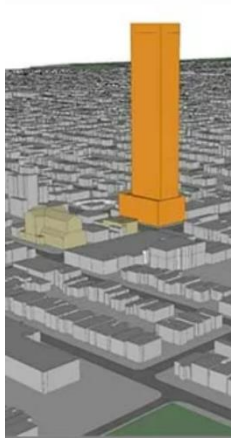




## Danforth Residents for Appropriate Development Inc.

**Participant Statement / Additional Document  
Ontario Land Tribunal Appeal OLT23-000444**



Danforth Residents for Appropriate Development was initially formed in response to this proposed project at the corner of Pape and Danforth Avenues, and the precedent it may set for the entire area. Our not-for-profit corporation (#1000663620) supports thoughtful, moderate intensification and new housing in this area. However, we are strongly opposed to the Del Boca Vista proposal for a 49-storey tower, especially to the height and massing. Extensive community engagement has consistently shown that the proposal is overwhelmingly considered inappropriate for our neighborhood.

### **Background: Information from the neighbourhood**

Pg 2

### **Key “Asks” in this report:**

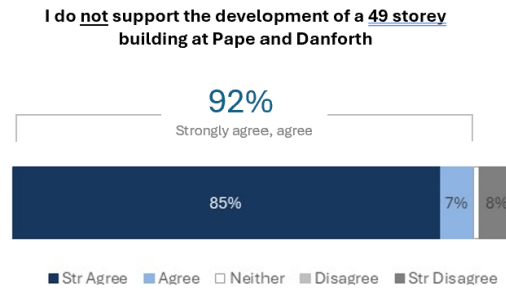
- 1. Make a very significant cut to the height and massing of this building** Pg 3
  - a. The proposed building does not conform to Provincial and Municipal plans, policies and guidelines requiring built form and massing that “fits with the existing neighbourhood” and “creates appropriate transition” to the surrounding area.
  - b. The Danforth Avenue Study (Broadview to Coxwell) and OPA 573 provide significant planned intensification and housing opportunities, even before including redevelopment of this site, and initiatives such as new missing-middle policies, Major Transit Station Areas and projected Transit Oriented Communities.
  - c. While the adopted Danforth study identified the immediate areas around Broadview and Pape stations as sites for studying opportunities for more intensification and housing, this proposal is far beyond what would be “appropriate”.
- 2. Provide more appropriate housing, both market value and affordable** Pg 5
- 3. Include improvements to the streetscape and public realm** Pg 6
- 4. Respect and enhance the lively character of Danforth and Pape avenues** Pg 7
- 5. Make serious commitments to the environment and sustainability** Pg 8
- 6. Don’t set a hugely inappropriate precedent for the future of the Danforth** Pg 9

