

May 30, 2017

**BY EMAIL & REGULAR MAIL**

Planning & Growth Management Committee  
City of Toronto - Toronto City Hall  
100 Queen Street West, 2nd floor  
Toronto, Ontario  
M5H 2N2

**Attn: Chair D. Shiner & Members of Committee**

**Re: City of Toronto ConsumersNext – Proposals Report & Background Studies  
Planning & Growth Management Committee Meeting - Item PG21.11  
Our File No. 1795**

We are planning consultants writing on behalf of Allegan Capital Partners Inc. ('Agellan') with respect to the ConsumersNext – Proposals Report and its various background reports. Agellan represents 229, 243, 245, 251 and 255 Consumers Road and 165 Yorkland Boulevard, comprising some 12 ha. in land area, within this 100 ha. community. Agellan is also a member of the Local Advisory Committee and comments as a participant in this planning process.

**The Need for an Alternate ConsumersNext Central or Core-Located High Order Transit Solution**

The planning and construction of the City's High Order Transit system has dramatically accelerated over the past ten years to support continuing urban intensification. The future success of this City relies on efficient and comfortable private and public mobility modal options.

The Royal Commission on Metropolitan Toronto on Transportation Organization, some 42 years ago stated, *"... Urban transportation planning can be considered part of urban planning, because transportation is so closely related to land use: transportation demand is shaped by land use pattern, and land use patterns are influenced by the configuration of transportation facilities."*

Today, this is further reinforced in the Provincial Growth Plan 2006, and now 2017, where, *"Transportation system planning, land use planning, and transportation investment will be co-ordinated to implement this Plan."* Good City building involves prioritizing and optimizing the value of existing and planned High Order Transit as set out in the Growth Plan.

ConsumersNext acknowledges in its Local Advisory Committee 3 Summary that *"...Deciding between subway and LRT is outside of the scope of this study. This plan recognizes future high order transit along Sheppard Avenue East but is technology agnostic, meaning that it could work with either subway or LRT."* Notwithstanding, ConsumersNext would benefit greatly from an alternate centralized or core-located High Order Transit solution to better contribute to the pillars of a strong economy, a clean and healthy environment and social equity. In short, a better city building initiative will lead to a more enjoyable, vital and viable, complete community.

In our opinion, ConsumersNext has failed to realize the full transit value potential by not studying and recommending the extension of the existing Sheppard Avenue East Subway, from its present terminus at Don Mills Station eastward, to a 'Main Street' – Settler's Road location, centralized or core-located within the ConsumersNext 'Planning Study Area' to serve the maximum amount of people. The subway could continue on to Victoria Park Station, to connect with the Sheppard LRT which would then continue eastward along Sheppard Avenue East as presently planned. Centralizing the surface LRT would be too disruptive to existing roads and built form in the community and is not a viable option. Please refer to the attached Figure 1 - Key Map.

### **Comments & Observations regarding ConsumersNext – Proposals & Background Reports**

We offer the following comments for consideration regarding the ConsumersNext Reports:

#### **Economic Potential Study – January 6, 2017**

It is evident from this study that there is value in linking High Order Transit investment to office employment, a major objective of the community vision. The study refers to this opportunity by the potential extension of the existing Sheppard Avenue East Subway, from its present terminus at Don Mills Station eastward. The study does not however specifically refer to a centralized location, as proposed herein, within the ConsumersNext 'Planning Study Area'.

*"...Major regional connections are within the vicinity of the Business Park but regional transit services do not directly serve it. Don Mills Subway Station is a major transit hub with multiple transit service connections but there is potential demand for greater regional transit service that directly serves the Business Park. The focus of regional transit should be connecting people with jobs, and the highest concentration of jobs in the vicinity is the Business Park. Therefore, any future regional transit connections should directly serve the Business Park." (page 17)*

It is acknowledged that no new major office buildings have been built in the Consumers Business Park since the early 90's. Low economic office rent, while it may bring tenant value in office space, simply frustrates community re-investment. Further, Agellan takes the position that a land/building owner is not going to remove an existing office building to rebuild it, and then add residential land use to it because this is not economically feasible.

