

November 20, 2013

**SENT VIA EMAIL & EXPRESS MAIL**

City of Toronto  
City Hall – City Clerk  
100 Queen Street West, 10<sup>th</sup> Floor (West Tower)  
Toronto, Ontario  
M5H 2N2

Attn: Ms. Nancy Martins, Administrator, Planning & Growth Management Committee

**Re: Proposed OPA No. 231 - Economic Health Policies and the Policies, Designations and Mapping for Employment Areas – Official Plan Review  
Dundas – Carlaw Employment Area – Site and Area Specific Policy No. 247  
City of Toronto  
Your File No: PG13084  
Our file: 1742**

We are the planners of record for the 'Carlaw Industrial Centre', owners and operators of property comprised of 388 Carlaw Avenue & 10 Dickens Street; part of the Dundas-Carlaw Employment Area. Our client's landholdings collectively include about 2.0 ha. (4.9 acres) in total land area, per Aerial Image 1. This represents about 15 % of the Dundas-Carlaw Employment Area, which measures about 13.3 ha. (32.8 acres) in total land area.

We welcome this opportunity to provide further input on the City's Draft Official Plan Amendment No. 231 ('OPA No. 231') to the City's Official Plan, subsequent to our September 30, 2013 written submission. In addition, we also refer to Site and Area Specific Policy No. 247 (formerly No. 154), applying to the Dundas-Carlaw Employment Area; certain lands within the blocks bounded by *Queen Street East, Boston Avenue, Logan Street and the CN Railway Tracks*, wherein the 'Carlaw Industrial Centre' is located.

Having reviewed the City's draft OPA Nos. 231 and Site and Area Specific Policy No. 247, along with the supporting Planning Staff report dated November 5, 2013, we provide the following comments and recommendations for further consideration as part of the City's Official Plan Review process.

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POUND & STEWART ASSOCIATES LIMITED



### **Our Comments & Recommendations regarding proposed OPA No. 231**

The following refers to parts of Chapters 2, 3 and 4, as amended, per OPA No. 231 wherein we provide our recommended modifications as described below; more formally set out in our Table 1 attached.

- We support Planning Staff's recommendation to replace the '*Core Employment Areas*' land use designation for the Dundas-Carlaw Employment Area, with the '*General Employment Areas*' land use designation, as described on attached Figure 1 herein, being Map 45 of the draft OPA. This modification more aptly recognizes, in our opinion, the planning vision and supports future re-development opportunities in the Dundas Carlaw Employment Area; to be subject to proposed Site and Area Specific Policy No. 247 (formerly No. 154);
- In support of the City's effort to create cultural capital, growth of cultural industries will be encouraged given their potential for wealth and job creation where they are complementary and compatible to the character of the Dundas-Carlaw Employment Area. We support the '*General Employment Areas*' land use designation which will better support this planning objective as well;
- In our September 30, 2013 submission we also provided our Table 1, inclusive of our recommended modifications to OPA No. 231. Only those recommendations which have not been addressed by Planning Staff, at this time, remain shown in Table 1, attached. We continue to recommend our proposed modifications to the proposed OPA No. 231 to support better clarity and certainty in its implementation.

### **Our Comments & Recommendations regarding proposed Site and Area Specific Policy No. 247**

The following refers to part of Chapter 7, Site and Area Specific Policies ('SASP'), as amended, by adding No. 247 (formerly No. 154), wherein we provide our recommended modifications as described below; more formally set out in our Table 2 attached.

- City Staff have modified Map 45 of the 'SASP' No. 247 to the '*General Employment Areas*' land use designation. For greater clarity and certainty, we recommend 'SASP' No. 247 policies, a) and ii) require text modification to refer to '*General Employment Areas*', rather than the former '*Core Employment Areas*' land use designation;

