



LAKESHORE GROUP

November 20, 2013

VIA EMAIL pgmc@toronto.ca

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

Dear Ms. Martins:

RE: Toronto Official Plan Amendment No. 231 – 1650 The Queensway

We are the planning consultants for Humberview Partners (“Humberview”), owners of the property at 1650 The Queensway (“the subject property”) in the former City of Etobicoke. We have previously submitted comments on the Toronto Official Plan Amendment/Municipal Comprehensive Review process on September 17, 2013. We have reviewed the most recent draft of Official Plan Amendment No. 231 and it appears that City Staff have not changed their recommendations with respect to the policies with which we had concern. We continue to maintain our position as set out in our September 17, 2013 letter which is attached for your convenience.

Please provide the undersigned with notice of any decision or any further consideration of this matter, including the passing of any Official Plan Amendment in this regard.

Should you have any questions, please feel free to call me at (416) 364-5926.

Sincerely,
THE LAKESHORE GROUP

Nima Kia
MANAGER

c.c
Official Plan Review Team - opreview@toronto.ca
Greg Campbell, Humberview Partners
Rick Pennycooke, The Lakeshore Group



LAKESHORE GROUP

September 17, 2013

VIA EMAIL pbain@toronto.ca

Mr. Paul Bain, Project Manager
Strategic Initiatives, Policy & Analysis
City Planning Division
City of Toronto
Metro Hall, 22nd floor
55 John Street
Toronto, ON M5V 3C6

Dear Mr. Bain:

RE: Official Plan/Municipal Comprehensive Review – 1650 The Queensway

We are the planning consultants for Humberview Partners (“Humberview”), owners of the property at 1650 The Queensway (“the subject property”) in the former City of Etobicoke. We have reviewed the draft Official Plan Amendment associated with the ongoing Official Plan/Municipal Comprehensive Review and wish to provide the following comments in advance of the September 19, 2013 Public Open House meeting to consider the same. The subject property is proposed to be included as an “*Employment Area*” in the Urban Structure Map and redesignated as: “*General Employment*” under the Land Use Plan.

Draft Policy Concerns

Section 2.2.4, policy 6 of the Official Plan is proposed to be amended to state that:

“Employment Areas in the vicinity of existing major transportation infrastructure such as highway interchanges, ports, rail yards and airports are designated to provide for, and are to be preserved for, employment uses that may rely upon the major transportation infrastructure for the movements of goods”.

The proposed policy would apply to the subject property as it is immediately adjacent to the Highway 427 interchange with The Queensway. However, the underlying *General Employment* land use designation proposed for the subject property would also apply which permits a variety of non-employment uses.

Restricting the use of the subject property to such Employment Uses associated with the movement of goods is not appropriate. The property already contains an automobile dealership use as well as office uses and is ideally suited to intensify with commercial and retail development. These uses are not typically associated with the movement of goods. In fact, this site and surrounding area of The Queensway, stretching east towards Kipling Avenue, has seen a number of recent development

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approvals which permit large-scale retail uses. Furthermore, the March 23, 2001 Staff Report prepared for the adjacent property at 1608 The Queensway states that:

"This portion of the Queensway is seen as a desirable area for big box retail as a result of its transportation access to major highways and availability of large serviced lots. Evidence of land use changes along The Queensway is reflected in recent approvals of Costco, Home Depot, Chapters and IKEA developments. The Queensway will continue to face additional pressure for similar types of retail development."

As such, Policy 6 as proposed should be amended to permit a broader range of uses including retail with respect to the subject lands so that it is consistent with the range of uses permitted in the proposed *General Employment* designation.

General Employment Designation – Parking Requirements

Section 4.6, Policy 5 (h) relates to major retail development exceeding 6,000 sq.m. of retail gross floor area in a *General Employment Area* that fronts onto and has access to a major street, outside of the *Downtown and Central Waterfront*. It is proposed to be amended as follows:

"The majority of vehicle parking is located below grade and/or in a parking structure with limited visibility from the street."

Although we understand the urban design intent of this policy, we believe that the minimum gross floor area threshold for this policy is too low to make development economically viable as underground parking structures and parking decks are very expensive to construct and maintain. This requirement is particularly problematic for Humberview's site at 1650 The Queensway which contains modern automobile dealerships. Should Humberview seek to expand their existing operations with a larger automobile dealership ranging from 6,000 – 9,300 sq.m. (65,000 sq.ft. – 100,000 sq.ft.) of total commercial GFA, this proposed policy would make it economically unviable to undertake such a development. Furthermore, such policy would not allow for the proper on site functioning of the dealership in terms of vehicle servicing and customer car delivery. As such, the minimum threshold for requiring the majority of vehicle parking spaces to be located below grade and/or in a parking structure should be greater than 9,300 sq.m. (100,000 sq.ft.) of commercial gross floor area.

We are available at any time to meet or to provide any additional information you may require regarding this submission. Kindly advise us in writing how you intend to address the issues raised herein and keep us informed of all future changes to the draft Official Plan Amendment. In addition, please notify us of all future public meetings and Council's decision regarding the adoption of the Official Plan Amendment.

Should you have any questions, please feel free to call me at (416) 364-5926.



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