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Chair and Members of Scarborough Community Council
c/o Administrator of Community Council – Carlie Turpin
Scarborough Civic Centre
3rd Floor, 150 Borough Drive
Toronto, ON
M1P 4N7

Dear Ms. Turpin:

**RE: Proposed Golden Mile Secondary Plan
Agenda Item SC16.3**

We are the planning consultants representing 1941 Eglinton Avenue Holdings Inc ("1941 Eglinton") that has the concurrence of the private landowners to file this letter, for the approximate 4-acre block bounded by Eglinton Avenue East, Warden Avenue, Civic Road and Prudhum Gate, excluding the parcel owned by Metrolinx, within the proposed Golden Mile Secondary Plan ("GMSP") area, as shown on **Attachment 1** ("the subject block"). This planning letter addresses some of key comments on the draft Golden Mile Secondary Plan (GMSP), which was initially made available to the public on June 6, 2020 and is scheduled for a Statutory Public Meeting at Scarborough Community Council on July 17, 2020.

The owners of the subject block seek permission to redevelop the subject block as a mixed-use residential and commercial site containing retail and service uses on the ground floor, potentially offices in the upper storeys of the podium, and residential towers above. Through the draft GMSP process, this permission is sought by either adding residential use permission in conjunction with the permitted employment uses, or, to apply a *Mixed Use Areas* land use designation on this site and the surrounding block. This way, a comprehensive mixed-use development contemplated by these owners that is suitable for the subject block and the Eglinton Avenue East corridor, can be realized.

Description of Subject Site, Subject Block and Surrounding Area Context

As **Attachments 1 – 5** of this letter indicate, the subject block occupies the majority of lands within the block bounded by Eglinton Avenue East to the north, Warden Avenue to the west, Prudham Gate to the east, and Civic Road to the south. The subject block is currently occupied by Scarborough Nissan automobile dealership, which includes a single storey dealership building surrounded by a large amount of surface parking and automobile storage and display areas. The remainder of the subject block includes a Hyundai car dealership at the southwest corner of Prudham Gate and Eglinton Avenue East, a single storey restaurant (Eggsmart) at the southeast corner of Eglinton Avenue East and Warden Avenue, a vacant small parcel owned by Metrolinx for an Eglinton Crosstown Electrical substation, and a small property at the northeast corner of Civic Road and Warden Avenue, used as a sales outlet for Finish Master (Automotive and Industrial Paint).

All of the uses within the subject block are developed as very low intensity automobile oriented uses with considerable paved areas surrounding the buildings and limited, if any, landscaping on these properties. It is estimated that approximately 100 +/- employees current exist on this block.

The subject block at the intersection of Eglinton Avenue East and Warden Avenue. The subject block is a larger urban redevelopment site with approximately 1.62 ha (4 ac) and a site depth of approximately 76 m (**Attachments 3 and 4**).

The corner of Eglinton Avenue East and Warden Avenue is the location of a Light Rapid Transit (LRT) station of the Eglinton Crosstown LRT (the "ECLRT"), both of which are now under construction. This new ECLRT line is projected to be operational in 2022.

Surrounding the subject block are further land uses and built forms supportive of the current suburban retail and service commercial uses and character of the area. This includes:

- To the west:
 - Along the south side of Eglinton Avenue East, extending from Warden Avenue to west of Lebovic Avenue, are retail and service commercial plazas, single storey bank branches, big box/large format retail outlets and automobile dealerships. Immediately west of Scarborough Toyota, at the southeast corner of Eglinton Avenue East and Pharmacy Avenue (1891 Eglinton Avenue East) is a large plant occupied by Flexible Packaging Corp. In 2012 - 2013, with the positive recommendation of City staff, Official Plan Amendment (OPA) 231 converted the Eglinton Avenue frontage of this property, extending southerly for approximately two thirds of this site's depth, from *Employment Areas* to *Mixed Use Areas*. As part of the OPA 231 process, Site and Area Specific Policy (SASP) 435 was applied to that site. SASP 435 indicates:

"SASP 435 (1891 Eglinton Avenue East)

- a) Development of lands for residential uses on the Mixed Use Areas-designated portion of the site will include employment uses including office space having a minimum gross floor area of 6,000 square metres or 5 per cent of the total gross floor area of residential uses, whichever is smaller.
- b) Employment uses on the portion of the site designated General Employment Areas, shown as "Parcel A", will be compatible with adjacent residential uses.
- c) A feasibility analysis and impact assessment as per Section 4.10.3 of the province's D-6 Guidelines for Compatibility Between Industrial Facilities and Sensitive Land Uses is to be completed and necessary mitigation measures are to be incorporated into the development design for residential and other sensitive uses, to the satisfaction of the City."

- Along the north side of Eglinton Avenue East, extending west from Warden Avenue, is a five storey office building at the northwest corner of Eglinton Avenue and Warden Avenue surrounded by considerable surface parking. West of this, extending to Pharmacy Avenue, are many free-standing commercial buildings and big box retail plazas with large amounts of surface parking.
- To the north:
 - At the northeast corner of Eglinton Avenue East and Warden Avenue is the existing Cosmetica Laboratories plant (1960 Eglinton Avenue East), comprised of a 2-storey office building, north of which is a large sprawling single storey plant building together with surface loading and parking areas. 1960 Eglinton Avenue East is currently under application proposing a 2,600-unit mixed-use development with building heights ranging from 30 to 45 storeys and a Floor Space Index ("FSI") of 5.3 times the lot area;
 - To the east of Cosmetica Laboratories, extending to Birchmount Road, are a variety of large format retail uses and two – three storey office buildings at the northeast corner of Thermos Road and Eglinton Avenue East;
- To the south:
 - Along the south side of Civic Road between Warden Avenue and Manville Road, are a City water tower at the southeast corner of Warden Avenue and Civic Road, east of which are low scale automotive uses with surface parking and storage of vehicles.
 - Along the south side of Civic Road between Manville Road and Sinnot Road is the East Toronto Detention Centre.
- To the east
 - Along the south side of Eglinton Avenue East, between Prudham Gate and Sinnot Road, there are, 1 – 2 storey automotive related uses, very large surface parking lots and some single storey restaurant buildings surrounded by surface parking.
 - Along the south side of Eglinton Avenue East between Sinnot Road and Birchmount Road is a large site occupied by the Scotiabank Eglinton Campus.

Policy Context of the Subject Site, Subject Block and Surrounding Area

The subject block is designated as *General Employment Areas* on Map 20 of the City Official Plan ("City OP") (**Attachment 6**). The *General Employment Areas* land use designation is applied to the south side of Eglinton Avenue East from Birchmount Road to the east, which is the east boundary of the draft GMSP area, up to but not including 1891 Eglinton Avenue East, which is located at the southeast corner of Eglinton Avenue East and Pharmacy Avenue. As mentioned, 1891 Eglinton Avenue East was redesignated as part of OPA 231 from *Employment Areas* to *Mixed Use Areas*, is now subject to SASP 435 (mentioned above), and, is not proposed to be amended as part of proposed OPA 499. The lands on the south side of Eglinton Avenue East, west of Pharmacy Avenue, which is

the Eglinton Square indoor mall, are also designated as *Mixed Use Areas*. All of the north side of Eglinton Avenue East in the draft GMSP extending from Birchmount Road to Victoria Park Avenue is designated as *Mixed Use Areas*.

Map 2 - Urban Structure of the City OP (**Attachment 7**) identifies all of the Eglinton Avenue East frontage between Victoria Park Avenue and Birchmount Road as *Avenues*, but for the lands identified along the south side of Eglinton Avenue East as *Employment Areas* and the above described Eglinton Avenue frontage lands of 1891 Eglinton Avenue, which is designated on Map 20 as *Mixed Use Areas* and subject to SASP 435.

Prior to 2012, the *Avenues* designation applied to both sides of Eglinton Avenue East (**Attachment 7: Map 2, 2010 Official Plan**), including the subject block. In 2012 - 2013, the *Avenues* overlay on the south side of Eglinton Avenue East between Pharmacy Avenue and Birchmount Road was removed from Map 2 as part of OPA 231.

Map 3 of the City OP identifies both Warden Avenue and Eglinton Avenue East as *Major Streets*. Maps 4 and 5 identify Eglinton Avenue East as a *Transit Corridor* and *Transit Priority Segment*. This is in recognition of the construction of the LRT along Eglinton Avenue.

The subject block is also within a large area defined by Site and Area Specific Policy 129 ("SASP 129"), applying to lands north and south of Eglinton Avenue East between Victoria Park Avenue and Birchmount Road. The policies of SASP 129 permit retail and service uses, including stand-alone retail stores and/or "power centres". This SASP reflects the large amount of stand-alone big box retailing that currently exists along this stretch of Eglinton Avenue.

