



BOUSFIELDS INC.

Project No. 12169

November 5, 2012

Planning and Growth Management Committee
c/o Ms. Merle MacDonald
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, Ontario M5H 2N2

Dear Ms. MacDonald:

**Re: *Five-Year Official Plan Review / Municipal Comprehensive Review
Draft Policies and Designations for Employment
50 Wilson Heights Boulevard
Committee Item 2012.PG19.5***

We are planning consultants to Build Toronto with respect to its property located at the northwest corner of Wilson Avenue and Wilson Heights Boulevard, municipally known as 50 Wilson Heights Boulevard (the "subject site").

We have reviewed the staff recommendations and directions set out in the October 23, 2012 staff report, and we wish to provide the following comments on behalf of Build Toronto.

We are supportive of staff's determination that the subject site could be converted through redesignation to *Regeneration Areas*, in concert with a site and area specific policy. However, we are concerned regarding the potential requirement in the site and area specific policy for a minimum 50 percent employment use gross floor area on the subject site. We note that, for all other properties within the proposed *Regeneration Areas* designation/site and area specific policy, the requirement would be simply a net gain in employment gross floor area with redevelopment.

Existing Official Plan and Zoning

The subject site is currently identified as an *Avenue* on Map 2 (Urban Structure). The *Avenues* identification applies to both the north and south sides of Wilson Avenue. Although the northerly tip of the subject site may fall within the *Employment Districts* category on Map 2, it is noted that the *Avenues* identification does not have a fixed width and is intended to be conceptual in nature; it is commonly interpreted to apply to the properties fronting on the *Avenue* regardless of property depth. In that context, the entire site would be interpreted to fall within the *Avenue*.

The same pattern, with *Avenues* along the Wilson Avenue frontage and *Employment Districts* beyond, repeats on the south side of Wilson Avenue.

The Official Plan text indicates that *Avenues* are one of the four components of the urban structure that are primarily intended to accommodate growth. In particular, the Plan provides that the mixed use *Avenues* are to emphasize residential growth, while the *Employment Districts* are to focus on job intensification.

The Downsview Area Secondary Plan applies a minimum gross density requirement of 0.75 FSI to the subject site, with a maximum density permission of 1.0 FSI. Policy 2.2.1(g) applies to the Wilson Precinct, which includes the three existing TTC commuter parking lots, including the one on the subject site. The policy provides that “redevelopment of the commuter parking lots will result in an improved streetscape and improved pedestrian connections on Wilson Avenue”. Policy 3.1.4 provides that lands immediately adjacent to the Wilson subway station should be developed to “create highly accessible and visible pedestrian station entrances facing and with direct access from . . . Allen Road and Wilson Avenue.”

From a zoning perspective, the subject site is zoned entirely for residential purposes. The southerly 100 metres (approximately) is zoned RM4, while the northerly portion is zoned R4. The RM4 zoning permits a wide range of multiple family dwellings, including an apartment house dwelling and a nursing home, as well as various low-rise housing forms. The R4 zoning permits only one-family detached dwellings.

Analysis

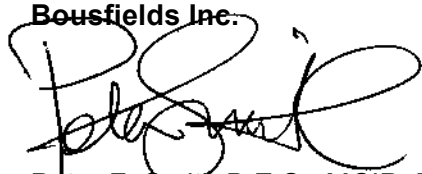
Based on our review of the existing Official Plan and zoning provisions, the subject site currently enjoys both residential zoning permissions and an urban structure direction that emphasizes residential growth. In our opinion, these existing provisions should be taken into account in proposing a new set of policies for the subject site.

In reviewing the staff report, it is not apparent how or if staff have taken these factors into consideration. In contrast to the approach taken with the subject site, the recommended site and area specific policy for south of Wilson Avenue simply provides for replacement of existing employment gross floor area. There is no planning rationale provided for the recommendation to treat the north and south sides of Wilson Avenue differently.

We recognize that the directions set out in the staff report are preliminary in nature, and we look forward to continuing to work with staff to fine-tune the site and area specific policy prior to a final report in Spring 2013.

We appreciate your consideration of the foregoing submission. Should you require any additional information, please do not hesitate to contact me or David Huynh of our office.

Yours very truly,

Bousfields Inc.


Peter F. Smith B.E.S., MCIP, RPP

PFS/kah:jobs

cc: *Prakash David/Carlo Bonanni, Build Toronto*
Kerri Voumvakis, City Planning