



Principals

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October 15, 2020

Delivered Via Email: scc@toronto.ca

**Scarborough Community Council
Scarborough Civic Centre
150 Borough Drive, 3rd Floor
Toronto, ON M1P 4N7**

Attention: Ms. Carlie Turpin, Committee Administrator

**Subject: Item SC18.1a - Golden Mile Secondary Plan – Supplementary Report
and Draft Official Plan Amendment 499
Supplementary Public Input
Bell Canada - 865 Pharmacy Avenue, City of Toronto
GWD File PN.17.2581**

Gagnon Walker Domes Ltd. (GWD) is agent to Bell Canada (Bell), the registered owner of the approximately 2.36 hectare (5.83 acre) property known municipally as 865 Pharmacy Avenue in the City of Toronto (Bell Property). The Bell Property is located at the southeast corner of Pharmacy Avenue and Ashtonbee Road (less than 100 metres north of Eglinton Avenue East) and within the City of Toronto's Golden Mile Secondary Plan (GMSP) boundary. A five-storey central telecommunication toll and mobility switching building and a 152.7 metre (500 foot) high communications tower currently occupy the Bell Property. The Bell Property is also occupied by a series of outdoor generators and other underground infrastructure. The existing building, tower and infrastructure are integral components of Bell's communications network. The Bell Property's facilities and infrastructure provide communications services that are utilized by local and regional emergency services, in addition to private commercial and residential uses. A context plan and aerial photo of the Bell Property are enclosed as Attachments 1(A) and 1(B) respectively.

As a land owner and essential utility provider Bell is significantly invested in maintaining its current operations on the property. Of primary importance to Bell is ensuring that its structures and service operations are thoroughly considered during the development of the GMSP policy framework. In addition, it is Bell's position that the GMSP should also appropriately recognize the intensification potential of the Bell Property given its proximity to the future Eglinton Crosstown Light Rail Transit line (LRT), frontage on an arterial road, location within a 'Major Transit Station Area', and existing 'Mixed Use Area' Official Plan designation.

Bell Participation in GMSP Study

Bell and its consultants have attended various Community Consultation and Advisory Committee Meetings over the past several years to discuss their ongoing concerns with

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the emerging GMSP policy framework. Previous public input letters were submitted to the City of Toronto on behalf of Bell in connection with the GMSP on June 7, 2018, November 14, 2018, September 6, 2019 and February 20, 2020.

Additional written communication was delivered to Scarborough Community Council (SCC) on July 16, 2020 outlining Bell's concerns with Draft Official Plan Amendment 499 (OPA 499), which includes the draft GMSP. These comments were reiterated again through GWD's delegation to SCC on July 17, 2020.

At the July 17, 2020 SCC meeting Community Council deferred its consideration of OPA 499 and directed that City staff further consult with those stakeholders that had made written submissions prior to reporting back to SCC on October 16, 2020.

Following the July 17, 2020 SCC meeting, in response to SCC's direction Bell provided the City with further written correspondence on August 10, 2020 outlining its specific policy concerns with OPA 499 along with Bell's recommended policy and mapping modifications necessary to address those concerns.

At Bell's request, City Staff arranged a virtual meeting with Bell and its representatives on October 1, 2020 to discuss Bell's August 10, 2020 correspondence and the City's proposed modification to Section 6.3 of the GMSP.

Summary of Bell's Concerns

Bell's concerns with the draft GMSP have been detailed within the multiple submissions previously provided to the City and are generally a result of a proposed Secondary Plan planning policy framework that:

- Does not appropriately recognize the existing built conditions of the Bell Property and its existing and long term role as a 'Major Facility'; and
- Does not appropriately recognize the intensification potential associated with those portions of the Bell Property that may be appropriate for intensification and infill.

More specifically, Bell's critical concerns relate to the following:

- All Maps: Conceptual placement of the full right-of-way width of 'New Street-EW2' within the south limit of the Bell Property, which will disrupt the Bell Property's existing underground communications infrastructure and current and future use as a 'Major Facility', as well as diminish future tall building intensification opportunity south of the existing Bell building where the greatest level of intensification on the Bell Property should be planned;
- Maps 45-4, 45-7 and 45-9: Identification of an additional 'New Conceptual Street' through the Bell Property, which is not achievable in the long term as it conflicts with the planned retention and long term use of the existing Bell building, telecommunications tower and accessory building/generators;
- Maps 45-3, 45-5 and 45-13: Identification of the Bell Property as being wholly located within the 'Ashtonbee Character Area' and subject to a maximum building



height of 25 storeys and a maximum FSI of 2.5; whereas the Bell Property should more appropriately be identified as being located within the 'Mixed Use Transit Nodes' Character Area and permitted to be developed for the highest permitted building heights and density permitted in the GMSP on account of the Bell Property's immediate proximity to an LRT transit station and location within a planned 'Major Transit Station Area'.

