

May 10, 2013

Planning and Growth Management Committee
c/o Ms. Frances Pritchard
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, Ontario M5H 2N2

Dear Ms. Pritchard,

**Re: *Five-Year Official Plan Review / Municipal Comprehensive Review*
*4665 Steeles Avenue East***

We are planning consultants to Global Fortune Real Estate Development Corp. ("Global Fortune") with respect to the above-noted matter.

Notwithstanding the Preliminary Assessment of sites noted in Attachment 5 of the Staff Report (October 23, 2012) from the Chief Planner and Executive Director, City Planning and Committee's interim disposition of the matter at its November 8, 2012 meeting, our client hereby request the Chief Planner and Executive Director, City Planning, to conduct additional analysis of its property. The reason for our requests are set out below.

In summary, it is our opinion that the redesignation of the property at 4665 Steeles Avenue East to *Mixed Use Areas* would be appropriate and desirable, for the following reasons:

1. A *Mixed Use Areas* designation would be desirable given the proximity of the site to the Milliken GO Station and its location on Steeles Avenue at the edge of the Milliken Employment District. Mixed-use development would allow for residential and employment intensification that would provide ridership to promote the usage of the adjacent Stouffville GO Transit line. Recognizing that service on the Stouffville GO line is peak direction only (i.e. southbound to Union Station in the AM peak and northbound from Union Station in the PM peak), residential intensification is better suited to the nature of the existing transit service than employment (office) intensification, which would require service in the opposite direction.
2. Mixed-use development on the site would not displace existing industrial or office uses, nor would it result in land use compatibility issues with adjacent employment uses, which are predominantly retail in nature. The entire area bounded by Steeles Avenue, Kennedy Road, Passmore Avenue and Midland Avenue is subject to Site

and Area Specific Policies 104 and 133, which permit retail and service uses, including stand-alone retail stores and/or “power centres”, as well as business and trade schools, libraries, fraternal organizations, long term care facilities, recreational uses and places of worship. Virtually all of the properties nearby and adjacent to the subject site are developed or are proposed to be developed for retail uses, many of them previously developed by companies related to Global Fortune. Given that single-storey retail uses served by surface parking can be readily redeveloped in a more intensive form as part of mixed-use developments, there is no legitimate planning concern related to the loss of retail employment lands as a result of the requested redesignation to *Mixed Use Areas*.

3. As part of previous and current planning approvals for retail developments in the area, our client and its related companies have provided significant funding for the Redlea Avenue Extension from Steeles Avenue to Passmore Avenue, helping to bring to fruition a key element of the road network that has been planned for more than 20 years. However, approved and proposed mixed-use developments in the City of Markham are seeking to take advantage of this infrastructure investment, while the land use permissions in the City of Toronto have restricted mixed-use development in this vicinity, resulting in a significant inequity. In this regard, approved and proposed developments in Markham include a 7-storey, 123 unit mixed-use building under construction at 4600 Steeles Avenue East (Milliken Centre), a proposal for 4 seniors’ residences ranging from 6-24 storeys at 35, 67, 73 Old Kennedy Road and 4550 and 4576 Steeles Avenue East, and a proposal for two 20-storey towers comprised of a total of 475 hotel and condominium units at 4390 Steeles Avenue East (Remington Centre Phase 2).
4. The Global Fortune site is part of a “major transit station area” as defined by the Growth Plan for the Greater Golden Horseshoe. Policy 2.2.5(1) of the Growth Plan directs that “major transit station areas” are to be designated in official plans and planned to achieve “increased residential and employment densities that support and ensure the viability of existing and planned transit service levels” and “a mix of residential, office, institutional, and commercial development, wherever appropriate”. The redesignation of the subject site to *Mixed Use Areas* would conform with these Provincial policy directions.
5. The Official Plan Review background report “Sustainable Competitive Advantage and Prosperity – Planning for Employment Uses in the City of Toronto” provides strong support for mixed-use development on arterial road edges in employment areas, particularly in proximity to transit. The report states that the review of case studies found a growing body of experience suggesting:

- consensus that a mixed use model (residential, retail & service and office if not industrial) is “the only reasonable approach to intensification and more compact form, particularly in conjunction with transit”;
 - introduction of mixed use to employment areas is at the very least a potential answer to revitalizing employment areas that are in decline, or under-using their land base; and
 - creation of “more urban, more vibrant, mixed use environments can bring higher rents, returns to capital, and re-investment” (p. A2.4-1).
6. Based on the case studies, the Official Plan Review background report recommends consideration of the following directions for planning policy for employment uses:
- Permission for a broader range of uses, including residential, could assist in revitalizing the employment attractiveness of business parks with office densities. For them to merit consideration, there must be net gains to employment space of similar quality and an evident prospect of benefit to existing employment space in the area.
 - Such uses are best placed at arterial edges or key intersections with higher order transit service.
 - The influence of a mixed use project on an adjacent employment area is likely limited to a walking radius.
 - Grocery shopping as a component of a retail mix would add to the attractiveness of shopping opportunities in a mixed use setting (pp. A2.4-7-A2.4-8).

It is noted that the above observations and recommendations apply to employment areas generally and do not apply specifically to the four business parks in the Don Valley corridor.

7. The October 23, 2012 staff report (Planning for a Strong and Diverse Economy) recommended that certain *Employment Areas* on rapid transit be considered for intensification of both employment and residential uses. In this regard, City Planning Division and Economic Development, and Culture staff considered specific areas currently designated as *Employment Areas* that share several defining traits (including areas around the Wilson subway station and the Mimico GO station. The areas are:
- serviced by an existing subway or GO station and suitable for transit-based intensification
 - relatively small pockets of employment isolated from larger employment areas
 - areas with little employment
 - areas with vacant land parcels
 - areas with poor public realm condition
 - proximate to existing residential neighbourhoods with community facilities

- areas, with one exception, where residential development has already been constructed or approved and transition has already begun
- areas where the juxtaposition of residential and permissions for traditional industrial require a detailed blueprint for their future.

The subject site is located within an area that shares a number of these same traits (i.e. serviced by an existing GO station and suitable for transit-based intensification, including vacant land parcels and poor public realm conditions, and proximate to existing residential neighbourhoods with community facilities). While it is located within a larger employment area with significant existing employment, much of that employment is retail in nature.

8. The redesignation of the subject site to *Mixed Use Areas* would help to facilitate intensification in an area of the city (Scarborough, and north Scarborough in particular) that has seen comparatively little intensification over the past decade, despite the substantial intensification occurring elsewhere in the city. The lack of geographic dispersion of intensification creates significant social and economic challenges for those parts of the city that are being by-passed by reinvestment and redevelopment. In Scarborough, which has poorer subway accessibility than many other parts of the city, the areas around GO stations represent a significant opportunity for intensification from a strategic city-building perspective.

Thank you for your consideration of the foregoing comments. Should you require any additional information, please do not hesitate to contact me or Louis Tinker of our office.

Yours very truly,

Bousfields Inc.



Peter F. Smith, MCIP, RPP

cc: *Kerri Voumvakis – Director, Strategic Initiatives, Policy & Analysis*
Paul Bain – Project Manager, Official Plan Review
Raymond David – Director, Community Planning – Scarborough District
Bruce McMinn – Global Fortune