



**WESTON
CONSULTING**

planning + urban design

Planning and Growth Management Committee
City Clerk's Office, Toronto City Hall
100 Queen Street West
Toronto, Ontario M5H 2N2

PG27.2.3

February 21, 2018
File 7795

Dear Members of the Committee,

**RE: Item No. PG.27.2
Draft Official Plan Amendment 393
ConsumersNext Secondary Plan**

Weston Consulting is the planning consultant representing the Armenian Community Centre (ACC) located at 45 and 50 Hallcrown Place in the City of Toronto. As previously stated at the Planning and Growth Committee meeting on May 31st, 2017, we have been retained to assist the ACC in monitoring the proceedings of the ConsumersNext process and its potential impacts to our Client's land holdings. This letter is provided in response to the Draft ConsumersNext Secondary Plan (Official Plan Amendment No. 393) to the City of Toronto Official Plan, as it relates to the subject property.

The ACC is situated in the south-east corner of the proposed ConsumersNext Secondary Plan area, which encompasses lands bound by Highway 404 to the west, Highway 401 to the south, lands just beyond Victoria Park Avenue to the east and Sheppard Avenue East to the north.



Figure 1: ACC Land Holdings

Our Client's mandate is to ensure that the future development of the Consumers Road Business Park will not interfere with the functionality of the ACC lands. As previously expressed in our

submission letters to Staff and their consultant team, impacts to the ACC lands, as a result of future development, should be mitigated as much as possible.

Weston Consulting has actively participated in the ConsumersNext Planning Study process on behalf of the owner, having attended several open houses in relation to the ConsumersNext Planning Study and the Draft Secondary Plan. Additionally, we have made written submissions on behalf of the land owner to Staff and the Planning and Growth Committee (previous comments attached), and have held discussions with Staff in relation to these matters.

At this time, we wish to express our general support for the ConsumersNext Secondary Plan as presented, and wish to provide the following comments on behalf of the owner.

We are in support of Staff's recommendation No. 3 contained within the Staff Report dated January 31, 2018.

1) Vision and Guiding Principles

Section 1 of the proposed draft Secondary Plan outlines the vision and guiding principles for the future development of the Consumers Road Business Park. It is our understanding that the primary objective of the draft Secondary Plan is to establish a planning framework that will facilitate the development of a vibrant business park flanked by mixed use community along Sheppard Avenue and Victoria Park Avenue with a high degree of connectivity and community and amenity spaces to "*enliven the area outside regular business hours*".

The ACC contains a range of important community and amenity spaces that contribute to this vision including the church; community centre; school (including 500 seat theatre and regulation sized basketball court); a day care/pre-school; 600 person capacity banquet hall; meeting rooms; and, outdoor recreation space. These uses support functions at various points of the day from Monday to Sunday. The ACC holds sociological and cultural importance to the Armenian community and the broader public. It is imperative that the future development of the Business Park occurs in such a way that permits these important uses to continue as they exist today.

A development concept has been prepared for 50 Hallcrown Place, which envisions the future development of the parcel for mixed employment / commercial development comprised of a hotel and office / medical office building. It is the community's intent to enhance the continued function of the ACC through the redevelopment of this parcel. Staff must consider the future development of this parcel in the context of the area with respect to traffic, road pattern design and built form. It is not clear whether future redevelopment of the 50 Hallcrown Place property has been considered in the City's plans. The Secondary Plan should ensure recognition of existing uses and not preclude the possible expansion of the ACC lands.

To that end, we are in support of proposed **policy 1.1.3** which speaks to the possibility of the enactment of Holding By-laws to ensure adequate infrastructure is in place prior to new residential development, particularly as it relates to the provision of new public streets and infrastructure construction.

- 1.1.3 Development of residential uses may be controlled through the use of a Holding (H) symbol and permitted following the fulfillment of criteria to allow removal of the Holding (H) symbol as it relates to the provision of new public streets, infrastructure construction, implementation of higher order transit, provision of non-residential floor area and/or dedication of parkland.

