

March 5, 2013

Chair, Planning and Growth Management Committee
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Attn: Frances Pritchard

Dear Ms. Pritchard:

***Re: Draft New Toronto Zoning By-law
Symesbridge Inc., 150 Symes Road***

We are planning consultants to Symesbridge Inc. with respect to their property located at the southwest corner of Symes Road and Glen Scarlett Road, municipally known as 150 Symes Road (the “subject site”). The subject site is a vacant industrial site, formerly used as a City waste transfer station and is now proposed to be revitalized as a mixed commercial employment centre with a wide range of potential employment uses.

We are writing to provide comments on the Draft New Toronto Zoning By-law (New By-law) and to request clarification on permitted uses applicable to the subject site. Through our initial review of the New By-law, it appears that several uses that are currently permitted in the BE (York By-law 1-83) and I3 and I4 (Toronto By-law 438-86) zones, may no longer be permitted (the property is split zoned).

Site and Surroundings

The subject site is located at the southwest corner of Symes Road and Glen Scarlett Road. The subject site is 5.69 acres in size, with frontages of 250 metres on the northern boundary and 50 metres on the eastern boundary on Symes Road. The westerly portion of the subject site is vegetated where the grade drops toward the west.

The site is located at the edge of the employment area with residential neighbourhoods to the west, north and south. Immediately to the south is a vacant chemical plant and to the east and north are tannery, meat packing and automotive

uses. Park and open space land is located to the north adjacent to the low-rise residential neighbourhood.

In addition, further to the east is the recent mixed commercial development at 30 Weston Road including large-format retail and a limited amount of small scale retail uses complemented by a range of other non-residential space up to approximately 50,000 square metres. The location of the subject site and the nature of the surrounding uses make the lands key to appropriate transition in this diverse area.

The site is developed with two buildings which were used as a City waste transfer station and associated garage, including a 4,231 square metre historical building on the easterly portion of the site and the smaller 1,091 square metre former garage. The character and built form of the heritage building provide an opportunity for additional uses and make certain traditional employment uses (such as warehousing, manufacturing, meat-packing etc.) impractical and inappropriate.

The subject site is underutilized and presents an opportunity for a development that would make an attractive re-use of the former industrial heritage building for a wider range of non-residential uses such as a climbing gym or event space. In addition, the opportunity to utilize a large significant heritage building will facilitate the revitalization of a brownfield site in a manner which would be compatible with the surrounding area.

Official Plan

The growth management policies of the Official Plan direct growth to identified areas on Map 2 (Urban Structure), which include *Centres, Avenues, Employment Districts* and the *Downtown*, where transit services and other infrastructure are available. The subject site and surrounding area are not identified as being within an Employment District on Map 2.

The subject site and surrounding area are designated as *Employment Areas* on Map 17 (Land Use). The *Employment Areas* designation permits uses such as offices, manufacturing, warehousing, distribution, research and development facilities, media facilities, hotels, ancillary retail outlets, and restaurants and small scale stores and services that serve area businesses and workers (4.6.2).

As well, places of worship, recreation and entertainment facilities, business and trade schools and branches of community colleges or universities are permitted on major streets, while large scale, stand-alone retail stores and power centres are permitted

by rezoning on major streets that also form the boundary of the *Employment Areas* designation (4.6.2 and 4.6.3). In this case, both St. Clair Avenue West and Weston Road are designated as major streets and form the boundary of the *Employment Areas*. Symes Road is not identified as a major street.

Lands immediately east of the site are also designated *Employment Areas*, with lands to the south, west and north designated *Neighbourhoods* and *Parks and Open Space*.

Draft Policies of the Official Plan Review

The draft policies of the Toronto Official Plan Review propose to designate the subject site as Core Employment Areas, which would permit “offices, research and development facilities, manufacturing, warehousing, distribution of goods, utilities, post-secondary business and trade training facilities, arts training facilities and studios, media facilities, and vertical agriculture.”

Current Zoning

The subject site is split-zoned zoned BE (west portion) by By-law 1-83 (former City of York) and I3 (East Portion), including a permissive exception permitting I4 uses by By-law 438-86 (former City of Toronto). The BE zoning category permits a wide variety of manufacturing, warehousing and wholesaling uses, including medical laboratories, data processing, communications and graphic arts. As well, the BE zoning permits offices uses. The I3 zone also permits a wide range of manufacturing, warehousing and wholesaling uses, including a brewery and others. The I3 zone does not permit office uses, but does permit restaurants up to a maximum of 475 square metres of gross floor area. The I4 zone permits a range of heavier industrial uses such as animal by-product plants and chemical plants amongst others.