- A new policy has been added to the initial 'SASP' No. 247 which reads as follows: *c) A neighbourhood improvement plan will set out a broader vision for neighbourhood amenities and public realm improvements.*" We support this policy as long as the *neighbourhood improvement plan*, (which is also referred to as a 'study' in the Nov. 5, 2013 Planning Staff report), its terms of reference, timing, level of public involvement and implementation program, does not become an impediment to the timing of achieving the planning vision and redevelopment opportunities in this area. Redevelopment and revitalization of this area should not be unduly restricted or potentially delayed while the *neighbourhood improvement plan* process is underway; as long as the proposed redevelopment can demonstrate that it is moving in the direction of the broader and/or site specific policy objectives of the City's Official Plan;
- The existing *Neighbourhood Improvement Plan* acknowledges that change and renewal are ongoing, and the most significant conclusion reached is the principle of maintaining the existing mixed use industrial and residential character, affordability, and improved stability, through the reuse of existing buildings, where possible, to preserve the heritage/historical structures. As a result, residential and live/work uses are permitted, when located within mixed use buildings located within this Employment Area. The continued success of this policy objective is maintained and enhanced by 'SASP' No. 247. This ensures that the Dundas-Carlaw Employment Area continues to evolve as intended, as a mixed use urbanizing Employment Area. The '*General Employment Areas*' land use designation and supporting policies are intended to broaden land use opportunities to achieve a more complete community. This further strengthens urban renewal, supports reduction in congestion by providing opportunities for people to live and work nearby. Cultural diversity is also enhanced given the demand that existing and new residents and workers may have, thereby supporting continued and desired urban renewal;
- The '*General Employment Areas*' designation permits '*major retail developments with 6,000 m<sup>2</sup> ( 64,586 sq. ft.) or more of retail gross floor area ...on lots fronting onto major streets...subject to the enactment of a zoning by-law*', subject to additional Employment Areas policies. Carlaw Avenue and Dundas Street are deemed major streets on Map 3 of the City's Official Plan, however 'SASP' No. 247 policy *b)* reads, "*Despite a) above, retail, service and restaurant uses to serve residents and/or businesses are permitted when they are small in scale and located on Carlaw Avenue and/or Dundas Street East.*" Based on the foregoing it would appear that these uses will be capped at under 6,000 m<sup>2</sup> (64,585 sq. ft.). It is not clear if this cap applies to the collective total area of the Dundas-Carlaw Employment Area or in effect to each individual land parcel that could potentially sustain such redevelopment;

- The Toronto Transit Commission and the City of Toronto are considering a Downtown Relief Line (DRL) East via King Street (St. Andrew to Pape Stations). Figure 2: Downtown Relief Line (Carlaw Avenue & Dundas Street East) clearly relays the relative proximity of the DRL to the Dundas-Carlaw Employment Area. This should be considered in the context of the location of the transit system and the proximity of planned stations relative to the area. We have in our prior submission referred to the possibility of an 'Avenues' Urban Structure designation for this small link between Queen Street and Gerrard Streets, along Carlaw Avenue which may better support the required transit demand. As the DRL project evolves, there ought to be consideration of future mechanisms to recognize redevelopment opportunities and density to sustain transit ridership objectives;
- There is also the reference to '*Entertainment and Recreation Uses*' being prohibited from Employment Areas. On this basis it appears that the new Crow's Theatre, which fronts onto Carlaw Avenue and Dundas Street East, would not be permitted. This undermines the cultural objectives associated with an '*Entertainment Uses*', which technically would not be permitted under the new proposed Employment Area policies. In addition, existing '*Recreation Uses*' are located within the 'Carlaw Industrial Centre' which also fronts onto Carlaw Avenue. 'SASP' No. 247 should be modified to recognize that '*Entertainment and Recreation Uses*' should also be permitted in this area where it strengthens urban renewal, supports reduction in congestion by providing opportunities for people to live and work nearby. Cultural diversity is also enhanced given the demand that existing and new residents and workers may have, thereby supporting continued and desired urban renewal.

#### **Request Opportunity to Meet with City Staff**

We would appreciate the opportunity to meet with City Staff to review our concerns in further detail and are hopeful that a reasonable resolution may be achieved regarding same.

#### **Request for Notice of Decision regarding proposed OPA No. 231 & 'SASP' No. 247**

Please provide us with notice of any new documents or decisions which arise from the ongoing review of Employment Area policies, and in particular that associated with the Dundas-Carlaw Employment Area. We understand that City Council is scheduled to approve OPA No. 231 and Site and Area Specific Policy No. 247 on December 16, 2013. We request your consideration of the foregoing and look forward to co-coordinating with the City in this regard.

Thank-you.

Yours truly,  
Pound & Stewart Associates Limited



Philip J. Stewart MCIP, RPP

/la

1742ltr.Nov.20.2013

Attachments:

**Image 1:** Community Context - Urban Structure

**Figure 1:** Dundas - Carlaw Employment Area - designated as "General Employment Areas"

**Table 1:** Comments & Recommendations on Proposed OPA No. 231

**Table 2:** Comments & Recommendations on Proposed 'SASP' No. 237

**Figure 2:** Downtown Relief Line (Carlaw Avenue & Dundas Street East)

cc. Ms. U. Watkiss, City Clerk, City of Toronto (via email and regular mail)

cc. Ms. J. Keesmaat, City of Toronto (via email and regular mail)

cc. Ms. K. Voumvakis, City of Toronto (via email and regular mail)

cc. Mr. P. Bain, City of Toronto (via email and regular mail)