Proposed Golden Mile Secondary Plan (GMSP)

The proposed GMSP process was initiated in May 2016 to develop a vision and comprehensive planning framework for the Golden Mile area, which generally extends just west of Victoria Park Avenue to the west, Birchmount Road to the east, Ashtonbee Road to the north and the south boundary of Eglinton Square Mall and Civic Road to the south (**Attachment 8**). Draft OPA 499, which would implement the GMSP, was the subject of a staff report at the Scarborough Community Council meeting on June 19, 2020. At that meeting, the Community Planning report dated May 27, 2020, included the draft OPA 499 and a recommendation that it be considered at a Statutory Public Meeting on July 17, 2020, which was adopted. Draft OPA 499 contains proposed amendments to the City OP and new policies that include:

- Map 20, Land Use Plan, is amended in certain locations;
- Chapter 7, Site and Area Specific Policies, is amended to delete SASP 129 for lands within the GMSP;
- Map 3, Right-of-Way Widths Associated with Existing Major Streets, is amended to widen certain segments of roadways, including widening Eglinton Avenue East from 36 m to 43 m and widening Warden Avenue from 30 m to 36 m within the GMSP area; and

- Chapter 6, Secondary Plans, is amended by adding Section 45, the Golden Mile Secondary Plan.

The policies of the draft GMSP provide the vision of significant reurbanization and transformation of the Eglinton Avenue corridor arising from the completion of the ECLRT. The ECLRT will travel in a dedicated transit right-of-way and will include five LRT transit stops/stations with the boundaries of the GMSP area. According to the draft GMSP background documents, the ECLRT is considered a “catalyst to aid in transforming the GMSP area’s current landscape of auto-oriented retail and industrial uses into a mixed-use, transit-oriented community, while maintaining and enhancing the existing employment uses in the Plan Area”. The vision is for a connected, accessible, diverse, complete and liveable mixed-use community, emerging as an urbanized node for southeast Toronto, subordinate in scale and massing to the Scarborough Centre.

The draft GMSP identifies Districts and Character Areas that are planned to accommodate a balance of residential, commercial, employment and community uses with a comfortable and attractive public realm. The draft GMSP emphasizes multi-modal transportation, anchored by the ECLRT, which is part of the proposed new identity of the area. The level of density is planned to promote a transit-supportive environment, increasing transit ridership and optimizing significant public investment in the ECLRT. Policy 3.1 of the draft GMSP identifies five transit nodes centred upon the ECLRT stops/stations, as one type of urban structural element functioning as the foundation of the planning framework of the GMSP.

Map 45-3 Character Areas (**Attachment 8**) locates the subject block within Character Area 7 – Employment Area. Proposed Policy 3.10 states:

“Development in the Employment Area will provide mid-rise buildings with employment uses, as well as commercial uses at grade along Eglinton Avenue East. Development will provide public realm improvements including a new park.”

It is noteworthy that the north side of Eglinton Avenue East across from the subject block is within the Mixed Use Transit Nodes Character Area, to which proposed Policy 3.5 applies:

“Development in the Mixed Use Transit Nodes will be designed as the centre of activity along Eglinton Avenue East. Development will contribute to the creation of a green and vibrant commercial main street along the ECLRT corridor. Development will also provide a series of parks of varying sizes and functions, as well as a mix of tall and mid-rise buildings. This Character Area will include buildings with some of the greater heights in the Plan Area, located near the ECLRT stops. Development surrounding the ECLRT stops will be designed with architecture, landscape and public art of the highest quality to accentuate these places as the arrival points along the ECLRT corridor.” (emphasis added)

Map 45-5 Development Density (**Attachment 9**) permits a maximum FSI of 2.5 on the subject block. By comparison, the proposed density permitted on the north side of Eglinton Avenue East is 3.2 in the vicinity of the planned transit station at the intersection of Eglinton Avenue East and Warden Avenue and 3.0 to the east of the transit station.

Map 45-13 Building Types and Heights in Character Areas (**Attachment 10**) designates the subject block for mid-rise buildings (5-11 storeys). By contrast, the north side of Eglinton

Avenue East opposite the subject block is designated for a mix of tall buildings and mid-rise buildings (max. 30 storeys).

The subject block is at the planned LRT station, at the arterial edge with considerable frontage along Eglinton Avenue East, and with Civic Road effectively functioning as a defined southerly land use border/boundary. As the provincial policy documents reviewed below direct, this is an excellent candidate site where the City policies should seek to achieve a mixed-use land use, utilizing the land and new infrastructure efficiently and optimally. The low height, limited range of land uses, and the lower density proposed on the subject subject block in the draft GMSP would, in our opinion, under-utilize the lands should these policies come into effect. A broader range of uses, including residential uses, are appropriate at this edge location and could be combined in one or more mixed use buildings supporting all planning objectives of the draft GMSP. Our expectation is that, as proposed, the draft GMSP will provide little incentive for redevelopment of the subject block. This in turn will result in little or no redevelopment on the subject block into the foreseeable future, leaving the subject block as is, contrary to the intent of the proposed new vision for this area.

As such, we see the need to revise the draft GMSP. The subject block should be permitted to have residential uses, with similar height and density permissions as would apply across the street on the north side of Eglinton Avenue East. We also think that the maximum height and density currently proposed by the GMSP is too low, reflecting mid-rise density for a tall building area. The ultimate density permitted should be design driven, subject to the availability of appropriate supporting infrastructure. The lower levels of new mixed use buildings could be used for a range of employment, commercial, community and residential uses, with residential towers above to most effectively leverage the significant public investment into rapid transit infrastructure along this corridor.

Provincial Policy Context

The Provincial policy documents that apply to the consideration of the draft GMSP and any proposed revisions are the Provincial Policy Statement, 2020 ("PPS") and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 ("Growth Plan").

The PPS 2020

The PPS, which came into effect on May 1, 2020, provides policy direction on matters of provincial interest and all planning decisions "shall be consistent with" the PPS. Relevant policies of the PPS 2020 include as follows:

- Promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term; (1.1.1a)
- Accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons) employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs (1.1.1b);

- Promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs (1.1.1e);
- Settlement areas shall be the focus of growth and development (1.1.3.1);
- Land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment in accordance with the criteria in policy 1.1.3.3, where this can be accommodated (1.1.3.2)
- Land use patterns within *settlement areas* shall be based on densities and a mix of land uses which:
 - a) Efficiently use land and resources;
 - b) Are appropriate for, and efficiently use, the *infrastructure* and *public service facilities* which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;
 - e) Support *active transportation*;
 - f) Are *transit-supportive*, where transit is planned, exists or may be developed; (1.1.3.2a, b, e & f)
- Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs (1.1.3.3);
- *Major facilities* and *sensitive land uses* shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential *adverse effects* from odour, noise and other contaminants, minimize risk to public health and safety , and to ensure the long-term operational and economic viability of *major facilities* in accordance with provincial guidelines, standards and procedures; (1.2.6.1)
- Planning authorities shall promote economic development and competitiveness by providing for an appropriate mix and range of employment, institutional and broader mixed uses to meet the long-term needs (1.3.1a);
- Planning authorities shall promote economic development and competitiveness by providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses (1.3.1b);
- Planning authorities shall promote economic development and competitiveness by encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities, with consideration of housing policy 1.4 (1.3.1d);

- Within employment areas planned for industrial or manufacturing uses, planning authorities shall prohibit residential use and prohibit or limit other sensitive land uses that are not ancillary to the primary employment uses in order to maintain land use compatibility. Employment areas planned for industrial or manufacturing uses should include an appropriate transition to adjacent non-employment areas (1.3.2.3);
- Planning authorities may permit conversion of land within employment areas to non-employment uses through a comprehensive review, only where it has been demonstrated that the land is not required for employment purposes over the long term and that there is a need for the conversion (1.3.2.4);
- Notwithstanding policy 1.3.2.4, and until the official plan review or update in policy 1.3.2.4 is undertaken and completed, lands within existing employment areas may be converted to a designation that permits non-employment use provided the area has not been identified as provincially significant through a provincial plan exercise or as regionally significant by a regional economic development corporation working together with affected upper and single-tier municipalities and subject to the following:
 - a) There is an identified need for the conversion and the land is not required for employment purposes over the long term;
 - b) The proposed uses would not adversely affect the overall viability of the employment area; and
 - c) Existing or planned infrastructure and public service facilities are available to accommodate the proposed uses (1.3.2.5);
- Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:
 - b) permitting and facilitating:
 - 1. All housing options required to meet the social, health, economic and well-being requirements of current and future residents, including *special needs* requirements and needs arising from demographic changes and employment opportunities; and
 - 2. All types of *residential intensification*, including additional residential units, and *redevelopment* in accordance with policy 1.1.3.3;
 - c) directing the development of new housing toward locations where appropriate levels of *infrastructure* and *public service facilities* are or will be available to support current and projected needs;
 - d) promoting densities for new housing which efficiently use land, resources, *infrastructure* and public service facilities, and support the use of *active transportation* and transit where it exists or is to be developed;

- e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations (1.4.3b, c, d & e);
- Before consideration is given to developing new *infrastructure* and *public service facilities*:
 - a) the use of existing *infrastructure* and *public service facilities* should be optimized; (1.6.3a)
- efficient use should be made of existing and planned *infrastructure*, including through the use of *transportation demand management* strategies, where feasible. (1.6.7.2)
- A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and *active transportation*. (1.6.7.4)
- Long-term economic prosperity should be supported by:
 - b) encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce;
 - c) optimizing the long-term availability and use of land, resources, infrastructure and public service facilities;
 - d) maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets;
 - e) encouraging a sense of place, by promoting well-designed built form and....
 - g) providing for an efficient, cost-effective, reliable multimodal transportation system that is integrated with adjacent systems and those of other jurisdictions, and is appropriate to address projected needs to support movement of goods and people; (1.7.1 (b), (c), (d), (e), and (g)).
- Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and preparing for the impacts of a changing climate through land use and development patterns which encourage transit-supportive development and intensification to improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion (1.8.1e).

