



BOUSFIELDS INC.

June 26, 2023

Project No. 22115

Via Digital Delivery

Scarborough Community Council Members
Scarborough Civic Centre
3rd floor, 150 Borough Dr.
Toronto, ON M1P 4N7

Members of Scarborough Community Council:

**Re: SC6.13: Our Scarborough Centre Secondary Plan Study, Proposals Report
710 Progress Avenue**

We are the planning consultants to Stanford Homes (the “owners”) with respect to the property located at 710 Progress Avenue (the “subject site”).

The subject site is within the Scarborough Centre Secondary Plan area, on the north side of Progress Avenue, immediately west of the East Highland Creek. The subject site is designated *Mixed Use Areas* in the Official Plan and is currently occupied by a commercial/industrial building surrounded by surface parking to the east and west, with a driveway connection at the north of the building and two vehicular access points along Progress Avenue. The west access is shared with the property at 700 Progress Avenue to the immediate west.

With the owners, we have previously met with City staff on January 13, 2023, and then met with staff at a formal Pre-application Consultation (PAC) meeting on May 11, 2023, to present a mixed-use development proposal that includes two towers with a shared podium. The proposal would provide for approximately 1,100 residential units along with approximately 1,000 square metres of retail gross floor area.

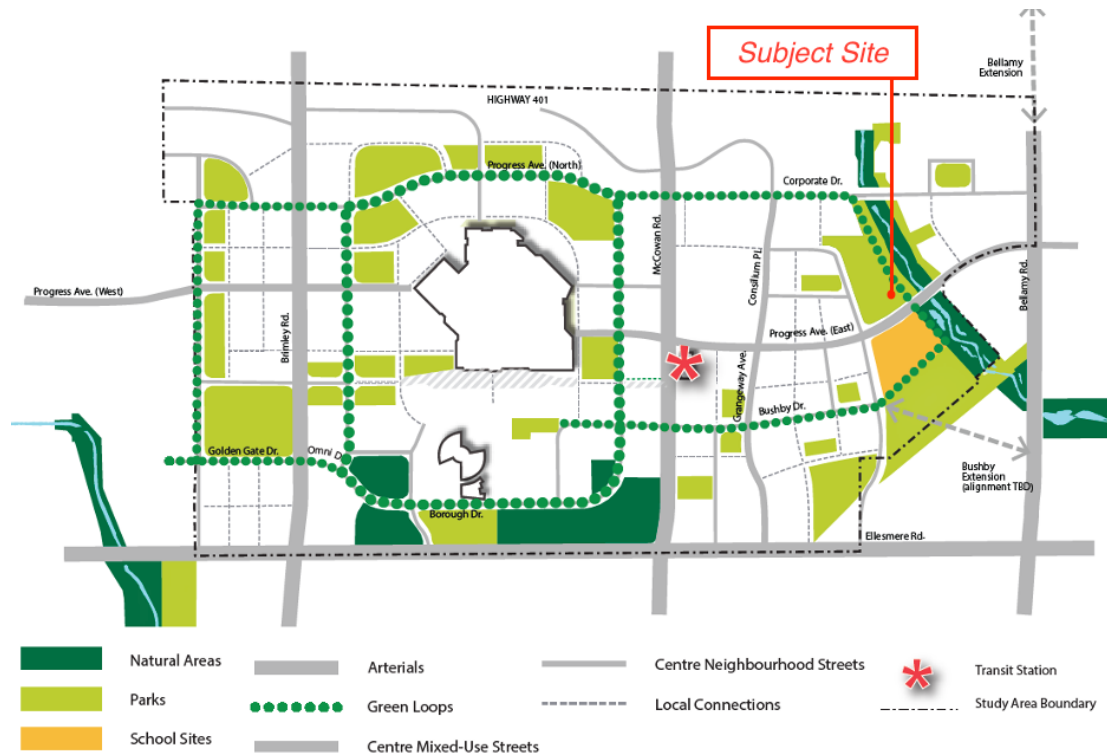
The proposal would provide a number of contributions to the public realm, including:

- an 888 square metre public park at the north end of the site comprising 10 percent of the subject site’s area.
- a conveyance to the Toronto and Region Conservation Authority (TRCA) of an approximately 10 metre strip of land along the east edge of the property;
- a privately-owned publicly accessible space (POPS) wrapping around the proposed buildings and providing for a potential mid-block connection through future developments to the north and west;

- a 5 metre setback at grade along Progress Avenue, allowing for enhanced landscaping and potential spill-out space for the proposed retail uses in order to activate the street.

