

720-742 BROADVIEW AVENUE

Planning Rationale Addendum

September 26, 2025

This Planning Rationale Addendum Report has been prepared by Urban Strategies on behalf of Choice Properties Limited Partnership (“Choice Properties”) in support of combined Official Plan and Zoning By-law Amendment applications to permit the redevelopment of the properties at 720-742 Broadview Avenue, collectively the Site.

TABLE OF CONTENTS

1.0	INTRODUCTION	2	4.0	PLANNING RATIONALE	17
1.1.	PROJECT BACKGROUND	2	4.1.	TOWER HEIGHT	17
1.2.	ENGAGEMENT UNDERTAKEN TO DATE	3	4.2.	BUILDING MASSING	21
2.0	DESCRIPTION OF SEPTEMBER 2025 PROPOSAL	4	4.3.	RAVINE STRATEGY	23
2.1.	OVERVIEW OF THE 2025 PROPOSAL	4	4.4.	PROPOSED OPA/ZBA	24
2.2.	REDUCED SITE AREA	6	5.0	CONCLUSION	25
2.3.	SITE ORGANIZATION AND ACCESS	7			
2.4.	BUILT FORM	8			
2.5.	PUBLIC REALM	10			
2.6.	NATURAL HERITAGE AND SLOPE STRATEGY	11			
2.7.	PHASING STRATEGY	12			
3.0	SUPPLEMENTARY POLICY ANALYSIS	14			
3.1.	BILL 109, MORE HOMES FOR EVERYONE ACT, 2022	14			
3.2.	BROADVIEW STATION PROTECTED MAJOR TRANSIT AREA	14			
3.3.	BILL 23, MORE HOMES BUILT FASTER ACT, 2022	14			
3.4.	BILL 185, CUTTING RED TAPE TO BUILD MORE HOMES ACT, 2024	14			
3.5.	PROVINCIAL PLANNING STATEMENT, 2024	15			
3.6.	BILL 17, PROTECT ONTARIO BY BUILDING FASTER AND SMARTER ACT, 2025	15			
3.7.	SUMMARY OPINION REGARDING SUPPLEMENTARY POLICY ANALYSIS	15			

1.0 INTRODUCTION

1.1. Project Background

Urban Strategies has prepared this Planning Justification Report Addendum (“**Addendum**”) on behalf of CP REIT Ontario Properties Limited (the “**Applicant**”) for its Official Plan Amendment (“**OPA**”) and Zoning By-law Amendment (“**ZBA**”) application resubmission for 720-742 Broadview Avenue (the “**Site**”).

In August 2021, the Applicant submitted applications for an OPA and ZBA for a larger development site comprising 682-742 Broadview Avenue that proposed to retain the existing house-form structures at 682, 686, 688 and 742 Broadview and to intensify the remainder of the site with a 35-storey mixed-use development, integrated with a seven-storey podium element (the “**Original Proposal**”). A related Draft Plan of Subdivision application was submitted in August 2021, but is no longer being pursued by the Applicant.

Since the submission of the OPA/ZBA applications in 2021, the Applicant has received comprehensive City Staff and agency comments on the Original Proposal, has participated in a Community Consultation Meeting (“**CCM**”), and has participated in multiple meetings with City and Toronto & Region Conservation Authority (“**TRCA**”) staff to discuss issues and a path forward for the project.

This OPA/ZBA resubmission has been filed to advance a revised proposal for the Site (henceforth described as the “**September 2025 Proposal**”) that excludes the properties at 682, 686 and 688 Broadview Avenue that previously formed part of the original development site.

This Addendum will:

- Summarize engagement undertaken to date with the local community and City/TRCA staff;
- Describe the September 2025 Proposal including key differences from the Original Proposal and revisions made in response to City/TRCA input;
- Review changes to the legislative and policy context for land use planning since the original applications were filed in 2021;
- Provide supplementary planning justification in respect of the latest design changes; and
- Provide a conclusion and summary planning opinion in respect of the September 2025 Proposal.

1.2. Engagement Undertaken to Date

The list below summarizes engagement undertaken for this proposal to date, beginning with the initial Pre-Application Consultation (“**PAC**”) meeting with City staff:

1. July 12, 2021: PAC Meeting
2. August 27, 2021: Original OPA/ZBA submitted
3. September 7, 2021: Presentation to Councillor Fletcher
4. November 17, 2021: Information Session hosted by Councillor Fletcher (attended by 180 residents)
5. November 24 2021: Preliminary Report considered and adopted by TEYCC
6. December 8, 2021: Meeting with City Planning
7. January 14, 2022: Meeting with TRCA
8. February 9, 2022: City-led Community Consultation Meeting
9. July 11, 2022: Meeting with TRCA
10. October 14, 2022: Meeting with City Staff to review key City/TRCA comments

Through this engagement the Applicant has received considerable feedback that has informed revisions incorporated into the September 2025 Proposal.

WHAT WE HEARD:

The following is a summary of key messages but does not represent a comprehensive summary of feedback.

- The proposal should not provide a connection from Broadview Avenue into the adjoining ravine;
- TRCA does not wish to assume ownership of the ravine lands;
- An on-site public park is not desired by the City (request for off-site parkland dedication);
- Heritage staff appreciate the whole building retention of the on-site heritage buildings, and staff recommend not impacting the existing Seeds of Hope operations;
- The core principles of Site & Area Specific Policy 772 (“**SASP 772**”) should be advanced, including heritage conservation, public realm enhancement, and seeking to provide a range of housing options through developments that also advance sustainability and climate resilience;
- While the site is appropriate for tall buildings, shadowing on Broadview and Danforth should be limited; and
- A privately-owned, publicly accessible open space (“**POPS**”) along Broadview is a desirable element of the plan that should be maintained.

2.0 DESCRIPTION OF SEPTEMBER 2025 PROPOSAL

2.1. Overview of the 2025 Proposal

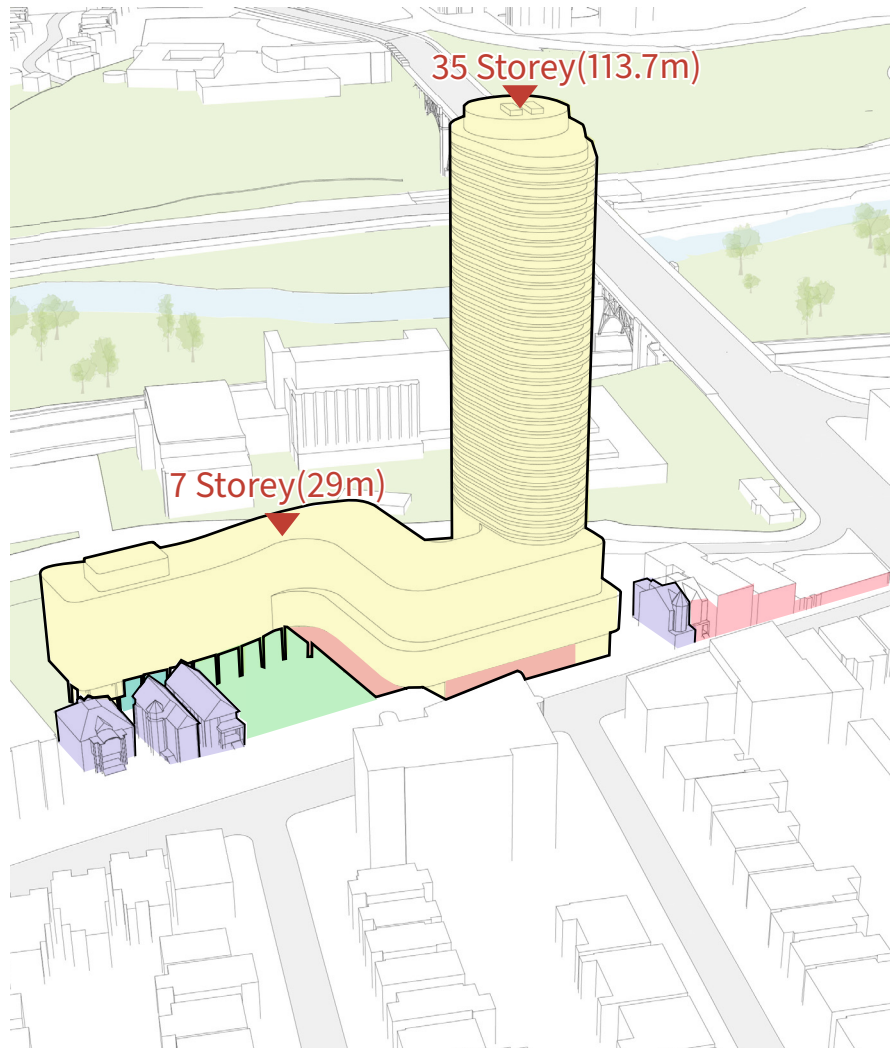
The September 2025 Proposal is for a mixed-use development incorporating an at-grade grocery store of 2,289 square metres as well as 55,894 square metres of residential gross floor area comprising 857 residential units.

The proposal includes two tall buildings—Building A, a 39-storey (132.9 metre) tower at the south end of the Site, and Building B, a 42-storey (138.4 metre) tower at the north end. The development is anchored by a one-storey (8-metre) ground floor level containing the grocery store, as well as residential lobbies and servicing spaces.

The strategy for how the proposed development interfaces with the adjoining ravine has changed for this submission. Unlike in the Original Proposal, an existing concrete retaining wall along the western edge of the Site will be maintained in situ, with modifications, to accommodate additional open space (see Section 2.6 below), which has implications for development setbacks from natural heritage features.