The above policies, in combination, strongly supports and directs, in our opinion, the broadening of the range of land uses within the subject block and the optimization of the infrastructure of this area. As indicated above, the subject block is at an arterial edge location, with a defined southerly land use boundary in the form of Civic Road. A combination or mix of employment, residential and commercial uses are ideal for this strategic and important location at an ECLRT station along the Eglinton Avenue East corridor.

Importantly, a fully mixed use project can be accommodated on this site without compromising the long-term viability of the remaining *Employment Area* south of Civic Road. A very good example of where this has already been implemented is at 1891 Eglinton Avenue East (southeast corner at Pharmacy Avenue), where the City converted the Eglinton Avenue frontage portion of that property from *Employment Areas* to *Mixed Use Areas*, as part of OPA 231 and applied SASP 435 to this site. The southern portion of that property was not converted and remains as *Employment Areas*. Also, the draft GMSP identifies a new east west road that connects with Pharmacy Avenue, reinforcing the southern boundary of the *Mixed Use Areas* fronting onto Eglinton Avenue East and the *Employment Areas* designation and land uses to the south. That site is also at a planned LRT stop/station.

The same land use planning principles that were applied to 1891 Eglinton Avenue could similarly be applied to the subject block. This illustration assists in a reasonable and appropriate application of the PPS policies to the subject block.

The subject block is not within a *provincially significant employment zone*. That supports the consideration of adding residential use permission to the subject block. An opportunity remains to achieve a fully integrated combination of uses by including both residential and employment uses within the subject block. The lower base levels of a tall building on this site could include commercial and office uses, as are intended now in the draft GMSP. The public interest benefit of this requested revision to the draft GMSP, is achieving similar, if not greater, employment usage of the lands as is now intended, when compared to the current employment uses within the subject block. Fully integrated mixed use buildings at this location would not, in our opinion, adversely affect the overall viability of the nearby *Employment Areas*. It could achieve similar employment levels, better optimize the use of the land and new infrastructure (including the ECLRT) and incentivize the realization of the vision.

Mixed-use development (including residential uses) on the subject block would be consistent with PPS policies that promote compact, mixed-use intensified, transit-supportive development and encourage the provision of residential uses in locations well-served by public transit to meet long-term housing needs. In our opinion, this would be supportive of the overall policy thrust embodied in the PPS policies.

It is notable that the update to the PPS issued on May 1, 2020 added the words “and broader mixed uses” to policy 1.3.1a, a clear indication that at the provincial level, policies to promote economic development and competitiveness envision a broader mix and range of uses in conjunction with employment and institutional uses. In our opinion, at the local level, the nature of the proposed mixed-use development would promote economic development and prosperity in the GMSP area.

The Growth Plan 2019

A Place to Grow: Growth Plan for the Greater Golden Horseshoe derives its authority from the Places to Grow Act, 2005 and became effective on May 16, 2019. Many of the Provincial policy themes enunciated in the PPS have been carried forward, and further articulated, in the Growth Plan. This document therefore is a further expression and articulation of Provincial policy and is a Provincial Plan, pursuant to Section 3 of the *Planning Act*.

The Growth Plan generally aims to, among other things, revitalize downtowns to become vibrant and convenient centers, create complete communities that offer more options for living, working, shopping and playing; provide greater choice in housing types to meet the needs of people at all stages of life; curb urban sprawl; protect farmland and green spaces; and reduce traffic gridlock by improving access to a greater range of transportation choices. Similar, to the PPS, the Growth Plan encourages compact, vibrant complete communities, optimizing the use of land and infrastructure in order to support growth in a compact and efficient form. The 2019 Growth Plan updated the previous Growth Plan by strengthening and reinforcing the Provincial policy direction of promoting intensification and optimization of the land base and of available and planned infrastructure.

The subject block is located within the area identified as “built-up area”, which encompasses the whole of the City of Toronto. Section 1.2.1 of the Growth Plan includes Guiding Principles. Some of the key principles include:

- “Support the achievement of *complete communities* that are designed to support healthy and active living and meet people’s needs for daily living throughout an entire lifetime.
- Prioritize *intensification* and higher densities in *strategic growth areas* to make efficient use of land and *infrastructure* and support transit viability.
- Support a range and mix of housing options, including second units and *affordable* housing, to serve all sizes, incomes, and ages of households.”

Section 2 of the Growth Plan relates to “Where and How to Grow”. The following quotes from that section capture important policy directions of the Growth Plan relating to the proposed GMSP and potential revisions:

“This Plan is about accommodating forecasted growth in *complete communities*. These are communities that are well designed to meet people’s needs for daily living throughout an entire lifetime by providing convenient access to an appropriate mix of jobs, local services, *public service facilities*, and a full range of housing to accommodate a range of incomes and household sizes. *Complete communities* support quality of life and human health by encouraging the use of *active transportation* and providing high quality public open space, adequate parkland, opportunities for recreation, and access to local and healthy food. They provide for a balance of jobs and housing in communities across the GGH to reduce the need for long distance commuting. They also support climate change mitigation by increasing the *modal share* for transit and *active transportation* and by minimizing land consumption through *compact built form*.”

“To support the achievement of *complete communities* that are healthier, safer, and more equitable, choices about where and how growth occurs in the GGH need to be made carefully. Better use of land and *infrastructure* can be made by directing growth to *settlement areas* and prioritizing *intensification*, with a focus on *strategic growth areas*, including *urban growth centres* and *major transit station areas*, as well as *brownfield sites* and *greyfields*. Concentrating new development in these areas provides a focus for investment in transit as well as other types of *infrastructure* and

public service facilities to support forecasted growth, while also supporting more diverse range and mix of housing options...”

“This Plan recognizes transit as a first priority for major transportation investments. It sets out a regional vision for transit, and seeks to align transit with growth by directing growth to *major transit station areas* and other *strategic growth areas*, including *urban growth centres*, and promoting transit investments in these areas. To optimize provincial investments in *higher order transit*, this Plan also identifies *priority transit corridors* and the Province expects municipalities to complete detailed planning for *major transit station areas* on these corridors to support planned service levels.”

“It is important to optimize the use of the existing urban land supply as well as the existing building and housing stock to avoid over-designating land for future urban development while also providing flexibility for local decision-makers to respond to housing need and market demand. This Plan’s emphasis on optimizing the use of the existing urban land supply represents an *intensification* first approach to development and city-building, one which focuses on making better use of our existing *infrastructure* and *public service facilities*, and less on continuously expanding the urban area.”

Policy 2.2.1.2 relates to managing growth and indicates that growth will be accommodated by:

- “2. Forecasted growth to the horizon of this Plan will be allocated based on the following:
 - a) the vast majority of growth will be directed to *settlement areas* that:
 - i. have a *delineated built boundary*;
 - ii. have existing or planned *municipal water and wastewater systems*, and
 - iii. can support the achievement of *complete communities*.
 - b) within *settlement areas*, growth will be focused in:
 - i. *delineated built-up areas*;
 - ii. *strategic growth areas*;
 - iii. locations with existing or planned transit, with a priority on *higher order transit* where it exists or is planned; and
 - iv. areas with existing or planned *public service facilities*;

By definition, mixed use development within the subject block would represent *intensification* within a *strategic growth area* and within a *major transit station area*, which according to Section 7 of the Growth Plan, are defined as follows:

“Intensification: The development of a property, site or area at a higher density than currently exists through:

- a) *redevelopment*, including the reuse of *brownfield sites*;

- b) the development of vacant and/or underutilized lots within previously developed areas;
- c) infill development; and
- d) the expansion or conversion of existing buildings.”

“Strategic Growth Areas: Within *settlement areas*, nodes, corridors and other areas that have been identified by municipalities or the Province to be the focus for accommodating *intensification* and higher-density mixed uses in a more *compact built form*. *Strategic growth areas* include *urban growth centres*, *major transit station areas*, and other major opportunities that may include infill, *redevelopment*, *brownfield sites*, the expansion or conversion of existing buildings, or *greyfields*. Lands along major roads, arterials, or other areas with existing or planned *frequent transit service* or *higher order transit* corridors may also be identified as *strategic growth areas*.”

Major Transit Station Area: “The area including and around any existing or planned *higher order transit* station or stop within a *settlement area*; or the area including and around a major bus depot in an urban core. *Major transit station areas* generally are defined as the area within an approximate 500 to 800 metres radius of a transit station, representing about a 10-minute walk.”