## Information from the neighbourhood

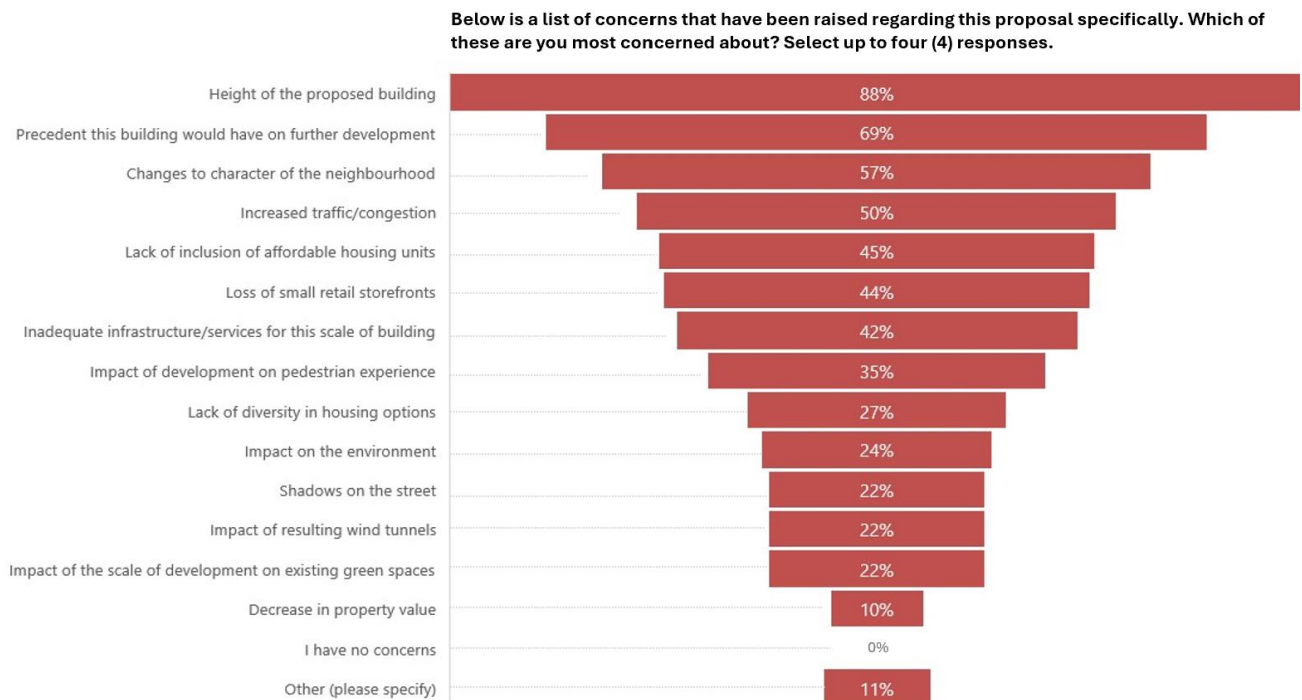
The neighbourhood opposition became very obvious when we circulated a petition asking people to sign “if you are in favour of a more appropriate approach to increasing the density of the Danforth while at the same time preserving its unique character as a vibrant, livable neighbourhood.” That petition garnered almost 900 signatures (±95% from Wards 14 and 19), and many thoughtful comments.

In April 2024, we conducted a quick online survey of neighbourhood attitudes and concerns, which had a 22% response rate. That also elicited further insights.

- One question asked about levels of support – this was overwhelmingly the response chosen:



- Another question asked people to rate their top four concerns about the project:



**Petition signer:** “We own a business (on) Pape Ave. I am in favour of rebuilding within the city guidelines. The 49-storey would-be building is absolutely ridiculous.”

## THE COMMUNITY ASKS

### 1. Make a very significant cut to the height and massing of this building

a. The proposed building does not conform to Provincial and Municipal plans, policies and guidelines for built form and massing that “fits with the existing neighbourhood” and “creates appropriate transition” to the surrounding area.

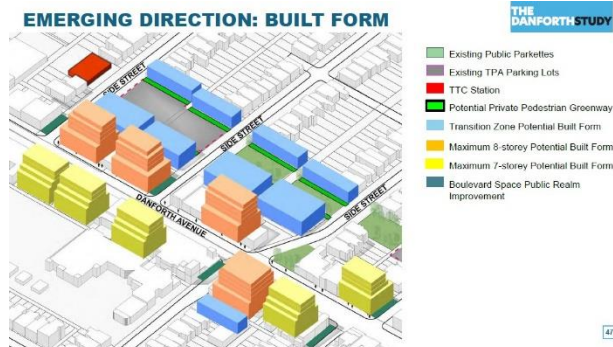
It is almost 20 times the height of the common building form along this part of both Danforth and Pape. Even its podium dwarfs the heritage-listed landmark Royal Bank building on the opposite corner. The only existing “tall building” for blocks is a 12-storey seniors’ residence/long-term care home – less than 25% the height of this proposal.



Existing neighbourhood context illustration from the City’s presentation to the 2023-02-15 Community Consultation meeting.

The City chose to fight the developer’s appeal, on the basis that “the application is not consistent with certain provincial and Official Plan policies in particular as concerns the inappropriate height and massing.” We agree.

b. The Danforth Avenue Study (Broadview to Coxwell) and OPA 573 provide significant planned intensification and housing opportunities, even before including redevelopment of this site, and initiatives such as new missing-middle policies, Major Transit Station Areas and projected Transit Oriented Communities.