	ORIGINAL PROPOSAL	JULY 2025 PROPOSAL
Site Area	13,118 m ²	9,524 m ²
GFA (Total)	40,126 m ²	58,273 m ²
GFA (Non-residential)	2,091 m ²	2,289 m ²
FSI	3.06	6.11 (reflects reduced site area)
Height	35 Storeys (114.65 m)	39 Storeys (132.9m) 42 Storeys (138.4m)
# Residential Units	503	857
Amenity ratio (total)	4.0 m ² /unit	4.0 m ² /unit
Amenity ratio (indoor)	2.1 m ² /unit	2.38 m ² /unit
Amenity ratio (outdoor)	1.9 m ² /unit	1.62 m ² /unit
Parkland dedication	460 m ²	none
POPS/ Plaza Space	1,364 m ²	333 m ²
Vehicle Parking	220	48
Bicycle Parking	524	970
Loading Spaces	1 Type-A 1 Type-B 2 Type-C 1 Type-G	1 Type-A 1 Type-B 3 Type-C 2 Type-G

ORIGINAL PROPOSAL



SEPTEMBER 2025 PROPOSAL

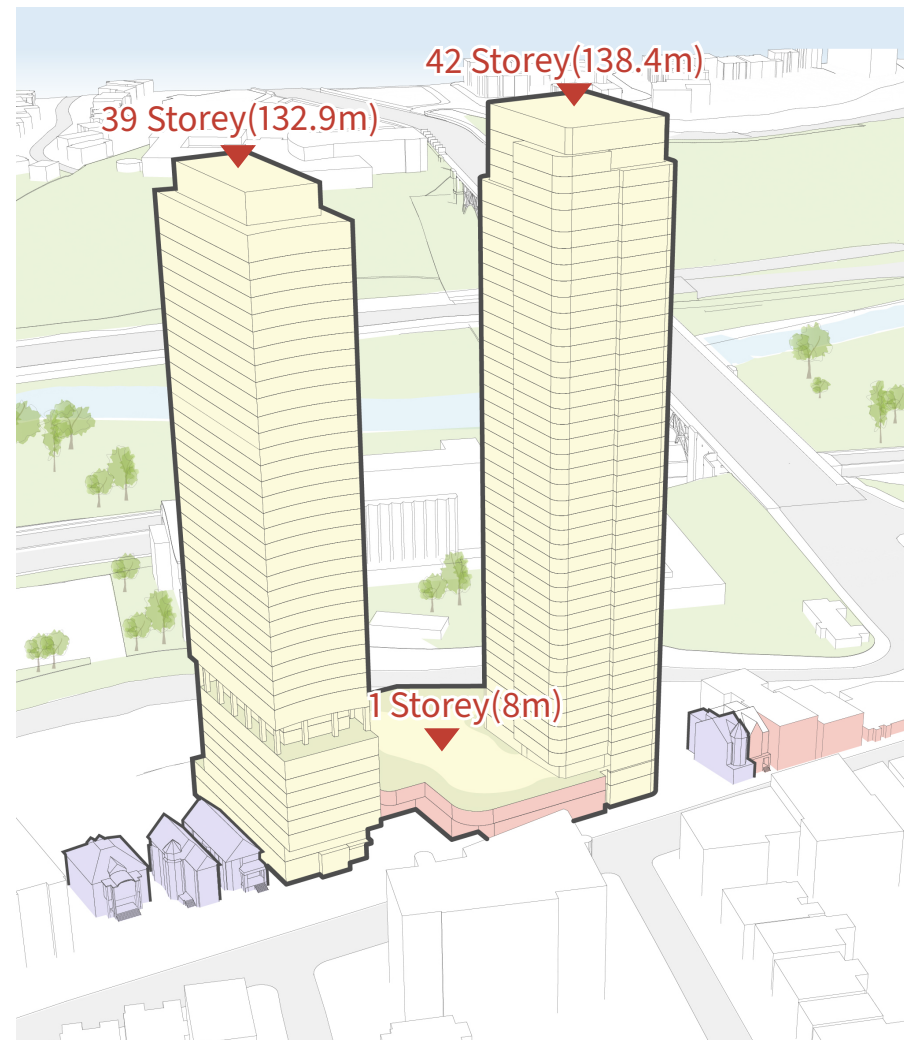
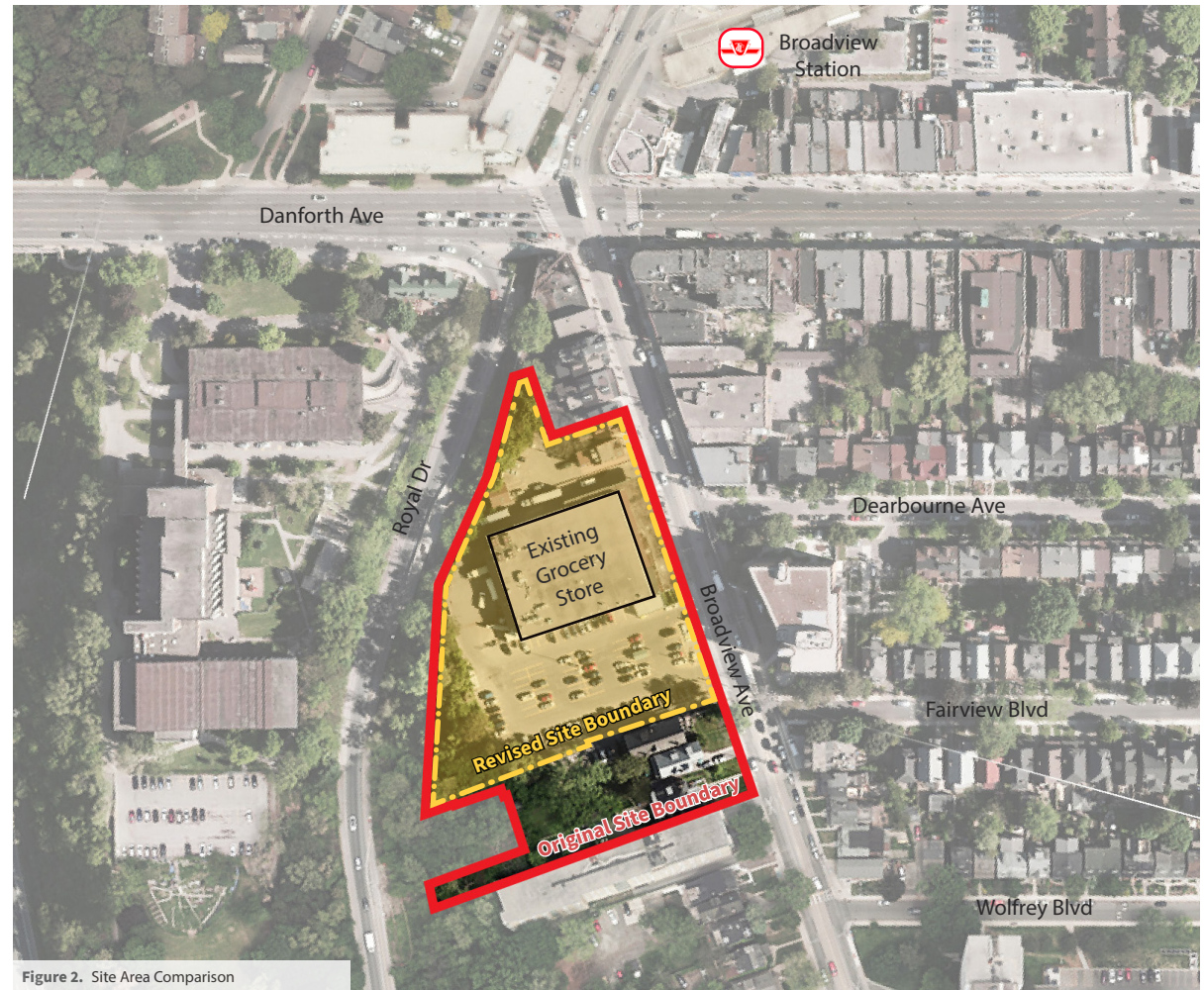


Figure 1. Perspective view of the Original Proposal (left) and the September 2025 Proposal (right)

2.2. Reduced Site Area

As previously indicated, the Site area subject to the OPA/ZBA applications has been reduced from its original size of 13,118 square metres, to 9,524 square metres. This reduced Site includes the existing Loblaws grocery store at 720 Broadview Avenue, the detached house-form building at 740 Broadview Avenue, and the semi-detached house-form building at 742 Broadview Avenue.



2.3. Site Organization and Access

The development is oriented to continue to front onto Broadview Avenue, and in its ultimate condition will continue to have two vehicular entry points—one to the north of Building A leading to the underground parking garage and to a pick-up / drop-off area serving Building A, and a second to the north of Building B leading to grocery store loading area and a pick-up / drop-off area serving Building B.

As in the Original Proposal, a new signalized intersection continues to be proposed where the southern vehicular access intersects with Broadview Avenue. This intersection would enable full moves access in and out of the site as well as provide a new mid-block pedestrian crossing between Danforth Avenue and the existing pedestrian crossing at Wolfrey Avenue.

To accommodate the northern vehicular access, the existing detached house-form building at 740 Broadview Avenue would be demolished. The driveway would extend to the western edge of the Site to a hammerhead turn-around area to accommodate truck deliveries. The existing semi-detached house-form building at 742 Broadview Avenue will be maintained with no change.



