

LORNE ROSS PLANNING SERVICES INC.

36 Saratoga Drive, Scarborough, ON, M1P 4J1
Tel: 416-289-2789 e-mail lrps@sympatico.ca

November 19, 2013.

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

Attention: **Nancy Martins**,
Committee Secretary
Planning and Growth Management Committee

**RE: OBJECTION TO PROPOSED OFFICIAL PLAN AMENDMENT
PUBLIC MEETING NOVEMBER 21ST 2013
MUNICIPAL COMPREHENSIVE REVIEW
F. T. REISMAN ASSOCIATES LTD
3266-3270 MIDLAND AVENUE**

Dear Ms Martins:

Please consider this letter an objection on behalf of F. T. Reisman Associates Ltd to the proposed Official Plan designation of their property at 3266-3270 Midland Avenue. Having reviewed the final Staff recommendation report, particularly with regard to the Milliken District, the subject property should be designated as part of a Regeneration Area.

Map 7 of the proposed Official Plan amendment appears to designate the subject property for Core Employment. The owner objects to this proposed designation.

We have been given to believe throughout the MCR process that the land use designations available for consideration were initially Core, General and Retail Employment, later collapsed to two designations being Core and General Employment.

These have been the only land use designations appearing on various iterations of the Land Use Plans for Milliken throughout the MCR process.

Of the two land use designations put forward by Staff, and subject to my comments below regarding Regeneration Area designations, we had always indicated that the appropriate designation for the subject property is General Employment for the following reasons:

1. The site has direct driveway access to Midland Avenue;
2. The site has Midland Avenue addresses;
3. The property's frontage is on Midland Avenue;
4. The property has signage rights on Midland Avenue;

LORNE ROSS PLANNING SERVICES INC.

36 Saratoga Drive, Scarborough, ON, M1P 4J1
Tel: 416-289-2789 e-mail lrps@sympatico.ca

The city has been working for several years to complete construction of the missing sections of Silver Star Boulevard. When this work is complete, the subject site will be the only property having frontage, access, signage rights and address on Midland Avenue which would be designated Core Employment if the amendment before Committee is passed in its present form. Every other property with these characteristics will be designated General Employment.

In their August 20th 2013 report Planning Staff reported on several requests by landowners for a General Employment designation rather than a Core Employment designation, as follows:

“The key question was whether the site was appropriate for retail uses. Staff reviewed the designation of the properties considering criteria such as:

1. Whether the size, shape and access to the site lends itself to retail use;
2. Whether the site was on a major road with visibility and access for retail use;
3. The current use of the site and surrounding uses.”

The subject site is appropriate for retail uses and meets all of these criteria:

1. The site is flat, rectangular, with direct driveway access to Midland Avenue secured by easements through the adjacent Sky City commercial development;
2. The driveway system on the Sky City development is straight and broad and leads directly to the subject site;
3. Commercial development of the site would ‘terminate the view’ down this main driveway system for the combined developments, enhancing its ‘presence’ on Midland;
4. The Midland address and retention of signage rights in the Sky City pylon sign on Midland provide commercial development on the subject site exactly the same ‘visibility’ from the arterial road as Buildings B and E, the two westernmost buildings in the Sky City development;
5. Commercial development of the subject property is entirely compatible with existing land uses on adjacent and proximate properties.

Regeneration Area

The property owner at 4665 Steeles Avenue East requested a Mixed Use designation in 2012 as part of the MCR process. Staff in their October 2012 report did not support the introduction of residential uses in this District.

Staff have now reversed this position in their final report and recommend a Regeneration Area designation not only for 4665 Steeles but also for an additional 5 properties comprising +/- 10 hectares of land approximately as shown in blue in the air photo below:

LORNE ROSS PLANNING SERVICES INC.

36 Saratoga Drive, Scarborough, ON, M1P 4J1
Tel: 416-289-2789 e-mail lrps@sympatico.ca



A Regeneration Area designation provides for “...a broad mix of commercial, residential, light industrial, parks and open space, institutional, live/work and utility uses...”.