In April of 2022, the City of Toronto amended its Official Plan to adopt SASP #772, a new Site and Area Specific Policy (zoning), and Urban Design Guidelines for building along Danforth Avenue from Broadview to Coxwell. The changes are intended to:

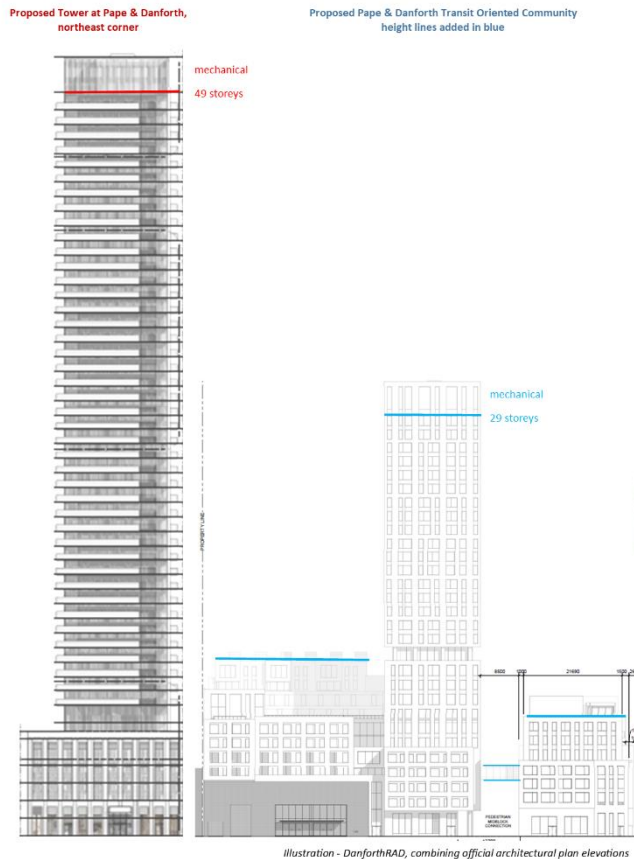
- Preserve the Danforth’s historic main street character — 3/4 of the buildings date to 1910-1929 or earlier, and there are many historically or culturally significant landmarks and building rows.
- Allow for “moderate incremental development” (7- to 8-storeys high with setbacks) along the Avenue, especially with housing on upper storeys, with 4-6 storey transition areas into neighbour-hoods, and appropriately scaled and designed spaces (retail, services, restaurants, etc.) at grade level.

**Petition signer:** “This (Del Boca Vista) proposal goes directly against the City of Toronto’s mid-rise vision, which approaches increased density in a manner that preserves the unique character of the community as well as INCLUDES and does not SHUT OUT access to affordable living and housing.”

That presented an exciting vision for low- to mid-rise intensification along the Danforth, that many people have bought into.

**c. The adopted Danforth study identified the immediate areas around Broadview and Pape stations as sites for studying opportunities for more intensification and housing. However, this proposal is far beyond what would be “appropriate”.**

According to Del Boca Vista’s planning information, this building has an extremely high FSI of 20.63. It attempts to use every possible square inch of the site, with a brutal approach to the streetscape, the public realm, respecting the small retail/services character of the Danforth, and the need for transition to the surrounding area.



Many residents believe the proposal for the Transit Oriented Community project is still far too high.

The Del Boca Vista appeal is asking for a whopping 20 storeys higher.

**Petition signer:** “I agree that there needs to be some intensification. But the proposed 49 story building is beyond reasonable. 20 (storeys in total) would be more than enough.”

Just to the east of this proposed tower, there is a massive construction site for the Ontario Line tunnel and its planned Pape Station interchange.

The province started public consultation this spring on plans for a Transit Oriented Community on that site after the subway project ends. Announced proposals there are much more moderate than those for the Del Boca Vista project. They feature one tower set back from Danforth reaching 29 storeys, with mid-rise transition on all sides to the surrounding area.

