minimum setback of 3.5 metres from Danforth Avenue. Above the podium, the tower element is set back 5.4 metres from Danforth Avenue, 12.9 metres from the east lot line and 13.1 metres from the south lot line. The tower steps back 10.6 metres from the western edge of the 8-storey podium element, providing a minimum separation distance between the 13-storey mid-rise element and the tower element of 37.0 metres.

The tower element continues to be rectangular in shape, oriented east-west along Danforth Avenue, however, given the decrease of the overall tower height, the floor plate size has increased to 850 square metres GCA. While the proposed tower floorplate is larger than the recommended 750 square metre size, it continues to meet the general intent of the Tall Building Design Guidelines by limiting built form impacts on its surroundings and maintaining appropriate relationships to adjacent existing, proposed and potential future buildings. It continues to be our opinion that a larger floorplate is appropriate given that it does not result in unacceptable shadow, sky view and wind impacts. Moreover, as discussed in detail in our 2024 Rationale Report, it is our opinion that larger tower floorplates are appropriate on sites that can comfortably accommodate them and where Tall Building Design

Guideline recommendations for tower setbacks and tower separation can be achieved. In this regard, the proposed tower exceeds the minimum 12.5-metre setbacks to lot lines or centre lines of abutting streets and will comfortably achieve a minimum separation distance of 25.0 metres between towers, should the properties to the east redevelop as a tall building in the future.

With respect to the massing of Building B, as noted in our 2024 Rationale Report, the mid-rise element is situated parallel to both Danforth Avenue and Westlake Avenue, framing both streets. The mid-rise element continues to be 13-storeys (52.4 metres including a 6.0-metre mechanical penthouse) in height. The new 2024 Mid-Rise Urban Design Guidelines give consideration for mid-rise buildings taller than the adjacent right-of-way widths. The mid-rise element continues to provide a 2-storey streetwall that transitions to 4-storeys in the western portion of the site, with a 2.0-metre step back above, enhancing the pedestrian scale and reducing the perceived massing of the structure. The 2- and 4-storey (9.6 metres and 17.2 metres, respectively) streetwall heights along Danforth Avenue is in keeping with the built form policies of the Official Plan and the 2024 Mid-Rise Design Guidelines, which recommend step back at a height equivalent to 80 percent of the right-of-way width (i.e., 21.6 metres). Additionally, the building steps back another 1.5 metres on Level 11, further breaking up the massing along Danforth Avenue. With respect to rear transition to the adjacent low-rise neighbourhoods, the mass of Building B maintains the intent of the 2024 Mid-Rise Design Guidelines through the provision of a minimum rear yard setback of 11.6 metres for the 11-storey portion of the building, above which a 0.76-metre stepback is provided for the upper two floors. The proposed setback and stepback condition exceeds the 10.0-metre rear yard setback recommended in the 2024 Guidelines and appropriately responds to the adjacent residential uses.

With respect to density, it continues to be our opinion that a density of approximately 5.62 FSI is appropriate and desirable. Within a policy context that promotes intensification, as is the case with the subject site, the optimization of land and infrastructure is in fact a desirable planning outcome, provided that there are no unacceptable impacts either in terms of built form or the capacity of infrastructure. As detailed in our 2024 Rationale Report and the following sections, the proposed development has no unacceptable built form impacts, represents good urban design, and is supported by existing and planned infrastructure.

Furthermore, as noted above, OPA 540 introduces a new policy that permits an FSI of 8.0 or more for lands that are designated *Mixed Use Areas*, are within 200 metres of an existing transit station and are within a PMTSA (Policy 8.5(6)). We acknowledge that the implementation of this policy is subject to a City-initiated zoning by-law amendment, and as such does not yet apply to the subject site.

With respect to public realm, the Revised Proposal continues to contemplate a POPS space that is 354 square metres in size located in the eastern portion of the subject site fronting on Danforth Avenue. Moreover, at grade the revised proposal continues to provide active fine grain retail spaces, new hard and soft landscape elements and new street trees, in order to animate and enhance the streetscape along Danforth Avenue and Westlake Avenue.

Built Form Impacts

Light, View, Privacy

It is our opinion that the Revised Proposal will not have an unacceptable impact on the light, view and privacy (LVP) conditions of adjacent existing, planned and potential future development, surrounding streets, open spaces or *Neighbourhoods*. The Revised Proposal continues to generally meet, or exceed, the recommended setbacks provided by the Tall Building Design Guidelines and adequately mitigate potential impacts through spatial separation, orientation and mitigating measures between buildings.

With respect to the podium element, it maintains similar setbacks along Danforth Avenue, Westlake Avenue and the south and east lot lines. While the podium element has increased in height to 8 storeys at the base of the tall building (Building A), a stepback of 5.4 metres is incorporated, providing for a 32.4-metre separation distance from the buildings on the north side of Danforth Avenue, by virtue of the stepback and the right-of-way width of 27.0 metres.