*"...The economic viability and investment potential of office development in Consumers Road has been tested through a series of pro forma analyses. The analysis demonstrates the limited potential for new office development within Consumers Road in the near term. The low rents currently experienced in Consumers Road do not support new office development, but they are part of the value proposition of the Business Park." (page iv)*

Coincidentally, all suburban office intensification areas and corridors in Business Parks, located within the Greater Golden Horseshoe, compete for office investment in a mutually shared environment of broad economic trends, each of which undermine new office development and make its economic viability difficult. These include:



- A decrease in office space per worker (doing more with less space);
- Tenant expectations of ample and free ground-related vehicular parking;
- Much higher office development activity/demand in the central core;
- Increased employment mobility - office environments and work from home;
- Slower employment growth rates than forecast;
- An increase in floor space per worker in the industrial-type employment sector and higher levels of automation;
- The result of e-commerce and warehousing formats and declining retail store sizes.

This report also refers that the past and “as is” market conditions will improve to support re-investment. This seems unrealistic given that the market is affected by the major trends as noted above, and has operated in a low interest rate environment over the past 10 years without improvement.

While amenitization of the Business Park is laudable, achieving this is difficult as it requires significant private sector re-investment that will only occur on viable returns on investment. How much amenitization is affordable in the public realm with ‘B’ and ‘C’ level office structure with lower rents? Office facilities compete to serve tenant interests within their existing building assets. The list of land uses to support amenitization proposed in the Report (page 41) are typically associated within, or are in close proximity, to urban residential development setting.

Given the foregoing, it appears that the future success of this community will be better served with a centralized, core-located High Order Transit solution, supported by a ‘mixed use’ community, with ‘mixed use’ buildings, sharing mutual accessibility, mobility and active transportation opportunities to better serve both residents and workers, so as to re-establish viable market rents, intensification and needed urban re-vitalization.

In support of “Mixed-Use Development”, reference is made to MTO’s Transit Supportive Guidelines defining “Mixed-Use Development” as follows: “Areas characterized by a wide variety of shopping, employment, entertainment, light industrial and residential uses. Mixed use development may occur at the level of individual buildings or complexes, or at a larger scale within activity nodes or corridors.”

#### **Master Servicing Plan- February 21, 2017**

We are advised by the Master Servicing Plan (‘MSP’) that the “...City of Toronto recognizes that the successful re-development of the Consumers Next Study area requires an integrated process of land use, transition and municipal infrastructure planning....” The MSP is an integral component of the Study to assess capacities...”

This work has determined that generally no improvements are needed to water distribution sanitary sewerage and storm drainage systems, notwithstanding re-development will require specific engineered solutions in terms of roads and the related municipal engineering services as noted therein. Municipal servicing will accommodate some 50,000 persons and workers.

### **Transportation Master Plan – May 9, 2017**

The Transportation Master Plan ('TMP') does not consider extending the existing Sheppard Avenue East Subway, from its present terminus at Don Mills Station eastward, to a centralized, core-located 'Main Street' – Settler's Road location within the 'Planning Study Area' to serve the maximum amount of people. The TMP reads, *"Don Mills Subway Station, located within walking distance of the study area will become a major transit hub with multiple regional transit service connections, including: VIVA Green (Don Mills BRT) and Sheppard East LRT."*

Based upon the review of existing conditions, the TMP describes six big opportunities:

1. *Providing balanced land use mix to maximize capacity;*
2. *New Street Network for all mobility users;*
3. *Improve pedestrian and cycling connections at interchanges;*
4. *New innovative smart mobility plan and parking strategies;*
5. *Feasibility for regional transit integration;*
6. *Pre and post LRT conditions – Transit integration."*

Further, the TMP recommends the "Mid-Rise Avenues" Scenario resulting in about 15,400 population and 31,600 employment, undertaking traffic trip generation and movement modelling to support the TMP recommendations.