Additional concerns identified by Bell include, but are not limited to, proposed GMSP policy provisions that:

- Inappropriately and arbitrarily limit the number and height of potential tall buildings on the Bell Property;
- Prescribe overly restrictive building performance standards in Secondary Plan policy related to base building heights, building setbacks, tower setbacks, tower floorplates and tower separation distances;
- Identify 'Potential POPS/Public Art at Intersection' at the southwest limit of the Bell Property where the site's greatest intensification opportunity exists;
- Identify 'Potential Mid-block Pedestrian Connections' within Bell Property which may not be achievable as a result of the failure of the GMSP to appropriately acknowledge the long term retention of the existing Bell building and/or the effect that the extent of new proposed public streets on the Bell property would have on its redevelopment potential;
- Identify 'Possible Building Edges' which do not consider the retention of the existing Bell building and/or other development constraints;
- Restrict redevelopment to being required to fall within a 45 degree angular plane measured from Existing Parks and Open Spaces, including The Meadoway Reservoir Park which within immediate proximity of the Bell Property is developed with several municipal/ utility buildings and an associated parking lot;
- Advance overly prescriptive sun lighting/ shadowing criteria for new and existing parks;
- Fails to include the existing Bell building within the list of non-residential uses subject to the Gross Floor Area exclusions listed in Section 4.15; and
- Advance interim development and land use policies that could restrict future improvements and/or alteration to the existing Bell facility and operations.

City Staff Response to Bells Concerns

In response to Bell's numerous concerns City Staff have proposed just one (1) Secondary Plan policy modification. More specifically, a modification to Section 6.3 has been proposed in an effort to protect Bell's major telecommunication infrastructure through the physical implementation of any future proposed public streets.

While Bell appreciates the efforts taken by City Staff to modify Section 6.3 in response to Bell's concerns respecting the protection of its critical telecommunication related infrastructure during the planning and implementation of future public streets, it is our



opinion that a corresponding modification has failed to be made to the Maps associated with GMSP, which still identify a potential public street ('New Street-EW2') through the southern portion of the Bell Property. The identification of the full 'New Street-EW2' cross section fully within the Bell Property is inconsistent with the proposed policy modification in Section 6.3 and causes confusion as this proposed public street would be in direct conflict with Bell's existing essential infrastructure. Notwithstanding the conceptual nature of the road alignment with the Maps, to appropriately reflect the policy intent of modified Section 6.3 a corresponding modification to the draft GMSP Maps is required that would identify this public street further south to avoid conflicts with existing Bell infrastructure.

No further policy or mapping revisions have been advanced in attempt to address Bell's numerous other concerns.

OPA 499's Failure to Address Bell Concerns

Bell supports the City's overall initiative to update planning policies for the GMSP area that generally encourage mixed use intensification along the Eglinton Crosstown corridor. However, despite Bell's ongoing input and participation, Bell remains significantly concerned with:

- The insufficient regard that the draft GMSP has made with respect to the Bell Property as it pertains to the retention of the existing building, tower and infrastructure and the long term use of the Bell Property as a 'Major Facility'; and
- Failure of the draft GMSP to appropriately recognize the Bell Property's intensification potential as a tall building site, at a density that will optimize the significant investment made to local transit infrastructure.

As a result of the failure of draft OPA 499 to address Bell's long standing concerns, Bell advises that it does not support Staff Recommendations and requests that Scarborough Community Council not endorse Draft OPA 499, including the draft Golden Mile Secondary Plan and Urban Design Guidelines in their current form.

We request notification of all decisions of Scarborough Community Council and City Council in connection with the GMSP.

