



IBI Group
308–30 Eglinton Avenue West
Mississauga ON L5R 3E7 Canada
tel 905 890 3550
fax 905 890 7081

November 20, 2013

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

Dear Chair Milczyn and Members of the Committee:

**CITY OF TORONTO DRAFT OFFICIAL PLAN AMENDMENT 231
PROPOSED EMPLOYMENT AREA POLICIES
CANADIAN TIRE REAL ESTATE LTD. COMMENTS**

IBI Group was retained by Canadian Tire Real Estate Limited (CTREL) to review their property assets in relation to the proposed Official Plan Amendment (OPA) 231. We have reviewed the latest Draft OPA, released in October 2013, on behalf of our client, and would like to offer the following comments in relation to the proposed Employment Area policies.

As you may be aware, CTREL owns a number of properties throughout the City of Toronto that offer a variety of services and stores to its customers. These include Canadian Tire retail stores (including garden centres and automotive repair centres), gas stations, Partsource, Mark's Work Warehouse, and Sport Chek. As the retail market continues to evolve, it is essential that Canadian Tire be able to adapt their stores and services in a manner that appropriately responds to the needs of their customers. In some cases, this involves making modifications to existing property assets, which may include building renovations, additions, site reconfigurations, signage modifications, and in some cases, the complete tear down/rebuild of existing sites.

We have reviewed the latest Draft OPA 231, dated October 2013, in relation to three properties designated within the City's proposed Employment Areas, including:

- 4630 & 4650 Sheppard Avenue East;
- 1901 Eglinton Avenue West; and
- 1608 & 1612 The Queensway.

These three properties all contain a Canadian Tire retail store, and are proposed to be designated within General Employment Areas.

We appreciate that policies have been included in the Draft OPA that permit major retail developments, subject to criteria. We also understand, through discussions with City staff, that existing retail uses are recognized on properties designated within Employment Areas, and that site and building modifications for *existing* retail uses would be exempt from the proposed OPA policies. It is our understanding, however, that in the case of a complete redevelopment of an existing retail use, such as a tear down/rebuild, conformance to the proposed policies would be required. Such policies are found in Section 3.4 of the Draft OPA, and pertain to matters relating

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to transportation demands and impacts, parking, vehicle and pedestrian movement, land use compatibility, economic health, urban design and site configuration.

Our client's concern lies in a circumstance whereby an existing retail store would undergo total redevelopment. In such an instance, even though the uses on the site as well as the owner would not change, the proposal would be subject to the proposed policies noted above. While we understand the intent of establishing policies that guide major retail developments within General Employment Areas, and that the intent is primarily focused on new retail developments, it is important to understand that in Canadian Tire's case, total redevelopment of a store would take advantage of existing site characteristics, such as existing servicing, transportation and access. The uses and overall function of the site would remain the same, however by virtue of the fact that the site is modernized through a tear down/rebuild as opposed to only a partial building demolition, CTREL would be required to demonstrate conformance with the proposed policies. As such, a potential redevelopment of an existing store may require an Official Plan Amendment, which can be a very costly and lengthy undertaking.

Based on the foregoing, we request that the Canadian Tire properties noted above be exempt from the proposed policies relating to major retail developments, found in Section 3.4 of Draft OPA 231. Alternatively, we recommend that a provision be added to the Draft OPA that acknowledges redevelopment of sites *for an existing retail use*, and exempts these existing uses from the proposed policies. Such a provision would provide clarity with respect to permissions for redevelopment, additions and site modifications for *existing retail uses*, and would further provide Canadian Tire with the assurance that their sites can continue to function and evolve without the need for an OPA, or a risk of store closure or site relocation.

We would like to thank you for your consideration of our request, and would be available to arrange a meeting, should you wish to discuss this further. If you have any questions regarding our comments, please do not hesitate to contact the undersigned.

Yours Truly,
IBI Group


Scott Arbuckle, MCIP, RPP
Associate


Michael Lipkus, MCIP, RPP

cc. Mr. Paul Bain, Project Manager, Official Plan Review
Ms. Emily Chan, Canadian Tire Real Estate Limited

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