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Delivered by Email (phc@toronto.ca)

Toronto Planning & Housing Committee
10th Floor West Tower
Toronto City Hall
100 Queen St W
Toronto, ON M5H 2N2

Attention: Nancy Martins, Committee Administrator

Dear Madam Chair Ana Bailão and Members of the Planning and Housing Committee:

**Re: Geary Works Planning Study and City-Initiated Official Plan Amendment and Draft Zoning By-law Amendment
May 20, 2021, Planning and Housing Committee Meeting, Item #PH23.1
21/23 Primrose Avenue, 345 Geary Avenue, Toronto
Commenting Letter**

We represent John E. Goudey Manufacturing Ltd., the owner of 21/23 Primrose Avenue and 345 Geary Avenue ("Subject Property"), located east of Primrose Avenue and south of Brandon Avenue. The business has operated at this location since 1943. We understand that City-initiated draft Official Plan amendment (OPA) and draft Zoning By-law amendment (ZBA) relating to the Geary Works Planning Area will be presented to Planning and Housing Committee on May 20, 2021. As such, please accept this correspondence outlining our comments as our formal written submission for this matter.

The Geary Works Planning Area is bounded by the properties north and south of Geary Avenue between the east side of Primrose Avenue to the west side of Ossington Avenue. The Subject Property is located at the western edge of the study area along Primrose Avenue and partially south of Geary Avenue. See the attached Location Map identifying the property location. The Subject Property is currently designated Core Employment Areas in the Toronto Official Plan and zoned E2.0 (x312) in Zoning By-law 569-2013.

Chris Currie, property owner, has participated throughout the process including attending all the various public information/consultation meetings as well as having numerous discussions and email correspondence with City Planning staff and Nicholas Gallant, Senior Advisor, Community Planning & Policy for the Office of Deputy Mayor and Councillor Ana Bailão. We thank staff for their continued collaboration, cooperation and providing updates to the property owners to allow the owners to be aware of the process and make formal submissions.

We have had a chance to review the staff report dated, May 6, 2021, the associated draft OPA and ZBA documents and the Geary Works Area Profile and Community Visioning Report dated, November 2020. Our client is appreciative of all the efforts and vision presented by staff for the Geary Works Planning Area including an effort to create a framework for a pedestrian-focused public realm along Geary Avenue, encourage active, animated non-residential uses at the ground level and provide for intensification in this

area. We generally support Planning staff's vision but do have some comments as it relates to the Subject Property. As stated above, our client has participated throughout this process and have had many productive discussions with planning staff. A number of previous issues have already been resolved through collaboration and discussions with staff.

In light of this and upon review of the staff report and draft OPA and ZBA documents, there are a few points of clarification and comments our client would like to raise and submit for Planning and Housing Committee's consideration at this time.

Draft Official Plan Amendment

1. Public Realm (1. e. and 5): elimination of boulevard parking. *"New development and/or the City will plan to eliminate parking spaces within the boulevard of the Geary Avenue right-of-way and eliminate the associated curb-cuts in order to provide additional on-street parking and prioritize pedestrian use of the boulevard. New boulevard parking spaces will not be permitted."*

The policy should be clarified. In speaking with Thomas Rees, City Planner, on May 5, 2021, he has clarified that this policy refers to properties with private front yard parking and not street parking. He also indicated that this is a high-level policy and that City staff will work with individual owners on the elimination of the parking space and associated curb-cuts at the appropriate time when a new development application is brought forward.

The parking situation is currently challenging and as such, any removal of street parking would exacerbate this challenge for the tenants and visitors of this area. We want to emphasize that existing street parking should not be eliminated. We understand a Parking Management Plan for Geary Avenue will be conducted in consultation with businesses, nearby residents and other parking users, to address competing demands on limited space from employees, shipping, receiving, customers, visitors and local residents. As such, our client would be interested in participating in this process when the opportunity is available.

2. Public Realm (3): *"Privately owned, publicly-accessible spaces (POPS) will be encouraged as part of applications for new development along Geary Avenue, and in particular at the location generally identified on Map 2 at 259 Geary Avenue and adjacent to any future pedestrian/cycle connection across the CP rail corridor as referenced in Policy 7 below. New building adjacent to POP are encouraged to be set back from the POPS to allow for additional landscaping and enhance the quality of the POPS."* (underline added)

Aside from 259 Geary Avenue, we submit that without any specific development applications, it is difficult to determine the ideal location of the POPS. As such, it would be more appropriate to use the word, "considered" in place of "encouraged". With respect to the future pedestrian/cycle connection across the CP rail corridor please refer to the comments in item 3 below.

3. Public Realm (7) and Map 2: *“The City will seek to establish a pedestrian/cycle connection across the Canadian Pacific rail corridor at the location shown on Map 2 or otherwise accessible from the west end of Geary Avenue. A crossing at grade is preferred.”*

The proposed potential location of the pedestrian/cycle connection, identified on Map 2 is not ideal. We prefer the location to be eliminated until further study and consultation with the public takes places. Our client, as a property owner within the Planning area, request to participate in the consultation and planning process.

