

November 6, 2012

[DEVELOPMENT AND PLANNING SERVICES]

BY EMAIL

City of Toronto
Planning and Growth Management Committee
ATTN: Merle MacDonald
Committee Administrator
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

To the Chair and Members of the Planning and Growth Management Committee:

**RE: Agenda Item PG19.5
Planning for a Strong and Diverse Economy: Official Plan/Municipal Comprehensive Reviews
Draft Policies and Designations for Employment
28 Bathurst Street**

We are writing on behalf of Build Toronto with respect to its property at 28 Bathurst Street, located at the northwest corner of Bathurst and Front Streets.

As planning consultants we have been working with our clients toward an appropriate redevelopment scheme for these lands, currently vacant and underutilized. The 0.97 hectare site is currently designated *Employment Areas* in the City's Official Plan and is zoned I1 D3 (Industrial District). It is also subject to Site and Area Specific Policy 2 of the Garrison Common North Secondary Plan (GCNSP Policy 2), which contemplates a mix of employment and residential uses subject to compatibility criteria. Surrounding uses include an 18-storey residential redevelopment recently approved to the east, the CN rail corridor to the south, an operational meat processing facility to the west and a stable low-rise neighbourhood to the north. This portion of the Bathurst Street corridor south of King Street West has seen considerable redevelopment activity in recent years.

Build Toronto has met with City Planning staff for a preconsultation meeting on the redevelopment potential for the site, based in large part on the pre-existing residential use permissions outlined in GCNSP Policy 2. Our clients also identified this site, among others, in correspondence with Policy staff for consideration in the context of the Municipal Comprehensive Review pertaining to Employment lands. We have reviewed Staff's report on this item and are encouraged that the City recognizes the opportunity to redesignate this site from *Employment Areas* to allow redevelopment to occur. However we remain concerned with the specific policy directions proposed in Attachment 5 of the report with respect to 28 Bathurst Street.

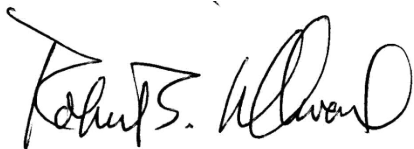
In particular, the planning rationale for removing the site from GCNSP Policy 2 is unclear and requires further discussion. In our view, the current policy appropriately acknowledges the transitional nature of this area to a mixed use neighbourhood and provides adequate tools for such redevelopment. Staff's preliminary assessment also proposes that the site be redesignated to *Regeneration Area* with the

creation of a new Site and Area Specific Policy in the Secondary Plan, which would only permit employment uses on the lands and consider residential uses along the Bathurst Street frontage provided the lands have been environmentally remediated to MOE requirements. While Build Toronto does not object to environmental remediation, the rationale for this specific approach to regulating the location of residential and non-residential land uses has not yet been provided.

We also wish to discuss with Staff in further detail the appropriateness of applying the *Regeneration Area* designation to these lands. In our view, the requirement to undergo a Secondary Planning exercise would be unduly onerous for a site of this relatively small size when the matters outlined in Section 4.7 of the Official Plan could be satisfactorily addressed through the rezoning process. Our opinion is that a *Mixed Use Area* designation over the entire site may be more appropriate, as it would align more closely with neighbouring designations while allowing greater flexibility to deal with the complex parameters of the property. Given the site's context with respect to prior industrial contamination, as well as the sensitivity of adjacent lands including low-rise residential, industrial, commercial and community uses, that flexibility will allow the most appropriate redevelopment of the entire property to take place.

We recognize that the report's specific recommendations are preliminary in nature and are subject to further consultation. We look forward to discussing an appropriate redevelopment scheme and land use designations with staff through a concurrent development review process. We intend to submit an application for these lands on behalf of Build Toronto in the near future.

Respectfully submitted,



Robert E. Millward
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