In addition, the subject block is also located along a *Higher Order Transit* corridor which is subject to *Frequent Transit*, defined as follows:

“Higher Order Transit – Transit that generally operates in partially or completely dedicated rights-of-way, outside of mixed traffic, and therefore can achieve levels of speed and reliability greater than mixed-traffic transit. *Higher order transit* can include heavy rail (such as subways and inter-city rail), light rail, and buses in dedicated rights-of-way.”

“Frequent Transit – A public transit service that runs at least every 15 minutes in both directions throughout the day and into the evening every day of the week.”

Section 2.2.6.1 a)i. of the Growth Plan also speaks to housing and the need to “identify a diverse range and mix of housing options and densities, including second units and *affordable* housing to meet projected needs of current and future residents”.

Section 2.2.5 of the Growth Plan contains employment policies that are similar to the PPS. Policy 2.2.5.1 states:

“Economic development and competitiveness in the GGH will be promoted by:

- a) making more efficient use of existing *employment areas* and vacant and underutilized employment lands and increasing employment densities;
- b) ensuring the availability of sufficient land, in appropriate locations, for a variety of employment to accommodate forecasted employment growth to the horizon of this Plan;
- c) planning to better connect areas with high employment densities to transit; and

- d) integrating and aligning land use planning and economic development goals and strategies to retain and attract investment and employment.”

As in the PPS, there are Growth Plan policies that provide for conversion of lands within employment areas. Policy 2.2.5.9 states:

“The conversion of lands within *employment areas* to non-employment uses may be permitted only through a *municipal comprehensive review* where it is demonstrated that:

- a) There is a need for the conversion;
- b) The lands are not required over the horizon of this Plan for the employment purposes for which they are designated;
- c) the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;
- d) The proposed uses would not adversely affect the overall viability of the *employment area* or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan; and
- e) There are existing or planned *infrastructure* and *public service facilities* to accommodate the proposed uses.”

Policy 2.2.5.10 states:

“Notwithstanding policy 2.2.5.9, until the next *municipal comprehensive review*, lands within existing *employment areas* may be converted to a designation that permits non-employment uses, provided the conversion would:

- a) Satisfy the requirements of policy 2.2.5.9 a), d) and e);
- b) Maintain a significant number of jobs on those lands through the establishment of development criteria; and
- c) Not include any part of an employment area identified as a *provincially significant employment zone*.”

As previously noted, no portion of the subject block is identified as a provincially significant employment zone.

Policy 2.2.5.10 of the Growth Plan is similar to Policy 1.3.2.5 of the PPS. As noted above, broadening the range of land uses permitted within the subject block could increase the amount of employment on the subject block, and the overall viability of the adjacent *employment area* is not anticipated to be adversely affected due to the subject block’s location on the arterial edge, its physical separation from the *employment area* by Civic Road, and the nature of the surrounding employment uses. The need to enable a broader range of uses arises from the public interest objective to see this *major transit station area* site develop for intensified uses that contributes to a more complete community along Eglinton Avenue East. The alternative, as reflected in the draft GMSP, is to under-utilize

the site from a land use, density and built form perspective. The opinions expressed in this planning letter support the policy imperatives of the Growth Plan of protecting for employment growth while supporting complete communities and optimizing the use of existing and planned infrastructure, including significant public investment in transportation infrastructure.

From a population perspective, adding residential uses on the subject block will contribute to satisfying housing needs for projected population growth while providing increased employment opportunities in the area. In 2020, there is no longer a need to make the two land uses mutually exclusive in a location such as the subject block. The subject block is located within a *Major Transit Station Area (MTSA)*, is served by rapid transit stops/stations, and is well served by existing and planned shopping, services, places of employment and community facilities in close walking proximity. The proposed revisions to the draft GMSP are intended to better utilize and optimize the subject block, implementing the *intensification* first approach of the Growth Plan and contributing to a complete community.

The subject block is strategically located, and a genuine opportunity exists to optimize the range of uses and the utilization of the site. The alternative, based on the draft GMSP, would be the real potential for the subject block not to redevelop in the foreseeable future. With the currently proposed uses for the subject block being restricted to employment uses only, within a 5 to 11 storey building, with a maximum density of only 2.5 FSI, the subject site may not be sufficiently incentivized to redevelop, and even if it did, these restrictions would be significantly under-utilizing the land use and density potential appropriate for the subject site given its location.

In our opinion, a decision to permit high-density mixed-use development on the subject block would be consistent with the PPS and would conform to the Growth Plan.

Other Comments on the Proposed Golden Mile Secondary Plan

Some additional comments concerning the proposed GMSP include:

1. Policy 7.21: This policy should not function to limit the ongoing form and function of existing uses which may wish to continue or expand.
2. Policy 7.26 sets out minimum and maximum podium heights. The GMSP should not be prescriptive but should rather enable a site specific solution to be determined at the time of a redevelopment application, based on the proposed range of land use(s) of the application, among other factors.
3. Policy 7.44 sets out development standards for tall buildings which exceed or are more restrictive than the development standards for tall buildings throughout most of the City of Toronto. The justification for this is unclear and, as such, we suggest that 7.44 (b), (c), (d) and (e) be deleted so that the use of guideline documents can be applied as appropriate and so that the built form of each site can be determined on its own merit.
4. Policies 7.45 (d) and (e) seek to elevate guideline standards to Official Plan policies related to mid-rise buildings which, in our opinion, are most appropriately left as guideline standards, to enable the evaluation of the specific site capabilities and context at the site application stage.

5. Policy 7.47 utilizes the standard of “minimize” shadows whereas the more conventional and appropriate official plan standard of “adequately limiting” such shadows should continue in this context.
6. Policies 7.49 and 7.50 provide standards for shadows on park areas and on sidewalk areas without fully understanding the use or utility of such areas or without determining whether such policy could function to otherwise limit height and/density at important and strategic areas such as *major transit station areas*. We suggest that the language of “adequately limiting” be carried forward into the proposed GMSP to ensure that built form is not inappropriately limited by these policies.
7. Policy 13.18(b) relates to a circumstance where network improvements identified on Map 45-18: Transportation Implementation Plan are not part of a Site, yet somehow ties such an applicant, or requires of such an applicant, “best efforts” be exercised to coordinate the required improvements with other landowners in the Plan Area. In our opinion, this policy is vague, and potentially ties such an applicant to improvements that may be identified on the map yet are not needed to enable the proper function of the applicant’s site and/or block. Additional clarity of the meaning or intent of this policy is required so it is clear what the implications of this policy are for the subject block.

Conclusions and Requested Revisions to the Proposed Golden Mile Secondary Plan

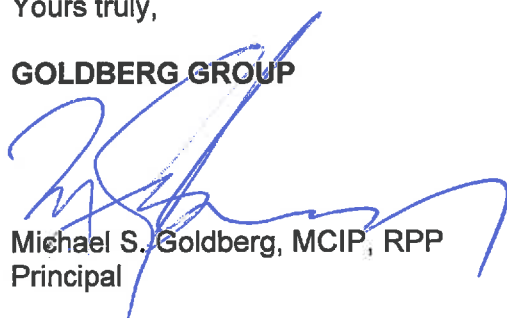
As noted above, the subject block is, by definition, located in a *Strategic Growth Area* and a *Major Transit Station Area* and is served by a *Higher Order Transit* line and *Frequent Transit*. The Eglinton Avenue East corridor on which the subject block is located is planned to evolve from its current context dominated by low scale large format retail commercial uses and suburban built form to a dense, urban mixed-use community served by the ECLRT. In our opinion, that vision should include permission for high-density mixed-use development on the subject block given its location at an ECLRT station and other locational attributes. Treating this block different than the sites immediately across the street, on the north side of Eglinton Avenue East, would represent a missed opportunity and an under-utilization of the subject block. The arterial edge location and the clear physical southern boundary of Civic Road, with *Mixed Use Areas* to the north and *Employment Areas* to the south, offers the opportunity for a mixed residential/commercial land use solution for the subject block that is fitting for the function of this location on the Eglinton corridor without any anticipated adverse impacts to the remaining *Employment Area* to the south.

In view of the foregoing, we request that the draft GMSP be revised to enable a broader mix of uses on the subject block, including residential, in a high-density and tall building form, with height and density permissions similar to those that may be achieved on the north side of Eglinton Avenue East immediately opposite the subject block. The Cosmetics Laboratories site is currently under application for a mixed use redevelopment seeking both heights and overall density which exceed those currently proposed in the GMSP. We are of the opinion that the strategic location and rapid transit infrastructure at the corner of Eglinton Avenue East and Warden Avenue will likely support greater levels of height and density than what the current draft GMSP would permit.

We would be pleased to advance discussions about the appropriate revisions to the draft GMSP. If you have any questions or require additional details about this request, please do not hesitate to contact me at (416) 322-6364 ext. 2100.

