

May 30, 2017

Nancy Martins  
Secretariat – City of Toronto Planning and Growth Management Committee  
10th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, Ontario  
M5H 2N2

Dear Ms. Martins:

**RE: PG21.6 DUFFERIN-WILSON REGENERATION AREA STUDY  
CITY INITIATED OFFICIAL PLAN AMENDMENT - FINAL REPORT  
OUR FILES 0650'J' AND 13206'A'**

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We are the planning consultants for the Grazia Maria Antinori and D. & L. Group Limited, the registered owner, and 725 Wilson Inc. ("725 Wilson"), the land lessee, of the lands known municipally as 725 Wilson Avenue. On behalf of our client, we have been directly involved throughout the Dufferin-Wilson Regeneration Area Study (the "DW Study") process, providing comment and suggestions to City staff through the study's progression.

As noted in the staff report, in March 2017, after numerous discussions with City staff, on behalf of 725 Wilson, we submitted a Site Plan Approval application for a mixed commercial development consisting of a one storey building (facing Dufferin Street) and a three storey building (facing Wilson Avenue). Attached is a coloured site plan and renderings of the main building along Wilson Avenue for your ease of reference.

725 Wilson's proposal incorporates a variety of retail, office, restaurant, personal service and commercial recreation uses into the two proposed buildings. Further, this proposal incorporates both north-south and east-west pedestrian connections through the site. It also protects for a future 23 metre north-south road along the eastern property line.

In our respectful submissions, we believe that the proposal implements the vision enunciated by City staff throughout the DW Study process.

However, having reviewed the Draft Official Plan Amendment No. 362, we have outlined our clients' comments and concerns. Please note, in many cases our clients' concerns may merely require clarification rather than revision to the draft policies.

## Comments

1. **Policy 2 b)(i)** prohibits “Major retail and/or service development with over 6,000 square metres or more of retail and/or service gross floor area.”

We had understood that the City’s intention is for the Regeneration Area to develop as a higher density, mixed use area and not be developed with one-storey commercial developments with associated parking fields as is common in typical power centres (including those in the general area). Put another way, we understand that large-scale uses are problematic, but the greater issue was the deployment of those uses and the built form of the structure in which those uses were located.

As written, the policy is not clear on this intent.

Throughout meetings for DW Study and on the 725 Wilson Inc.’s proposal, no specific concerns with the aggregate amount of gross floor area were raised by City staff within the urban, mixed-use non-residential development as currently proposed.

Unfortunately, the current wording of Policy 2 b)(i) is too broad and could be interpreted to capture all of the uses our client proposes (not just retail and service commercial uses) and thus inadvertently prohibit an appropriate designed mixed non-residential development as proposed by 725 Wilson. Greater clarity is therefore required to ensure that the policy does not prohibit multi-storey, multi-tenant developments which meet the intent of the DW Study. If the intent is indeed to prohibit not just large-scale typical power centre development but also multi-storey, multi-tenant developments over 6,000 sq m then our client takes issue the policy as it is unnecessarily restrictive based on the result of the DW Study.

2. **Policy 5a)** contemplates the City securing new streets “as required”. Further, **Policy 5c)(i)** contemplates the conveyance of public streets as part of the first phase of development.

With the exception of situations where a development involves a plan of subdivision, the policy is not clear as to the City’s legislative authority to require conveyance of *new* roads (rather than widenings) under the *Planning Act*.

3. Given the orientation of the building our client proposes to construct along Wilson Avenue, we do not believe that an additional set back along the future road allowance along the street line is required.

As such, we would respectfully request that **Policy 6d)** be softened such that building and site design flexibility can occur in specific circumstances as the language is too prescriptive, as the setback may not be necessary in the context of a particular development. We therefore request the policy to be revised (as underlined) to read:

“Buildings fronting onto other streets in the Dufferin-Wilson Area other than noted in 6c) may be required to be set back at-grade to provide at-grade amenity to support at-grade retail and restaurant uses, and appropriate screening to buffer residential uses at-grade, and will be guided by the street-cross sections in the Dufferin-Wilson Urban Design Guidelines to be prepared by the City and adopted by Council.”

4. **Policy 6f)** requires a minimum three storey height requirement for new buildings. There does not appear to be any rationale for this minimum height in the supporting materials. While we appreciated the intent to intensify this area with higher buildings, in some cases a height of three storeys is not feasible at this time. We would request that this soften to allow for flexibility in site and building design by replacing “will be a minimum” to “are strongly encouraged to be a minimum” of three storeys.
5. Given our client’s application is in process, we request that the Draft Official Plan Amendment be modified to include a clear and concise transition policy with respect to existing applications.

We would be pleased to have further discussions with City staff to discuss our client’s concerns and comments before Council adoption of the amendment.

Thank you.

Yours truly,

**MHBC**



David A. McKay, MSc, MCIP, RPP  
Vice President & Partner



Eldon C. Theodore, BES, MUDS, MCIP, RPP, LEED AP  
Partner

cc. *Clients*



**725 WILSON AVENUE | COLOURED LANDSCAPE PLAN**









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725 WILSON  
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