It is our client’s position that there may be other more ideal locations for such pedestrian crossings such as at the south end of Lightbourn Avenue. This location is situated closer to midblock of the western Geary Works Planning area and would therefore be more logical and can service a greater population. This location safely connects the centre of the community on the north side of Dupont with the centre of the new development on the south side of Dupont and there would be no need to cross the busy intersection of Dufferin and Dupont. Furthermore, this location would provide convenient pedestrian access to the middle of the platform of the possible future Go Train stop at the Brick which would bring residents and customers to the area.

Regarding the current proposed CPR crossing there are a number of busy loading docks at the proposed potential pedestrian/cycle crossing at the CPR tracks and Primrose Avenue. As such, this proposed location is not optimal. A walkway would be very dangerous due to the high volume of car and truck traffic pulling into and out of the loading docks. Furthermore, the intersection of Emerson Ave and Dupont Street provides a blind curve creating a dangerous crossing location for pedestrians and vehicles.

As such, it is prudent to conduct further studies before determining the ideal location of the CPR pedestrian cross. Again, our client request to participate in the planning process of this future pedestrian crossing.

4. Built Form (8): Provides development standards for new development within the lands outlined on Map 1. These development standards more or less match that of the draft Zoning By-law. However, the draft Zoning By-law recognizes 0m rear yard setback at 21-39 Primrose Avenue and buildings fronting onto Primrose Ave, only requiring a 3m front yard setback for any part of a building located above the third storey. This has not been reflected in the draft OPA and we respectfully, request that it be included for consistency and clarity. Furthermore, we request that our property at 345 Geary Avenue be included with the Primrose Avenue properties as it will likely be development together with 21/23 Primrose Avenue.
5. Built Form (14): *“The façade of new development will be designed with high-quality materials that complement the eclectic industrial character of existing buildings on Geary Avenue while contributing to street animation by providing:*
 - a. *fine-grained articulation;*
 - b. *exterior cladding that complement neighbouring and nearby buildings, such as brick or stone;*

- c. *a high level of transparency on the ground floor; and*
- d. *space for artistic expression.”*

These design elements are prescriptive and we suggest using language “where possible” as some of these design requirements may not be feasible as part of the development proposal and there may be other equivalent design options.

Draft Zoning Amendment

- 6. 10(A)(xiii) and (xiv). This relates to side yard setbacks. We ask that side yard setbacks be exempt for the 21/23 Primrose Avenue and can be reviewed at the time of a development application. Currently, the properties on the east side of Primrose Avenue, do not have any side yards. Any future redevelopment of this block will determine the appropriate building separation distances.
- 7. 10(A)(x) and (xii). *“Provide a minimum 3-metre front yard setback if the building is located on the south side of Geary Avenue;” and “provide a minimum 8-metre building front yard setback above the second storey if the building is located on the south side of Geary Avenue;”*

Again, we request that similar front yard setbacks for properties fronting onto Primrose Avenue apply to 345 Geary Avenue as this property will likely be developed together with 21/23 Primrose Avenue.

In addition, we appreciate Planning staff’s commentary and review of the Municipal Comprehensive Review of Employment Areas (MCR Review). We support Planning staff’s comments on considering the appropriateness of redesignating the current Core Employments Areas to General Employment Areas (including the Subject Property). To expand on this consideration, there has been many comments made by the local property owners wanting to see some form of live/work use. We believe that the live/work option will make the area more vibrant and complete community particularly with the beautification of this area.

The live/work use will continue to support the Employment nature of the area with the benefit of achieving a complete community with access to housing options for the envisioned art and cultural businesses/venues. This would be an integrated approach to infrastructure planning and investment optimization as part of the land use planning process and will support compact planning as directed in provincial policies.

We understand that there will be follow up meetings relating to the Mobility and Public Realm Strategy; Zoning and Licensing Review of certain uses and Parking Management Plan for Geary Avenue . Staff has also recommended Council direct the Chief Planner and Executive Director, City Planner, to retain a qualified consultant to conduct a scoped rail safety study for properties on the south side of Geary Avenue to determine the threshold in size or capacity for various low occupancy non-residential uses that would not require rail safety measures for protection for the adjacent rail corridor. Our client looks forward in continuing to engage in this process.



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Specifically, with respect to any future open houses, information/public/Committee/Council meetings relating to the subject study area bounded by the draft OPA and ZBA, my client would appreciate being notified in advance of such meetings. Our client continues to want to be engaged and participate in any future planning aspects of this area. Kindly, add our client to the mailing list, if it has not already been included.

Furthermore, we kindly request that we receive any decisions made on this matter from the Committee and/or City Council.

We acknowledge and thank staff for all their hard work in this planning study. We also thank you in advance for the opportunity to provide our comments and Committee's consideration. We will be in attendance on May 20th to answer any questions you may have.

Yours truly,

MATHANY & HIGGS LAW

M&H LLP

May Luong, MCIP, RPP

Cc: client

Thomas Rees

Location Map