2.4. Built Form

BUILDING A

Building A consists of a 7-storey podium element with a reveal at levels 8-9 and a regularized tower floorplate above having a gross construction area of 760 square metres. The building is set back 9.7 metres from the east (Broadview) property line to accommodate a POPS space, with the ground level further set back to enable increased exterior pedestrian space. At the level 8-9 reveal, the building face steps back by 3 metres along its north, west and south sides, and 6.3 metres along its east side. This reveal provides massing relief and helps to reinforce a mid-rise scale along Broadview. The upper tower element incorporates a 3.3 metre east tower step-back from the podium below.

Building A includes a continuous 2.1-metre building south building setback (except at the level 8-9 reveal). Ordinarily, the Tall Building Design Guidelines (“**TBDG**”) would recommend that tall buildings be set back by 12.5 metres to the property lines to allow for adequate tower separation to future adjacent development. In this case, the Applicant owns the three properties to the south (682, 686 & 688 Broadview) which have a collective width in excess of 25 metres. The Applicant proposes to enter into a Limiting Distance Agreement (“**LDA**”) to permit the reduced south tower setback for Building A. While the properties have been removed from this development application, they continue to owned by the landowner.



Figure 4. Rendered view of the September 2025 Proposal (Courtesy: Superkül)

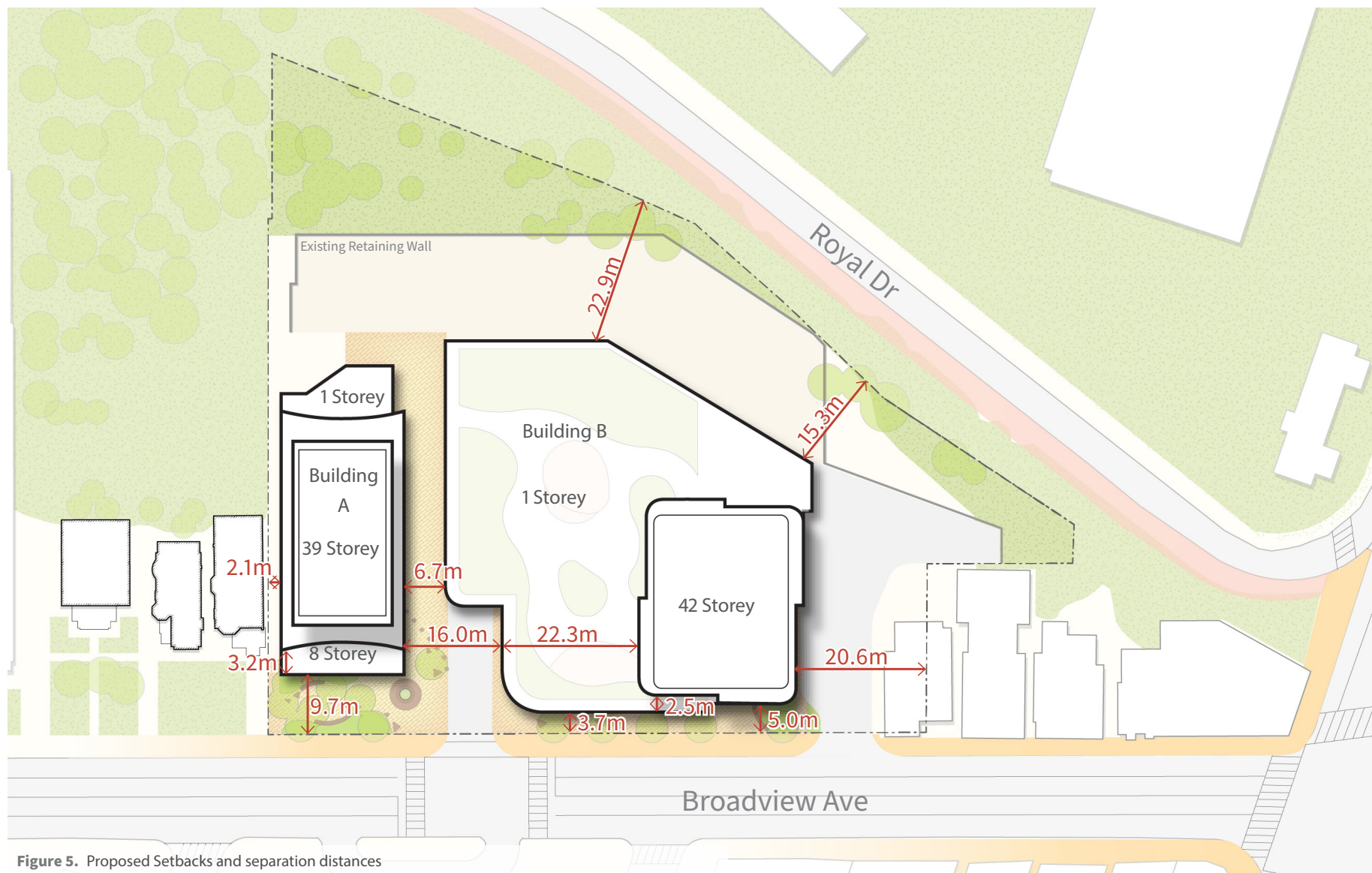


Figure 5. Proposed Setbacks and separation distances

2.5. Public Realm

The September 2025 Proposal includes public realm upgrades intended to improve the Site's Broadview Avenue frontage while complementing the proposed at-grade grocery store and new residential uses. A continuous 2.1-metre pedestrian clearway is maintained within the public right-of-way along the Broadview frontage, with regularly spaced street trees proposed on the private lands. Other elements incorporated along the street frontage include bicycle racks, street furniture, and shrub planting beds. Pedestrian-focused areas are distinguished from the primary vehicular routes with contrasting unit pavers to support safe movement through the Site.

A 333-square metre POPS is proposed in front of Building A. The POPS is designated as a landscaped plaza with seating areas and greenery, helping to frame the Building A residential lobby and the southern vehicular access point to the Site. The POPS blends seamlessly into the east-west pick-up / drop-off zone along the northern edge of Building A, which then leads to additional at-grade open space at the rear (west) edge of the Site.

At the rear of the Site, the existing retaining wall is proposed to be retained for the purpose of accommodating additional at-grade open space. It is the Applicant's intention to explore the detailed design and programming of this space at a future date, with the input of City staff.

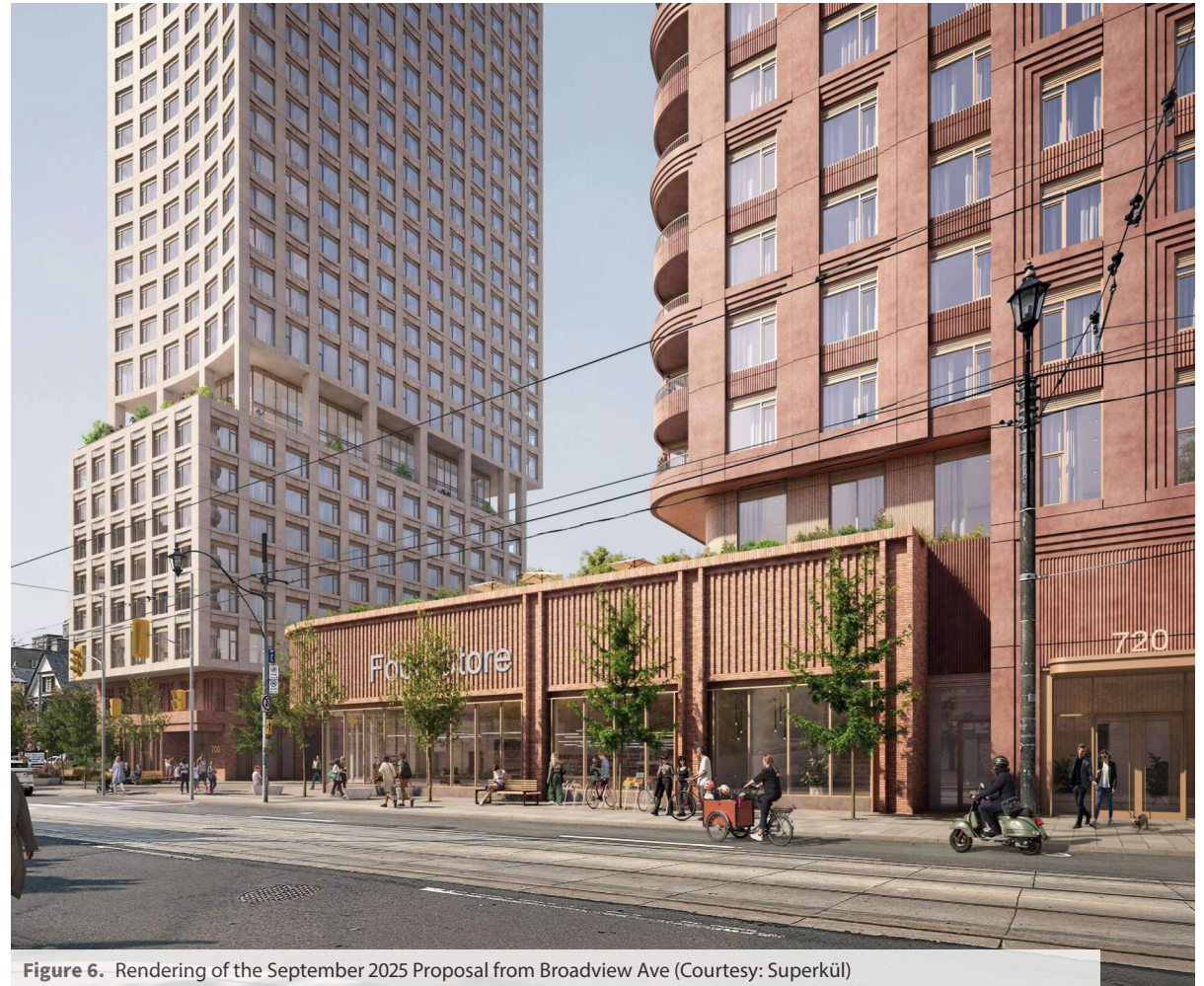


Figure 6. Rendering of the September 2025 Proposal from Broadview Ave (Courtesy: Superkül)

2.6. Natural Heritage and Slope Strategy

The western edge of the Site is occupied by ravine lands and a natural embankment along the western edge of the Site, which slopes down toward the northbound on-ramp for the Don Valley Parkway. This ravine edge is highly disturbed, with a concrete retaining wall having been constructed several decades ago for the existing grocery store.