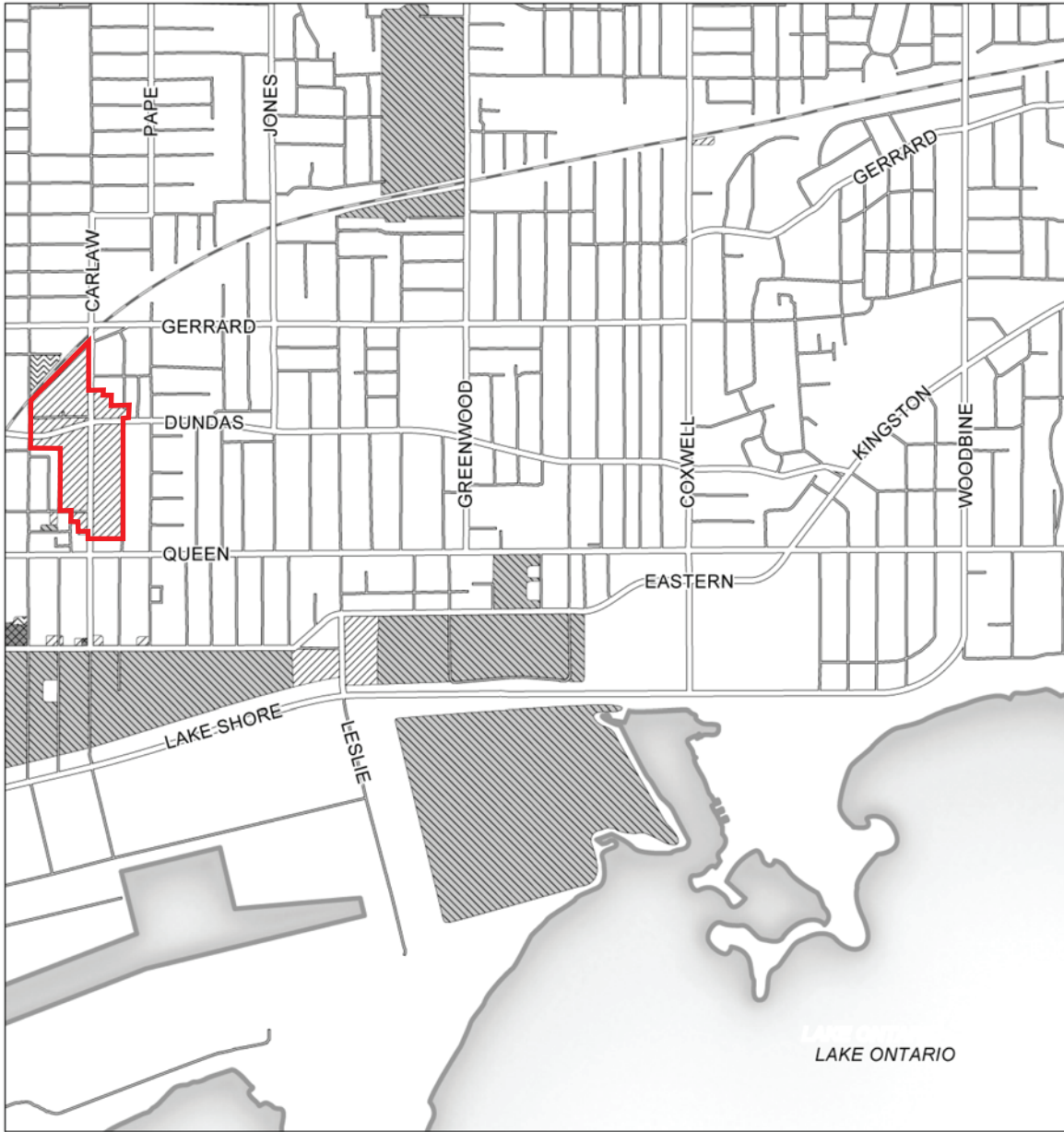
cc. client (via email and regular mail)

Image 1 - Community Context - Urban Structure



	<p>Dundas - Carlaw Employment Area designated "General Employment Area" (Site &amp; Area Specific Policy No. 247, per OPA No. 231)</p>		<p>Existing Avenues per City of Toronto Official Plan &amp; Official Plan Review 2013</p>		<p>Carlaw Industrial Centre (388 Carlaw Avenue &amp; 10 Dickens Street)</p>	<p><b>POUND &amp; STEWART</b> PLANNING CONSULTANTS • CITYPLAN.COM AERIAL PORTFOLIO SERVICES</p>
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Figure 1  
 Dundas - Carlaw Employment Area - Designated as "General Employment Areas"  
 Proposed Employment Land Designations Per OPA No. 231, November 5, 2013



Redesignate from 'Employment Areas' to Official Plan Designations Shown on Maps 1 to 48 inclusive