### **Community Services and Facilities Study - 2017**

ConsumersNext *"is well served by a wide range of community services and facilities in the surrounding area. Over 18 existing facilities are located within 1.6 kilometres or a 20 minute walk of the Mixed Use Districts in ConsumersNext."* It is significant to note that that we are informed that community services include 2 libraries, 3 community centres, 2 arenas, 16+ child care centres, 17 TDSB and 3 TCDSB schools and approximately 25 community agencies".

### **The Final Report – May 11, 2017**

We are advised in the Final Report that the *"...Consumers Road Business Park remains an important office node in Toronto that continues to experience employment growth, but not a significant mount of investment in the construction of new office buildings."* It recommends the "Mid-Rise Avenues" Scenario resulting in a population of about 15,400 and employment of 31,600 for the ConsumersNext Area.

Major policy effort is recommended in the Final Report to protect the stability of existing low density residential areas to the north and east of the ConsumersNext study area through land use and urban design. Therefore, these stable low density residential areas will be overserved by the location of High Order Transit (LRT) on Sheppard Avenue East. A better solution is to serve more people, more effectively and comfortably, with a centralized, core-located subway station to be located within the ConsumersNext area.



The proposed ConsumersNext planning model involves a broad ‘separation of urban land uses’ within the planning node. In my opinion it is more appropriate to support a ‘mixed use’ community, with ‘mixed use’ buildings, that share mutual accessibility, mobility and active transportation opportunities to better serve both residents and workers, and to re-establish viable market rents, intensification and needed urban re-vitalization, where possible.

The schematic planning built form design, as shown for certain Agellan properties on Figures 22a and Figure 22c, as depicted on pages 65 and 67, of the Final Report are not viable. The ‘Highway Edge District’ planning design and policy recommendations are not supported as well.

### **The City of Toronto Proposals Report (PG21.11) – May 15, 2017**

It is significant that the land use density and the planned population and employment for Consumers Road Business Park, as outlined by ConsumersNext exhibits Urban Growth Centre density characteristics per the ConsumersNext reports and background documents. Please refer to Table 1 below which indicates existing and proposed population and employment density as it relates to the 100 ha. ConsumersNext Study Area.

<b>TABLE 1 - Mid-Rise Avenues Preferred Alternative</b>	
Land Area (Hectares)	100
Residents	15,398
Jobs	31,609
Total (Residents & Job)	47,007
Residents & Jobs Per Hectare	470

**\*Note:** Per the Growth Plan for the Greater Golden Horseshoe, 2017, Policy 2.2.3 Urban Growth Centres:  
“2. Urban growth centres will be planned to achieve, by 2031 or earlier, a minimum density target of:  
a) 400 residents and jobs combined per hectare for each of the urban growth centres in the City of Toronto;”

As per the Provincial Policy Statement and the Growth Plan, municipalities are empowered to achieve higher urban intensification should they choose to. That said, these higher population and employment densities need to be properly and comfortably served by public infrastructure with High Order Transit as a key ingredient. For this reason, it is self-evident that the centralization of the subway to the core of the Consumers Road Business Park is key to unlocking the full potential of this well positioned urban node within the City. It is also noted that Urban Growth Centres in the City exhibit at least, similar or greater urban population and employment densities, and are presently serviced or planned to be serviced by subway. Additionally, these subway routes typically bi-sect these Urban Growth Centres in the City.

The peripheral High Order Transit maintained in the Proposals Report supports a land use and built form pattern which will continue to support a higher dependence on the automobile for internal access to the Consumers Road Business Park. A centralized, more highly accessible subway, will better contribute to the pillars of a strong economy, a clean and healthy environment and social equity. In short, this is a better city building initiative leading to a more enjoyable, vital, viable and complete mixed use community.

The new Growth Plan requires that all planning decisions must conform to policies when it comes into effect July 1, 2017. The City is also guided by the Provincial Policy Statement (2014), and the Ministry of Transportation Transit Supportive Guidelines (2012), defining “Transit-Supportive” and “Transit-Oriented Development”.