Yours truly,

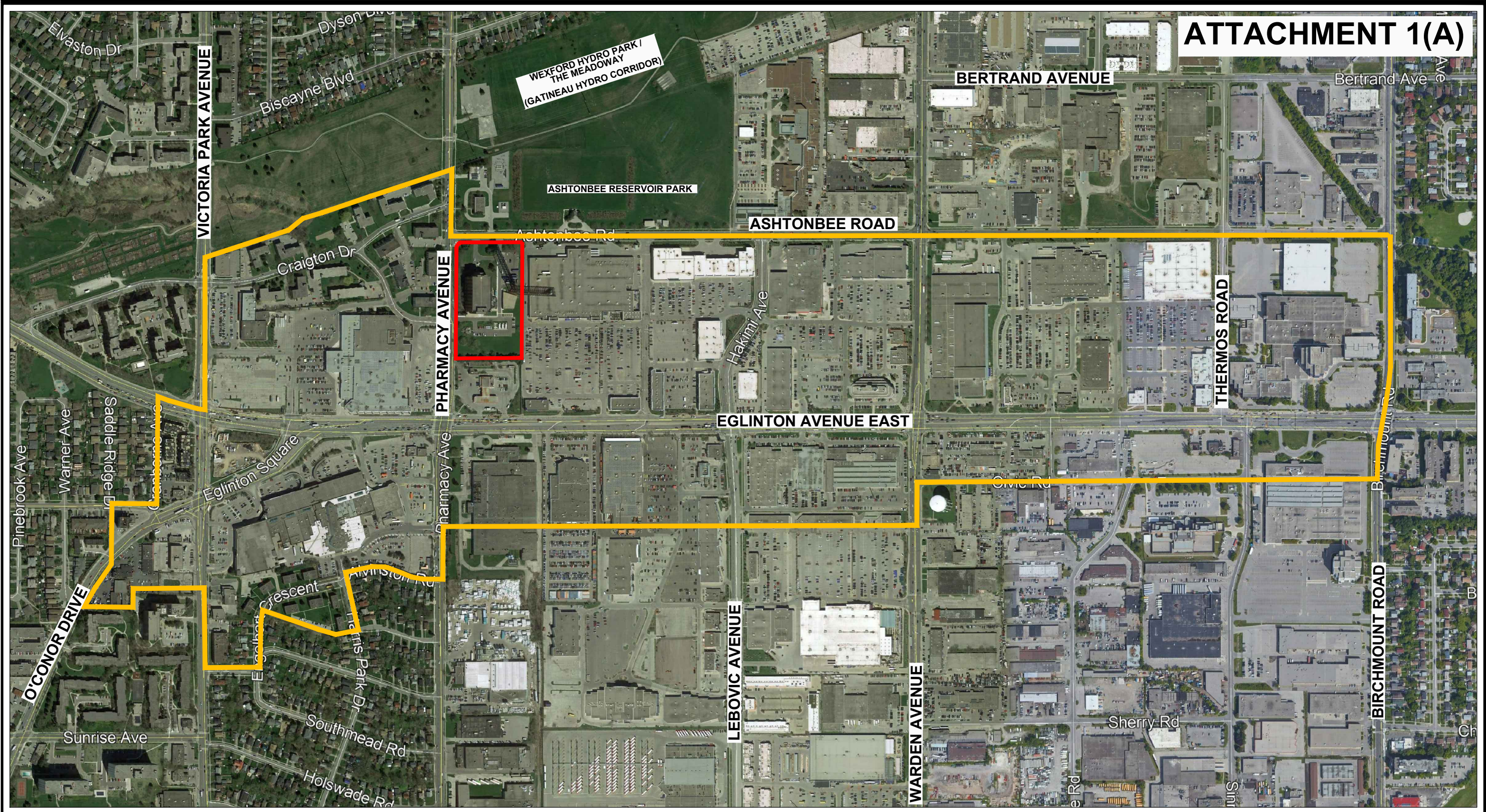
A blue ink signature of Michael Gagnon, consisting of several overlapping loops and a long horizontal stroke.

Michael Gagnon, B.E.S., M.C.I.P., R.P.P.
Managing Principal Planner

C.C.: **Bell Canada**
I. Tang, Borden Ladner Gervais LLP
E. Caldwell, City of Toronto

A black ink signature of Richard Domes, featuring a large, sweeping loop that extends upwards and to the right, with several smaller loops below it.