Map 45

- |                          |                          |                          |                   |
|--------------------------|--------------------------|--------------------------|-------------------|
| Neighbourhoods           | Parks & Open Space Areas | Employment Areas         | Utility Corridors |
| Apartment Neighbourhoods | Natural Areas            | Core Employment Areas    |                   |
| Mixed Use Areas          | Parks                    | General Employment Areas |                   |
| Regeneration Areas       |                          |                          |                   |



Not to Scale  
 10/30/2013

Dundas - Carlaw Employment Area designated as "General Employment Areas"

**TABLE 1**  
**COMMENTS & RECOMMENDATIONS ON CITY OF TORONTO OFFICIAL PLAN AMENDMENT (OPA) NO. 231**  
**PROPOSED ECONOMIC HEALTH POLICIES & PROPOSED POLICIES & DESIGNATIONS FOR EMPLOYMENT LANDS**

PROPOSED OPA NO. 231 POLICIES – NOVEMBER 5, 2013	COMMENTS & RECOMMENDATIONS
<b>A. CHAPTER 2 POLICIES</b>	
<p><u>2.2.4 Employment Areas: Supporting Business and Employment Growth</u></p> <p>Our <i>Employment Areas</i> are finite and geographically bounded. Given relative land values, residential lands are rarely converted to employment uses and there is little opportunity to create new employment lands. It is the City's goal to conserve our <i>Employment Areas</i>, now and in the longer term, to expand existing businesses and incubate and welcome new businesses that will employ future generations of Torontonians. Given the diminishing supply of vacant land <i>in Employment Areas</i>, new development in <i>Employment Areas</i> needs to take place in a more intensive physical form.</p>	<p>The following policy should be revised to read:</p> <p><i>“Given the diminishing supply of vacant land in Employment Areas, new development in Employment Areas needs to take place in a more intensive physical form, <b>while protecting the interests of existing businesses.</b>”</i></p>
<p>2. <i>Employment Areas</i> will be used exclusively for business and economic activities in order to:</p> <p>a) retain sufficient availability of lands, for both current and future needs, for industrial functions such as manufacturing and warehousing which are permitted only within <i>Employment Areas</i> and <i>Regeneration Areas</i>;</p>	<p>The timeline ‘current and future needs’ is good because it allows for a broad time range to support planning justification for a development or redevelopment project, and not just long term.</p> <p>The following policies should be revised to read:</p> <p>2. a) retain sufficient availability of lands, for both current and future needs, for industrial functions such as manufacturing, <del>and</del> <b>warehousing and distribution</b>, which are permitted only within <i>Employment Areas</i> and <i>Regeneration Areas</i>;</p> <p>2. m) should be added to read:</p> <p><i><b>“Ensure that the necessary infrastructure is provided to support current and future uses.”</b></i></p>
<p>3. A more intensive use of lands in <i>Employment Areas</i> for business and economic activities will be encouraged to make better use of a limited supply of lands available for these activities.</p>	<p>The following policy should be revised to read:</p> <p><i>“3. A more intensive use of lands in <i>Employment Areas</i> for business and economic activities will be encouraged to make better use of a limited supply of lands available for these activities, <b>where public services and infrastructure permit.</b>”</i></p>
<p>4. <i>Employment Areas</i> will be enhanced to ensure they are attractive and function well, through actions such as:</p> <p>b) investing in key infrastructure to support current and future needs, and facilitating investment through special tools, incentives including tax incentives, and other programs or partnerships, in order to:</p> <p>iv. Address the absence of key physical infrastructure and amenities for workers, poor environmental conditions or poor accessibility;</p>	<p>The following policy should be revised to read:</p> <p>4. b) iv. <del>Ensure</del> <b>Address the absence of key physical infrastructure is in place and/or allow the adaptive reuse of physical infrastructure to improve environmental conditions or achieve universal accessibility.</b></p>

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**TABLE 1**  
**COMMENTS & RECOMMENDATIONS ON CITY OF TORONTO OFFICIAL PLAN AMENDMENT (OPA) NO. 231**  
**PROPOSED ECONOMIC HEALTH POLICIES & PROPOSED POLICIES & DESIGNATIONS FOR EMPLOYMENT LANDS**