Yours truly,

GOLDBERG GROUP

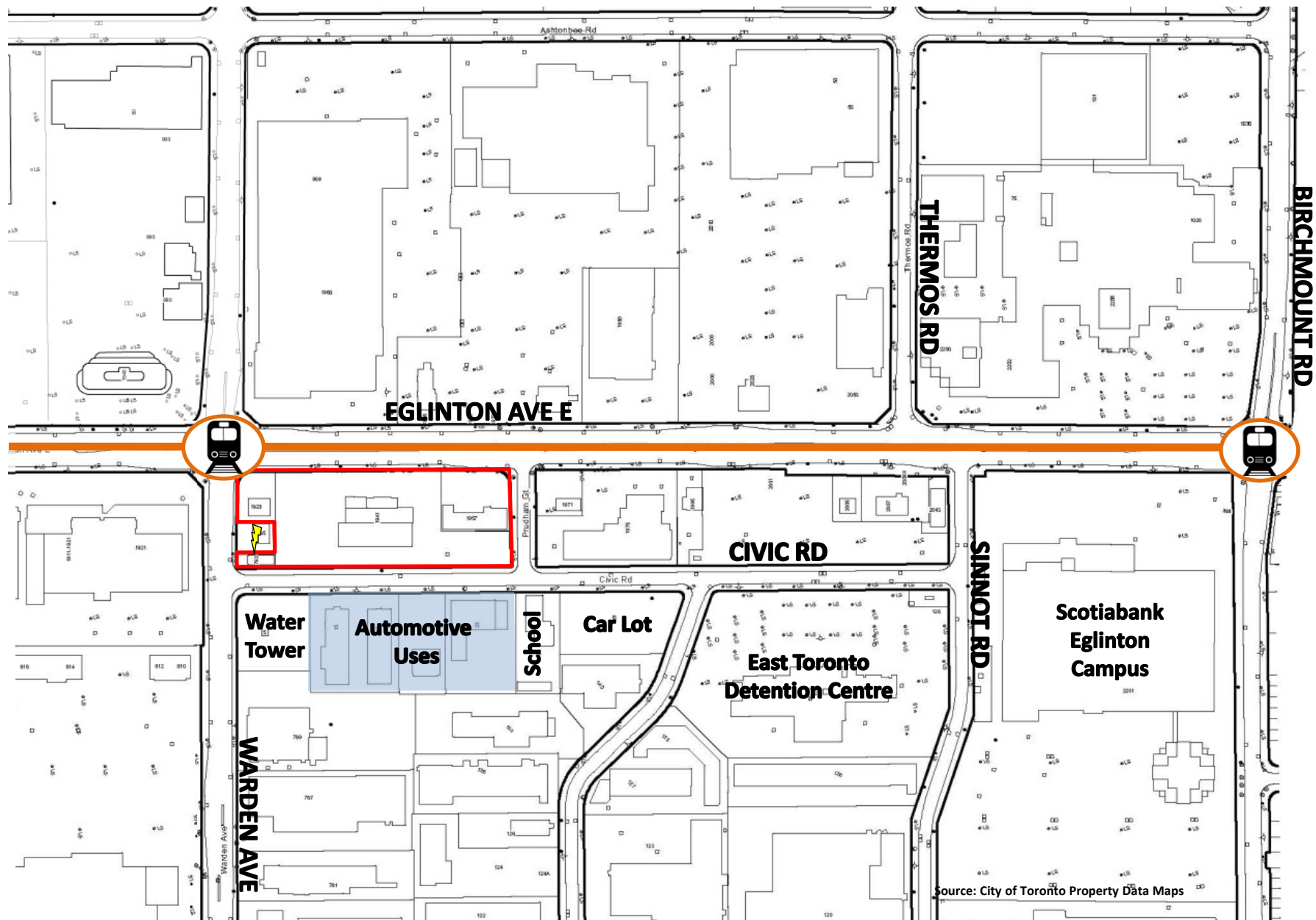


Michael S. Goldberg, MCIP, RPP
Principal

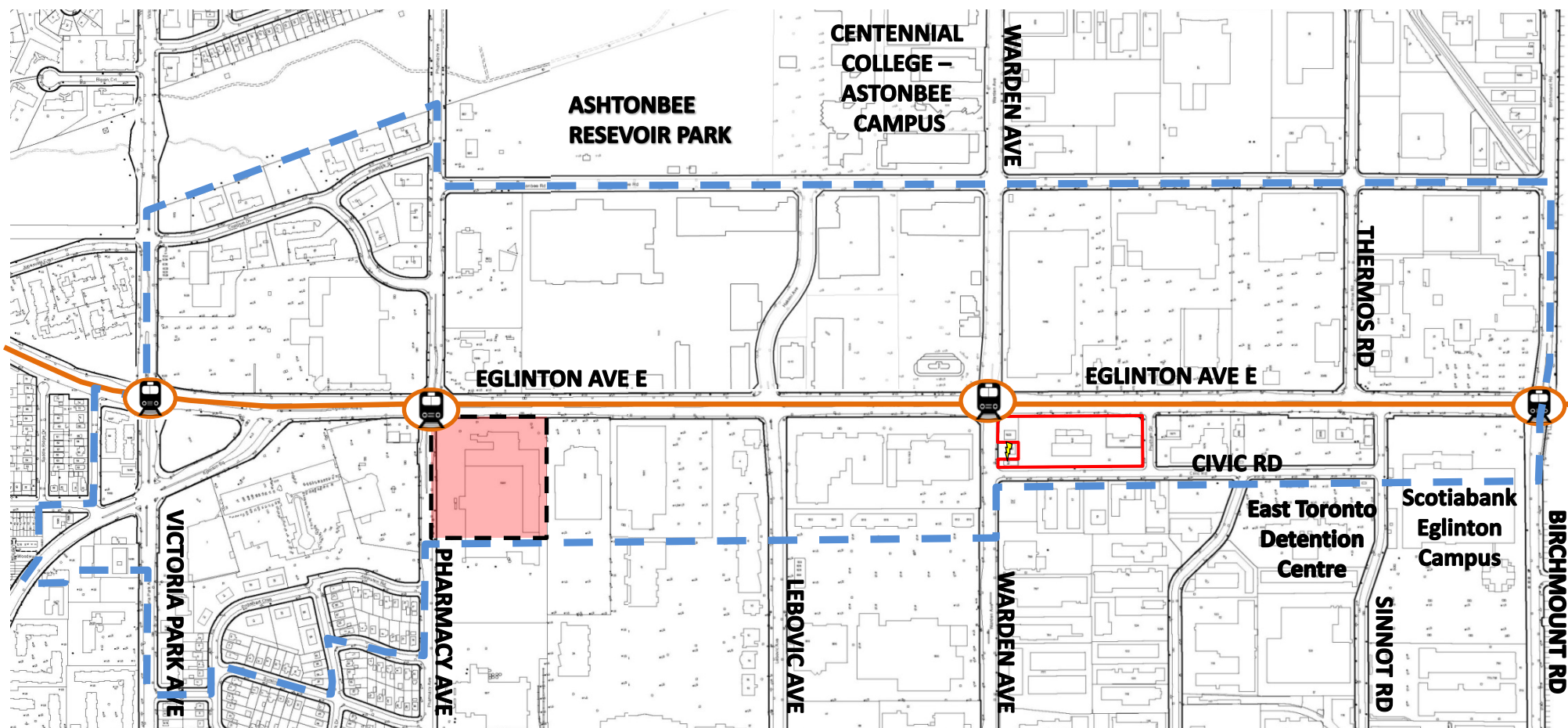
Attachments:

- Attachment 1: Location Map
- Attachment 2: Location Map of the Golden Mile Secondary Plan
- Attachment 3: 3D Air Photo - Subject Site
- Attachment 4: Survey/Site Plan – 1941 Eglinton Ave E
- Attachment 5: 3D Air Photo, Area Context
- Attachment 6: Map 20, Official Plan
- Attachment 7: Map 2, 2010/2019 Official Plan
- Attachment 8: Map 45-3, GMSP
- Attachment 9: Map 45-5, GMSP
- Attachment 10: Map 45-13, GMSP

cc. Ms. Emily Caldwell, Senior Planner, City of Toronto
Ms. Cheryl Shindruk, Executive Vice President, Geranium Corporation
Mr. Mark Flowers, Davies Howe LLP
Mr. Nick Sgro, 1941 Eglinton Avenue East Holdings Inc.
Mr. Michael Norton, Metrolinx



ATTACHMENT 1 - LOCATION MAP



Source: City of Toronto Property Data Maps

-  Eglinton LRT Line
-  Eglinton Crosstown LRT Electrical Substation
-  Proposed Eglinton LRT Stop
-  Converted to Mixed-Use Areas by OPA 231
-  Golden Mile Secondary Plan Boundary