At page 36-37 of the Staff final report their reasons for recommending this Regeneration Area as given as follows:

“...staff concluded that many of the components were present that, in combination, made a *Regeneration Area* designation and a study to guide future development desirable, including:

1. Adjacency to the Milliken GO Train Station which is subject to a current environmental assessment to increase GO service to Stouffville.
2. Large areas occupied by surface parking lots and underutilized or vacant land awaiting access through the extension of Redlea Avenue
3. Limited employment.
4. Existing Official Plan permissions for institutional uses including seniors residential uses
5. Permissions for Mixed Use development in Markham north of Steeles Avenue, although approvals to date are only commercial.
6. Public realm conditions in need of improvement.

LORNE ROSS PLANNING SERVICES INC.

36 Saratoga Drive, Scarborough, ON, M1P 4J1
Tel: 416-289-2789 e-mail lrps@sympatico.ca

Staff rationale has only just been released. It is not at all clear on an initial review why the criteria cited by Staff do not also apply to a great many more parcels of land in this District including the Reisman property.

For instance:

There are many properties which will benefit from the completion of both Redlea and Silver Star as through roads, not simply the 5 proposed for Regeneration Area designation. The subject Reisman property has access rights to Silver Star and will thus benefit from Silver Star's ultimate connection as a through road to Steeles.

As noted in the Malone Givens Parson background report, the Milliken District has the third largest percentage of undeveloped land of all the City's Employment Districts. In my view this arises largely because of Plans and By-laws that restrict such lands to industrial uses, including the subject Reisman property.

Supporting existing and improved rapid transit with high density mixed use development including residential is a key planning consideration in Ontario. The location of the existing Milliken Station on the Stouffville GO line is therefore perhaps one of the most important considerations supporting the proposed Regeneration Area designation.

The area surrounding the GO station is not however the only location in this District with important transit service. The Stouffville GO line operates 6 trains southbound in the morning and 8 trains northbound in the afternoon-evening. Weekday capacity on the GO line, assuming 10 car trains is +/- 22,680 persons. There is no service on weekends

In comparison the existing TTC bus service provided on the arterial boundaries of the District and right through the middle of the District on McNicoll Avenue, has a capacity of 113,208 persons on weekdays. Service is provided 24 hours a day on Steeles and Finch, and +/- 20 hours a day on the Midland, Kennedy and McNicoll routes. On weekends, when the GO train service is shut, the TTC's bus service capacity provided to Milliken is 68,900.

Appended to this letter are two graphics representing the weekday and Saturday transit capacity available in the Milliken District provided by GO in green and by the TTC in red. The arrows are scaled to the transit capacity provided. In terms of service to Milliken it is clear that the TTC provides a far greater capacity serving the entire district over much longer periods of the day and week than does the GO station.

It is not clear why supporting existing-improved transit service with high density mixed use development is a criteria for a Regeneration Area surrounding the GO station, with a capacity for 22,680 travelers per day, does not equally apply to many other properties in this District for which the City through the TTC presently provides 500% more weekday capacity through 5 bus routes with longer hours of operation, including weekend service when none is available from the GO station.

LORNE ROSS PLANNING SERVICES INC.

36 Saratoga Drive, Scarborough, ON, M1P 4J1
Tel: 416-289-2789 e-mail lrps@sympatico.ca

The Reisman property is vacant, will benefit from improved accessibility through the extension of Silver Star as a through road to Steeles, has direct pedestrian access to the existing Midland and Finch bus services which combined have 2.5 times greater weekday passenger capacity than the Milliken GO station and which provide service over a far greater period of the day and week than the GO service, and has frontage, access, an address and signage rights on the arterial boundary. Given the criteria set out by Staff there are a great many other properties in the Milliken District, including the subject Reisman property, which warrant a Regeneration Area designation.

Given these observations and such additional matters as may arise from a more thorough review, please consider this letter an objection to the application of a Regeneration Area designation within the Milliken District as shown on Map 7 of the recommended Official Plan Amendment unless this same Regeneration Area designation is also applied to the subject Reisman property.