The definition of “Transit-Supportive” is common to the PPS, the Growth Plan, Transit Supportive Guidelines, where:

*Transit-Supportive: Makes transit viable and improves the quality of the experience of using transit. When used in reference to development, it often refers to compact, mixed use development that has a high level of employment and residential densities to support frequent transit service... (Source: Transit Supportive Guidelines).*

*Transit-Oriented Development: A planning approach that calls for high-density, mixed use business/residential neighbourhood centres to be clustered around transit stations and corridors... (Source: Transit Supportive Guidelines).*

Also, it is valuable to consider the definition of “Major Transit Station Areas” generally common to the Growth Plan, and Transit Supportive Guidelines where:

*2.2.5 “Major Transit Station Areas and intensification corridors will be designated in official plans and planned to achieve –*

- a) increased residential and employment densities that support and ensure the viability of existing and planned transit service levels*
- b) a mix of residential, office, institutional, commercial development wherever appropriate.” (Source: The Growth Plan)*

In the Growth Plan 2017, section 2.2.4 ‘Transit Corridors and Station Areas’ notes that ‘major transit station areas will be planned and designed to be transit supportive...’

As well, specific to the Consumers Area, it is noted that Sheppard Avenue is defined as a *priority transit corridor*, as defined by Figure 5 as part of the new Growth Plan. It is required that municipalities “... delineate the boundaries of major transit station areas in a transit-supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station.”

The ConsumersNext studies and reports provided, clearly describe that the density is well in excess of the density required to support a subway, where a minimum of 200 residents and jobs combined per hectare is required, and in the case of ConsumersNext the density will be closer to 500 residents and jobs combined per hectare.



## Conclusions

The planning and construction of the City's High Order Transit system has dramatically accelerated over the past ten years in an effort to respond to rapid urban intensification. The future success of this City will rely on efficient and comfortable private and public mobility modal options.

A centralized, or core-located High Order Transit subway will better serve both residents and workers, supporting mobility, mixed use, intensification and needed urban re-vitalization of this community. It will better contribute to the pillars of a strong economy, a clean and healthy environment and social equity. This is a better city building initiative that will lead to a more enjoyable, vital, viable and complete mixed use community. Such a system will also better manage our winter conditions, as it will offer the most people, residents and workers, the most comfortable, clean, fast and affordable way to obtain mobility throughout the local and regional transportation network. An underground or 'mini-path' system could also be considered to further support the winter climate, as well as underground connectivity between transit and buildings. Also, such transit service may also serve to attract post-secondary education facilities to this area to bolster the business and academic synergies along with campus activity.

## Recommendation

It is recommended that ConsumersNext explore the opportunities and constraints of providing a centralized, or core-located High Order Transit solution that involves a subway extension that will better serve both residents and workers supporting mobility, mixed use, intensification and needed urban re-vitalization based on a similar alignment to that shown on the Pound & Stewart Planning, Figure 1 - Key Map, and respond back for further consideration and direction.

Thank-you for your consideration and we welcome the opportunity to meet with City Staff, as appropriate, to discuss matters in further detail, requesting further public notice on this matter.