With respect to the 13-storey mid-rise building (Building B), there are no built form changes, and all the setbacks originally proposed are maintained, therefore our opinions as stated in our November 2024 Rationale Report remain unchanged.

For the tower element, the City-wide Tall Building Design Guidelines recommend a separation distance of 25.0 metres between tower faces and a tower setback of 12.5 metres from the side and rear property lines measured to the exterior walls of the building (i.e., balconies are permitted within the setback zone).

The Revised Proposal continues to be entirely in keeping with the above-noted LVP standards and guidelines as all towers are setback a minimum of 12.5 metres from all property lines and they are separated by a minimum distance of 25.0 metres.

Finally, with respect to the separation distance between Building B (mid-rise element) and Building A (tower element) is 37.0 metres.

Sun/Shadow Study

A revised Shadow Study has been prepared by Bousfields for March 21st, June 21st, September 21st, June 21st and December 21st at each hour between the times of 9:18 a.m. and 6:18 p.m. and for December 21st between the hours of 9:18 a.m. and 4:18 p.m., in order to assess the incremental shadow impacts of the Revised Proposal.

As mentioned in our 2024 Rationale Report, Official Plan Official Plan Policy 3.1.3(5) requires that new development be located and massed to ensure access to sunlight and daylight on the public realm. Policy 3.1.4(10) further provides that the tower portion of a tall building should be designed to limit shadow impacts on the public realm and surrounding properties and maximize access to sunlight and sky view from the public realm. The policies specific to the *Mixed Use Areas* designation directs that new buildings will adequately limit shadow impacts on adjacent *Neighbourhoods*, particularly during the spring and fall equinoxes (Policy 4.5.2(d)).

With respect to lands designated *Neighbourhoods*, as mentioned in our 2024 Rationale Report, the closet designated *Neighbourhoods* properties are located immediately south of the subject site, to the west of the subject site, on the west side of Westlake Avenue and approximately 60 metres north of the subject site. The Shadow Study demonstrates that there would be adequately limited shadows on the lands designated *Neighbourhoods*. In this respect, incremental shadows are cast on March 21st and September 21st between the hours of 9:18 a.m. and shortly after 12:18 p.m. and on June 21st only after 6:18 p.m. On December 21st, the proposed development casts incremental shadow on *Neighbourhoods* throughout the day.

As it related to parks and open spaces, as previously mentioned the nearest parks to the proposed development include the new parkette at 144 Stephenson Avenue (that is not yet open) to the southeast of the subject site, Stephenson Park to the south of the subject site, and Stanley G. Grizzle Park, which is approximately 98 metres northeast of the subject site. With respect to the new park that is not yet open, the Shadow Study demonstrates that there is a sliver of a shadow in the northern portion of the park after 5:18 p.m. on June 21st and after 6:18 p.m. on September 21st. The Shadow Study also demonstrates that there is a minor incremental shadow at Stanley G. Grizzle Park only between 12:18 p.m. and 2:18 p.m. on December 21st, on Coleman Park to the northeast from 3:18 pm. to 4:18 p.m. on December 21st and on Dentonia Park further to the northeast at 4:18 p.m. only on December 21st.

With respect to shadowing on nearby sidewalks, minor incremental shadows will be cast on both sidewalks on Danforth Avenue on March 21st, September 21st, and

December 21st between 9:18 p.m. and 4:18 p.m. On June 21st, minor shadows will be cast between 9:18 a.m. and 2:18 p.m.

Based on the foregoing analysis, it is our opinion that the incremental shadow impact of the Revised Proposal on neighbouring properties, sidewalks and open spaces would be “adequately limited” in accordance with the applicable Official Plan policies.

Wind Impact Study

RWDI prepared a Pedestrian Level Wind Memorandum, dated September 8, 2025, that evaluates the wind impacts of the Revised Proposal.

The study concludes that the results of the pedestrian wind assessment conducted in November 2024 remain generally the same, however, given that the overall height of Building A has been reduced from 35 to 29 storeys, lower wind speeds are expected with slightly improved conditions around the subject site. In addition, the memorandum speaks to wind mitigation measures that have been incorporated including canopies above the residential and retail entrances along Danforth Avenue and Westlake Avenue, which are expected to improve the local wind conditions at the entrances. With respect to the outdoor amenity at the podium level, the memorandum notes that amenity space continues to have a similar layout with wind conditions expected to remain similar to the November 2024 assessment.

Urban Design

From an urban design perspective, it is our opinion that the Revised Proposal continues to be appropriate and desirable in urban design terms and conforms with the applicable built form and urban design policies of the City of Toronto Official Plan, the Danforth Planning Study and the Main Street Planning Study, and is generally in keeping with the guidelines outlined in the Danforth Avenue Urban Design Guidelines, City-wide Tall Building Design Guidelines and 2024 Mid-rise Building Design Guidelines. In this respect, various key urban design elements remain unchanged from the Original Proposal. The revised scheme continues to provide appropriate heights, setbacks, and built form relationships in an area that is well served by public transit, promotes an urban character with appropriately scaled mid-rise and tall building elements, and creates a good street relationship and public realm.

