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BY EMAIL

City of Toronto, City Clerk's Office
Toronto City Hall
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Planning and Growth Management Committee

To the Chair and Committee Members:

**RE: Agenda Item PG24.5 – Official Plan/Municipal Comprehensive Reviews:
Preliminary Assessments of Additional Conversion Requests
28 Bathurst Street, Toronto
Application No. 12 297477 STE 19 OZ
Build Toronto**

We are writing on behalf of our client, Build Toronto, with respect to the property at 28 Bathurst Street.

Without consultation with Build Toronto, the Staff Report dated April 23, 2013 recommends that the planning of the potential redevelopment of both 2 Tecumseth and 28 Bathurst be considered together in a new Site and Area Specific Policy in the Garrison Common North Secondary Plan. **This assessment to treat the two sites in tandem is not appropriate for a number of reasons as set out below.**

1. **There has been a lack of consultation on the Preliminary Assessment and Draft Policy Directions for 28 Bathurst to date.**
2. **28 Bathurst Street is the subject of a complete and active development application.**
3. **The lands at 28 Bathurst and 2 Tecumseth Street are enshrined in two entirely different policy regimes.**

Background

1. Fundamental Lack of Consultation on Draft Policy Directions to Date

Over the past year Build Toronto has made at least 6 requests to meet with City Planning Staff in letters dated April 24, 2012, April 4, 2013 and verbally in February, March and May 2013. In addition, R.E. Millward & Associates submitted a letter to this Committee dated November 6, 2012, in which they expressed concern over the lack of explanation for policy staff's assessment and a desire to meet with Staff to discuss further. Policy Staff have not responded to these requests.

2. Active Application for 28 Bathurst Redevelopment

The 28 Bathurst site is the subject of an active Official Plan and Rezoning Application which proposes a mixed commercial and residential redevelopment, implementing the intent of the in force Official Plan policies.

The Ward Councillor has held a consultation meeting as recently as April 24, 2013, initiating a dialogue with the community regarding the appropriate redevelopment of the site for mixed commercial and residential uses.

3. Variation in Policy Regimes

The lands at 2 Tecumseth are an actively operating meat processing facility, with a totally different policy regime from that applying to 28 Bathurst Street. The abattoir is specifically recognized as Area 1 of the Secondary Plan, which policy states:

On the lands shown as 1 on Map 14-1 the abattoir, meat and meat by-product processing operations generally of the nature existing in the year 1994 is permitted and will be protected.

The majority of the 28 Bathurst lands, which is subject to the current development application form part of the Secondary Plan's Area 2, which policy states:

On the lands shown as 2 on Map-14-1 a mix of employment and residential uses is permitted provided that employment uses are restricted to those compatible with adjacent and neighbouring residential uses in terms of emissions, odour, noise and generation of traffic.

By expressly permitting residential and non-noxious employment uses, the Area 2 policies are intended to facilitate the transition of this district to a more stable mixed-use neighbourhood. Community Planning staff advised in preconsultation that the Secondary Plan policies would allow the uses as proposed. The need for an Official Plan amendment is in fact technical and not a conversion request.

The proposed direction to consider these two sites in tandem is therefore impractical and inappropriate from a policy perspective.

The basis of Staff's draft policy direction to apply a "holistic" approach to the redevelopment of this district focuses selectively on the two sites at 28 Bathurst and 2 Tecumseth. Yet there is no mention made of other redevelopment proposals in the area, most notably a closer proposal at 89-109 Niagara Street, known as the "Coffin Factory" Lofts (File No. 12 130868 STE 19 OZ), which is immediately adjacent to both sites.

We ask that Build Toronto be given the opportunity to meaningfully consult with Policy Staff on the proposed redesignation of 28 Bathurst Street, well in advance of its Final Report on the matter, and that the 28 Bathurst Street be considered separately from 2 Tecumseth Street, on its own merits.

We would be grateful for the Committee's and Staff's consideration of this matter.

Yours truly,



Cynthia A. MacDougall

- c. Paul Bain and Christian Giles, Strategic Initiatives, Policy & Analysis Section, City Planning
Lynda Macdonald and Graig Uens, Community Planning, Toronto and East York District
Build Toronto
Bob Millward, R.E. Millward & Associates