The entirety of Building A is set back a distance of 10 metre from the long-term stable top of slope ("**LTSTOS**"). The western edge of the grocery store footprint in Building B maintains a 6-metre setback from the LTSTOS, and the Building B tower element is set back a distance greater than 10 metres from the LTSTOS. The existing concrete retaining wall on the Site, which encroaches into the LTSTOS, will be maintained in situ, as it has been assessed to be in good condition and will enable additional open space along the Site's western edge. The proposed OPA would permit this ravine setback approach on a site-specific basis.

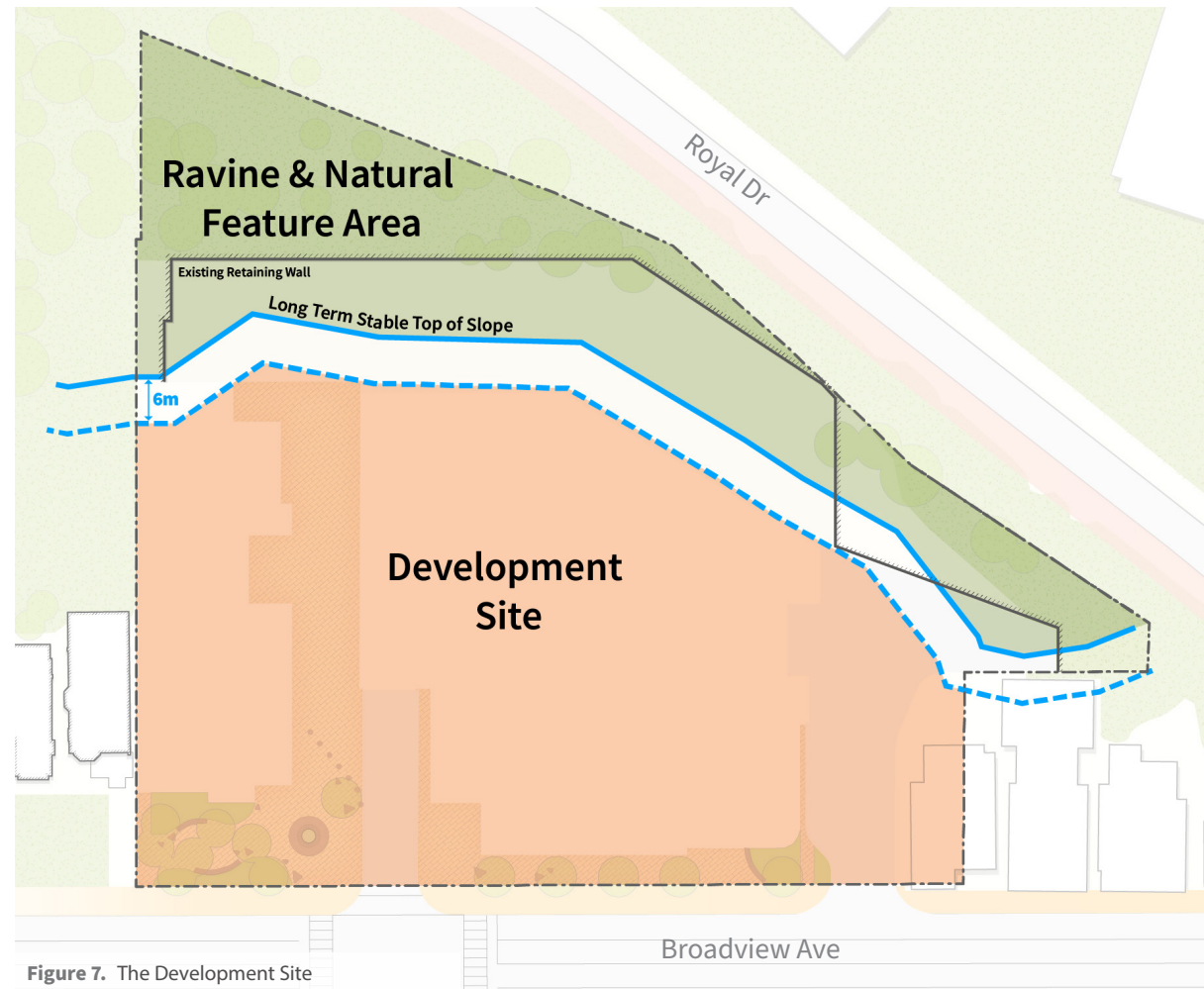


Figure 7. The Development Site

2.7. Phasing Strategy

The Applicant intends to proceed with the proposed development in a phased manner, which will allow continuous operation of the grocery store while the first tower is constructed. The phasing approach will necessitate a number of interim alterations to the site, as outlined below.

PHASE 1

Phase 1 includes the construction of Building A, the 39-storey residential tower on the southern edge of the Site. Within the Phase 1 boundary, a driveway servicing Building A will be constructed, providing access to an at-grade pick-up/drop-off zone, three short-term surface parking spaces, and an enclosed loading area. To offset the loss of existing grocery store parking spaces within the Building A footprint, the existing building and rear garage at 740 Broadview will be demolished and replaced with a new drive aisle and interim parking spaces. Truck deliveries to the grocery store will continue to occur via the existing driveway along the southern edge of the grocery store.

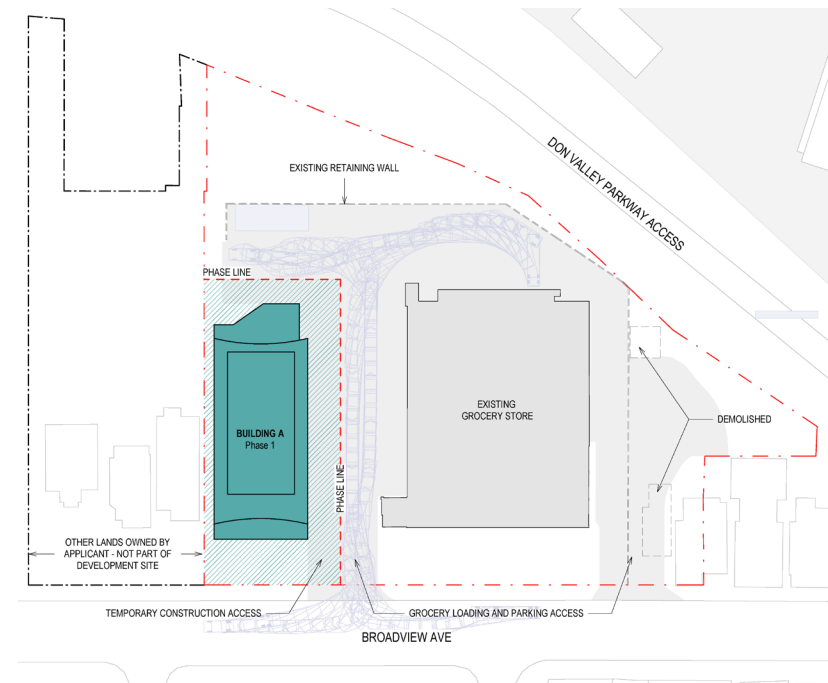
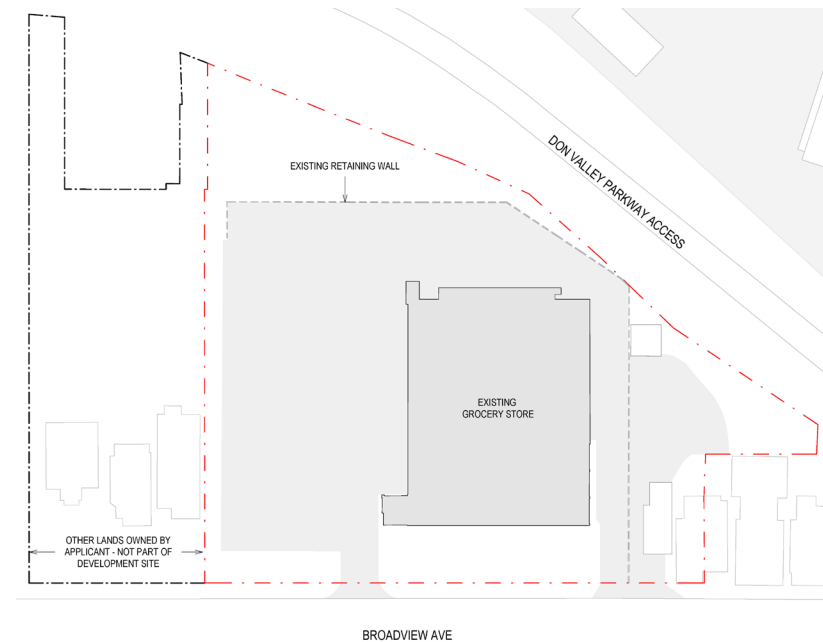


Figure 8. Existing Site Plan (left) and Phase I Site Plan- Construction and Interim Condition (right)

PHASE 2

Phase 2 includes demolition of the existing grocery store and its replacement with Building B, which contains the new grocery store and 42-storey residential tower on the northern part of the Site. Once construction of Building B is complete, loading areas for the new grocery store will be accessed from the northern driveway.

