

# DEVINE PARK LLP

PLANNING AND DEVELOPMENT LAWYERS

Patrick J. Devine  
patrick.devine@devinepark.com  
D 416.645.4570

Devine Park LLP  
250 Yonge St., Suite 2302  
P.O. Box 65  
Toronto ON M5B 2L7

T 416.645.4584  
F 416.645.4569

Matter No. M613-01

July 4, 2019

## DELIVERED

City of Toronto, City Planning Division  
Community Planning, Toronto East York District  
Toronto City Hall  
18th Floor, 100 Queen Street West  
Toronto ON M5H 2N2

Attention: Peter Raynes

Dear Peter,

RE: 465-471 Richmond Street West and 38 Camden Street, City of Toronto  
- Manga Hotels (Richmond) Inc.  
- Zoning By-law Amendment Application

We are the solicitors for Manga Hotels (Richmond) Inc, the owner of the lands municipally known as 465-471 Richmond Street West and 38 Camden Street, in the City of Toronto (the "Site").

### Site Description and Context

The Site is located within the West Precinct of the King Spadina area of Downtown Toronto, just west of Spadina Avenue, on the south side of Richmond Street West. The Site is a through lot with 31.8 metres of frontage along Richmond Street and 18.25 metres of frontage along Camden Street, with a site area of 1,334 square metres.

The Site contains an existing surface parking lot and an existing 2-storey commercial building, along the north lot line abutting Richmond Street. There is also an existing 2 and a half storey commercial building located on that portion of the Site municipally known as 38 Camden Street. This latter property is listed on the City of Toronto Heritage Register and is identified as a "contributing" property within the King Spadina Heritage Conservation District Plan.

The West Precinct of the King-Spadina area, is bounded by Queen Street to the north, Bathurst Street to the west, Front Street to the south and Spadina Avenue to the east. The character of

this area generally consists of rowhouses and low-rise and mid-rise industrial and warehouse style buildings built in the late 1800s and early 1900s. Most of these buildings are now used for commercial office and retail uses. There are also a number of newly-constructed residential buildings and purpose-built office buildings in the area, generally ranging in height between 8 and 17-storeys.

The Site is surrounded by new development activity including an active rezoning application to permit a 19-storey mixed-use building, to the immediate east of the Site. That proposal is currently under appeal.

To the immediate north of the Site, on the north side of the Richmond Street West right-of-way, is a 7-storey commercial building (460 Richmond Street West), a public laneway which extends north to Queen Street West ("McDougall Lane") and a row of 2½-storey row houses (474-478 Richmond Street West). To the east of 470 Richmond Street West is a site that is the subject of an OMB approved rezoning application to permit the redevelopment of the site with a 17-storey mixed-use building (known as 'The James'). To the east of 'The James' at 450 Richmond Street West, is an active rezoning application to permit the redevelopment of the site with a 19-storey mixed-use building, comprised of a 7-storey tower atop a 12-storey podium.

To the immediate west of the Site is the 12-storey Soho Lofts Starwood Centre (477 Richmond Street West). The building was formerly occupied by commercial and office uses and was converted to residential condos and commercial space.

To the immediate south of the Site is a 9-storey residential building at 40-42 Camden Street ("Zen Lofts"), with rear windows that face the subject site, together with rear balconies.

### **Zoning By-law Amendment Application**

The proposed development includes two multi-storey hotel buildings, connected at grade with a shared lobby. A 17-storey hotel building is proposed along the Richmond Street frontage, and a 15-storey hotel building is proposed along the Camden Street frontage. A total of 375 hotel suites are proposed, having a total gross floor area of 14,177 square metres. The proposed redevelopment includes the demolition of the building located at 38 Camden Street.

The enclosed application requests an amendment to City of Toronto Zoning By-law 438-86, as amended, and the new City-wide Zoning By-law 569-2013 to allow for an increase in the permitted height as well as to revise other development regulations in order to allow for the proposed massing and design.

### **Planning Context**

The proposed development is in keeping with a number of policies as set out in the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe and the City of Toronto Official Plan, including the efficient use of land and infrastructure within built-up areas and in particular, within the Downtown Toronto Urban Growth Centre. The City of Toronto Official Plan

designates the Site as 'Regeneration Areas'. The Site is also located within the King Spadina Secondary Plan Area.

It is our submission, as further supported by the enclosed Planning & Urban Design Rationale Report prepared by Bousfields, that the proposed hotel development complies with the City's Official Plan.

The Site is zoned Reinvestment Area (RA) by By-law 438-86, as amended, with a maximum height of 23.0 metres. In addition, the Site is proposed to be zoned CRE (x76) (Commercial Residential Employment) by By-law 569-2013, with a maximum height of 23.0 metres. The proposed hotel use is among the permitted uses under both the By-law 438-86 RA zone and the By-law 569-2013 CRE zone.

Further elaboration on compliance with the regulatory context as well as Planning and Urban Design analysis is provided in the enclosed Planning & Urban Design Rationale Report. This includes a review of intensification, height, massing and density, other built form aspects, heritage, transportation, servicing, wind, noise and complete community assessment.

City Council has identified the need for additional hotel rooms in the Downtown Area. This application is intended to meet that need. Our client is an experienced hotel builder and operator.