2) Structure

Based on proposed **Map 38-2 (Structure Plan)** and **Map 38-3 (Public Streets Plan)**, a new east-west public street is proposed adjacent to 45 Hallcrown Place between Hallcrown Place and Victoria Park Avenue (identified as New Link no. 12 of Appendix 1). This proposed connection is consistent with the recommendations of the Transportation Master Plan that was conducted to inform the ConsumersNext Planning Study. The ACC has retained a Traffic Consultant (NexTrans) to assess the strengths, weaknesses, opportunities, and threats posed by the City's proposed road network onto the function of the ACC lands. Based on NexTrans' assessment of the proposed road pattern, we are in support of the proposed new public street as it will help alleviate the existing traffic congestion in the vicinity of the ACC lands by providing an additional outlet to Victoria Park Avenue.

We support the requirement for further transportation analysis for site specific applications in order to demonstrate adequate capacity of surrounding roads and to ensure minimization of flow through traffic in the area.

Proposed **Map 38-2 (Structure Plan)** identifies a *Potential Future Park* to the north of the ACC. We encourage Staff to secure this space as a future park as it will act as a buffer between the ACC lands and will provide amenity space within the Business Park.

Proposed **policy 2.4** speaks to density and infrastructure capacity. This policy reads as follows:

- 2.4 Land uses and development densities identified on Map 38-4 and Map 38-6 ensure that intensification does not exceed the capacity of the physical infrastructure, including public transit and the public street network and is undertaken in contextually appropriate built form.

We would like to emphasize the importance of this policy.

Based on **Map 38-5 (Districts and Nodes Plan)**, the ACC lands are located within the proposed *Highway Edge District* and proposed to permit a maximum density of 1.5 FSI based on **Map 38-4 (Potential Tall Building Locations and Maximum Densities)**. We note that the *Highway Edge District* is envisioned to be enhanced with public realm improvements with an emphasis on landscaped areas and is proposed to include a *Greenway Connection* adjacent to Highway 401.

It is our understanding that the lands to the north of the ACC, including 2450 Victoria Park Avenue, are located within the proposed *Victoria Park Corridor District* based on the Demonstration Plan contained within the ConsumersNext Final Report, dated May 11, 2017. The *Victoria Park Corridor District* is not clearly shown on Map 38-5 and, therefore, it is our recommendation that this map be revised accordingly.

Based on proposed **policy 2.5.2** the *Victoria Park Corridor District* is to be developed “*primarily at a mid-rise scale*”. Based on the proposed policy, tall buildings may be considered as an alternative to mid-rise provided that the development criteria and the performance standards of the Secondary Plan are met.

2.5.2 The Victoria Park Corridor District will be developed primarily at a mid-rise scale with a consistent six-storey streetwall and generous setbacks along Victoria Park Avenue. Along the east side of Victoria Park Avenue, mid-rise buildings will be massed within the *Mixed Use Areas* to provide transition in scale to low scale building types in adjacent *Neighbourhoods* outside of the Secondary Plan Area. On the west side of Victoria Park Avenue, tall buildings may be considered as an alternative to midrise form, provided they comply with the Secondary Plan's development criteria and performance standards.

This policy is not consistent with the findings of the ConsumersNext Study. The Demonstration Plan contained within the ConsumersNext Final Report shows a singular tall building situated to the north-west corner of Consumers Road and Hallcrown Place. We request that Staff modify this policy to ensure that the vision brought forward through the ConsumersNext Planning Study is maintained.