PROPOSED OPA NO. 231 POLICIES – NOVEMBER 5, 2013	COMMENTS & RECOMMENDATIONS
	<p><b>General Recommendation:</b>            Phasing is not referenced in any of the proposed Employment Areas policies to assist business investment timing. A policy should be introduced acknowledging that the urban form envisioned by the Plan will take time to realize and therefore development may be phased in a manner that ultimately contributes to the achievement of the City’s policies and economic sustainability. It would be necessary for a proponent to demonstrate the importance of phasing in supporting business operations and future development.</p>
<p>8. Transit service and use to and from <i>Employment Areas</i> will be enhanced by:            b) encouraging new employment development to take place in a form and density that supports transit and discourages large areas of surface parking;</p>	<p><u>The following policy should be revised to read:</u>            8. b) encouraging new employment development to take place in a form and density that supports transit and discourages large areas of surface parking, <b>where practicable.</b></p>
<p><u>Conversion and Removal Policies for <i>Employment Areas</i></u>            12. During a Municipal Comprehensive Review, the City will assess requests to convert lands within <i>Employment Areas</i>, both cumulatively and individually, by considering matters such as whether:            e) the conversion(s) will adversely affect the overall viability of the <i>Employment Area</i> and maintenance of a stable operating environment for business and economic activities with regard to the:            iv. implementation of the Ontario Ministry of the Environment D series guidelines for compatibility between industry and sensitive uses or any successor guidelines;</p>	<p><u>The following policy should be revised to read:</u>            12. e) iv. implementation of the Ontario Ministry of the Environment D series guidelines for compatibility between industry and sensitive <b>land uses / receptors</b> or any successor guidelines;</p>
<b>1. CHAPTER 3 POLICIES</b>	
<p>'3.5.1 CREATING A STRONG AND DIVERSE CIVIC ECONOMY            Toronto's <i>Employment Areas</i> have great potential for additional employment growth through the incubation of new business, the nurturing of small business to become large business, attracting new and expanding employment clusters, and intensifying the form of development in our employment lands. To grow investment employment and investment the Plan promotes, and the City currently provides, both tax incentives and priority processing for new and expanding office buildings and industries. These incentives augment the supports for economic growth in Toronto already provided by: a well-educated and skilled labour force, access to financial capital, a strong research and development sector, advanced communications networks, a dynamic business climate, and an enviable quality of life in safe, congenial and inclusive neighbourhoods.</p>	<p><u>The following policy should be revised to read:</u>            Toronto's <i>Employment Areas</i> have great potential for additional employment growth through the incubation of new business, the nurturing of <b>start-up businesses, and support for a full range of business scales and models, small business to become large business</b>, attracting new and expanding employment clusters, and intensifying the form <b>and function</b> of development in our employment lands. To grow investment employment and investment the Plan promotes, and the City currently provides, both tax incentives and priority processing for new and expanding office buildings and industries. These incentives augment the supports for economic growth in Toronto already provided by: a well-educated and skilled labour force, access to financial capital, a strong research and development sector, advanced communications</p>

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**TABLE 1**  
**COMMENTS & RECOMMENDATIONS ON CITY OF TORONTO OFFICIAL PLAN AMENDMENT (OPA) NO. 231**  
**PROPOSED ECONOMIC HEALTH POLICIES & PROPOSED POLICIES & DESIGNATIONS FOR EMPLOYMENT LANDS**

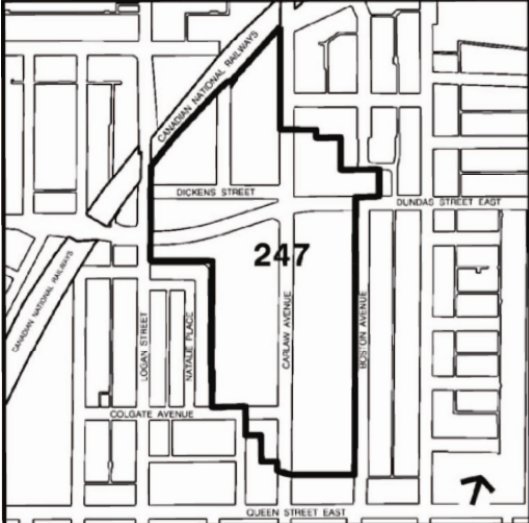
PROPOSED OPA NO. 231 POLICIES – NOVEMBER 5, 2013	COMMENTS & RECOMMENDATIONS
	networks, a dynamic business climate, and an enviable quality of life in safe, congenial and inclusive neighbourhoods.
3. A balanced growth of jobs and housing across the City will be pursued to: a) maintain a complete community; b) reduce the need for long distance commuting and lessen regional road congestion; and c) increase the proportion of travel by transit, walking and cycling.	<u>The following policy should be revised to read:</u> 3. b) reduce the need for <del>vehicular long distance</del> commuting and lessen regional road congestion; and
<b>2. CREATING A CULTURAL CAPITAL</b>	
'6. Cultural enterprises and employment are significantly clustered within <i>King Spadina Secondary Plan</i> area, <i>King Parliament Secondary Plan</i> area and the <i>Liberty Village Area of the Garrison Common North Secondary Plan</i> . The stock of non-residential floor space in these areas will be preserved and expanded to encourage the continued growth of cultural industries.'	Cultural Enterprises and Employment are also evident in the Dundas-Carlaw Employment Area and the potential opportunity for more exists.
<b>3. CHAPTER 4: EMPLOYMENT POLICIES</b>	
<u>Core Employment Areas</u> 1. <i>Core Employment Areas</i> are places for business and economic activities. Uses permitted in <i>Core Employment Areas</i> are manufacturing, warehousing, wholesaling, transportation facilities, offices, research and development facilities, utilities, post-secondary trade schools, media facilities, and vertical agriculture.	<u>The following policy should be revised to read:</u> 1. <i>Core Employment Areas</i> are places for business and economic activities. Uses permitted in <i>Core Employment Areas</i> are manufacturing, warehousing, wholesaling, <b>distribution of goods</b> , transportation facilities, offices, research and development facilities, utilities, post-secondary trade schools, media facilities, and vertical agriculture, <b>and their ancillary uses</b> .
<u>Policies for All Employment Areas</u> 6. Development will contribute to the creation of competitive, attractive, highly functional <i>Employment Areas</i> by: l) ensuring that where the zoning by-law(s) permit open storage and outdoor processing of goods and materials, the open storage and processing is: i. limited in extent;	<u>The following policy should be revised to read:</u> l) ensuring that where the zoning by-law(s) permit open storage and outdoor processing of goods and materials, the open storage and processing is: i. Limited in extent <b>to the needs of the business operation in keeping with planned function and the scale of the manufactured product;</b>
<b>'SENSITIVE LAND USES</b> For the purposes of this Plan the term 'Sensitive land uses' shall have the same meaning as in the Provincial Policy Statement. In the Provincial Policy Statement (2005) the term Sensitive land use means: buildings, amenity areas, or outdoor spaces where routine or normal activities occurring at reasonably expected times would experience one or more adverse effects, as defined in the Environmental Protection Act, from contaminant discharges generated by a nearby major facility. Sensitive land uses may be a part of the natural or built environment. Examples may include, but are not limited to: residences, day care centres, and educational and health facilities.'	As the PPS, 2005 is currently under review. This policy addition needs to be more flexible to account for possible changes as a result of the PPS review presently underway.