Transportation

A revised Transportation Letter was prepared by BA Group, dated September 8, 2025, to assess the transportation considerations associated with the Revised Proposal. Below is a summary of the key findings of the Transportation Letter:

- The revised total parking supply of 254 spaces (177 resident and 77 commercial/ visitor spaces) is within the parking minimum and maximum rates as prescribed by Zoning By-law 569-2013. Of the commercial/visitor parking spaces, 2 car-share parking spaces continue to be provided.
- All resident parking spaces will be equipped with electrical vehicle infrastructure, meeting Zoning By-law 569-2013 requirements. The Revised Proposal also provides 197 “energized” parking spaces for non-residential parking, meeting the Toronto Green Standard, Version 4, AQ 1.2 requirements.
- The overall supply of 568 long-term and 136 short-term bicycle parking spaces meets the prevailing parking requirements outlined in Zoning By-law 569-2013 and the Toronto Green Standard, Version 4.0.
- Existing Toronto Bike Share spaces (located on the west side of the subject site) continue to be proposed for relocation to the Danforth Avenue frontage, by the entrance to the potential grocery store.
- The proposed five loading spaces continue to meet the requirements of the City of Toronto Zoning By-law 569-2013 providing 1 Type ‘A’, 1 Type ‘B’, 1 Type ‘C’ and 1 Type ‘G’ loading space.
- A Transportation Demand Strategy (TDM) continues to encourage the use of alternative modes (transit, cycling, walking), beyond single-occupant private automobiles.
- With respect to traffic generation, the number of trips generated by the Revised Proposal remains consistent with the November 2024 Urban Transportation Considerations Report prepared by BA Group. A slight 18 square metre increase in non-residential grocery store GFA is included as part of the Revised Proposal, however, this increase has a negligible impact on the number of grocery store trips generated.
- The traffic generated by the Revised Proposal can be accommodated within the area public road network. No additional traffic impact assessment is required.

Servicing

A revised Functional Servicing & Stormwater Management Report was prepared by civilGo, dated September 8, 2025. The report provides a site servicing strategy for the Revised Proposal that remains the same as the Functional Servicing and Stormwater Management Report, dated November 11, 2024, previously submitted as part of the November 2024 application. Below is a summary of the servicing strategy.

Watermains & Water Servicing

- There are existing 150mm-diameter. And 300mm-diameter. watermains within Danforth Avenue, adjacent to the subject site's Danforth Avenue frontage.
- It has been determined that the existing 150mm watermain is sufficient to service the development and domestic/fire service connections are proposed to that watermain.

Sanitary Servicing & Combined Sewers

- There are existing parallel 300mm-diameter. and 450mm-diameter. combined sewers within Danforth Avenue adjacent to the subject site's Danforth Avenue frontage.
- The subject site is preliminarily serviceable to the combined sewers in the adjacent municipal right-of-way.
- Sanitary sewer connections are proposed to connect to the existing 300mm combined sewer.
- Combined sewer capacity and Procedure F-5-5 are addressed acceptably in the development of the subject site.

Storm Servicing, Storm Sewers & Stormwater Management

- There are no separated storm sewers within the municipal right-of-way adjacent to the subject site.
- It is proposed to service the Revised Proposal with the existing combined sewers, to which the subject site presently (pre-development) drains.
- Stormwater management quality, quantity and retention criteria are satisfied.

Foundation Drainage & Groundwater

- The Revised Proposal will be constructed in a watertight manner, without drained foundations.

Summary and Conclusion

Based on the analysis set out above and, in our November 2024 Planning and Urban Design Rationale Report, it is our opinion that the Revised Proposal is appropriate and desirable in both land use planning and urban design terms. It is our opinion that the Revised Proposal is in keeping with the planning and urban design framework set out in the Provincial Planning Statement (2024), the City of Toronto Official Plan, the Danforth Avenue Planning Study, the Main Street Planning Study and has regard for the relevant urban design guidelines.

The Revised Proposal continues to provide for residential/mixed-use intensification on an underutilized site within built-up urban area, designated *Mixed Use Areas* located on an *Avenue* and is well served by existing municipal infrastructure, including higher-order public transit.

Subject to the additional comments set out in this letter, the findings and analysis of the previously submitted November 2024 Planning and Urban Design Rationale Report continue to be relevant and accurate.

We trust that this letter is satisfactory for your review. If you have any questions and/or comments regarding this addendum letter, please do not hesitate to contact Mona Al-Sharari or the undersigned.

Yours very truly,
Bousfields Inc.



Tony Volpentesta, MCIP, RPP



Roxy Shiell, MCIP, RPP