



March 15, 2024

City of Toronto
Community Planning, North York District
North York Civic Centre
5100 Yonge Street
Toronto, ON M2N 5V7

Dear Marty Rokos:

Avenue and Lawrence Proposal: Comments on Revised Plan

Executive Summary

The Lytton Park Residents' Organization (LPRO) has been in communication with First Capital and Bousfields since late 2019. We have participated in several meetings and are pleased with progress to date. This includes the enlargement of the site, a proposed parkland dedication, the revised location of the parkland dedication without below-grade encumbrances and the proposed north-south through street providing opportunities for signalized vehicular accesses.

Outstanding concerns:

- Building setbacks to the parkland dedication and shadows on the parkland dedication
- Retention of the existing mid-block driveway
- Lack of dedicated pick-up and drop-off area at Building B
- Concern regarding transportation impact study assumptions
- Lawrence Avenue West streetwall height and lack of step-backs
- Overall building heights are not context appropriate nor consistent with relevant policies

First Capital has appealed their application to the Ontario Land Tribunal. LPRO has filed a request for party status to work towards resolving outstanding issues.

Revised Site Plan

The revised site plan is an improvement from previous iterations. The full through public street connecting Lawrence Avenue West to Douglas Avenue with access to Avenue Road is a significant improvement. The revised parkland dedication is also a significant improvement over the previous proposal. The new location is much better suited to a public park, with frontage on public roads and it is no longer secluded behind the buildings.

The Lytton Park Residents' Organization ("LPRO") is an incorporated non-profit association, representing residents living in the area bounded by Lawrence Avenue West to Roselawn and Briar Hill Avenues, Yonge Street to Saguenay and Proudfoot Avenue.

<https://lyttonparkro.ca/>

Parkland

The parkland dedication now meets the minimum required area. It is contiguous and unencumbered, which are important to the usability of the space. Our understanding is that city staff are generally satisfied with the parkland dedication size and location, while issues related to setbacks and shadows remained outstanding.

Transportation

Public Roadway / Traffic Signal: LPRO is supportive of the public roadway connection from Rosewell and Lawrence Avenues to Douglas Avenue. We support the installation of a traffic signal on Avenue Road at Douglas Avenue and on Lawrence Avenue West at Rosewell Avenue as recommended by the transportation impact study.

Mid-block Driveway: The proposal contemplates retaining the existing Pusateri's all-moves mid-block driveway. **LPRO has conveyed to Bousfields that we do not support retaining the mid-block driveway because it is a safety hazard.** This dangerous mid-block driveway is redundant given the two potential signalized access points from public streets. There is no reason to have cars driving across the sidewalk mid-block when two alternatives will exist. In response to our concerns, Bousfields assured us the driveway would be a **"right-in-right-out"** access. The transportation impact study submitted by Bousfields states that the driveway is proposed to be **"all moves"** which includes left turns and straight-through movements.

Currently, drivers exiting Pusateri's completely obstruct the sidewalk while waiting for a gap in the northbound traffic on Avenue Road and do not give pedestrians the right of way. This situation will worsen with the proposed development if the mid-block driveway is retained. **The proposed retention of the mid-block driveway is not consistent with policies in the City of Toronto Official Plan, Avenue Road Study, Mid-Rise Building Guidelines or Tall Building Guidelines.** It is our understanding that city staff oppose the retention of the mid-block driveway, and we forcefully endorse their position. We will not support a proposal that negatively impacts the safety of our residents. Appendix 1 shows the dangerous existing condition, proposed to be retained.

Site Circulation: The proposed site circulation remains problematic. Bousfields has stated that the mid-block driveway is required to access the 12 parallel short-term parking spaces shown on the plans. LPRO has raised the issue of Building B pick-up and drop-off with Bousfields. The lobby of Building B, which contains 499 residential units, has only one door which exits directly onto Lawrence Avenue West. There is nowhere for cars, ride-hailing services or delivery vehicles to stop. As proposed, the pick-up and drop-off activity will occur within the private driveway off of Avenue Road, more than 100 meters from the door of Building B. We anticipate a high volume of vehicles stopped on Lawrence Avenue West, as there is nowhere convenient for vehicles to stop that are accessing the Building B lobby. We are concerned about the potential impact to traffic flow. **The site circulation as proposed is not functional because it does not address pick-up and drop-off activity for the 499 residential units in Building B.**

The transportation impact study states that the lay-by spaces provided on the private driveway are located proximal to Building B’s “residential access on the private street.” The first-floor plan does not show a residential access on the private street. As stated above, the only residential entrance to Building B is located on Lawrence Avenue West. The transportation impact study and architectural plans are not consistent.