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**TABLE 2: COMMENTS & RECOMMENDATIONS ON PROPOSED CITY OF TORONTO OFFICIAL PLAN AMENDMENT NO. 231  
& SITE AND AREA SPECIFIC POLICY NO. 247 FOR THE DUNDAS-CARLAW EMPLOYMENT AREA**

PROPOSED SITE AND AREA SPECIFIC POLICY NO. 247	COMMENTS & RECOMMENDATIONS
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<b>Site and Area Specific Policy No. 247 which will replace No. 154.</b>	
<p>Chapter 7, Site and Area Specific Policies, is amended by adding Site and Area Specific Policy No. 247 for certain lands within the blocks bounded by Queen Street East, Boston Avenue, Logan Street and the CN Railway Tracks as follows:</p> <p><b>"247. Certain Lands Within the Blocks Bounded by Queen Street East, Boston Avenue, Logan Street and the CN Railway Tracks</b></p> 	<p><u>Comment 1:</u> As City Staff have modified Map 45 of the OPA No. 247 to the 'General Employment Areas' designation, and for greater clarity and certainty the following policies, a) and ii) of OPA No. 247, should also be amended to refer to 'General Employment Areas', instead of the former 'Core Employment Areas' designation.</p> <p><u>Recommendation 1:</u> Recommend revision of Policy 247 a) to read as follows: a) Residential and live/work uses are permitted when located within mixed use buildings that include <del>Core Employment Area</del> <b>General Employment Areas</b> uses provided that:</p> <p><u>Comment 2:</u> Residential and live/work uses are to locate a minimum of 30 metres from the nearest rail corridor and this affects redevelopment of the 'Carlaw Industrial Centre' property which abuts the CNR, located to the north-west.</p> <p><u>Recommendation 2:</u> Recommend revision of policy a) iv. of Policy 247 to read as follows: <b>'only the residential and/or live/work uses portion of a mixed use building</b> are located a minimum of 30 metres from the nearest rail corridor; and'</p> <p><u>Comment 3:</u> Retail, service and restaurant uses will be permitted to serve residents and/or businesses when they are small in scale and located on Carlaw Avenue and/or Dundas Street. It is not clear what constitutes small in scale, which requires clarification.</p> <p><u>Recommendation 3:</u> Clarification is required regarding b) of Policy 247 to what constitutes "small in scale." The 'General Employment Areas' designation permits 'major retail developments with 6,000 m2 ( 64,586 sq. ft.) or more of retail gross floor area ...on lots fronting onto major streets...subject to the enactment of a zoning by-law', subject to additional Employment Areas policies. Carlaw Avenue and Dundas Street are deemed major streets on Map 3 of the City's Official Plan, however policies read b) <i>Despite a) above, retail, service and restaurant uses to serve residents and/or businesses are permitted when they are small in scale and located on Carlaw Avenue and/or Dundas Street East.</i>" Based on the foregoing it would appear that these uses will be capped at under 6,000 m2 (64,585 sq. ft.)</p> <p><u>Comment 4:</u> <b>Dickens Street</b> is located in close proximity to Dundas Street and Carlaw Avenue and as such should not be excluded from policy b), so as to support a more complete land use and urban design opportunities for this area.</p> <p><u>Recommendation 4:</u> Also recommend revision of 247 b) as follows: "Despite a) above, retail, service and restaurant uses to serve residents and/or businesses are permitted when they are small in scale and located on Carlaw Avenue, <b>Dickens Street</b> and/or Dundas Street East."</p> <p><u>Comment 5:</u> There is also the general reference to <i>Entertainment and Recreation Uses</i> being prohibited from Employment Areas. On this basis it appears that the new Crow's Theatre, which fronts onto Carlaw Avenue and Dundas Street East, would not be permitted. This undermines the cultural</p>
<p>a) Residential and live/work uses are permitted when located within mixed use buildings that include <i>Core Employment Area</i> uses, provided that:</p> <ul style="list-style-type: none"> <li>i. any building containing residential and/or live/work units will provide for a satisfactory living environment compatible with any employment uses in the building and adjacent area;</li> <li>ii. new <i>Core Employment Area</i> uses are restricted to those compatible with residential uses in terms of</li> </ul>	