The TOC’s Planning and Urban Design Rationale says the plan “*will deliver much-needed housing and employment opportunities in a development that is appropriate to its surrounding context, on sites that are well served by existing and planned transit*” (page vii), and “*is consistent with the Provincial Policy Statement and supports relevant policy objectives related to growth management, land use, housing, transportation and employment. Together, these represent a form of intensification that is encouraged by the PPS, and will result in a mix of uses and higher densities of development in an appropriate location at a higher order transit station within an urban area.*” (page 48)

*(bold type emphasis added)*

**PAPE STATION TOC - Planning and Urban Design Rationale**

Ontario Line Technical Advisor, 2024-0214

[https://engageio.ca/sites/default/files/2024-03/olrezoning\\_planningrationale\\_pape\\_20240214\\_rs01.pdf](https://engageio.ca/sites/default/files/2024-03/olrezoning_planningrationale_pape_20240214_rs01.pdf)

## 2. Provide more appropriate housing, both market value and affordable

**The mix of housing units proposed for this site is not appropriate to welcome new residents into a complete and liveable community.**

There is no commitment that any of the 496 proposed housing units in the Del Boca Vista tower would be “affordable” using either the *percentage of income* or even the *percentage of market price* definition of that word.

In addition, although they meet the unit mix required by the City, there are too few 2 and 3 bedroom family-sized units and far too many studio and one bedroom units – and all are very small.

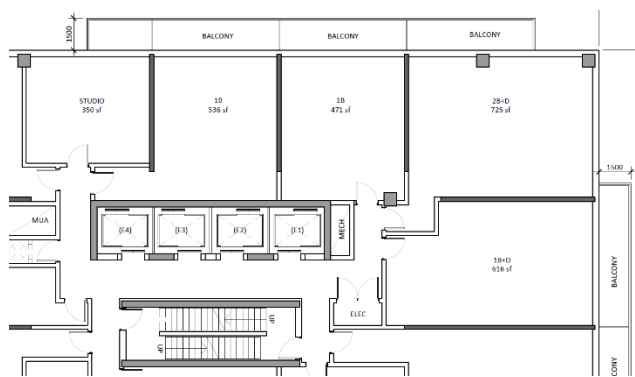
It appears that the building is designed for real estate investors looking for capital gains and/or short-term rentals, not residents for the neighbourhood. It would be far better to have a lower, more appropriate building, with fewer but “more liveable” units.

Currently, 45.5 per cent of condo units for sale are vacant and 21.7 per cent are tenanted with 31.1 per cent owner occupied, said (Tim) Storey (sales representative with Royal LePage Signature Realty). It can indicate the majority of units for sale are most likely investor owned.

**Toronto condo sales are tanking — but asking prices aren’t budging. Here’s why.**

by Clarrie Feinstein, Business Reporter  
Toronto Star, July 11, 2024

**Petition signer:** “I am in support of housing development that would produce improved access to affordable housing, larger units for families as a real alternative to single family dwellings, and environmental sustainability. This project does not offer these things.”



Detail from the project application architectural drawing file (#1) showing five of 12 apartment units. This shows the living area in square feet - studio apartment at 350, two one-bedroom units at 471 and 536, one bedroom plus den at 616, and two bedroom at 725. There is also a three bedroom unit in this floor plan, at 905 square feet.



Families at play in the children’s playground at Withrow Park

### 3. Include improvements to the streetscape and public realm

The Del Boca Vista proposal does not prioritize the streetscape and public realm. The proposed setbacks do not take into account the negative impact on the pedestrian experience (movement and safety) or include design elements to preserve access to sunlight and sky views or mitigate wind effects the developer's own consultants said would create difficult conditions for people.

We support the arguments given in the City of Toronto's decision to fight this developer's appeal to the Ontario Land Tribunal:

"Staff consider the site suitable for some level of intensification, however 49-storeys does not transition appropriately to the lower-scale built setting and exceeds what is appropriate for this area.

"Additionally, tower setbacks from the east and north property lines do not conform to the City's minimum Tall Building standard of 12.5 metres from property lines. Further, the proposed base building height does not reflect new built form policy limiting the streetwall condition to 14 metres on Danforth Avenue."

The design of the new Pape Station entrance on Danforth Avenue, immediately adjacent to the subject site, proposes a larger setback area of approximately 10 metres from curb to building face to allow movement of a larger number of pedestrians going in and out of the station. The building setback along Danforth Avenue should extend this 10 metre setback along the Danforth frontage of the site."

