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April 8, 2013

Delivered by Email

Ms. Ulli S. Watkiss, City Clerk
City Clerk's Office
City of Toronto
Etobicoke Civic Centre
399 The West Mall
Toronto, ON M9C 2Y2

Attention: Ms. Rosemary MacKenzie, Administrator

Dear Ms. MacKenzie,

**Re: City Initiated Official Plan Amendment Application No. 07 103514 STE
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Etobicoke York Community Council – April 9, 2013 – 7 pm - Item EY23.6
Our Client: Shoreline Towers Inc.
2313 & 2323 Lake Shore Boulevard West, City of Toronto**

We have been retained by Shoreline Towers Inc., owners of the lands at 2313 and 2323 Lake Shore Boulevard West. PMG Planning Consultants have also been retained, and will make a deputation at tomorrow evening's public meeting. PMG have attended the public open houses hosted by City staff, and have provided staff with the attached comments. The Secondary Plan currently before Council does not address our client's concerns raised through the public consultation process, but instead raises additional issues. The following points reflect broad areas of concern. Should Community Council endorse the staff recommendations, we will submit a follow up letter to Council with a detailed list of concerns to ensure all items may be dealt with through any subsequent appeal.

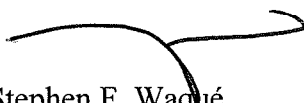
1. The Secondary Plan and Urban Design Guidelines propose to remove the potential for additional development on lands which currently have space for development without the need to remove existing rental housing, including our client's lands. These documents introduce a requirement for the dedication of a significant amount of private land for additional parkland along the waterfront, which is not justified through supporting studies. This is only 8 years after water lots were purchased and less than 1 year after lake fill was undertaken to create new parkland and the extension of the Martin Goodman Trail. A new waterfront public road, which is not needed to service development or address traffic issues, will require the dedication of even more private land. These dedications will make the remaining lands too small to develop, will remove parking required for the existing rental apartments, and will ensure that no development and no further improvements to the existing rental buildings (which may be deemed to be development), will occur.

2. Even though the introduction to the Secondary Plan recognizes that revitalization of the area can only be realized over time, the policies and guidelines (specifically related to Precinct Plans, Plans of Subdivisions, Holding Provisions, Site Plan Control and Section 37) require the full commitment of all land owners within a Precinct before anything can move forward. This is inherently difficult due to the unrelated land ownership pattern within a Precinct, owners who generally aren't developers, and the existing rental housing and lot configurations.
3. The policies and guidelines don't recognise the financial and physical burdens inherent with the replacement of existing rental housing units under the City's current policy framework. The proposed built form and policy framework doesn't even allow for the viable replacement of the parking required for the existing rental units.
4. The proposed height regime fails to recognise the heights of some existing buildings, and would make the existing buildings on our client's lands, legal-non conforming. Also, by concentrating taller buildings in a midblock band, mid-rise buildings along the water's edge, and shorter buildings along Lake Shore, the policies and guidelines are repeating the problematic massing pattern first planned for Humber Bay Shores and implemented on the lands south of Palace Pier.

In our respectful view, the Mimico 20/20 study and the resultant Secondary Plan and Urban Design Guidelines have strayed significantly from the original mandate to encourage the revitalization of the Mimico area through re-investment and development. Instead, we feel that these documents establish a series of roadblocks which, contrary to the original intention of the Study Process, will ensure that no redevelopment or revitalization will occur. As proposed, the Secondary Plan does not represent good planning. We therefore recommend that the staff report be received by Community Council, and that no further action be taken.

However, this study has shown that the City needs to address the broader issue of the stagnation of development and the deterioration of existing rental buildings, which are a direct result of the City's rental housing replacement policies. We would recommend a separate process of consultation with the development and rental property industries on a City-wide basis.

Yours very truly,



Stephen F. Waqué
SFW:cm
Enclosures

cc. Shoreline Towers Inc.
cc. Mr. Peter Swinton, PMG Planning Consultants

Peter Swinton

From: Peter Swinton [pswinton@pmgplanning.ca]
Sent: June-06-12 4:55 PM
To: 'Matthew Premru'
Cc: 'Bill Kiru'
Subject: Mimico 20/20 Workshop
 Matthew

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Thanks for including me in last night's workshop. As you were not at our specific table, I thought I'd send this e-mail to bring you up to speed on the issues we discussed which relate to 2313 & 2323 Lake Shore W:

1. Concerns were raised that the 5 to 9 storey slab building proposed by Urban Strategies to be located across the site would block views to the lake from the existing 10 storey rental buildings. A lower podium (3 – 4 storeys) and with a point tower in the middle would allow for these views to remain.
2. Point tower heights appear to be somewhat arbitrary, and should address site specific density needs, including the ability to recover costs to replace rental parking and housing (housing on other sites).
3. Locating the proposed public road entirely on private lands may make the development portion of the lands too small to be viable, or bring proposed buildings too close to the existing buildings to comply with City standards and good design. Policies should be flexible enough to allow the road to be located partially, or completely on the adjacent public lands. This need not displace park land as the shore edge is currently being modified, and could be further modified to ensure that the development site, the street, and the park all function properly.
4. It was noted that 2313, 2323 and the property immediately to the south create a break in the continuity of the Lake Shore Blvd main street built form when the properties to the north and south redevelop. Low-rise infill or a greening up solution could both be explored as a way of bridging this gap.
5. You should also be aware that I spoke with Tom Keefe after about our problems getting access to the construction drawings (specifically the grading plan) for the work being done by the TRCA along this portion of the waterfront. As previously discussed, this is critical information for both the Mimico 20/20 study and any development proposals that come forward to implement the results of the study. We acknowledge that there may be minor differences between the designed and final built condition, but the TRCA's continued refusal to provide this information, even conditionally, will either hold everything back, or deny proper consideration of the park design in the solutions being considered. I requested that, as staff have been unsuccessful in getting this information, the request should be made through political channels.

Could you please e-mail me a copy of the material presented, so that we can use it as a reference as we continue to evolve the plans for the site? We would also request that we be kept informed and are consulted as plans develop, polices are formulated, and reports are prepared. We will do the same.

Regards,

Peter Swinton, B.Arch, MCIP, RPP

pmg

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12/12/2012

Peter Swinton

From: Peter Swinton [pswinton@pmgplanning.ca]
Sent: November-21-12 3:26 PM
To: 'Matthew Premru'
Subject: RE: Mimico 20/20 - Open House materials online
Matthew

COPY

Please excuse this late response, but I just got back from holidays. I just wanted to send you a short e-mail so that you have a record of my feedback, which was given to you verbally at the open house. We do not believe that it is appropriate to remove development potential from the lands at 2313 & 2323 Lake Shore W by adding a Park strip and an additional road allowance. Also, as you were fully aware that we are preparing a development application for these lands, and the drawings presented at the June workshop showed the parking lot lands as a potential development site, we believe that it is completely inappropriate to bring this latest change to the public with absolutely no prior consultation with us.

We are available if you wish to speak with us prior to finalizing the consultants report, or preparing the staff report.

Regards,

Peter Swinton, B.Arch, MCIP, RPP

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From: Matthew Premru [mailto:mpremru@toronto.ca]
Sent: November-09-12 6:36 PM
To: Matthew Premru
Subject: Mimico 20/20 - Open House materials online

Hello again and thanks to everyone for attending last night's Open House at the Mimico Adult Centre. To assist with the feedback exercise and for those of you who missed the event, the Open House information panels have now been posted under the What's New section of our webpage:

<http://www.toronto.ca/planning/mimico2020.htm>

Please remember to submit your feedback forms (also available for download) by no later than **Monday, November 19, 2012.**

In the meanwhile, please stay tuned for further consultant report postings and an announcement about our next community consultation event.

Best- Matthew

12/12/2012

Peter Swinton

From: Peter Swinton [pswinton@pmgplanning.ca]
Sent: December-21-12 1:12 PM
To: 'Matthew Premru'
Subject: RE: Dec 6th Open House - now online
Matthew

COPY

Sorry for the delay in our response.

As per my November 21st comments on the November 8, 2012 open house, we continue to believe that it is not appropriate to remove development potential from the lands at 2313 & 2323 Lake Shore W by adding a Parks/Open Space strip and additional road allowances to the private lands. We are also concerned with the proposed built form regime, obligations being imposed on existing rental housing, and requirements for units in new developments. We invite further discussion on these issues.

Hope you have a great holiday.

Regards,

Peter Swinton, B.Arch, MCIP, RPP

pmg

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From: Matthew Premru [mailto:mpremru@toronto.ca]
Sent: December-12-12 10:40 AM
To: Matthew Premru
Subject: Dec 6th Open House - now online

Hello, just a quick reminder that the display panels from the December 6th Emerging Secondary Plan Policy Open House are now available on our webpage:

<http://www.toronto.ca/planning/mimico2020.htm>

and also, please submit your feedback to us by **December 17, 2012**.

Thank you.