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Recommended Text to be added is **Bold**.

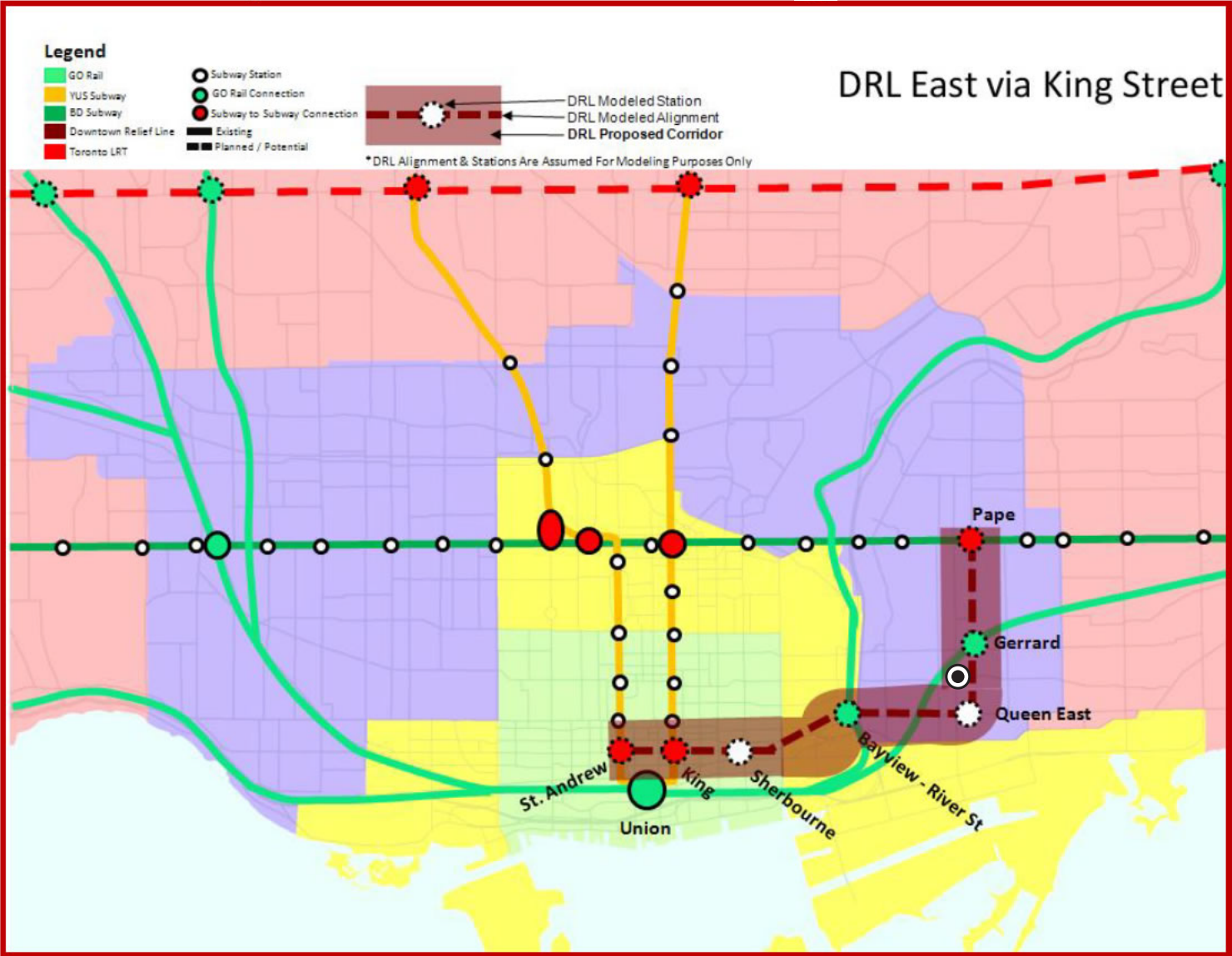
**TABLE 2: COMMENTS & RECOMMENDATIONS ON PROPOSED CITY OF TORONTO OFFICIAL PLAN AMENDMENT NO. 231  
&SITE AND AREA SPECIFIC POLICY NO. 247 FOR THE DUNDAS-CARLAW EMPLOYMENT AREA**