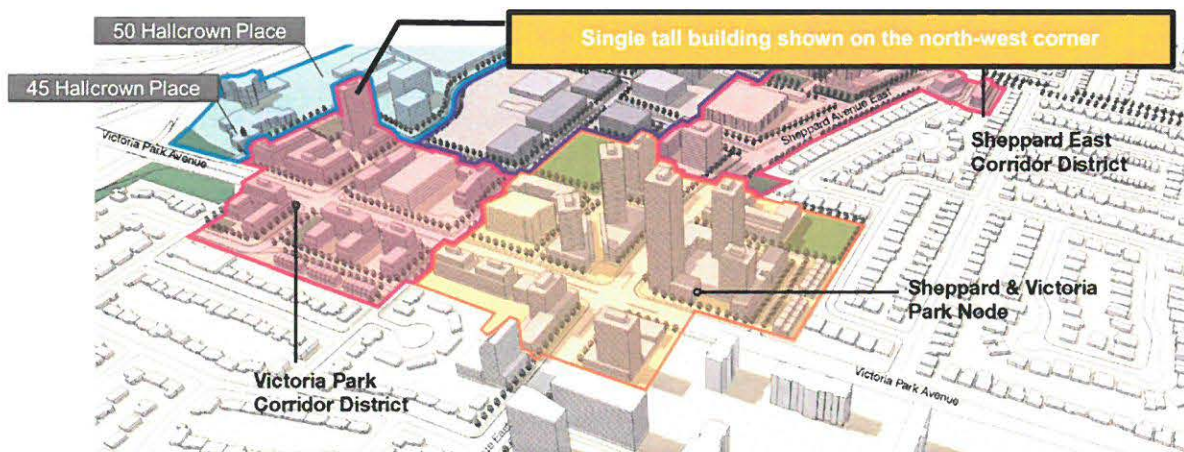


Figure 2: Demonstration Plan from ConsumersNext Showing Proposed Built Form

3) Land Use and Economic Development

The Secondary Plan area is subject to Site and Area Specific Policy (SASP) 386 of Official Plan Amendment 231 (OPA 231), portions of which remain under appeal at this time. It is noted that the policies of SASP 386 have been incorporated into the proposed Secondary Plan.

It is our opinion that the Secondary Plan does not adequately implement the policies of Council with respect to new residential development within *Mixed Use Areas* as contained within OPA 231. The Secondary Plan should incorporate the language contained within policy 9 of OPA 231, which reads as follows:

9. New development that includes residential units on a property with at least 1,000 square metres of existing non-residential gross floor area used for offices is required to increase the non-residential gross floor area used for office purposes where the property is located in a *Mixed Use Area* or *Regeneration Area* within:
- a) the *Downtown and Central Waterfront*;
 - b) a *Centre*; or
 - c) 500 metres of an existing or an approved and funded subway, light rapid transit or GO train station.
- Where site conditions and context do not permit an increase in non-residential office gross floor area on the same site, the required replacement of office floor space may be constructed on a second site, prior to or concurrent with the residential development. The second site will be within a *Mixed Use Area* or *Regeneration Area* in the *Downtown and Central Waterfront*; within a *Mixed Use Area* or *Employment Area* in the same *Centre*; or within 500 metres of the same existing or approved and funded subway, light rapid transit or GO train station.

The draft Secondary Plan establishes that the Consumers Road Business Park *“is an important employment centre, particularly for the office sector, as it contains one of the largest concentrations of office workers outside of the Downtown”*.

3 - Land Use and Economic Development

The Consumers Road Business Park is an important employment centre, particularly for the office sector, as it contains one of the largest concentrations of office workers outside of the Downtown. The land use framework of this Secondary Plan protect the area's economic function by providing land use certainty through the designation of lands for employment uses. Similarly, as lands designated *Mixed Use Areas* are redeveloped to include residential uses, the amount of non-residential gross floor area on these lands is required to be increased.

Based on proposed **policy 3.13**, existing Class B and Class C office buildings within the business park are to be maintained and renewed and that new Class A office buildings are to be developed.

3.13 The renewal of the office building stock in the business park will occur through the modernization and maintenance of existing Class B and Class C office buildings as well as through the addition of Class A office space. The City will encourage this renewal through

...

Despite the acknowledgement of the importance of the business park as an office concentrated area and the desire to maintain existing office space, there is no language in the Secondary Plan that speaks to the replacement of office uses when a proposal seeks to demolish existing office building stock. Clarification regarding what constitutes a Class B and Class C office building is requested.

Non-residential uses in *Mixed Use Areas*

3.3 Development on sites designated *Mixed Use Areas* on Map 38-6 that includes residential is required to increase the non-residential gross floor area.

Proposed policy 3.3 above only speaks to the provision of “*non-residential gross floor area*”, which does not work to facilitate the retention of existing office uses and, therefore, does not align with policy 3.13 of the draft Secondary Plan. Office related uses within the *Victoria Park Corridor District* should be maintained or replaced in order to conserve the Consumers Road Business Park as an “*important employment centre, particularly for the office sector*”.