 Subject Block





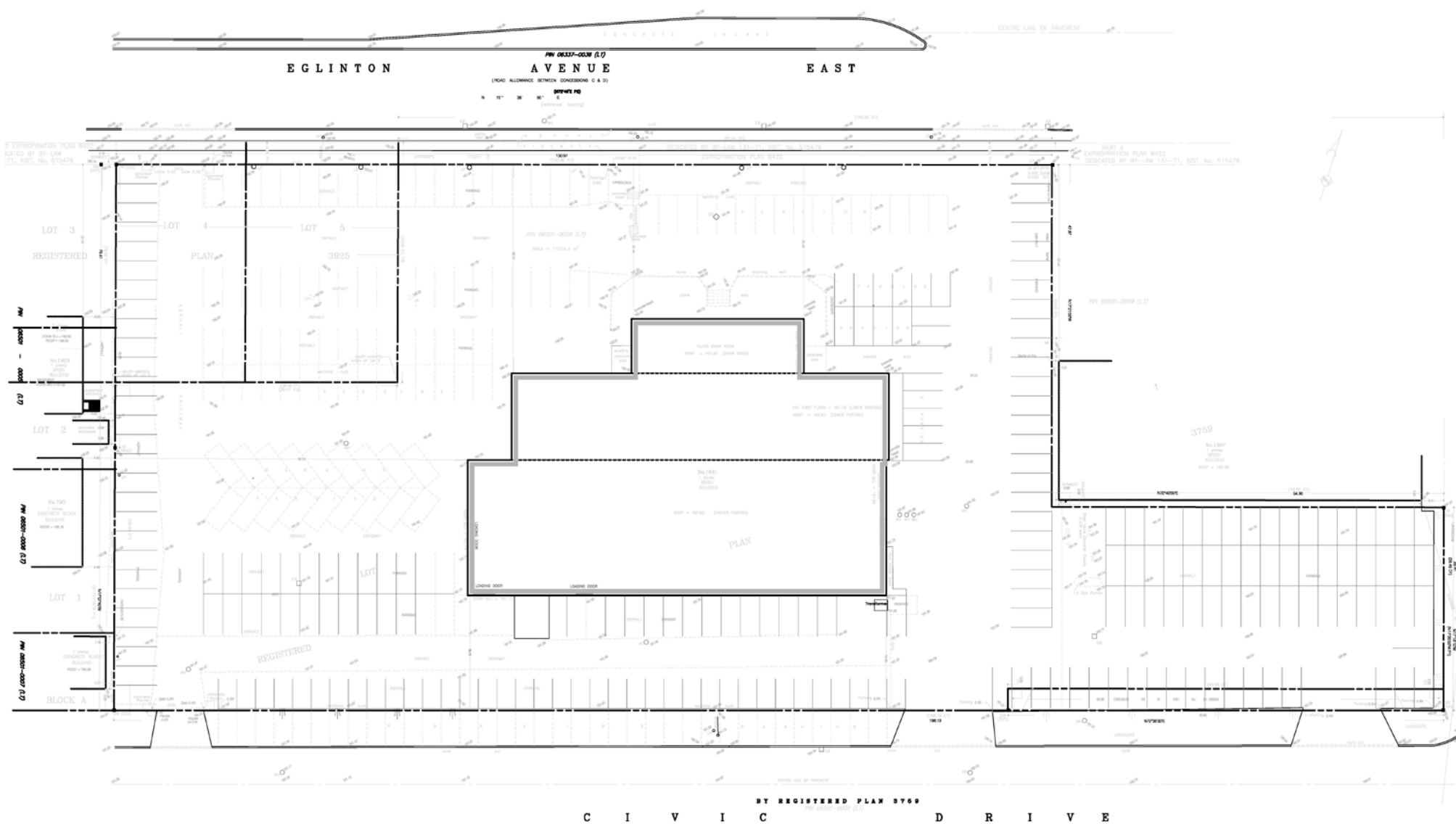
 Subject Block



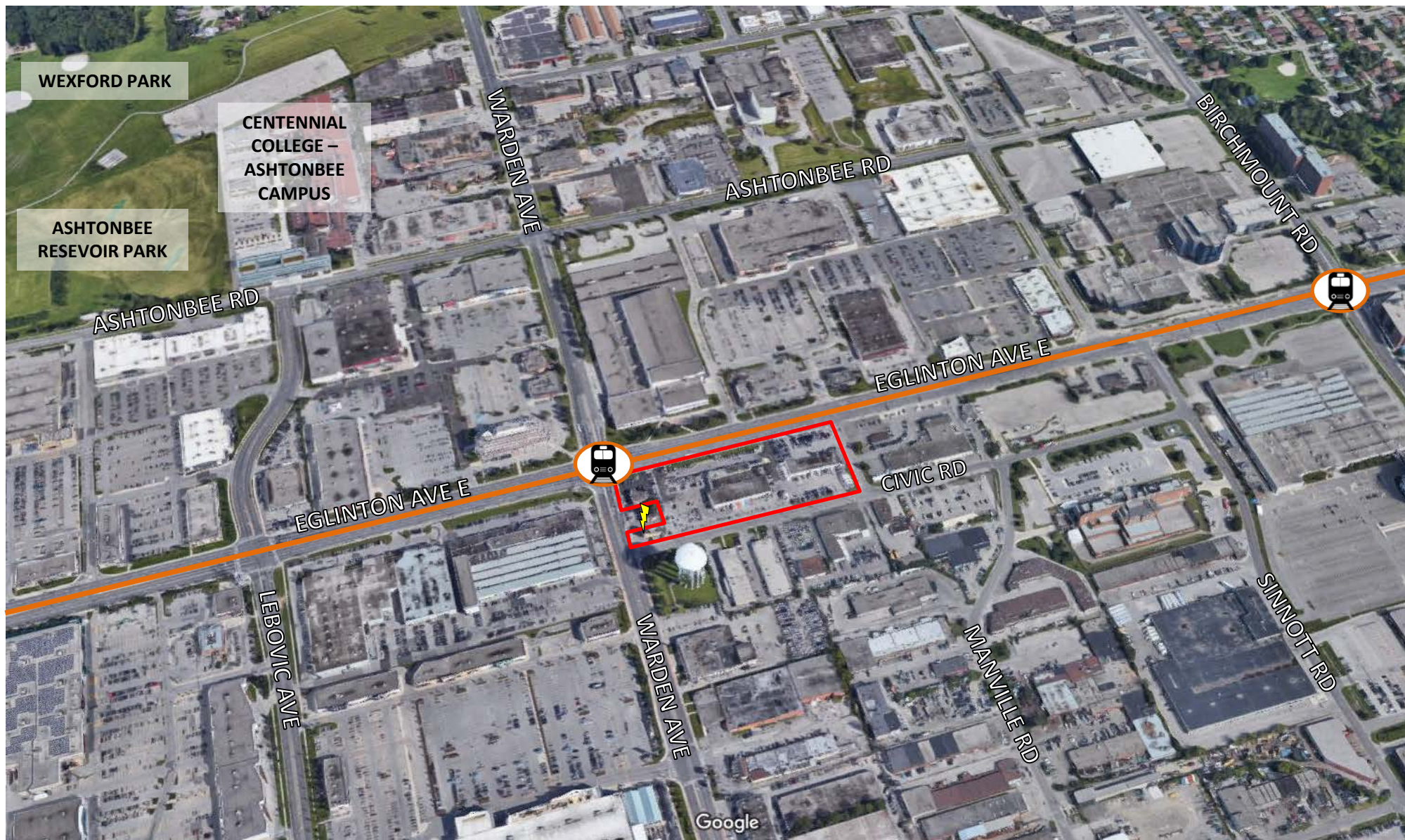
Source: Google Maps 2020

ATTACHMENT 3 - 3D AIR PHOTO of SUBJECT SITE

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ATTACHMENT 4 – SURVEY/ SITE PLAN – 1941 EGLINTON AVE E



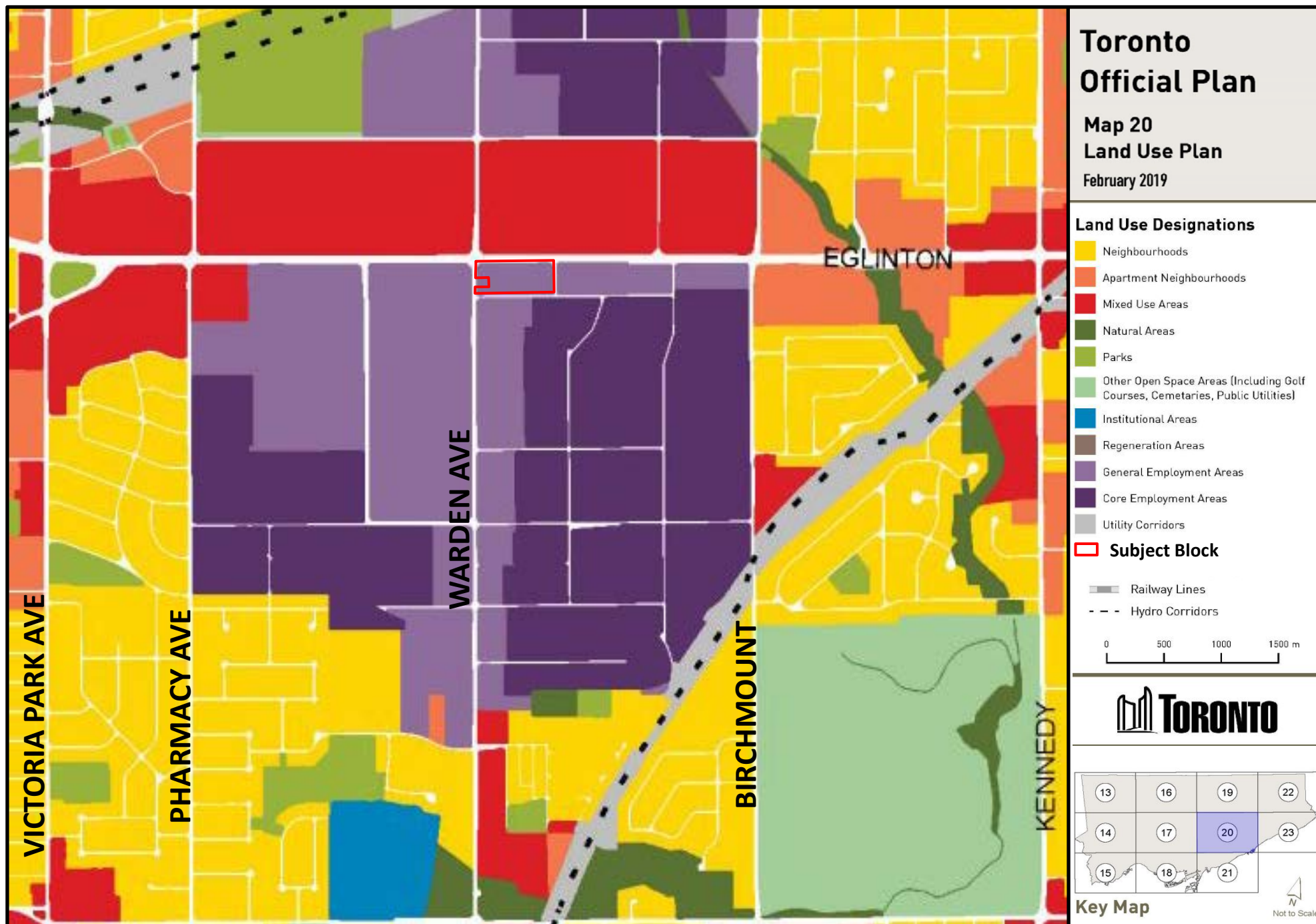
-  Subject Block
-  Proposed Eglinton LRT Stop