Richard Domes, B.A., C.P.T.
Principal Planner



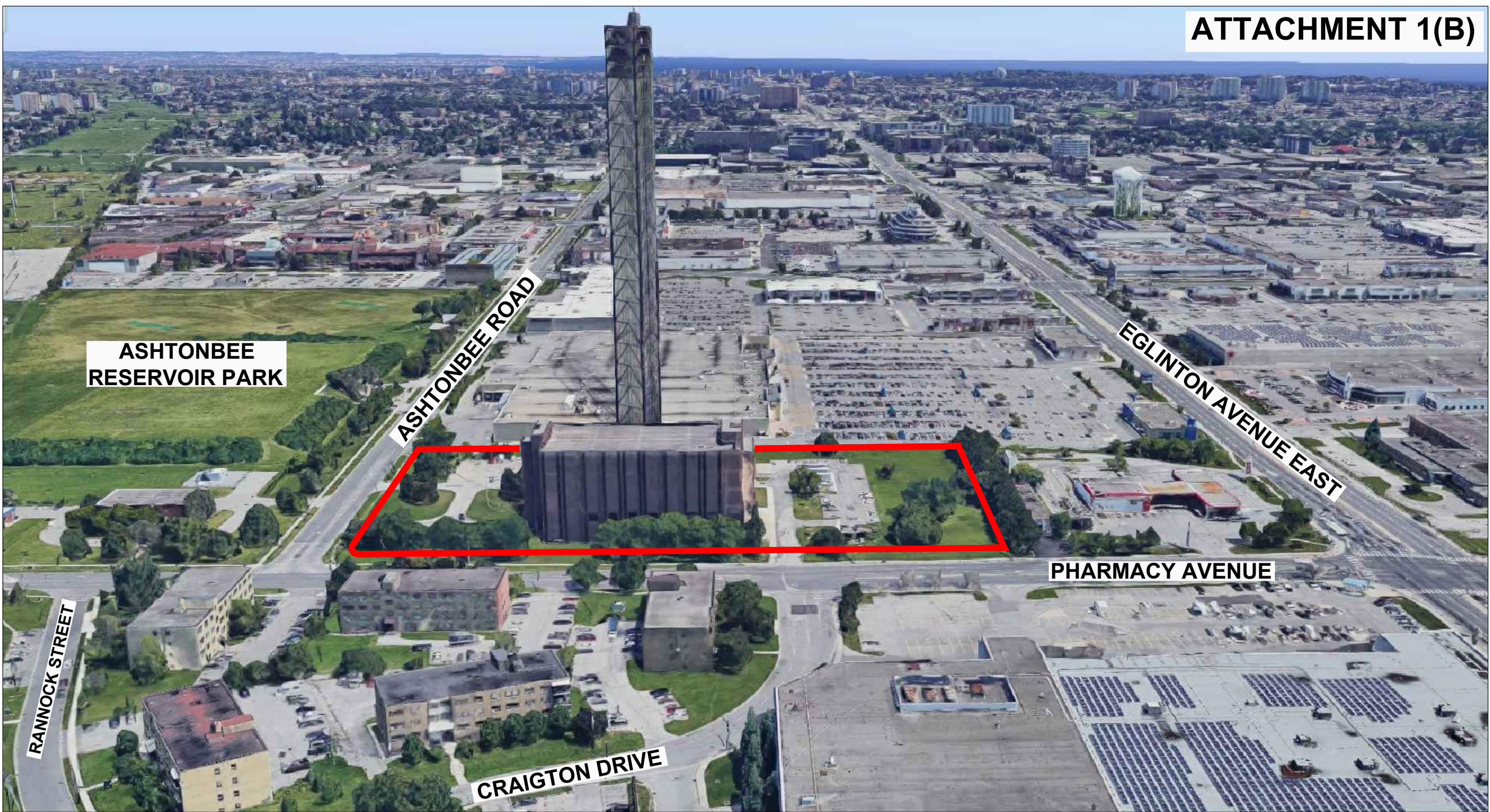
CONTEXT PLAN
GOLDEN MILE SECONDARY PLAN AREA
BELL CANADA
865 PHARMACY AVENUE



- LEGEND**
-  Subject Site
 -  Golden Mile Secondary Plan Boundary

GWD File No. PN 2581
Date: July 16, 2020





ASHTONBEE
RESERVOIR PARK

ASHTONBEE ROAD

EGLINTON AVENUE EAST

PHARMACY AVENUE

RANNOCK STREET

CRAIGHTON DRIVE

OBLIQUE AIR PHOTO
GOLDEN MILE SECONDARY PLAN AREA
 BELL CANADA
 865 PHARMACY AVENUE

LEGEND
 Subject Site

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