Transportation Impact Study

LPRO remains concerned about the traffic impact of the 715 onsite parking spaces and by the methodology of the transportation impact study. The residential trip generation rates were chosen based on the rates observed at only one building, located over a kilometer away, on the west side of Bathurst Street, in a different neighbourhood, with different demographics. We are concerned this may not be an accurate reflection of future trip volumes.

The residential trip generation in the submitted transportation impact study for the adjacent site at 250 Lawrence Avenue West was 0.44 during the AM peak hour. The assumed AM peak-hour trip rate for the subject site is only 0.14. The residential trip generation rate selected for the subject site is 68% lower than that of the adjacent site. LPRO reviewed AM peak-hour residential trip generation rates utilized for transportation impact studies submitted for other development applications within a two-kilometer radius. **The average trip generation rate utilized was 0.37, 164% higher than the rate assumed for the subject proposal. The assumed trip generation rate is not consistent with that assumed for nearby developments.** The lowest trip generation rate was 0.2, assumed for 3180 Yonge Street, which is adjacent to Lawrence Station. The subject site is one kilometer from Lawrence Station.

Table 1: AM Peak Hour Trip Generation

Address	AM Peak Hour Trip Generation Rate
250 Lawrence Avenue West	0.44
1670 Avenue Road	0.35
1 Alexandra Boulevard	0.39
3180 Yonge Street	0.20
2908 Yonge Street	0.53
41 Chatsworth Drive	0.37
49 Lawrence Avenue East	0.44
2795 Bathurst Street	0.29
2788 Bathurst Street	0.29
Average	0.37
Subject Site	0.14

Additionally, the transportation impact study assumes the 1500m² of ancillary (non-grocery store) retail will not attract any car trips during the AM peak hour. The existing ancillary retail attracts 80 car trips. **We do not agree with the assumption that the number of car trips attracted by the non-grocery retail on the site will drop from 80 to zero during the AM peak period.** Similarly, during the Saturday peak hour, it is assumed that non-grocery auto trips will drop from 105 to 10. We do not agree with the assumption that the number of non-grocery retail trips made by car will drop by 90%.

Rosewell Avenue

The transportation impact study proposes to remove the existing AM peak-hour southbound left turn restriction and PM peak-hour northbound right-turn restriction at Rosewell Avenue and Lawrence Avenue West. **These turning restrictions reduce traffic infiltration into our neighbourhood and we have not been consulted about rescinding them.** Rosewell Avenue is home to Havergal College Junior School, Glenview Senior Public School and John Ross Robertson Junior Public School. Any increase in traffic infiltration needs to be adequately assessed along with community consultation. The transportation impact study also assumes that zero cars will proceed straight through the Rosewell Avenue and Lawrence Avenue West intersection despite the lack of any straight-through prohibition.

Rush-hour Traffic Queues

Given the heavy traffic during rush hours that creates long queues of cars extending east on Lawrence Avenue West and north on Avenue Road, we continue to have concerns about through traffic blocking the newly signalized intersections, as shown in the attached photos (see Appendix 2).

Height and Massing

As shown on the architectural plans, all building façades include a step-back above the double-height first level, except for the south façade of Building B along Lawrence Avenue West. The south façade of Building B will result in a streetwall height on Lawrence Avenue West of approximately 29m. The proposed streetwall is taller than the entire width of the Lawrence Avenue right-of-way. **In our opinion, this streetwall height is too tall and will be overwhelming when viewed from the ground by pedestrians.** This concern has been conveyed to Bousfields. The proposed streetwall exceeds the streetwall height of all buildings approved in the vicinity and it does not align with the Avenue Road Study, Mid-Rise nor Tall Building Guidelines. A step-back should be provided at a lower level. A small inset has been provided on the second floor, but floors 3-8 cantilever outwards to align with floor 1. Bousfields refers to the streetwall height as 1-storey. We disagree. The benefit of the second floor step-back is erased by the projection of floors 3-8. The streetwall continues to read as 8 floors and 29m.