4) Public Realm

We are generally supportive of the policies and maps that relate to the enhancement of the public realm within the Secondary Plan area. It is our understanding that the proposed multi-use greenway connection adjacent to the 401 is to be accommodated within the required MTO setback and that landowners will be encouraged to establish access easements to accommodate the trail. It is our recommendation that the width of the greenway and access easement be limited to six metres.

4.27 A multi-use Greenway Connection shown on Map 38-2 and Map 38-13 will be established through coordinated landscaping treatments within the setback required by the Ministry of Transportation along Highways 401 and 404 to serve as a recreational trail and alternate pedestrian and cycling connection through the Secondary Plan Area.

4.28 Landowners will be encouraged to coordinate efforts to dedicate the required public access easements to implement the Greenway Connection within the Highway Edge District as identified on Map 38-2. Mid-block pedestrian connections will be secured to the Greenway Connection through public access easements from existing and planned public streets.

5) Built Form and Density

Based on our review of **Map 38-4 (Potential Tall Building Locations and Maximum Densities)** and **Map 38-6 (Land Use)**, we note that lands within the *General Employment Areas* designation are proposed to have a maximum FSI of 1.5 times the area of the lot. We recommend that the permitted density for lands within the *General Employment Areas* be increased to 2.0. We further note that the lands adjacent to the ACC to the north are proposed to have a maximum density of 3.0.

Proposed **Map 38-10 (Potential Tall Building Locations and Maximum Heights)** indicates that the lands at 2450 Victoria Park Avenue may be suitable for additional heights (a maximum height of 36 metres for mid-rise and a potential tall building with a maximum height of 83 metres, subject to compliance with policy 5.16.5(d)). The policy reference on this map is incorrect, it appears to be a typo; we believe the correct policy reference should be 5.16.5(d).

We do not support the built form policies contained within **Section 5 (Built Form)** of the draft Secondary Plan as they relate to the *Victoria Park Corridor District*. Our reasons for concern are as follows:

Map 38-10 (Potential Tall Building Locations and Maximum Heights) and draft **policy 5.16.5(d)** do not reflect the Demonstration Plan within the ConsumersNext Final Report as approved. **Map 38-10** and **policy 5.16.5(d)** fail to appropriately depict and control how the permitted built form is to be organized and where certain building mass should be located. As shown above, the Demonstration Plan depicts low-rise built form adjacent to the ACC lands; mid-rise development fronting Victoria Park Avenue and a single tower at the north-west corner of Consumers Road and Hallcrown Place. Proposed policy 5.16.5(d) reads as follows:

- d) On the west side of Victoria Park Avenue within this District, tall buildings are permitted only if:
 - i. the base building is 6 storeys in height;
 - ii. the tower component of the building does not exceed 83 metres in height;
 - iii. the development complies with the angular plane provided for in Policy 5.17.4(a); and
 - iv. the overall development does not exceed the maximum density illustrated on Map 38-4.

As currently written, the policy suggests that multiple tall buildings may be permitted to be located anywhere within the District, whereas the Demonstration Plan only shows one tall building. As stated in our previous written comments, and as discussed with Staff in our meetings, height and massing should be directed away from the ACC lands as much as possible in order to limit overlook, limit negative impacts on sky views and to preserve the views to the church. Our previous endorsement of the Demonstration Plan was founded on the basis of Staff's commitment to concentrate height and massing away from the ACC lands in the form of a single, slender tower located at the north-west corner of Hallcrown Place and Consumers Road.

Proposed **policy 5.16.5(d)** should be revised to better reflect the Demonstration Plan as endorsed by the community and should include additional performance standards to better guide the design and placement of the tall building that is anticipated to be located to the north of the ACC lands, including maximum floorplate size and language regarding where a tower may be positioned. Additionally, specific building heights should not be prescribed in the Secondary Plan.

Proposed **policy 5.16.2** speaks to angular planes adjacent to *Neighbourhoods*. This policy should also apply to sensitive uses within *General Employment Areas*, such as the ACC lands which

contain a number of sensitive uses, and should be afforded appropriate transition and separation from higher intensity uses.

