



November 14th, 2013

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

Dear Chair and Committee Members:

Re: *November 21 Special Public Meeting*
Five-Year Official Plan Review/Municipal Comprehensive Review
23 Park Lawn Road and 2150 Lake Shore Boulevard West

We are planning consultants to Mondelez Canada Inc., the owners of the above-noted property.

On behalf of our client, we previously submitted comments to the City as input into the Five-Year Official Plan Review/Municipal Comprehensive Review on May 6, 2013, in the form of a Planning Peer Review report dated May 2013. The report reviewed Mondelez' request for redesignation dated November 1, 2012, which requested a redesignation of the subject property from *Employment Areas* to *Regeneration Areas*, and concluded that the requested redesignation of the subject property to *Regeneration Areas* was appropriate and desirable, and would facilitate the redevelopment of the lands for a mix of uses that could reasonably be expected to generate considerably more employment than exists on the property today in a mixed-use setting, while also achieving Provincial and City objectives related to residential intensification, transit-supportive development and the reurbanization of important city streets (i.e. Lake Shore Boulevard and Park Lawn Road).

We have reviewed the City's draft Official Plan Amendment (OPA) 231 with respect to *Economic Health and Employment Land Policies and Employment Area Policies and Designations*, which was released on October 31st. We note that the draft Official Plan Amendment proposes a number of changes with respect to the subject property, as follows:

- removal of the *Avenues* identification on Map 2 along the Lake Shore Boulevard frontage of the property;
- redesignation of the property from *Employment Areas* to *Core Employment Areas*; and
- replacement of Site and Area Specific Policy 15 with new provisions that would require development proposals to be considered through a comprehensive plan responding to the *Employment Areas* policies of the Plan as well as additional site-specific policies.

For the reasons set out both in our May 2013 report and below, we wish to note our objection to the proposed changes as recommended by City staff in draft OPA 231:

1. Removal of the *Avenues* identification. In our opinion, the *Avenues* identification should be retained across the entire Lake Shore Boulevard frontage of the site. In this regard, it should be noted that City staff recommended the *Avenues* identification applying to the site and to the south side of Lake Shore Boulevard in its May 2002 draft of the current Official Plan, and in fact did not recommend that any portion of the site be shown as an *Employment District*.

The Official Plan states that the *Avenues* are important corridors along major streets where reurbanization is anticipated and encouraged to create new housing and job opportunities, and specifically provides that “the mixed use *Avenues* will emphasize residential growth”. In our opinion, Lake Shore Boulevard is appropriately identified as an *Avenue*, given the good transit access provided by the Lake Shore streetcar and the redevelopment potential of the lands on both sides of the street (i.e. vacant lands and parking lots on the subject site and former low-intensity motel uses on the south side of the street).

Restricting redevelopment of the site to employment uses would be contrary to the direction set out in Policy 2.2.5(1) of the Growth Plan, which requires “intensification corridors” to be 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”. In our opinion, reserving the property solely for employment uses is likely to result in an underutilization of the property over the long term.

2. Redesignation to *Core Employment Areas*. The proposed redesignation of the property to *Core Employment Areas* would remove existing land use permissions that currently apply to the property pursuant to Policy 4.6(2) and 4.6(3), given its location at the edge of the *Employment Area*, fronting onto two “major streets” (Lake

Shore Boulevard and Park Lawn Road). Policy 4.6(2) permits recreation and entertainment facilities, business and trade schools and branches of community colleges and universities, among other uses, while Policy 4.6(3) permits large scale, stand-alone retail stores and “power centres” through a rezoning application, subject to meeting the criteria set out in that section. As well, the proposed Official Plan Amendment would remove the general permission for restaurants and small-scale stores and services pursuant to Policy 4.6(1).

Recognizing that the Lakeshore Bakery is now closed and considering the large size of the property, it is our opinion that restricting the range of potential employment uses as proposed by staff is contrary to the objectives of efficiently using the subject property and maximizing its employment-generating potential.

In contrast, redesignation of the property to *Regeneration Areas* would allow for mixed-use intensification that can help achieve the planning objectives established in the Official Plan relating to both population and employment targets. In particular, the *Regeneration Areas* designation would allow for the retention of employment opportunities on the subject property while also allowing for intensification of the property through a range of uses, including residential.

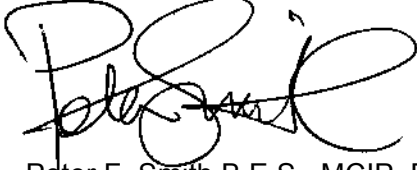
3. Replacement of Site and Area Specific Policy 15. While it is recognized that the existing Site and Area Specific Policy 15, which restricts permitted uses to “light industrial uses and offices ancillary to the Christie Brown, Kraft Canada Inc. and/or related businesses” needs to be updated in order to reflect the closure of the Lakeshore Bakery, it is our opinion that the proposed new policies do not go far enough in recognizing the potential for mixed-use employment and residential intensification. In some respects, the recommended provisions in Site and Area Specific Policy 15 appear to be in conflict with the recommended *Core Employment Areas* designation, for example, the directions to maximize “the site’s location, visibility, accessibility, and size to accommodate employment intensification” and to provide for “a broad range of employment uses”, including “possible educational and/or institutional uses through public-private partnerships”.

We understand that staff’s recommendations as set out in draft Official Plan Amendment 231 will be considered at the Special Public Meeting of Planning and Growth Management Committee on November 21, 2013. Please include this letter as our official objection on behalf of Mondelez Canada Inc. regarding staff’s recommendations for the subject property at 23 Park Lawn Road and 2150 Lake Shore Boulevard West.

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

Yours very truly,

Bousfields Inc.



Peter F. Smith B.E.S., MCIP, RPP

*cc: Kerri Voumvakis – Director, Strategic Initiatives, Policy & Analysis
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