"Similarly, the proposed 4.3 metre setback along Pape Avenue does not reflect the minimum standards expressed in the Tall Building Guidelines or protect for the existing and planned pedestrian volumes in the area. The proposal should, therefore, be revised to expand and enhance the pedestrian and public realm at street level."



- Significantly reduce the tower height and improve the transition to the built setting
- Meet the appropriate tower setbacks
- Change the podium to appropriate height
- Harmonise frontage treatment with the far sides of the streets – particularly respecting the heritage-listed RBC to the west and nearby small scale, cultural heritage streetscape forms
- Provide an appropriate setback from the curb along Danforth Avenue, to help accommodate transit pedestrians and improve the public realm
- Line the expanded setback on Danforth with a double row of deep planted trees to help provide green space at the corner
- Expand the setback from the curb on Pape
- Deal effectively with the wind issues
- Ensure various projects are scheduled to avoid problems and unnecessary inconvenience

**4. Respect and enhance the lively character of Danforth and Pape avenues**



The Danforth is celebrated for its vibrant storefront character – but this proposal introduces a massive and featureless interruption.

Also, the existing building contains six retail or services storefronts - (two restaurants, one convenience store, one tech store, one pharmacy and a medical imaging service). The proposed building shows only two retail spaces.

**Survey respondent:** “Danforth Avenue offers a combination of a physically pleasant environment for shopping – of sunlight on the street, of small stores with owners who take an interest in their customers' satisfaction ... the wide range of stores, that sell good quality products, or offer useful services, and access to the subway.”

“The ground-floor retail spaces in the podiums, explicitly intended to animate the pedestrian realm and replicate the fine-grain commerce on Toronto’s main street, are ... typically too large for independent merchants and are marketed specifically to corporate tenants.”

**Time to rethink Toronto’s tall buildings**  
by John Lorinc  
The Globe and Mail, March 1, 2024

**Survey Respondent:**  
(What I like best is) “the variety of INDEPENDENT small businesses in the area. Also, the fact I can SEE THE SKY (unlike the corner of King and Bay or Yonge and Bloor, for example).”

The project’s disregard for local character and history is a significant loss that undermines the commercial vitality of this key destination. Respecting the cultural and built form heritage of Danforth and Pape Avenues, at an intersection that serves both vital arteries, is essential. Measures to provide affordable retail and work space would be very useful.

Furthermore, with existing traffic issues in the area, any development must carefully consider its impact on local congestion and transportation flow.

## 5. Make serious commitments to the environment and sustainability

In section 10 of the Site and Area Specific Policy (“Sustainability”), 10.1 says “... development is encouraged to meet or exceed the highest performance level of the Toronto Green Standard.” This project only commits to meeting the lowest (mandatory) level. It also needs to show green roof measures.

In our climate crisis, high towers are inherently questionable. The embodied greenhouse gas (GHG) emissions in their key construction materials are very high.

In an [April 19, 2023 post](#) in Carbon Upfront titled “How tall should a building be?”, Lloyd Alter refers to a study comparing four different building approaches: High Density High Rise, Low Density High Rise, High Density Low Rise, and Low Density Low Rise. It concluded that central Paris-type density had less than half the life cycle GHG emissions of midtown Manhattan-type.

“While towering steel-and-concrete structures once symbolized economic growth, they are now emblematic of the climate challenge that needs to be scaled. The extensive use of carbon-intensive cement, steel and aluminum in buildings has made it the third most emissions generating sector in Canada, accounting for 92 MT of CO<sub>2</sub>e (carbon dioxide equivalent emissions), or 13% of all emissions in 2022. Rising populations, continued urbanization and a rush to develop multi-storey concrete buildings to address a housing supply crisis could make it harder to rein in emissions.