We had previously reviewed earlier materials related to the Our Scarborough Centre Secondary Plan Study and submitted comments to City staff on March 13, 2023, along with our request for the PAC meeting (see **Attachment A** to this letter). However, the concerns set out in our March 13, 2023, correspondence do not appear to have been addressed following our review of the June 8, 2023, Staff Report and the Executive Summary of the Final Consultant’s Report included in Attachment 2 to the report. The owners’ two key concerns are as follows:

1. Parkland



Under the heading “Parks and Open Spaces”, the staff report identifies three approaches are proposed for the implementation of parks, the first of which being “Immediate designation of specific lands as parks”. It is unclear if the subject site is proposed to one of these lands which is to be designated for parks, but Figures 6.1 and 6.2 of the Executive Summary of the Consultant Report identify the entirety of the subject lands as “Parks and Open Spaces”. Within the staff report, Figure 1: Proposed

Structure Plan also identifies the subject site as “Parks”. Again, it is unclear if a redesignation to *Parks* is being proposed.

The legislative changes brought forward through Bill 23 establish that the maximum amount of parkland that can be required to be conveyed or paid in lieu is capped at 10% of the land or its value for sites under five hectares, such as the subject site. The proposed development, as described above, would provide for a 10% parkland dedication that is the maximum potential parkland dedication that could be required under Section 42 of the Planning Act, as modified by Bill 23. The proposed 888 square metres of parkland would be strategically located along the north edge of the subject site, where it could be combined with parkland from other nearby properties into a larger park.

Furthermore, the 888 square metres do not include the proposed conveyance of a 10-metre buffer along the east edge of the site to the TRCA, which would constitute approximately 1,175 square metres, or an additional approximately 13 percent of the subject site.

Recommendation: Do not redesignate the subject site from *Mixed Use Areas* to *Parks and Open Space*, and identify the subject site as a development block rather than a location solely for parks and open spaces. While it is acknowledged that portions of the subject site would be appropriate for such uses (i.e. a parkland dedication and a buffer abutting the ravine), it is our recommendation that these uses be encouraged while still allowing for the development on the subject site.

2. Height

Under Density and Built Form, the staff report discusses the proposed “Multiple Peaks” strategy, of providing the greatest heights immediately around the planned transit station, with two other peaks at the intersection of Brimley Road and Progress Avenue, and the edge of Highway 401.

Figure 6.2 within the Executive Summary of the Consultant Report demonstrates the anticipated heights using the ‘Multiple Peaks’ strategy, identifying the entirety of the subject site as “Parks and Open Spaces”. In our opinion, the majority of the subject site is an appropriate location for development, rather than the entirety of the site becoming a public park. In this regard:

- the subject site’s in-force zoning permits a height up to 90 metres, or the equivalent of an approximately 29 or 30 storey building;

- the McCowan Precinct Plan's existing vision for the site is as a development block;
- the subject site is located approximately 450 metres from the future Scarborough Centre subway station;
- the subject site's location is within the recently delineated Scarborough Centre station PMTSA; and
- the existing approvals in the area including heights of up to 45 storeys to the immediate north of the subject site, at 85 Corporate Drive.

In our opinion, the subject site should be clearly identified as a location for tall building development, with heights that are contextually appropriate given the emerging context.

Further, it is our opinion that the inclusion of prescriptive limitations on height, and detailed numerical standards in detail, are inappropriate and undesirable in a policy document. If policies are to be included which identify specific height limits, the relaxation of density limits (see below) becomes even more important in terms of achieving transit-supportive intensification on the subject site.

Recommendation: identify the subject site as an appropriate location for tall buildings, with general directions on heights as opposed to specific height limits, having regard for the existing and planned context, and to proximity to existing and planned higher order transit.

3. *Density*

Figure 6.1 in the Executive Summary identifies the subject site, among others, as *Parks and Open Space*, while assigning the majority of the Secondary Plan area maximum densities ranging from less than 4.0 FSI to 10.0 to 12.0 FSI. While we have concerns about the potential redesignation of the site to *Parks and Open Space*, we are also of the opinion that this direction of providing maximum densities would not be consistent with the Provincial Policy Statement ("PPS"), 2020 and would not conform with the Growth Plan for the Greater Golden Horseshoe, 2019, as amended. Both of these contain a number of policies that seek to optimize the use of land and infrastructure and to promote intensification and compact built form, particularly in areas well served by higher order public transit.

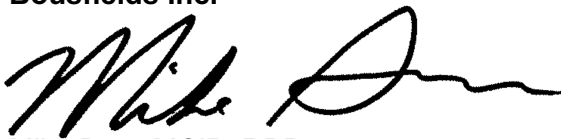
In our opinion, the inclusion of prescriptive limitations on density are contrary to those policy directions, given the location of the area within an urban growth centre and within major transit station areas, and, accordingly, within a strategic growth area as defined in the Growth Plan for the Greater Golden Horseshoe.

Recommendation: Do not include density limits. Instead, achieve transition through built form direction.

We are writing to request that staff consult further with the owners in advance of any further development of the future policy framework, so that we can further discuss these concerns with staff. We also request to be notified of any decision of Council with respect to this matter, including any adoption of the Secondary Plan.

Thank you for your consideration of these comments. If you require any clarification or wish to discuss these matters further, please do not hesitate to contact me.

Yours very truly,
Bousfields Inc.



Mike Dror, MCIP, RPP

cc: *Kelly Dynes, City of Toronto*
client