



BOUSFIELDS INC.

Project No. 1315

November 18, 2013

Mayor and Members of Council
City of Toronto
c/o Planning and Growth Management Committee
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, Ontario M5H 2N2

Attention: Ms. Nancy Martins

Your Worship & Members of Council:

**Re: Staff Report dated November 5th, 2013 and
Draft Official Plan Amendment No. 231
Five-Year Official Plan Review/Municipal Comprehensive Review
75 Rexdale Boulevard, Etobicoke**

We are planning consultants to Concert Properties Ltd. with respect to its property located at 75 Rexdale Boulevard, south of Rexdale Boulevard and east of Kipling Avenue (the "subject site"). On its behalf, we have previously provided comments on the Five-Year Official Plan Review/Municipal Comprehensive Review by letter dated February 22, 2013.

We have reviewed draft Official Plan Amendment No. 231 and the November 5, 2013 staff report titled "Official Plan and Municipal Comprehensive Reviews: Amendments to the Official Plan for Economic Health and Employment Lands Policies and Designations and Recommendations on Conversion Requests". While our client is supportive of the proposed designation of the subject site as *General Employment Areas*, rather than *Core Employment Areas* as previously proposed, it has concerns regarding the wording of proposed Official Plan Amendment, specifically with respect to proposed Policy 4.6(5), which states that:

"Major retail developments with 6,000 square metres or more of retail gross floor area may be considered in General Employment Areas outside of the Downtown and Central Waterfront on lots that front onto and have access to major streets as shown on Map 3, through the enactment of a zoning by-law where the following matters are addressed to the City's satisfaction:

- a) *The transportation demands and impacts generated by the development, particularly upon nearby residential neighbourhoods and the Employment Area, are reviewed and necessary improvements and mitigation measures can be completed;*

- b) *It is demonstrated that the existing and planned function of the Employment Area and within any nearby Employment Area, including the movement of goods and employees, is not adversely affected;*
- c) *It is demonstrated that the economic health and planned function of nearby retail shopping districts are not adversely affected;*
- d) *New public streets and/or private driveways designed to City standards for new streets, as appropriate, are provided adding to the area street network and providing improved pedestrian access and amenity;*
- e) *Retail buildings are located with street frontage and direct entrances from sidewalks of the public streets or private driveways designed to City standards for new streets;*
- f) *Parking located between the retail uses and the public sidewalk is minimized, and parking is located at the flank or rear of the building;*
- g) *Buildings are a minimum of two storeys; and*
- h) *The majority of vehicle parking is located below grade and/or in a parking structure with limited visibility from the street.”*

Our client's concerns relate primarily to paragraphs (e) to (h) above. Due to the location and configuration of the subject site (as described below), it would not be possible for retail buildings to be located with street frontage and direct entrances from public sidewalks, nor would it be apparent where the flanks or rears of the buildings would be.

Following from the foregoing, while the requirements in paragraphs (g) and (h) for a minimum height of 2 storeys and for the majority of parking to be below grade or in a parking structure may be appropriate for smaller sites in more urban locations where the creation of an urban streetwall condition is important, it is our opinion that it would not be appropriate or reasonable to apply these two provisions to the subject site given its configuration and locational context.

In this regard, the subject site is located within the interior of a large city block bounded by Rexdale Boulevard, Islington Avenue, Kipling Avenue and Highway 401/409. The site has limited frontage on Rexdale Boulevard by way of a narrow strip of land extending along the east edge of the Hydro corridor, which provides vehicular access. As a result, similar to the existing Home Depot store to the immediate south, buildings on the subject property will have no direct street relationship to either Rexdale Boulevard or Kipling Avenue, will have limited visibility from the abutting streets and will have no direct impact on the pedestrian environment. In these circumstances, there is no apparent urban design rationale to require minimum building heights and structured parking on the subject site.

From a land use efficiency perspective, it should be noted that the current use of the subject property and adjacent properties to the north, south and east consist of single-storey buildings with surface parking. In this context, redevelopment of the site for single-storey retail buildings with surface parking is likely to result in similar or higher employment densities than what currently exists on the site and in the area. At a typical density of 0.25-0.3 FSI for single-storey retail buildings, redevelopment of the site for retail purposes would be expected to generate

approximately 700-950 jobs, while the existing distribution facility would generate only approximately 400 jobs if fully occupied.

Given the surrounding land use and built form context, redevelopment of the site for single-storey retail purposes will result in employment densities that are relatively high, and would maintain employment uses in this location, in keeping with the objectives of the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe and the City of Toronto Official Plan. As well, retail developments of this nature preserve the land base in large parcels and therefore maintain options for future intensification.

For the foregoing reasons, we are requesting that a Site and Area Specific Policy be applied to the subject site to exempt the site from proposed Policies 4.6(5)(e) to (h). In this regard, it is recognized that the November 5, 2013 staff report states that “this provision would, at minimum require developers of major retail complexes to satisfy Council that there was a good reason why it was not reasonable or practicable to build a multi-storey building or structured parking”.

Finally, our client has concerns regarding the redefinition of “major retail development” proposed in the November 5, 2013 staff report. While staff had formerly proposed that “major retail development” be defined as a retail development that includes at least one store with a retail gross floor area of 6,000 square metres or more (which was arguably a reasonable definition of a large-scale stand-alone retail store or “power centre”), staff are now proposing that a major retail development be defined as any development with a total retail gross floor area of 6,000 square metres, regardless of the size of the anchor store. In our opinion, this proposed revision will result in the policy applying to forms of retail development (and to retail components of mixed-use developments) that would not reasonably be considered “major” and which need not be subject to the same level of policy scrutiny and urban design controls.

We appreciate your consideration of the foregoing submission. Should you require any additional information, please do not hesitate to contact me.

Yours very truly,

Bousfields Inc.



Peter F. Smith, MCIP, RPP

cc: *Kerri Voumvakis – Director, Strategic Initiatives, Policy & Analysis*
Adrian Kozak, Concert Properties Ltd.