-  Eglinton LRT Line
-  Eglinton Crosstown LRT Electrical Substation

Source: Google Maps 2020

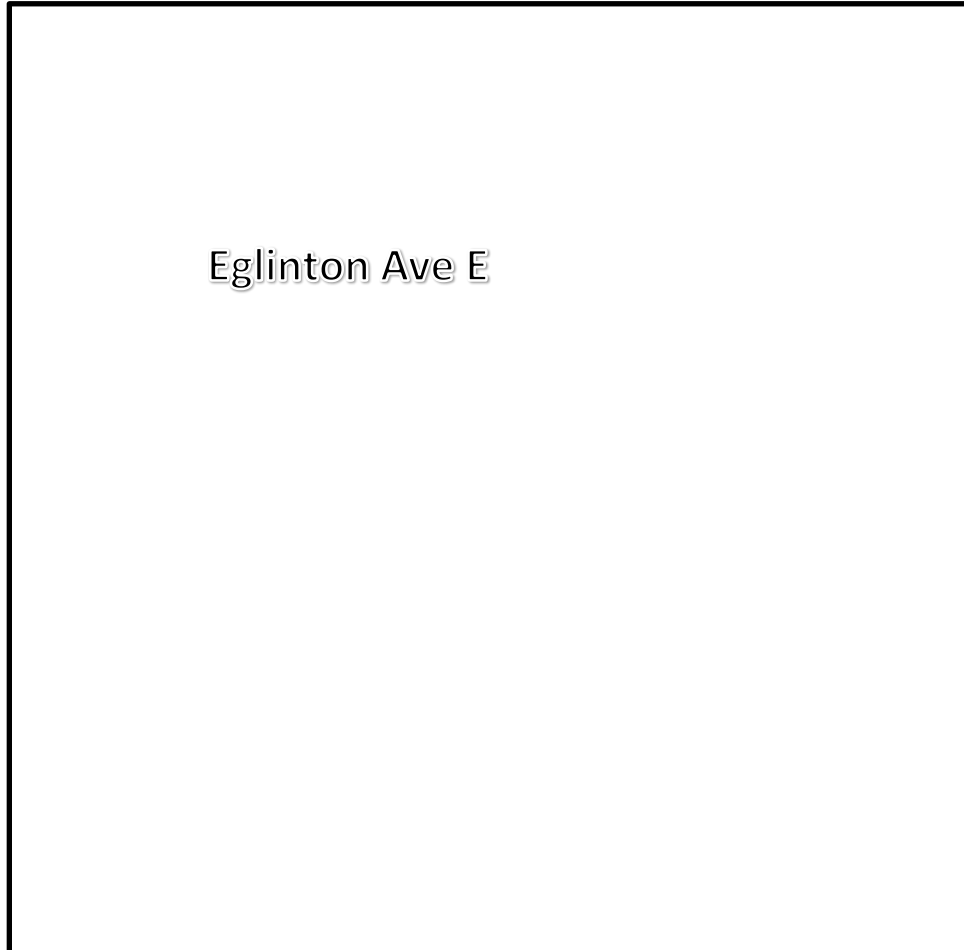


ATTACHMENT 5 - 3D AIR PHOTO, AREA CONTEXT

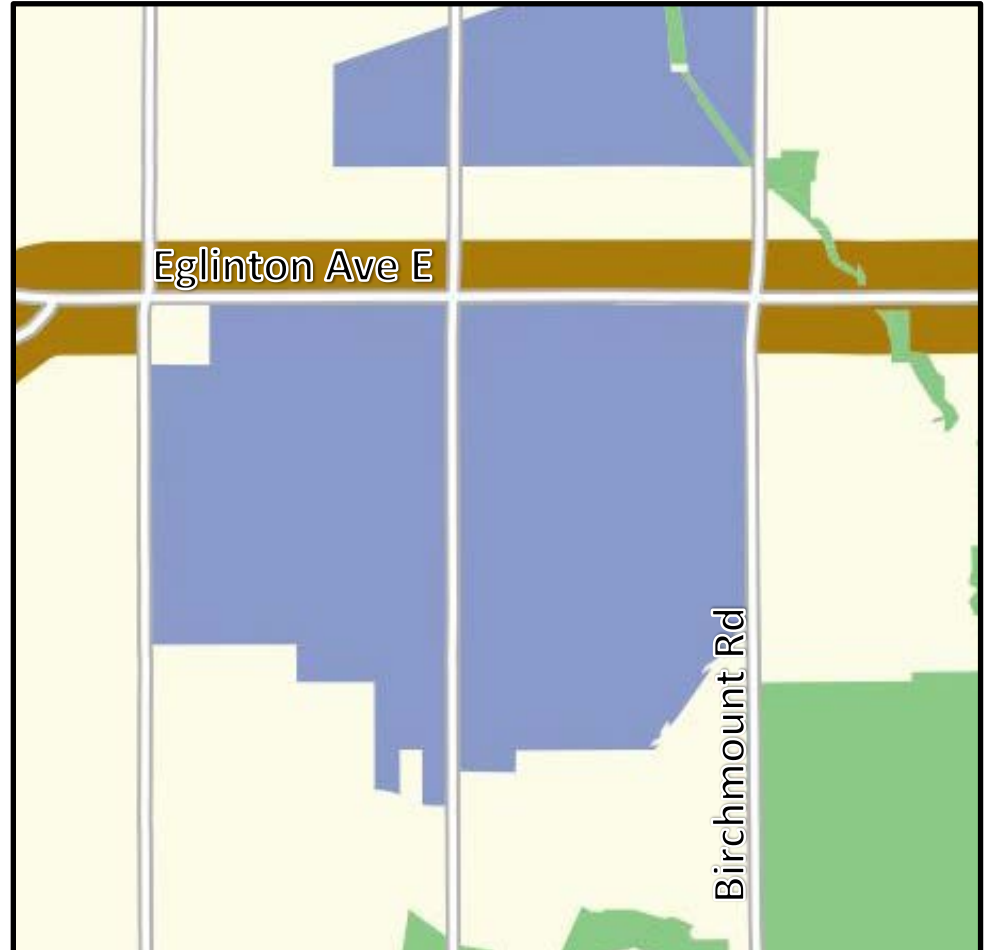
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URBAN STRUCTURES – MAP 2 (2010 VERSION)



URBAN STRUCTURES – MAP 2 (2019 VERSION)