5.16.2 All development will fall beneath a 45 degree angular plane projected from the abutting property line of lands designated *Neighbourhoods*. When the lands abutting the *Mixed Use Areas* within the *Neighbourhoods* designation contains a public street or public park, the required 45 angular plane shall be projected from the property line of the public right-of-way or parkland abutting the *Mixed Use Areas*.

We note that **clause iii** of **policy 5.16.5(d)** contains a typo. It is unclear what policies apply with respect to angular planes.

We would like to express support for proposed **policy 5.17** below.

5.17 For properties abutting *Employment Areas*, a setback of 20 metres is required between any building containing sensitive land uses and the shared property line. The separation distance may be occupied by a building containing other commercial uses or may include: a street; a laneway; landscaped space, either private or publicly accessible. Using a surface parking lot to obtain the required separation distance is discouraged.

The church is regarded as a significant structure from an architectural and cultural perspective. Based on **Map 38-9 (View Corridors and Vistas Plan)** and proposed **policy 5.9** the cupola of the St. Mary Armenian Apostolic Church is identified as an existing *Visual Point of Interest* with a *View Corridor* traversing in a south-west direction from Victoria Park Avenue. The cupola is also captured within a *Potential Visual Point of Interest* from Victoria Park Avenue looking north. We are highly supportive of the cupola's recognition as a significant architectural feature with visual interest from multiple sides of the street.

We note that proposed **policy 5.4** which speaks to the provision of a six-storey streetwall conflicts with the proposed policy 5.9.

5.4 On lands designated *Mixed Use Areas*, regardless of the building typology or maximum heights and density provided for by this Secondary Plan, a six storey streetwall will be developed along Sheppard Avenue East and Victoria Park Avenue by shaping the built form of new development generally as follows:

5.4.1 On sites where tall buildings are provided for, the maximum height for the base building along Sheppard Avenue East and Victoria Park Avenue is six storeys.

Furthermore, the ConsumersNext Final Report states, "*Victoria Park Avenue is not planned for the same level of transit improvement and development sites on the east side of the street are required*

to transition to adjacent low scale uses on lands designated Neighbourhoods. As such, it is recommended that the Victoria Park Corridor District be developed at lower densities". Based on the above, it is our opinion that a tall building should not be permitted along the Victoria Park Avenue frontage, but rather, if deemed appropriate be placed at the corner of Hallcrown Place and Consumers Road, as originally depicted on the Demonstration Plan. In this regard, we do not support proposed **policies 5.4.1; 5.4.2; 5.14**, which would permit a tall building along Victoria Park Avenue.

We are in support of language contained within proposed **policy 5.14** which speaks to mid-rise as the "predominant building type" within the Victoria Park Corridor District.

6) Mobility and Parking

The Consumers Road Business Park is anticipated to support intensification and mixed-use development. As such, a significant number of trips are anticipated within the Secondary Plan area. We are aware that the lands to the north of the ACC, municipally known as 2450 Victoria Park, are subject to an active Zoning By-law Amendment application which proposes to rezone the lands to permit a high-density, mixed use development that is anticipated to generate a number of additional trips in the nearby vicinity.

The ACC lands contain a number of uses that draw a high degree of traffic and include uses where children gather and play, including a nursery, elementary school, and library. Traffic flow and safety must be primary considerations in the future development of the area.

Based on proposed **Map 38-2 (Structure Plan)** and **Map 38-3 (Public Streets Plan)**, a new east-west public street is proposed adjacent to 45 Hallcrown Place between Hallcrown Place and Victoria Park Avenue (identified as New Link no. 12 of Appendix 1). This proposed connection is consistent with the recommendations of the Transportation Master Plan that was conducted to inform the ConsumersNext Planning Study. The recommendations of NexTrans are provided below.