### **Discussions with City Staff and Residents**

A meeting was held with City staff on June 4, 2018 to discuss a proposed redevelopment of the lands municipally known as 471 Richmond Street. Subsequent to this meeting, our client purchased the adjacent parcel to the south at 38 Camden Street, which was then consolidated with the original development site. A further meeting was held with Councillor Cressy and City staff on April 25, 2019, to discuss a revised development proposal.

In addition to pre-consultation with City staff, the client's Planning consultant has been active in a stakeholder engagement process. The client, architect and planning consultants have met with the adjacent 477 Richmond Street West Condo Board on June 11, 2019, the Garment District Neighbourhood Association on May 14, 2019, the 32 Camden Condo Board on February 28, 2019, the 42 Camden Condo Board on January 21, 2019 and the Garment District Ratepayers Association on January 16, 2019.

Further detail with respect to the comments received is provided in the enclosed Public Consultation Strategy Report prepared by Bousfields.

### **Submission Requirements**

In support of the enclosed Zoning By-law Amendment application, and in accordance with the Planning Application Checklist provided by City staff, please find enclosed the following:

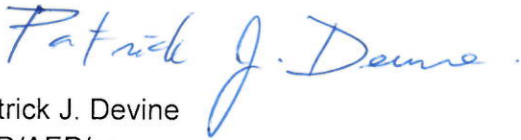
1. One (1) completed Development Approval Application Form;

2. One (1) copy of the Project Data form;
3. Five (5) copies of the Architectural Plans including Drawings A000 Cover Page, A001 Development Statistics, A003 Area Diagrams ZBL-569-2013, A100 Survey, A101 Survey, A102 Site Plan, A200 P3 Floor Plan, A201 P2 Floor Plan, A202 P1 Floor Plan, A203 Ground Floor Plan, A204 Ground Floor Mezzanine Plan, A205 2nd Floor Plan, A206 Typical Floor Plan (3rd to 14th), A207 15th Floor Plan, A208 17th Floor Plan, A209 Roof Plan, A400 471 Richmond Elevations North & South, A401 West Elevation, A402 38 Camden Elevations South and North, A403 East Elevation, A501 North South Section, A800 Existing Sun Shadow Study (September 21), A801 Sun Shadow Study (September 21), and A803 Existing Sun Shadow Study (March 21);
4. Five (5) copies of the Landscape Plans including Sheet L1 Landscape Masterplan, sheet L1A Landscape Sections, and Sheet L2 Composite Utilities Plan, all dated July 3, 2019 prepared by NAK Design Group;
5. Computer Generated Building Mass Model;
6. Two (2) copies of the draft Zoning By-law Amendment to By-law 438-86;
7. Two (2) copies of the draft Zoning By-law Amendment to By-law 569-2013;
8. Two (2) copies of the Planning & Urban Design Rationale, dated July 2019, prepared by Bousfields;
9. Two (2) copies of the Complete Community Assessment, dated July 2019, prepared by Bousfields;
10. Two (2) copies of the Pedestrian Level Wind Study dated May 30, 2019, prepared by GradientWind;
11. Two (2) copies of the Roadway Traffic Noise Assessment, dated May 30, 2019, prepared by GradientWind;
12. Two (2) copies of the Heritage Impact Assessment dated May 29, 2019 prepared by ERA;
13. Two (2) copies of the Public Consultation Strategy Report, dated July 2019, prepared by Bousfields;
14. Two (2) copies of the Transportation Impact Assessment, dated June 2019, prepared by LEA Consulting Ltd.;
15. Two (2) copies of the Site Servicing and Stormwater Management Brief, dated June 2019, prepared by LEA Consulting Ltd.;
16. Two (2) copies Drawing No. C-01 Preliminary Site Grading Plan, dated June 7, 2019, prepared by LEA Consulting Ltd.;
17. Two (2) copies Drawing No. C-02 Preliminary Site Servicing Plan, dated June 7, 2019, prepared by LEA Consulting Ltd.;

18. Two (2) copies of the Geotechnical Investigation dated December 18, 2018 prepared by Bruce A Brown Associates Limited;
19. Two (2) copies of the Phase I Environmental Site Assessment dated January 31, 2019 prepared by Bruce A. Brown Associates Limited;
20. Two (2) copies of the Initial Phase II Environmental Site Assessment dated December 14, 2018 prepared by Bruce A. Brown Associates Limited;
21. Two (2) copies of the Energy Strategy dated April 18, 2019 prepared by MCW Consultants Ltd.;
22. Two (2) copies of the Tree Inventory dated May 3, 2019 prepared by Canopy Consulting; and
23. One (1) cheque in the amount of \$142,630.34, made payable to the "City of Toronto", in payment of the Development Approval application fee.

Should you require anything further with respect to this matter, kindly contact Andrea Paterson, a Land Use Planner in our office, at 416.645.4574 or by email at [andrea.paterson@devinepark.com](mailto:andrea.paterson@devinepark.com).

Yours very truly,  
**DEVINE PARK LLP**



Patrick J. Devine  
PJD/AEP/ss

Enclosures

cc: Manga Hotels (Richmond) Inc.