The Phase 2 southern driveway will provide access to one level of underground parking, and to the pick-up / drop-off area for Building A. The interim Phase 1 driveway will be reduced in size and consolidated with the Phase 2 southern driveway to minimize the extent of curb cut along Broadview Avenue.

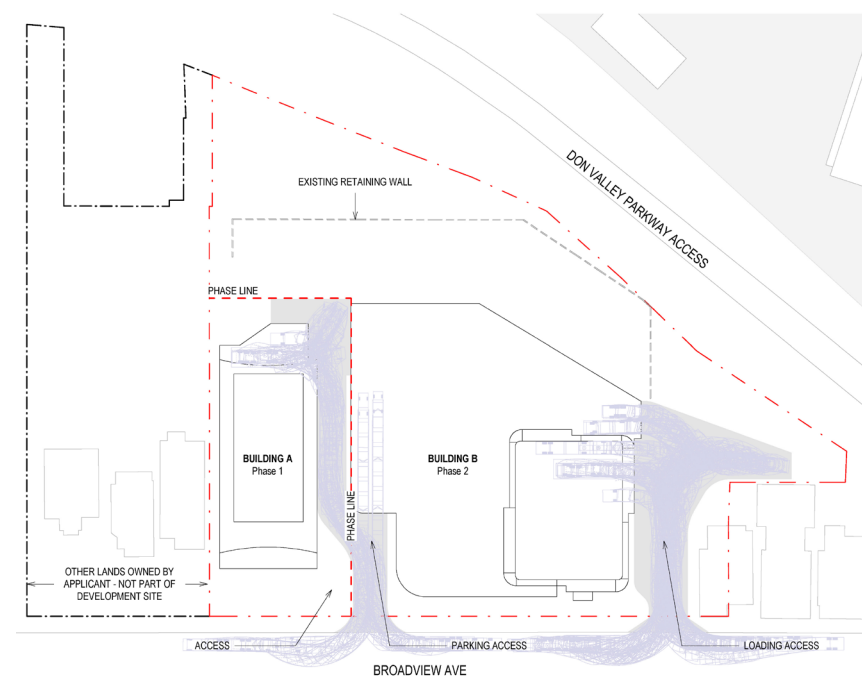
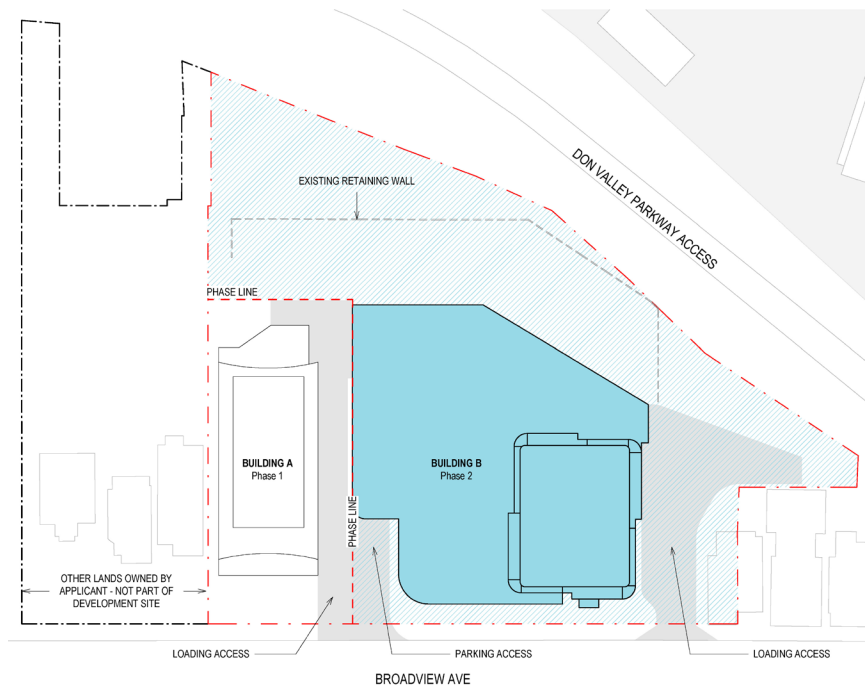


Figure 9. Phase I & II Site Plan- Construction (left) and Phase I & II Site Plan- Completed (right)

3.0 SUPPLEMENTARY POLICY ANALYSIS

Since the submission of the original OPA/ZBA applications in 2021, there have been changes made to the legislative and policy context for land use planning in Ontario and Toronto. In general, these changes are supportive of the planning merits of the September 2025 Proposal. Relevant updates are summarized below, in chronological order.

3.1. Bill 109, More Homes for Everyone Act, 2022

On April 14, 2022, Bill 109, More Homes for Everyone Act, 2022 received Royal Assent. While not specifically relevant to the Applicant's OPA/ZBA applications, Bill 109 represented the first of several pieces of legislation introduced by the Province to advance its Housing Supply Action Plan to incentivize the construction of more housing Province-wide.

3.2. Broadview Station Protected Major Transit Area

At its meeting on July 19-21, 2022, Toronto City Council adopted Official Plan Amendment 540 with respect to the implementation of "Twenty-three Major Transit Station Areas and Protected Major Transit Station Areas and associated maps along the Bloor-Danforth Corridor in the City of Toronto" ("**OPA 540**").

Included in OPA 540 is Site and Area Specific Policy 614 ("**SASP 614**"), which delineates the Broadview Station PMTSA, having a minimum population and employment target of 200 residents and jobs combined per hectare. Map 2 of SASP 614 identifies minimum densities for new development of 3.0 FSI for 720 Broadview and 2.0 FSI for 742 Broadview. The minimum densities represent some of the highest levels of minimum densities for PMTSAs outside of the Downtown.

On August 25, 2025, the Minister of Municipal Affairs and Housing approved OPA 540 with modifications. Among the Minister's modifications are new policies that state that within delineated Major Transit Station Areas and Protected Major Transit Station Areas, City-initiated zoning will permit, for lands designated Apartment Neighbourhoods, Mixed Use Areas, or Regeneration Areas, a floor space index of 8 FSI or more where the lands are located within 200 metres of an existing or planned transit station; and 6 FSI or more where the lands are located within 200-500 metres of an existing or planned transit station. The City has 1 year to update Zoning By-law 569-2013 to implement the Minister's directions, and a City staff report outlining a work plan to do so was considered and endorsed by Planning & Housing Committee at its meeting on September 25, 2025.

3.3. Bill 23, More Homes Built Faster Act, 2022

On November 28, 2022, Bill 23, More Homes Built Faster Act, 2022 received Royal Assent. Bill 23 amends existing legislation including the Planning Act, Ontario Heritage Act, and Development Charges Act.

Among other changes to the Planning Act, Bill 23 amends Section 42 with respect to parkland dedication, and imposes new caps on the maximum amount of land that municipalities can acquire for parkland dedication purposes. Another notable change is that lands encumbered by easements (e.g. POPS) or below grade infrastructure may fulfill parkland dedication requirements, however there has not yet been a regulation enacted by the Province to implement this particular change.

3.4. Bill 185, Cutting Red Tape to Build More Homes Act, 2024

On June 5, 2024, Bill 185, Cutting Red Tape to Build More Homes Act, 2024 received Royal Assent. Bill 185. Notably, Bill 185 removes the ability for municipalities to require the provision of vehicular parking within new development in a PMTSA, other than for bicycle parking. Other changes introduced under Bill 185 include new limits on third party appeals to the Ontario Land Tribunal and changes to the application process for new planning applications, among others.

3.5. Provincial Planning Statement, 2024

On August 20, 2024, the Province released the Provincial Planning Statement (“PPS 2024”), which took effect on October 20, 2024. The PPS 2024 replaces both the former Provincial Policy Statement (2020) and the Growth Plan for the Greater Golden Horseshoe (2020) and combines them into one Province-wide document. The PPS 2024 provides directions for matters of Provincial interest related to land use and development matters where decisions are made on or after October 20, 2024, and applies retroactively to planning applications filed before this time where a decision has not yet been made.

The PPS 2024 directs planning authorities to provide for an appropriate range and mix of housing options and densities by, among other actions, permitting and facilitating all types of residential intensification, including the development and redevelopment of underutilized commercial and industrial sites (Section 2.2).

The PPS 2024 carries forward the concept of strategic growth areas, which are to be a focus for intensification and additional housing, as well as the concept of major transit station areas which are required to accommodate minimum densities as set out under Policy 2.4.2(2). Policy 2.4.3 directs planning authorities to plan for intensification on lands adjacent to frequent transit corridors, which are defined as a public transit service that runs at least every 15 minutes in both directions throughout the day and into the evening.