 Avenues

 Centres

 Employment Areas

 Downtown and Central Waterfront

 Green Space System

 Greenbelt Protected Countryside

 Greenbelt River Valley Connections



Block





Golden Mile Secondary Plan

MAP 45-3 Character Areas

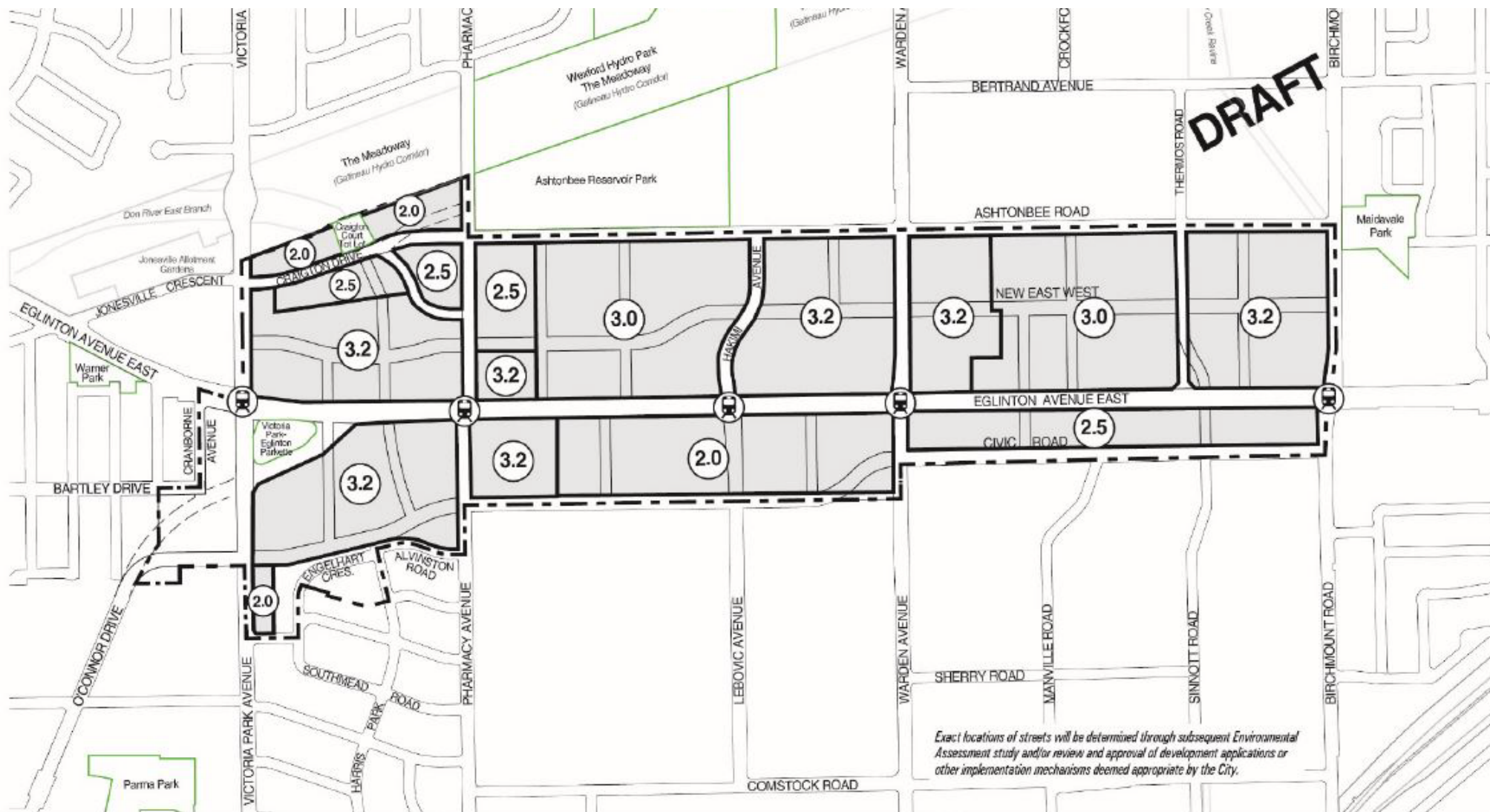
- | | | | |
|---|--|--|--|
| <p>--- Secondary Plan Boundary</p> <p>--- Existing Street within the Secondary Plan Boundary to be Potentially Realigned/Reconfigured</p> <p> Subject Block</p> | <p> Transit Node</p> <p> Existing Park</p> | <p>1 Golden Mile Commercial Gateway</p> <p>2 Mixed Use Transit Nodes</p> <p>3 East Park Mid-rise and Tall Building Community</p> <p>4 West Park and Meadoway Transition Area</p> | <p>5 O'Connor Drive Transition Area</p> <p>6 Ashtonbee Transition Area</p> <p>7 Employment Area</p> <p>8 Victoria Park Ave. / O'Connor Dr. - Emerging Main Street Area (Refer to SASP 400, Chapter 7 of the Official Plan)</p> |
|---|--|--|--|

Not to Scale



ATTACHMENT 8 - GOLDEN MILE SECONDARY PLAN – MAP 45-3

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Golden Mile Secondary Plan

MAP 45-5 Development Density

--- Secondary Plan Boundary



Transit Node



Maximum Permitted FSI (Gross)



Existing Park

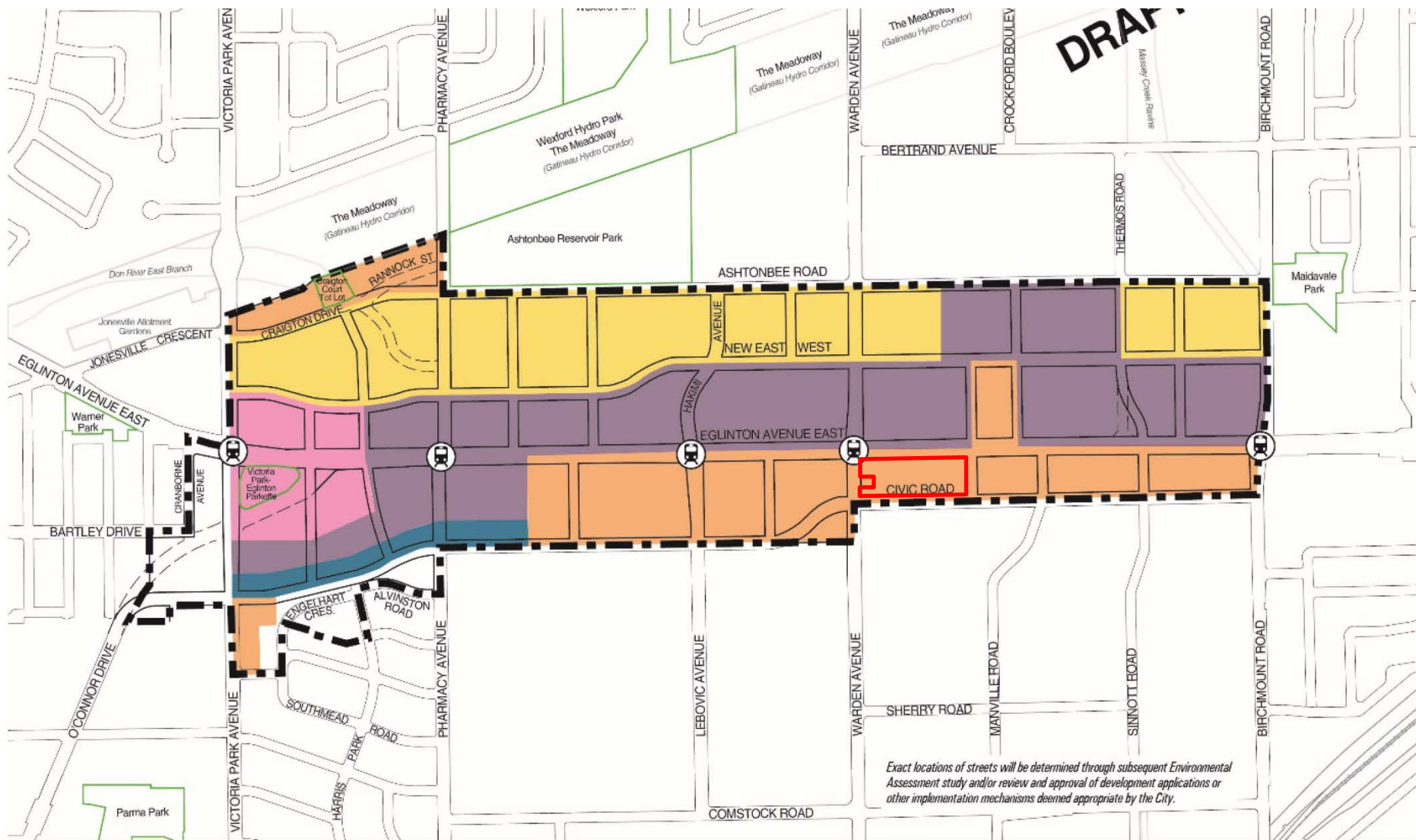
--- Existing Street within the Secondary Plan Boundary
to be Potentially Realigned/Reconfigured



Not to Scale

ATTACHMENT 9 - GOLDEN MILE SECONDARY PLAN – MAP 45-5

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Golden Mile Secondary Plan

MAP 45-13 Building Types and Heights in Character Areas

- Secondary Plan Boundary
- Existing Street within the Secondary Plan Boundary to be Potentially Realigned/Reconfigured
- Subject Block
-  Transit Node
- Existing Park
- Primarily tall buildings with some mid-rise buildings (Max 35 storeys)
- Mix of tall buildings and mid-rise buildings (Max 30 storeys)
- Mix of tall buildings and mid-rise buildings (Max 25 storeys)
- Mix of tall buildings and mid-rise buildings (Max 20 storeys)
- Mid-rise buildings (5 - 11 storeys)

Not to Scale 

ATTACHMENT 10 - GOLDEN MILE SECONDARY PLAN – MAP 45-13

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