

Project No. 12174

November 7, 2012

Planning and Growth Management Committee  
c/o Ms. Merle MacDonald  
10<sup>th</sup> 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*  
*Committee Item 2012.PG19.5*  
*611-623 Keele Street***

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We are planning consultants to Yorkville Equities Corporation, the beneficial owners of the property located at the southeast corner of Keele Street and St. Clair Avenue West, municipally known as 611-623 Keele Street (the "subject property").

On behalf of our clients, we wish to provide the following comments as input into the Five-Year Official Plan Review/Municipal Comprehensive Review and, in particular, to respond to the recommendations included in the October 23, 2012 staff report. Specifically, we are requesting that the subject property be designated *Mixed Use Areas* rather than *Retail Employment Areas*, as shown on Map 33.

**Background**

The subject property is currently designated *Employment Areas*, however, neither the site itself nor the lands to the south are included within an *Employment District*. The lands at the northeast corner of Keele Street and St. Clair Avenue West, immediately opposite the property, are designated *Mixed Use Areas*. The property is located along an *Avenue* that extends along St. Clair Avenue West to the east and west of the property. The *Avenue* coincides with the 512 St. Clair streetcar route, which terminates at Gunn's Loop, just west of Keele Street; considerable public investment was made in upgrading the St. Clair route within a dedicated right-of-way (opened June 30, 2010). As a result, the property enjoys a high level of transit accessibility.

In the Final Report regarding the St. Clair Avenue Study (Bathurst Street to Keele Street), dated May 11, 2009, staff noted the following in respect of properties within the Caledonia Node, the Old Weston Road Node and the Keele Street Node:

*"As part of the study process, residents in the area indicated that a number of these properties contain traditional industrial uses that are no longer compatible with the area or contribute to creating a vibrant streetscape. The consultant's final report recommended that these areas be studied at a later date as they have additional planning considerations and complexities that could not be addressed through the Avenue Study process which deals primarily with urban design and built form issues.*

*"Given the analysis required by the policies of the Growth Plan and Provincial Policy Statement in relation to the study of Employment Areas, staff is recommending that these studies be undertaken as a separate process. Planning staff have commenced a study of the Caledonia Node and expect to report to June 9th, 2009 meeting of the Etobicoke York Community Council. The study of the remaining areas will be undertaken in the near future as either a Local Area Study or as part of the 5-year Official Plan Review."*

#### **Comments**

Despite the direction set out in the May 11, 2009 Final Report regarding the St. Clair Avenue Study, it does not appear that there has been a detailed examination of the appropriate land uses for the Keele Street Node undertaken as part of the October 23, 2012 report or any other report. Instead, the preliminary policy direction set out in the report would remove the *Avenues* identification from the St. Clair Avenue West frontage, which would diminish the potential of the property for transit-supportive mixed-use intensification. Furthermore, based on our review of the October 23, 2012 report, it does not appear that any detailed rationale has been provided in support for the proposed *Retail Employment Areas* designation for the subject property.

In contrast, it is noted that Attachment 6(c) includes a preliminary assessment for the "Caledonia-St. Clair" Site and Area Specific Policy (part of the Caledonia Node), which would permit residential uses in single use or mixed use buildings, subject to conditions, once the current concrete batching use ceases, and on pages 85-86 of Attachment 5, the preliminary assessment in respect of the property at 360-362 Old Weston Road (in the Old Weston Road Node) supports a redesignation to *Mixed Use Areas*.

In our opinion, the redesignation of the subject property to *Mixed Use Areas*, similar to the proposed redesignation of the property at 360-362 Old Weston Road, would be consistent with the approach outlined in the St. Clair Avenue Study and would be

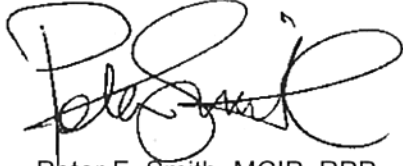
consistent with the existing *Avenues* identification along St. Clair Avenue West. The *Mixed Use Areas* designation would be compatible with the *Mixed Use Areas* designation at the northeast corner of Keele Street and St. Clair Avenue West and the existing and approved retail uses in the northwest and southwest quadrants of the intersection. It would allow for transit-supportive mixed-use intensification along St. Clair Avenue, which would support the investment that has been made in transit infrastructure to create dedicated streetcar lanes.

We recognize that the recommendation to Planning and Growth Management Committee is to endorse the preliminary assessments and draft policy directions as the basis for further consultation. In that context, we look forward to discussing this submission with staff prior to final recommendations coming forward to Planning and Growth Management Committee and Council in 2013.

Thank you for your consideration of the foregoing comments. 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, MCIP, RPP

cc: *Client*  
*Kerri Voumvakis – Toronto Planning*  
*Lou Moretto – Toronto Planning*