PROPOSED SITE AND AREA SPECIFIC POLICY NO. 247	COMMENTS & RECOMMENDATIONS
<p>emissions, odour, noise and generation of traffic;</p> <p>iii. the height, density and massing of new development respects and reinforces the existing and planned physical character of the adjacent area;</p> <p>iv. residential, live/work and place of worship uses are located a minimum of 30 metres from the nearest rail corridor; and</p> <p>v. non-residential gross floor area existing on December 16, 2013 or developed subsequently is replaced with any new development.</p> <p>b) Despite a) above, retail, service and restaurant uses to serve residents and/or businesses are permitted when they are small in scale and located on Carlaw Avenue and/or Dundas Street East.</p> <p>c) A neighbourhood improvement plan will set out a broader vision for neighbourhood amenities and public realm improvements."</p>	<p>objectives associated with an Entertainment use, which technically would not be permitted under the new proposed Employment Area policies. In addition, there are existing Recreation uses located within the 'Carlaw Industrial Centre' which also fronts onto Carlaw Avenue.</p> <p><u>Recommendation 5:</u> Also recommend adding a new policy d) to OPA No. 247 which reads as follows:  <b>d) In support of the City's effort to create cultural capital, cultural industries will be encouraged given their potential for wealth and job creation where they are complementary and compatible to the character of this area.</b></p> <p><u>Comment 6:</u> A new policy has been added to the original which reads as follows:  <i>c) A neighbourhood improvement plan will set out a broader vision for neighbourhood amenities and public realm improvements."</i></p> <p>We support the neighbourhood improvement plan, (which is also referred to as a 'study' in the Nov. 5, 2013 Planning Staff report), as long as its terms of reference, timing, level of public involvement and implementation program, does not become an impediment to the timing of valued planning and re-development in this area. Redevelopment and revitalization of this area should not be unduly restricted or potentially delayed while the <i>neighbourhood improvement plan</i> process is underway; as long as the proposed redevelopment can demonstrate that it is moving in the direction of the broader and/or site specific policy objectives of the City's Official Plan.</p> <p>The existing <i>Neighbourhood Improvement Plan</i> acknowledges that change and renewal are ongoing, and the most significant conclusion reached, is the principle of maintaining the existing mixed use industrial and residential character, affordability, and improved stability, through the reuse of existing buildings to preserve the heritage/historical structures. As a result, residential and live/work uses are permitted, when located within mixed use buildings located within this Employment Area and the continued success of this policy objective is maintained and enhanced by OPA No. 247. This ensures that the Dundas-Carlaw Employment Area continues to evolve as intended, as a mixed use urbanizing Employment Area. The <i>General Employment Areas</i> designation broadens land use opportunities to allow this area to be a more complete community a provincial planning objective. This further strengthens urban renewal, supports reduction in congestion by providing opportunities for people to live and work nearby. Cultural diversity is also enhanced given the demand that existing and new residents and workers may have, thereby supporting continued urban renewal;</p> <p><u>Recommendation 6:</u> <b>Redevelopment and revitalization of this area should not be unduly restricted or potentially delayed while the <i>neighbourhood improvement plan</i> process is underway, as long as the proposed redevelopment can demonstrate that it is moving in the direction of the broader and/or site specific policy objectives of the City's Official Plan.</b></p>

Proposed text to be deleted is ~~crossed out~~.

Recommended Text to be added is **Bold**.

**Figure 2**  
 Toronto Transit Commission - Downtown Relief Line 1  
 East via King Street (St. Andrew Station to Pape Station)  
 September 2012



1742\_Figure2.Nov.18.13

Source: TTC Downtown Rapid Transit Expansion Study, Phase 1 Strategic Plan, Final Report, Exhibit B-1, September 2012



Dundas - Carlaw Employment Area  
 (Proposed City of Toronto OPA No. 231,  
 Site & Area Specific Policy No. 247)