3.6. Bill 17, Protect Ontario by Building Faster and Smarter Act, 2025

On June 5, 2025, Bill 17, Protect Ontario by Building Faster and Smarter Act, 2025 received Royal Assent. Although not directly relevant to the Applicant's proposed OPA/ZBA, Bill 17 limits the required studies and information that municipalities can require in support of a complete application, allows as-of-right reductions to minimum setbacks, and introduces several changes with respect to the payment of development charges.

3.7. Summary Opinion Regarding Supplementary Policy Analysis

In our opinion, the September 2025 Proposal aligns with the intent of the legislative and policy changes introduced subsequent to the filing of the original OPA/ZBA applications, which generally speaking serve to reduce barriers to the construction of additional housing, particularly in locations that are well-served by public transit.

The September 2025 Proposal is consistent with the PPS 2024 and supports the achievement of the required minimum density target for the area surrounding Broadview subway station. Further, the proposal supports intensification along an adjacent frequent transit corridor (the 504 King streetcar line), minimizes vehicular parking, and accommodates an appropriate supply of bicycle parking to promote active transportation.

The September 2025 Proposal also supports the achievement of the required minimum density target of 200 people and jobs per hectare for the Broadview Station PMTSA established through OPA 540 and SASP 614. The proposal will help achieve the minimum density target through high density, transit-supportive development.

4.0 PLANNING RATIONALE

4.1. Tower Height

HEIGHT

The proposal's tower heights of 39 and 42 storeys reflect the Site's location within the Council-delineated Broadview Station PMTSA, an area that is well served by subway, bus, and streetcar public transit infrastructure. The towers contribute to a future height peak around the intersection of Broadview and Danforth, and are appropriately scaled relative to the physical context of the Site and broader surrounding area.

As Building A has a more direct relationship to the designated Neighbourhoods area east of Broadview Avenue, it has been massed to have a narrow rectangular floorplate, with the broader sides facing north and south, thus presenting a slimmer profile to the lower-scale area.

In our opinion, the September 2025 Proposal's tower heights are appropriate given the Site's location within the PMTSA and reflecting the area's existing context which includes existing tall buildings of 23 and 24 storeys a short distance to the southeast as well as other mid-rise buildings.



Figure 10. East (primary) Elevation of the September 2025 Proposal

SHADOW IMPACTS

Urban Strategies prepared a revised Sun-Shadow Study to assess the September 2025 Proposal's shadow impacts. The Sun-Shadow Study was prepared to the City's Terms of Reference, and was included separately for this OPA/ZBA resubmission. The shadow impacts can be summarized as follows.

On March 21 (spring equinox), shadows extend to the northwest in the morning hours. Shadows retreat from the Don Valley by shortly after 10:18 a.m., and partially shadow Playter Gardens between 9:18 – 11:18 a.m. There is limited shadowing on Danforth Avenue from the early morning until shortly after 3:18 p.m. There is shadowing on the designated Neighbourhoods area from about 2:18 p.m. to 6:18 p.m.

On June 21 (summer solstice) there is limited shadowing on the Don Valley which retreats by 10:18 a.m. There is no shadowing on Danforth Avenue. There are limited shadows on the designated Neighbourhoods area from shortly after 2:18 p.m. to 6:18 p.m.

On September 21 (fall equinox) the shadow impacts are similar to the March 21 impacts described above.

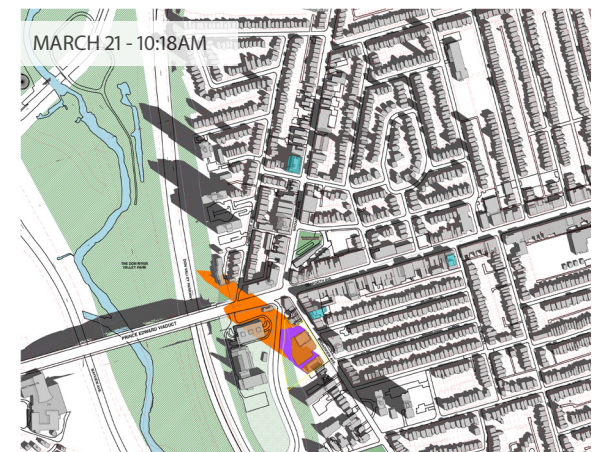
On December 21 (winter solstice) there are greater shadow impacts due to the lower height of the sun on the horizon. Shadows extend to the Don Valley at 9:18 a.m. but retreat by 10:18 a.m. At 12:18 p.m., the

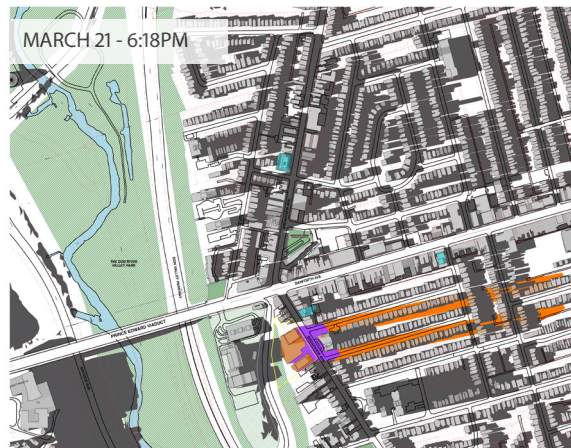
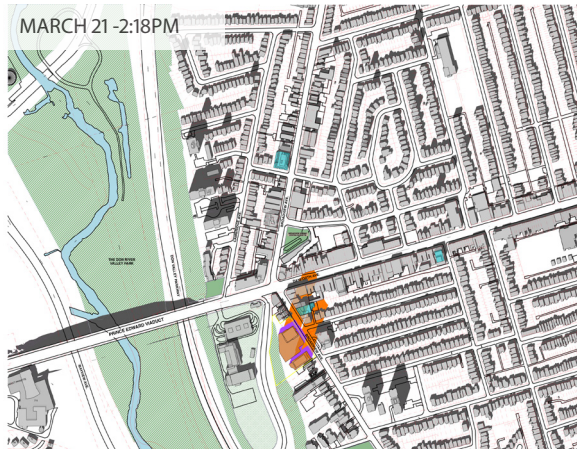
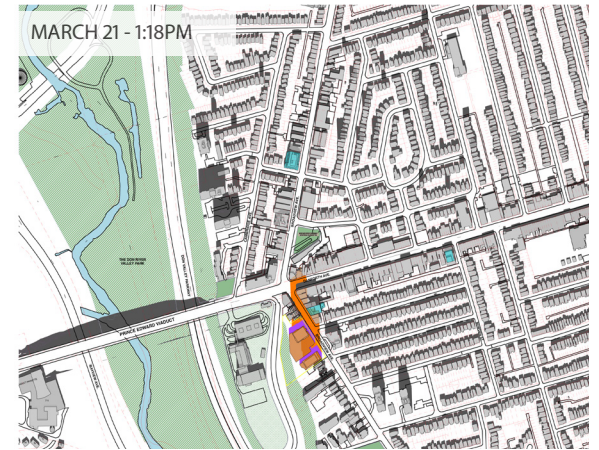
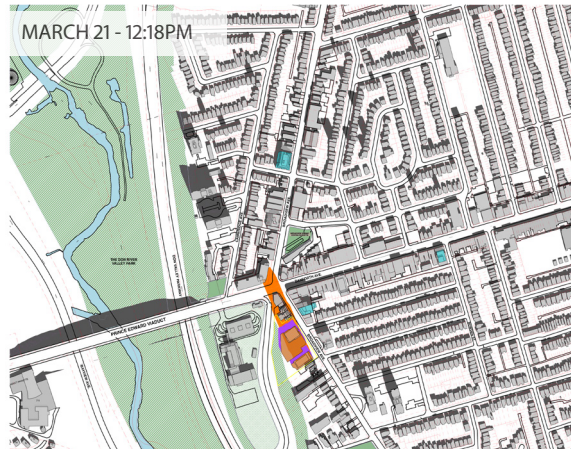
development casts shadow on Broadview Subway Station Parkette for about one hour. Limited areas of Danforth Avenue are shadowed all throughout the day, however much of Danforth is already shadowed throughout the day by the existing built environment. There is minimal discernable net new shadow impact on the designated Neighbourhood area beyond the existing condition.

SASP 772 (as amended by the OLT) contains Policy 4.3, requiring development in Policy Area A (within which the Site is located) to “not cast net-new shadow on sidewalks on the north side of Danforth Avenue and on parks and open spaces for a minimum of five hours in the spring and autumn equinoxes to enhance thermal comfort and preserve their utility.”

As the original OPA/ZBA applications were submitted prior to City Council's adoption of SASP 772 in April 2022 (which was subsequently appealed to the OLT, including by the Applicant), Policy 4.3 does not have force and effect on the proposed development. Notwithstanding, it is our opinion that the September 2025 Proposal appropriately limits net new shadowing on Danforth Avenue to minor and isolated areas, for short durations. The draft OPA submitted with the application provides policy direction to limit shadowing on Danforth Avenue based on the nature of shadowing outlined above.