**Timber Rising: How Wood Can Spur Canada’s Green Building Drive**  
by Myha Truong-Regan  
RBC Climate Action Institute, October 27, 2023  
<https://thoughtleadership.rbc.com/timber-rising-how-wood-can-spur-canadas-green-building-drive/>

**Table 3 Summary of the Life Cycle Greenhouse Gas Emissions and population accommodated with a fixed land area (detail)**

High Density Low Rise (like central Paris)/High Density High Rise (like midtown Manhattan)

	HDLR		HDHR	
	Average	Std. dev.	Average	Std. dev.
LCGE (MtCO <sub>2</sub> e)	8.79	1.16	24.98	2.69
Population (thousands)	46.66	12.65	57.80	18.98
LCGE per capita	0.19	0.09	0.43	0.14

[Decoupling density from tallness in analysing the life cycle greenhouse gas emissions of cities,](#) by Pomponi, F, Saint, R, Arehart, J.H. et al npj Urban Sustainability, July 5, 2021

Alter also quoted a [2017 study](#) by the UCL Energy Institute, which found that “when rising from five storeys and below to 21 storeys and above, the mean intensity of electricity and fossil fuel use increases by 137% and 42% respectively, and mean carbon emissions are more than doubled.

Other issues include the mass needed to counteract wind at heights, impact of mechanical, electrical and plumbing equipment and operations to transport water, coolant, people and air, and the amount of concrete/cement used for footings, foundations and parking below grade.



**Mass Timber buildings in TO**  
CreateTO’s [plans](#) for a 10-storey 94-unit mid-rise would be one of the larger buildings made of mass timber in this city – so far. This April, Ontario announced it expected to allow encapsulated mass timber buildings up to 18 storeys soon, a significant jump from 2022’s 12 storeys. Other exciting tall mass timber buildings include George Brown College’s [Limberlost](#) and the University of Toronto’s 14-storey [Academic Wood Tower](#).



## 6. Don't set a hugely inappropriate precedent for Danforth/Pape

Del Boca Vista's Block Context Plan assumed future development of another six towers in the immediate vicinity of their project. It's a bit hard to read the illustration, so one of the Danforth Residents for Appropriate Development volunteers added the number of storeys in large type and produced this approximation of massing:

Yes, this site is beside what is about to be an interchange subway station. However, there are growing calls for lower towers and less concrete and steel construction.

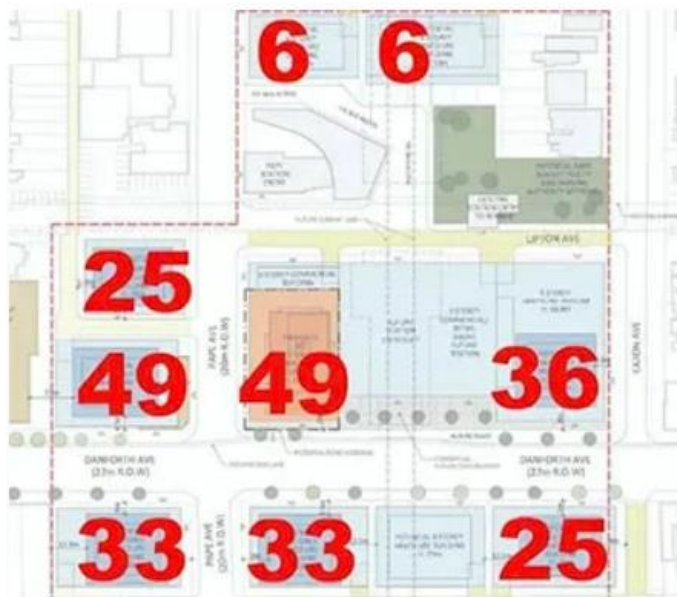
Does this proposed project constitute "good planning"?

Approval of this project would have far-reaching impacts. Not only is the proposed height physically out of scale, it is also potentially devastating economically.

"Right to Height" through up-zoning is a non-earned but very valuable land attribute. It affects the potential profits and value of the land it's connected to in predictable ways. And once a new level is established at a location, that changes how people assess potential opportunities and risk on other nearby properties.

If you have a plan which encourages mid-rise development, with an approved skyscraper in the same planning district, the viability of your plan takes a nosedive. Potential mid-rise redevelopers will find themselves competing with potential skyscraper developers for real estate. Potential "affordable housing" groups will suffer in the same way.

Developers will apply for zoning changes based on the approved skyscraper, and far too often in our system, they will win.



**Petition signer:** "A travesty and completely unacceptable. This will change the Danforth neighbourhood forever."

**The City and neighbourhood had produced an exciting vision for the Danforth, which would provide needed growth and housing in a higher-density but generally low- to mid-rise way. Allowing this proposal would kill it.**