Yours truly,  
Pound & Stewart Associates Limited



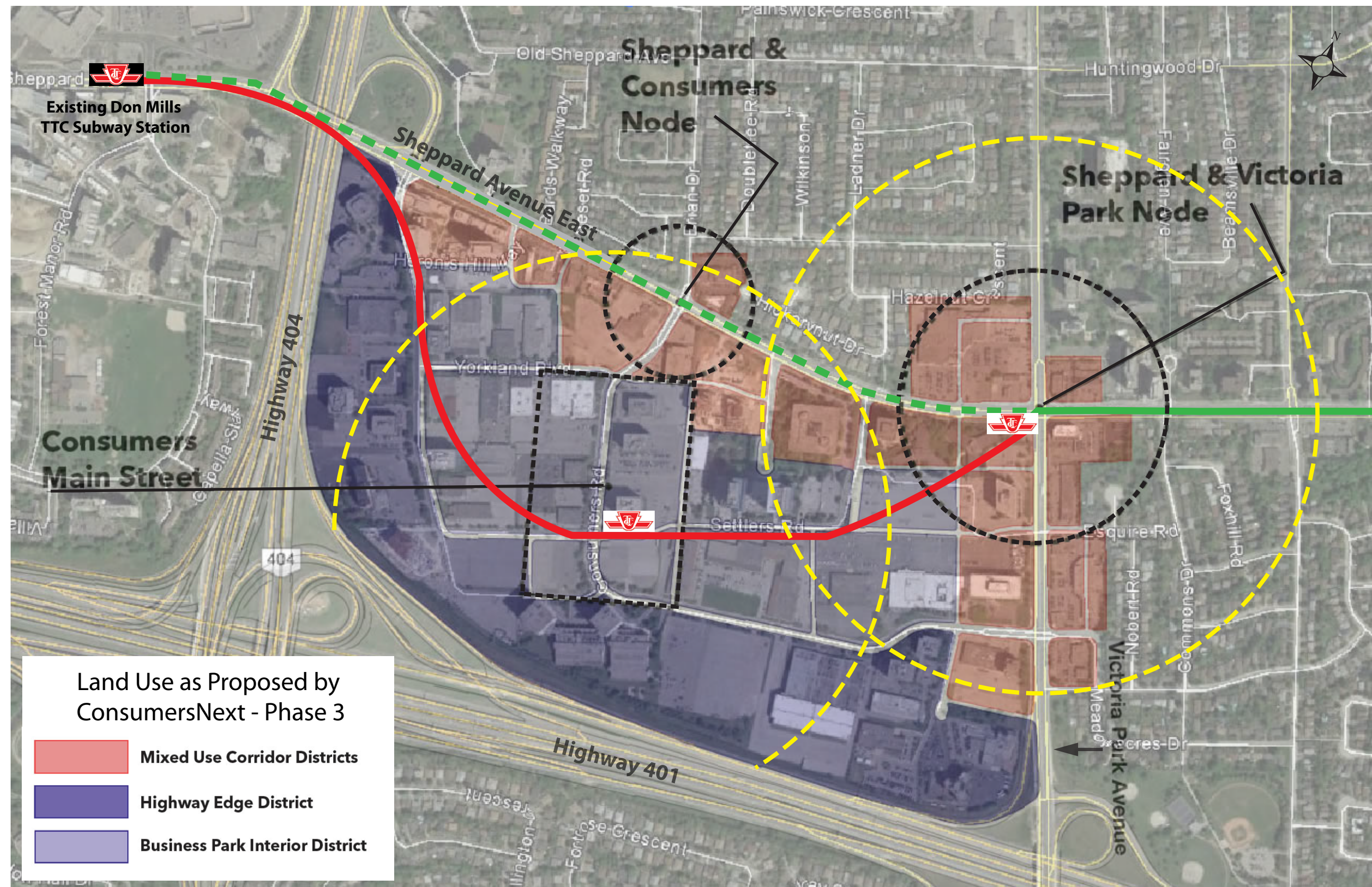
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cc. Ms. N. Martins, Committee Administrator, City Clerk's Office, City of Toronto  
cc. Councillor Shelley Carroll  
cc. Mayor John Tory  
cc. Ms. J. Keesmaat, Chief Planner & Executive Director, City Planning, City of Toronto  
cc. Mr. J. Jensen, President & CEO, Metrolinx  
cc. Hon. S. Del Duca, Minister of Transportation, MTO  
cc. Client

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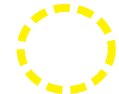
**FIGURE 1 : POTENTIAL SHEPPARD SUBWAY EXTENSION CENTRALIZED / CORE-LOCATED IN THE CONSUMERSNEXT AREA**



Base Map Source: ConsumersNext - Phase 3, Community Meeting #4 Presentation Panels (Compiled in Google Earth by Pound & Stewart Associates Limited)



Potential TTC Subway Stations



Potential TTC Subway Station  
500 m radius boundary zones



Potential TTC Subway Line  
Extension to Victoria Park Ave.



Planned Higher Order Transit  
(LRT Continuation)



Removed Section of Planned  
Higher Order Transit (LRT)