Yours truly,



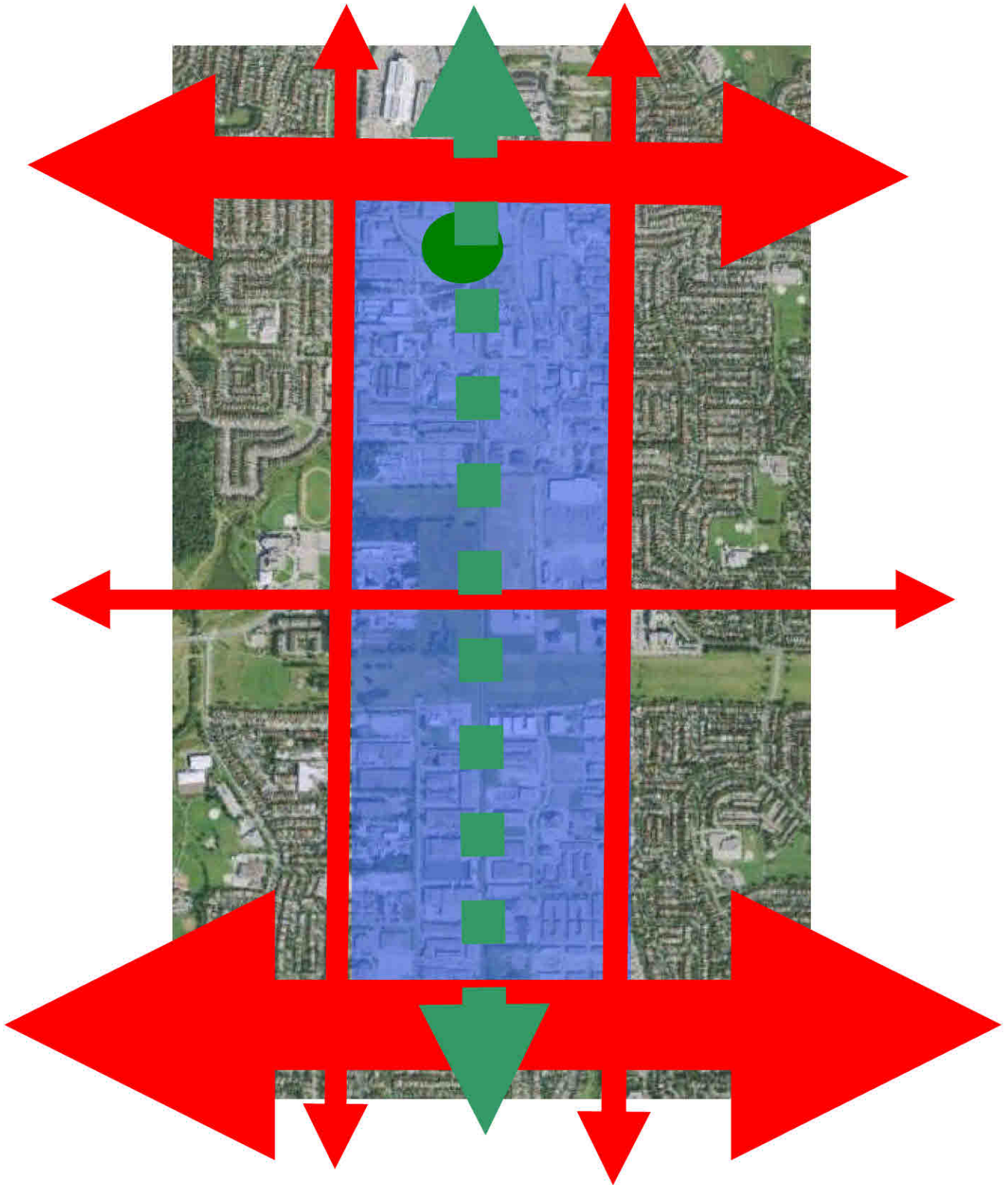
Lorne Ross Planning Services Inc.

CC: F. T. Reisman & Associates Limited
Mr. David Bronskill, Goodmans LLP.

LORNE ROSS PLANNING SERVICES INC.

36 Saratoga Drive, Scarborough, ON, M1P 4J1
Tel: 416-289-2789 e-mail ltps@sympatico.ca

Weekday Transit Capacity Provided to Milliken District



LORNE ROSS PLANNING SERVICES INC.

36 Saratoga Drive, Scarborough, ON, M1P 4J1
Tel: 416-289-2789 e-mail lrps@sympatico.ca

**Saturday Transit Capacity Provided to Milliken District
GO Train Service Closed**

