



February 24, 2014

VIA EMAIL wmacrae@toronto.ca

Mr. Willie Macrae, M.E.S, MCIP, RPP
Senior Planner, Community Planning
City of Toronto, Scarborough District
Scarborough Civic Centre
150 Borough Drive
Toronto, ON, M1P 4N7

Dear Mr. Macrae:

RE: 1355 Neilson Road – Zoning By-law Amendment & Site Plan Approval Applications

We are the land use planning consultants for Healthcare Properties Holdings Ltd. (“Healthcare”), owners of the property at 1333 Neilson Road which contains a medical office building. We are writing to comment on the zoning by-law amendment application filed for the adjacent property at 1355 Neilson Road which seeks to permit the establishment of a 96 unit residential townhouse development on the lands.

We have reviewed the planning justification report and the traffic impact studies submitted by the applicant, as well as the City’s planning staff report dated January 27, 2014. Our comments are set out below.

LAND USE COMPATABILITY

The proposed residential townhouse development poses concerns from a land use compatibility perspective with respect to the adjacent properties. Some of these concerns have been identified in the City’s planning staff report, however, they have not been adequately addressed.

Residential Infill and Built Form Concerns

A tower form of development for the proposed residential use would allow for a greater setback distance between the proposed new residences and the existing commercial developments on either side. Such tower design would be logical given that the proposal is a residential “infill” development between two commercial developments each with surface parking. Greater landscape buffers should be employed with a tower structure located closer to the Neilson Road street front that would separate further the residential units from the Healthcare parking area. Such design would be more consistent with the existing By-law permissions allowing for 8 storey buildings on the subject site and the height permissions applying to the adjacent properties to the north and south.



During the application review at the City, it appears from the staff report the applicant was encouraged to consider a tower form of structure as opposed to the townhouses currently proposed. However, the staff report indicates that the applicant did not want to build a residential tower as they "*indicated a preference for the current scenario as a result of factors such as: construction costs (i.e. wood frame vs. concrete), marketability and project timing.*" These reasons are not, in our opinion, valid land use justifications for determining the appropriate form of development for this type of infill situation.

The proposed development at 1355 Neilson Road is an infill residential development located between two existing medical office buildings. The proposed infill residential uses create the need to ensure that proper zoning performance standards are employed and detailed site planning and access design is undertaken to allow the proposed uses to integrate appropriately with the adjacent existing medical office uses. The residential built form must be properly designed and sited in order to reduce or eliminate land use conflicts. The present townhouse design does not achieve an acceptable level of land use compatibility with the adjacent uses.

Residential Living Environment and Site Design

As identified by staff on page 9, there is concern that some of the proposed residential units will only face onto the Healthcare parking area. While some redesign of the proposed development has occurred, 30 of the proposed units having views directly into the Healthcare parking lot area.

The number of units facing into the parking area is a cause for concern given the potential for future residents' complaints about the impact of Healthcare's existing operations (e.g. vehicle noise, vehicle exhaust, vehicle headlights, parking lot lighting) which will continue unchanged when the new residential use is introduced.

Again, the proposed townhouse built form does not afford the opportunity to address these impacts. Furthermore, Healthcare should not have to deal with complaints from the new residents when zoning standards and site design can be employed at this stage of development approval to create an appropriate residential living environment while allowing for normal commercial activities on adjacent lands to occur.

PARKING, LOADING AND VEHICULAR ACCESS

The applicant has submitted a Traffic Impact Study (TIS) report and a revised TIS report for the proposal. These reports, however, do not address key issues respecting parking and traffic circulation interaction between Healthcare's site and the applicant's site.

Parking Supply

The TIS addresses required parking supply for the proposal by identifying that there is a "*large pool*" of spaces available in the area to justify the proposed parking supply for the proposed development. However, it appears that the TIS is utilizing Healthcare's parking supply when such would not be available as it is dedicated for Healthcare's medical office tenants and patients. The proposed development must supply its own parking and not rely on spaces on the adjacent lands which have



been planned and reserved for the medical office tenants and patients. Project residents and visitors should not use Healthcare's parking area as overflow or convenience parking. It is not clear from the brief statement in the traffic reports how much demand for visitor parking the proposed townhouse development will generate. As such, the applicant should be required to provide a more detailed analysis of the anticipated demand for parking to ensure that sufficient parking is being provided on their own site.

Loading and Access

The proposed location of the access to the underground parking garage for the proposed residential use is of concern. The proposed location is immediately opposite the existing garbage and loading facility for Healthcare's building. As the access from Neilson Road is shared, this location could result in vehicular conflicts between traffic attempting to enter/exit the underground lot. Neither the original TIS report nor the revised TIS report addresses the shared access's function beyond its ability to meet the residential site's demands for access to and from Neilson Road. Furthermore, there is no analysis or discussion of the impacts of conflicting garbage and loading movements which may occur. Additional information is required to ensure that vehicular access to the proposed residential parking, vehicular access to the existing Healthcare parking, and both site's loading activities can coexist without conflict.

Underground Parking

Given the proposed infill residential development and the issues raised above, the draft by-law should require all parking be located underground. City staff expressed a number of concerns which resulted in modifications being made to the proposal to provide a pedestrian connection through the site by creating a mid-block linkage and increasing the landscaped open space as expressed on Page 10 of the staff report. Allowing surface parking for the townhouses is contrary to the need to create reasonable on-site landscape amenity space and to have a development which effectively links Neilson Road with the city park to the east. We agree with City staff that providing the pedestrian linkage and increased landscaping is important for the proposed residential development. A by-law requirement for underground parking would allow for greater landscaping and park linkages which in the context of this infill development is needed.



RECOMMENDATION

We would request that Community Council defer its decision on this matter to allow Healthcare and the applicant to meet and attempt to address the concerns identified. Healthcare is supportive of the site being developed, as it will remove a vacant and unmaintained site. However, it is paramount that the type of residential use proposed and the form of development proposed are compatible with existing adjacent commercial operations.

Should you have any questions, please feel free to call me at (416) 364-5926.

Sincerely,
THE LAKESHORE GROUP

Stephen Gardiner, MCIP, RPP
MANAGER

C.C.
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