In addition, the 29m-tall streetwall along Lawrence is 85m long. The wall should be broken up through variations in the massing, such as a façade indentation to give the appearance of two buildings. This concern has been conveyed to Bousfields.

Table 2: Building Heights

Address	Height (m)
1580 Avenue Road	25
1670 Avenue Road	30.3
1678 Avenue Road	23.6
1717 Avenue Road	22.5
250 Lawrence Avenue West	30
515 Rosewell Avenue	21.7
Proposed: Building A	40.4
Proposed: Building B	47.2

Four major development applications have been approved in the Avenue Road Study Area. To the immediate east is a recently completed condominium building at 250 Lawrence Avenue West. On the southeast corner of Rosewell and Lawrence Avenues is the Rosewell Gardens Apartment complex. All six developments are in the range of 20m to 30m in height. Building B will tower over its surroundings at roughly 47m in height as it would be more than 50% taller than the tallest buildings approved to date.

Building A is not located at a major intersection. It should reflect the existing and planned context of Avenue Road. The 40m building height is well outside the range of approved developments and in our opinion does not reflect the existing and planned context.

The Planning Rationale Addendum describes both buildings as “mid-rise buildings.” This description is not consistent with the Official Plan which defines a mid-rise building as one that has a height “generally no greater than the width of the right-of-way it fronts onto.” A similar definition is provided in the Mid Rise Building Guidelines. Building A is 13m taller than the right-of-way width and Building B is 21m taller than the right-of-way width. Both buildings are tall buildings by definition. The height of the proposed buildings is not consistent with the Avenue Road Study, Mid-Rise Guidelines nor the existing context, and the site is not located in a Major Transit Station Area.

Other Issues

Ravine Trail

The site should provide a connection from the planned ravine trail at the rear of 250 Lawrence to Douglas Avenue. This should be easier to achieve with the recent acquisition of 1549 Avenue Road.

Retail Space

It remains our opinion that the retail space facing Avenue Road should be divided into smaller units, in accordance with the direction provided by the Avenue Road Study and respecting the existing main street character. The 7.5m ceiling heights provided appear to be very tall for a retail space: reducing these could reduce the overall building height.

Curb Radii: The curb radii on the corner of Avenue Road and Lawrence appears to be quite large. We support reducing the curb radii if Transportation Services permits, in order to slow right-turning vehicles, and to reduce the width of the pedestrian crossings at Avenue Road and Lawrence.

Working Together

The Lytton Park Residents' Organization remains committed to working with the applicant and the City to arrive at the best result for the community. Please feel welcome to contact us to discuss our comments further.

Sincerely,

Maureen Kapral
President, Lytton Park Residents' Organization
lyttonparkresidentsorg@gmail.com

Eli Aaron, B.U.R.P.I.
Land-Use Planner
Lytton Park Residents' Organization

Copy to:

Shelly Cham, Manager, West Section, North York Community Planning
Vitumbiko Mhango, Manager, Parks Planning, City of Toronto
Sophie Lin, Parks Planner, Parks, Forestry & Recreation, City of Toronto
Sadaf Pourjavaheri, Senior Urban Designer, City Planning, City of Toronto
Diane Ho, Senior Transportation Planner, City Planning, City of Toronto
Councillor Mike Colle
Linda McCarthy, Assistant to Councillor Mike Colle
Casey Richardson, Assistant to Councillor Mike Colle
Alex Smiciklas, Senior Project Manager, Bousfields
Jocelyn Deeks, Partner, Bousfields
Kara Green, Development Manager, First Capital
Chris Atkins, Senior Director, Development, First Capital

Appendix 1: Drivers exiting Pusateri's mid-block driveway stopped on the sidewalk

Drivers stop to wait for a gap in the traffic once they have already rolled into the middle of the sidewalk, exiting the driveway without stopping for pedestrians. This illustrates the hazardous condition which is proposed to be retained by First Capital. **All three photos of drivers blocking the sidewalk were taken in a span of one minute on February 2, 2024.**



Appendix 2: Westbound Traffic Queues approaching Avenue Road and Lawrence Avenue West



Typical PM rush hour traffic conditions in Spring 2021



Typical PM rush hour traffic conditions in Summer 2023