SHADOW STUDY (MARCH 21)





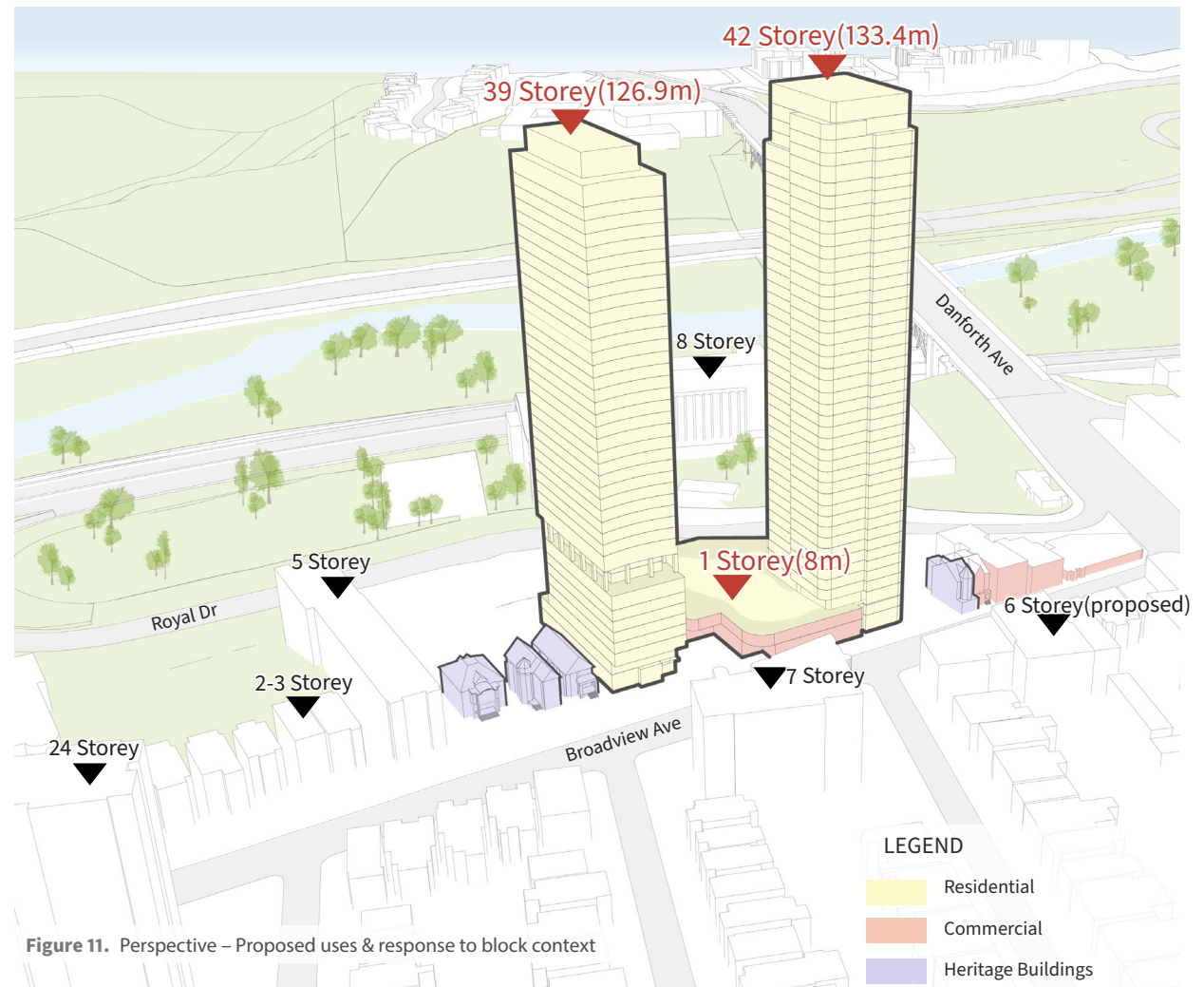
-  Existing Buildings
-  Recently Approved Development
-  Proposed Development
-  Parks
-  Natural Areas
-  Other Open Space Areas
-  Existing Shadow
-  Proposed Development Net New Shadow
-  As of Right Shadow



BLOCK CONTEXT

The September 2025 Proposal represents a modified development vision for the Site, as compared to the Original Proposal. In our opinion, the September 2025 Proposal continues to support the orderly and comprehensive development of the larger block context. This is achieved by accommodating adequate tower setbacks to recognize the development potential of adjacent lands that can be considered “soft sites”.

As previously outlined, the Applicant proposes to enter into an LDA to ensure that tower separation on the south side of Building A is borne by the properties at 682, 686 & 688 Broadview in the event that lands at 678 Broadview and further south are assembled for tall building development. Building B provides north tower setbacks ranging from 19.4 to 20.56 metres, which are appropriate reflecting the suitability of lands to the north for development.

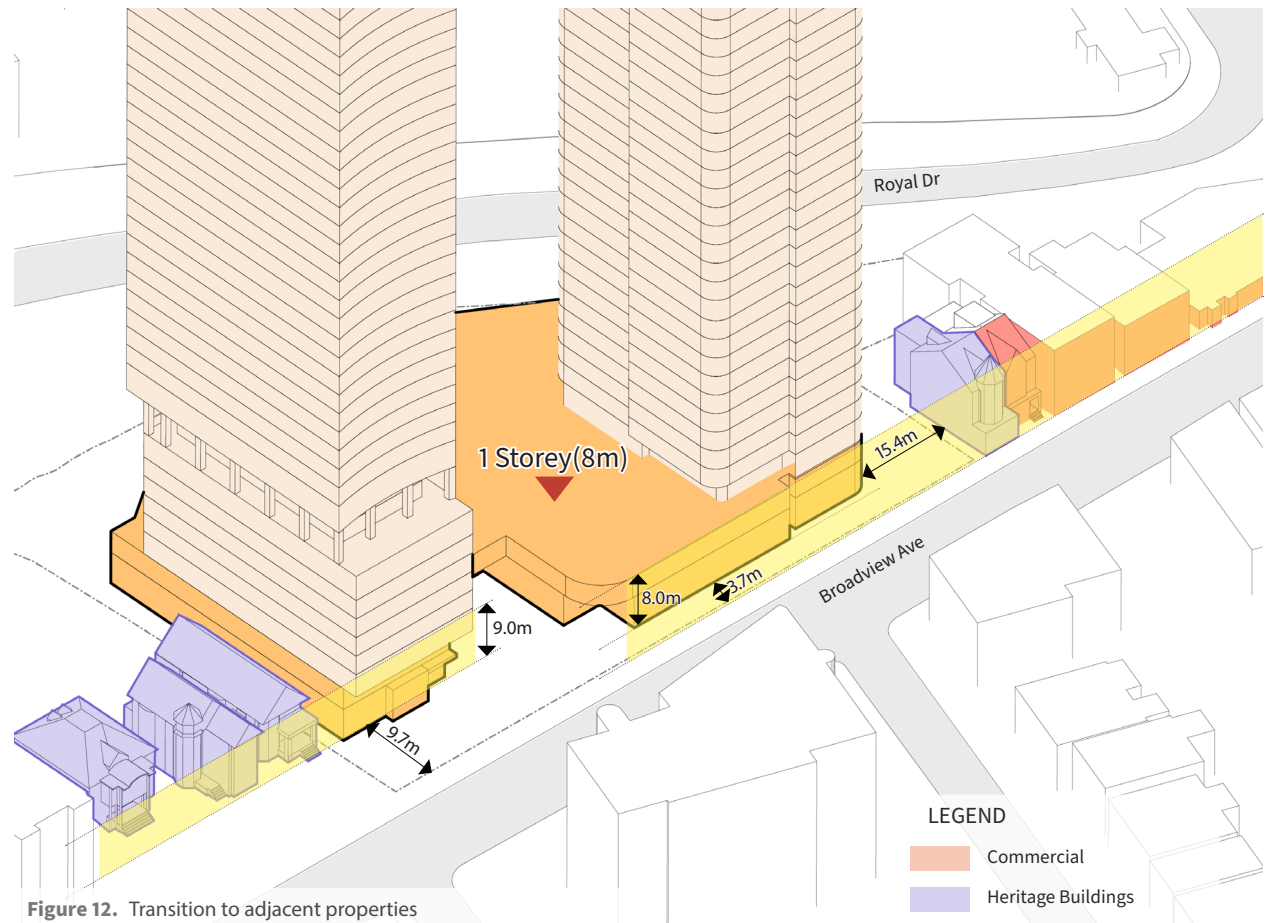


4.2. BUILDING MASSING

The September 2025 Proposal provides a responsive and contextually appropriate massing that contributes to built form diversity. Building A and Building B have been massed and architecturally treated to be cohesive, but not repetitive. Each tower has its own style of cladding, which adds visual interest and variety.

The proposal supports an active street edge condition along Broadview Avenue through the orientation of the grocery store and at-grade residential lobbies. These spaces facilitate overlook onto the public realm and contribute to a vibrant pedestrian environment. The treatment of the podium elements contributes to an appropriately scaled streetwall with a horizontal datum that generally aligns with the height and scale of neighbouring properties.

Massing is appropriately deployed across the Site through the use of appropriate lower- and upper-level setbacks and step-backs. As previously indicated, the proposal accommodates appropriate transition to the adjacent uses and potential soft sites, with regard for the planned context of the area. The built form is responsive to the nearby Neighbourhoods designated area while reflecting the prominent location of the Site within the Broadview Station PMTSA. The building placement enables adequate at-grade porosity, circulation, and public realm space.



WIND IMPACTS

The Site's exposure to prevailing winds from the west presents challenges with respect to wind impacts from tall building construction. The design team carefully considered the influence that the September 2025 Proposal will have on pedestrian wind comfort. Numerous features have been incorporated into the architectural design to mitigate strong wind flows within the public realm as well as within the Site. These mitigation features include the podiums, canopies, trellises, rounded building corners, and the outdoor amenity space at level 8 on Building A.