Proposed Zoning

The draft New Zoning By-law proposes to rezone the subject site to E. The proposed E zoning would permit a wide range of manufacturing and warehousing uses, offices, laboratories, financial institutions, performing arts studios, production studios, service shops, custom workshops and artist studios, among other uses. As well, the E zoning would permit recreation uses, eating establishments to a maximum of 10% of the building’s gross floor area to a maximum of 500 square metres, retail stores (to a maximum of 20% of the gross floor area of a permitted

manufacturing uses) and printing establishments and software development and processing (to a maximum of 5,000 square metres).

Requested Uses

It is unclear whether several uses that are currently permitted in the BE and I3 zones will continue to be permitted in the E zone. We request confirmation that the uses listed in the **Attachment A** will continue to be permitted in the E zone.

Secondly, it appears that certain uses which are currently permitted in either the BE or I3 zone will no longer be permitted. Amongst these are several uses such as commercial schools, clinics and animal hospitals which we believe would be compatible with the range of uses permitted in the E zone such as office uses, restaurants, and recreation uses (complete list in **Attachment B**). Specifically, the request for a commercial school appears consistent with the direction for the Core Employment designation that would permit “post-secondary business and trade training facilities and arts training facilities”. We also note that the zoning by-law team has found it appropriate not to permit the heavier industrial uses including tannery, slaughterhouse and chemical products factory uses which are currently permitted. Indeed it appears that such uses are now only proposed to be permitted on properties where they currently exist.

In addition, there are several uses permitted in the EO zone which we view as appropriate for the subject site, such as a place of assembly, art gallery etc. (see complete list in **Attachment C**). We request that a place of assembly use be considered as a permitted use on the subject site in order to provide for an opportunity to adaptively reuse the historical building as an event space, perhaps associated with a brewery or other permitted use. We believe that this land use would be compatible with and coexist well with the range of uses contemplated in the E zone.

Planning Rationale for the Proposed Mix of Uses

The site is located at the edge of the employment area adjacent to residential neighbourhoods to the west, north and south. The former waste transfer station building on the site has significant heritage value and we understand that the City will be seeking a heritage easement agreement in association with any future adaptive reuse of the building. In this respect, Symesbridge intends on conserving and re-using the building, and views the heritage attributes of the building as an opportunity to attract a broader range of non-residential uses. The unique heritage features as well as its built form features including high ceilings and column-free spans are

attractive to a range of non-residential uses. At the same time, in order to maintain these important features, the building would not lend itself to more traditional or heavier industrial uses.

In our opinion, the proposed use of the buildings on the subject site for a range of office, recreation, commercial school, clinic and other employment uses such as a place of assembly are appropriate and desirable. Additional flexibility in terms of permitted uses will allow for the City to take advantage of an opportunity to adaptively re-use a significant heritage structure on a key transition site which is located at the edge of an employment area adjacent to residential uses.

In addition, the proposed uses listed in Attachments A, B and C would be in-keeping with the direction of uses intended for the E zone, which permit offices, but removes the heavier industrial uses such as tanneries and meat-packers.

From a land use perspective, it is our opinion that the Official Plan and Zoning By-law should support and encourage a wide range of employment uses on the site in order to generate job opportunities and to continue to facilitate the re-use of the heritage building on the site. Such an approach would be consistent with the Provincial Policy Statement and would conform with the Growth Plan for the Greater Golden Horseshoe.

We appreciate your consideration of the foregoing submission.

Yours very truly,

Bousfields Inc.



Michael Bissett, MCIP, RPP

cc *Gregory Byrne, City Planning*
Tom Ehrlich, Symsbridge Inc
Joe D'Abramo, Zoning By-law & Environmental Planning

Attachment A –

Requested Uses that are currently permitted under the existing by-law for which permission under E Zone is to be Confirmed

- Clinic
- Day Nursery
- Storage Warehouse Class B
- Community Health Centre
- Union Hall
- Brew-on-premises establishment
- Caterer's Shop
- Showroom
- Tailoring Shop
- Designers Studio
- Industrial Computer Service
- Publisher
- Commercial Parking Lot
- Private Commercial Garage
- Private Garage
- Sales or Hire Garage
- Recycling Shop
- Industrial Catering Service
- Brewery
- Ceramics Factory
- Distillery
- Electronic Equipment Factory
- Garment Factory
- Plastics Products Factory
- Rubber Products Factory
- Animal Hospital
- Market Gardening

Attachment B

Requested Uses that are currently permitted under the existing by-law for which are no longer permitted in E Zone

- Commercial School
- Trade School
- Animal Hospital

Attachment C

Requested Uses from EO Zone that are not found in proposed E Zone

- Self-storage Warehouse
- Veterinary Hospital
- Art Gallery
- Community Centre
- Apparel and Textile Manufacturing
- Beverage Manufacturing
- Computer, Communications, Electronics, or Optical Media Manufacturing
- Furniture Manufacturing
- Medical Equipment and Supplies Manufacturing
- Education Use
- Outdoor Patio
- Personal Service Shop
- Place of Assembly