Based on the recommended Streets and Blocks of the ConsumersNEXT Final Report in Section 3.3 (Page 30) and New Street Network Schedule outlined on Pages 153 and 154 of the ConsumersNEXT Transportation Master Plan, it is our opinion that the following three transportation related improvements are beneficial and important to the Armenian Community Centre:

1. A new east-west road connecting Hallcrown Place to Victoria Park Avenue. This will provide additional outlet to and from Victoria Park Avenue in the event of accidents at the Consumers Road/Hallcrown Place intersection and future traffic congestion at this intersection.
2. Reconfiguration of the existing Highway 401 ramps. This will allow the proposed new east-west road to connect to Victoria Park Avenue without impacting the existing westbound on-ramp and allow safe pedestrian crossing Victoria Park Avenue both east-west and north-south directions.
3. Four-legged intersection of Consumers Road and Hallcrown Place. This will allow direct access to Sheppard Avenue East and reduce the eastbound left turn demand at the Consumers Road/Victoria Park Avenue intersection.

We are in support of the proposed new public street as it will help alleviate the existing traffic congestion in the vicinity of the ACC lands by providing an additional outlet to Victoria Park Avenue.

We are in support of proposed **policy 6.4** which speaks to the possibility of the enactment of Holding By-laws to ensure adequate transportation improvements are in place prior to new residential development.

We request that the ACC and their traffic consultant be invited to participate in discussions regarding the design and the timing of construction of any roads in the vicinity of the ACC lands. It is our recommendation that Staff establish a Community Advisory Group to facilitate discussions between the City and the various landowners in the area relating to the design and construction of the future road improvements.

The proposed public street that is contemplated should not require a conveyance as the uses on the site are existing uses and redevelopment is not anticipated to occur for the 45 Hallcrown Place property.

The geometric design, including lane geometry and intersection design, of all proposed public streets should optimize the efficiency and safety of pedestrians and drivers and should be adequately distributed throughout the Consumers Road Business Park. Any public roads in the vicinity of the school site located at 50 Hallcrown Place should include traffic calming measures, including speed bumps, signal timing and painted cross-walks in order to improve safety and reduce traffic flow. Roads in the vicinity of the school should be treated as a School Zone and should include adequate signage, pavement markings, and speed reduction measures. We respectfully request further details with respect to the proposed roads shown on the above noted maps when these become available.

7) Parking

We are generally supportive of the proposed parking policies contained within the Draft Secondary Plan. Proposed **policy 6.23** speaks to the provision of short-term on-street parking in appropriate locations.

6.23 Short-term on-street parking will be implemented at appropriate locations to accommodate car-share vehicles and service retail and other ground floor uses in the Business Park Interior or Highway Edge District.

We recommend this policy be modified to allow short-term on-street parking in appropriate locations within both the Business Park Interior and the Highway Edge District. Further, we recommend that Staff consider the provision of short-term on-street parking adjacent to the ACC lands which contains a variety of uses that require short-term parking.

8) Environment and Resiliency

We are in support of Section 8 of the draft Secondary Plan and do not have any comments to provide in this regard.

9) Interpretation and Implementation

As previously mentioned, the planned connection from Hallcrown Place to Victoria Park as shown as note 12 on **Map 38-14 (Transportation Implementation Plan)**, is an important connection for the future function of the area. We are in support of proposed **policy 9.8** (below), which requires that road network improvements be in place prior to construction.

9.8 If a required network improvement forms part of a site under application for redevelopment, that improvement will be secured and/or constructed prior to development proceeding.

Meetings with the area Councillors have taken place to discuss the comments and concerns contained herein. Our Client wishes to ensure that its current and future land functions are protected through the policies and provisions of the ConsumersNext Secondary Plan. A development concept has been prepared for 50 Hallcrown Place, which envisions the future development of the parcel for mixed employment / commercial development comprised of a hotel and office / medical office building. It is the community's intent to enhance the continued function of the ACC through the redevelopment of this parcel. Staff must consider the future development of this parcel in the context of the area with respect to traffic, road pattern design and built form. It is not clear whether future redevelopment of the 50 Hallcrown Place property has been considered in the preparation of the draft Secondary Plan.

We wish to reserve the right or provide further comments on the ConsumersNext Secondary Plan, as appropriate. We request to be notified concerning the release of any future modifications to the ConsumersNext Secondary Plan and any future meetings in relation to the Secondary Plan process.

Should you have any questions, please contact the undersigned or Courtney Heron-Monk (ext. 401). Thank you.

Yours truly,
Weston Consulting
 Per:

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c. Greg Chilian, ACC