With Building A in place as the first phase of development, the safety exceedances within the POPS and extending southeast of Building A are due to the tower intercepting the northwesterly and southeasterly winds and directing them downwards to grade, where the flows accelerate around the building corners. To mitigate these wind flows, the Applicant's wind engineer, SLR, recommends the inclusion of wind screens, canopies, and/or public art within the POPS.

The safety exceedances at the southwest corner of Building A are due to the northwesterly and southeasterly winds downwashing around the building and accelerating across the level 2 terrace and into the adjacent backyards. To mitigate these wind flows, SLR recommends the inclusion of a wind screen along the south edge of the terrace.

The safety exceedances on the level 8 terrace are also due to northwesterly and southeasterly winds being directed downwards by the building and then accelerating across the terrace. To improve wind conditions in the terrace, SLR recommends including a semi-porous wind screen around the perimeter of the terrace.

With the site fully constructed (Phase 2), the safety exceedances around the northeast corner of Building B are due to the downwashing of easterly winds off the tower and accelerating around the building corner. To mitigate these wind flows, SLR recommends incorporating a wrap-around canopy, potentially with wind screens atop, around the northeast corner of the north tower.

SLR will continue to collaborate with the design team to achieve appropriate wind safety and comfort conditions as the design progresses.

4.3. RAVINE STRATEGY

The September 2025 Proposal includes the retention of the existing retaining wall, which itself encroaches into the LTSTOS associated with the adjacent ravine.

The design of Buildings A and B has sought to maximize the offset to the LTSTOS to the extent feasible while providing for a viable development. Building A is offset by 10 metres from the LTSTOS for its entire building footprint. Building B is offset 6 metres from the LTSTOS at the western edge of the grocery store footprint. The majority of the Building B footprint, including the tower element, is offset from the LTSTOS by a distance exceeding 10 metres.

Policy 3.4.8 of the Official Plan states that development will be set back at least 10 metres from the top-of-bank of valleys and ravines. The September 2025 Proposal does not conform to this policy, therefore the proposed OPA outlines an alternative site-specific approach to setbacks from the LTSTOS.

Balancing the constraints of the Site—including the presence of an existing retaining wall that encroaches into the LTSTOS—the approach reflected in the September 2025 Proposal to maintain the existing retaining wall while offsetting the new development from the LTSTOS by 6-to-10 metres fulfills the intent of Official Plan Policy

3.4.8 and balances ravine protection with transit-supportive intensification within a PMTSA. The site-specific approach to the natural heritage setback is appropriate given the unique circumstances of the Site, including the longstanding retaining wall, the Site's evaluated natural heritage features and the unique qualities of the ravine in this location where it transitions into tablelands against a highway on-ramp.

The highly urban context of the Site, with an existing concrete retaining wall that encroaches into the LTSTOS, supports an alternative site-specific ravine strategy. The retaining wall was assessed by a structural engineer who determined that it remains in good condition, and that its structural integrity will not be compromised by the proposed development approach. Given the engineering analysis undertaken, as well as the unique site-specific conditions, the proposed Site-specific ravine strategy and associated development setbacks are appropriate.

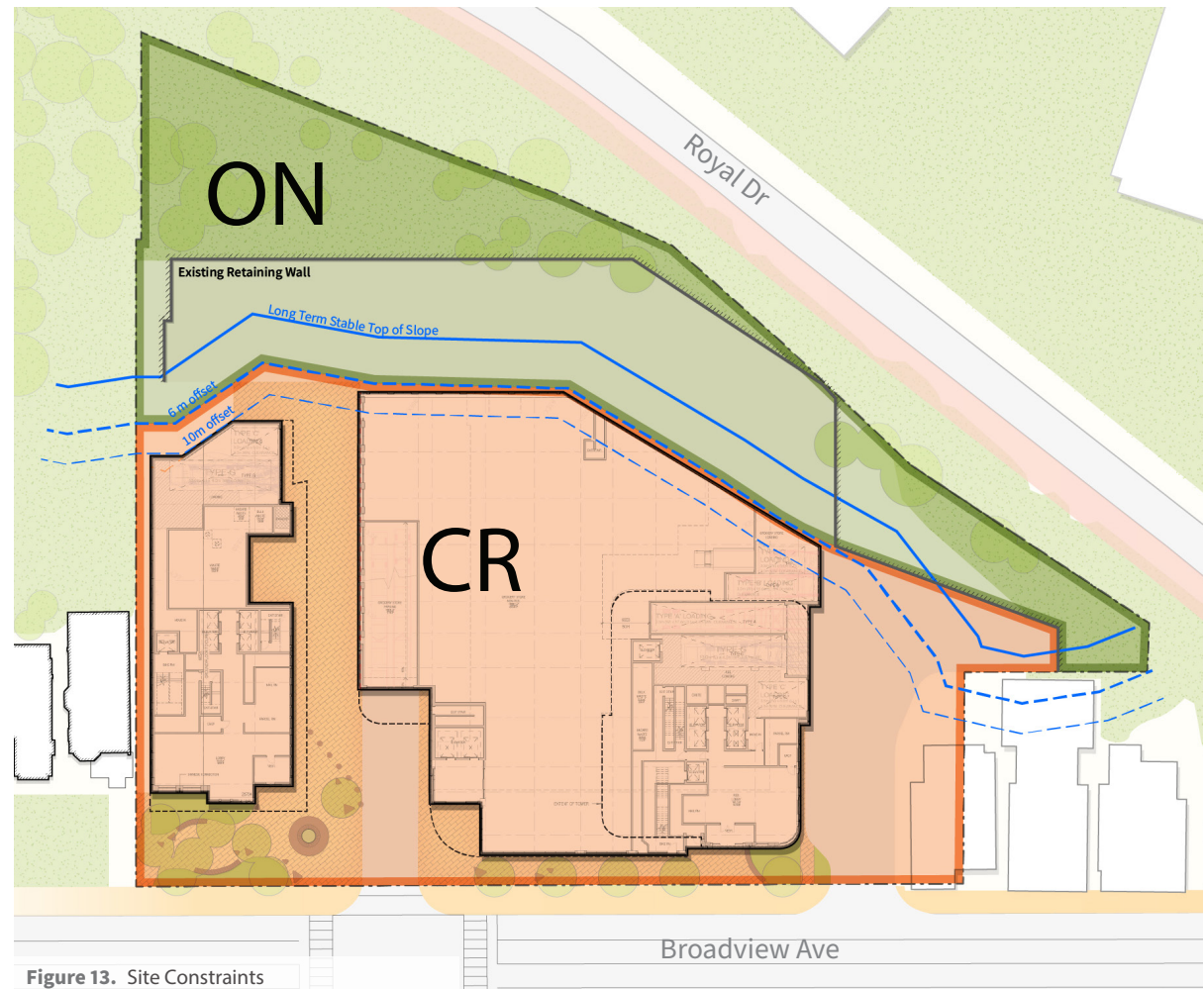
A TRCA Comment Response Memo was prepared and included as part of the OPA/ZBA resubmission. This Memo provides additional justification for the proposed ravine setback strategy with consideration for the Site's LTSTOS, natural heritage system, species at risk, and proposed edge management plan.

4.4. PROPOSED OPA/ZBA

The September 2025 Proposal continues to require an OPA and ZBA to establish the necessary land use permissions for the development to proceed.

The purpose of the OPA is to re-designate lands on the Site to Natural Areas and to Mixed Use Areas to reflect the current development approach; to permit an alternative ravine setback approach; to explicitly permit two towers of 39 and 42 storeys; and to require that development on the Site adequately limits net new shadow on sidewalks on the north side of Danforth Avenue and on nearby parks and open spaces.

The purpose of the ZBA is to amend the City-wide Zoning By-law 569-2013 to establish new Site-specific development criteria and performance standards to permit the Revised Proposal, including with zoning considerations around phasing and interim conditions.



5.0 CONCLUSION

The September 2025 Proposal continues to propose the intensification of the Site—reduced in area by exclusion of the three dwellings at 682, 686 and 688 Broadview—with a high-density mixed-use development that maintains an at-grade grocery store and adds 857 new residential units.

The built form strategy is responsive to the Site's central location within the Broadview Station PMTSA while incorporating measures such as setbacks and height transition to contribute to an appropriate transition to the nearby Neighbourhoods designated area. The proposed tower setbacks contribute to appropriate tower separation to potential future development on adjacent lands. The proposed south tower setback for Building A is appropriate given that the Applicant will execute an LDA to ensure that tower separation to the south is accommodated over the adjacent properties at 682-688 Broadview that are within the Applicant's ownership.

The Sun-Shadow Study undertaken by Urban Strategies demonstrates that the proposal will have adequately limited shadow impacts, including minimal impacts to parks and open space areas as well as the Danforth Avenue public realm where the City has undertaken to maximize sunlight access to maintain a vibrant pedestrian environment.

The development contributes to an appropriately-scaled streetwall and pedestrian realm along Broadview Avenue with active street-oriented uses and new landscaped open space. The existing retaining wall is proposed to be retained at the rear of the Site and it is the Applicant's intent for this area to be re-programmed for landscaped open space. The programming of this space will be determined in consultation with City Staff in the course of their review of this OPA/ZBA resubmission.

Overall, it is our opinion that the September 2025 Proposal continues to represent good planning, has appropriate regard for matters of Provincial interest set out under Section 2 of the Planning Act, maintains the overall intent of the Official Plan, and has regard for the applicable urban design guidelines.



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