

May 8, 2024

Councillor Gord Perks (Chair) and Members of Planning & Housing Committee

c/o Nancy Martins
Toronto City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

**RE: 695 WILSON AVENUE AND 90 & 100 BILLY BISHOP WAY, TORONTO
UPDATE DOWNSVIEW - COMMENTS ON APRIL 2024 DOWNSVIEW SECONDARY PLAN
PLANNING AND HOUSING COMMITTEE ITEM PH12.1
OUR FILE: 07132DZ-4**

On behalf of First Long Weekend Developments Inc., Home Depot Holdings Inc. and Costco Wholesale Canada Ltd. (the "Downsview Power Centre Owners"), the owners of the Downsview Power Centre located at the southwest corner of Wilson Avenue and Billy Bishop Way, (hereinafter the "Subject Lands") and shown below on **Figure 1**, we are making this further submission respecting the April 2024 version of the Downsview Secondary Plan ("April 2024 DSP") prepared by the City through the Update Downsview process.

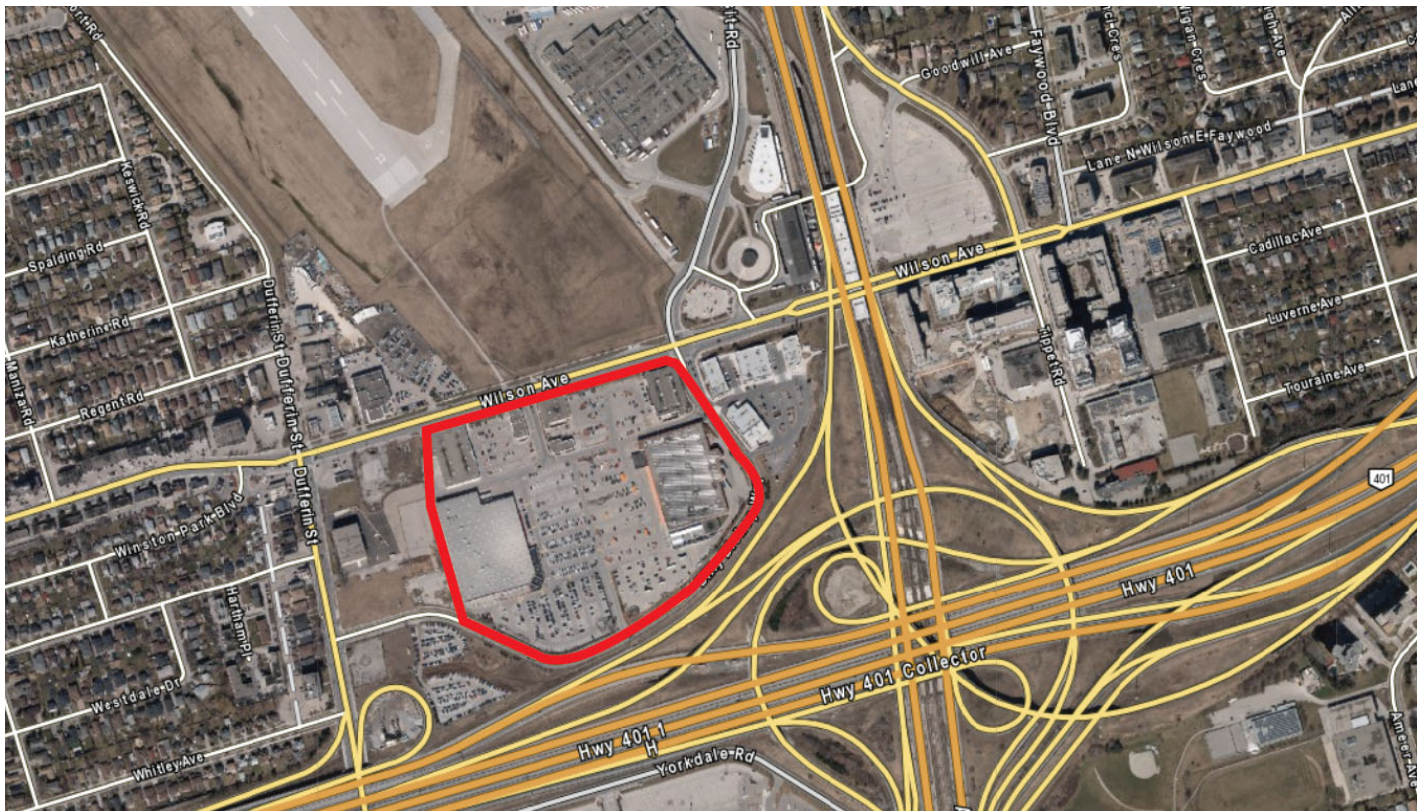


Figure 1 – Location of the Subject Lands (in red)

We had previously provided comments on December 18, 2023 and April 15, 2024 on the previous version of the DSP.

COMMENTS ON APRIL 2024 DSP

1. The Downsview Power Centre Owners are concerned with the density proposed through Section 7 and Map 7-6, which now contemplates a maximum rather than a target as was previously contemplated. The use of a target allows for greater flexibility especially where an area has numerous landowners who will develop over time and possibly at different times. We note that the rationale for the maximum 3.5 is that it is transit supportive and once parks, streets, etc. are netted out of the density calculation the 3.5 gross FSI translates into approximately 6.0 to 6.5 net FSI. Staff note that these densities are similar to those in other large scale development areas, however, we note that the list of examples excludes those such as Mimico-Judson, Main & Danforth, Golden Mile, and site specific applications in proximity to transit where gross densities are much higher than a gross density of 3.5 FSI and a net density of 6.0 to 6.5 FSI.

We further note that while the above noted density regime generally works where there are large, consolidated landholdings, this density regime does not work where the lands are fragmented with numerous landowners such as the case in Wilson South. The inadvertent result if this density regime proceeds as proposed is a "race to the swiftest" for density allocation to occur, resulting in other areas not fully utilizing their development potential of 3.5 gross FSI in order to support transit infrastructure.

For these reasons, we request either the implementation of targets rather than maximum densities or that a policy be added to increase the density for Wilson South to gross 5.0 FSI in order to ensure that all properties in Wilson South can achieve their planned function as established by the April 2024 DSP.

2. As the Downsview Power Centre Owners anticipate redevelopment over time, their existing businesses will remain operational while adjacent areas redevelopment. To this extent, they believe that policy modifications are needed to reflect their existing ongoing operations and that the following policies should only apply to full redevelopment proposals as follows:
 - a. Policy 3.3.3 – we request that "Full redevelopment proposals" be added at the beginning of this policy;
 - b. Policy 4.6.1 – we request that "For full redevelopment proposals" at the beginning of this policy;
 - c. Policy 4.6.4 – we request that "For full redevelopment proposals" at the beginning of this policy;
 - d. Policy 6.2.2 – existing large scale, stand alone retail uses should be explicitly permitted and stated that it should continue to remain prior to large-scale redevelopment occurring. To this extent we suggest language similar to that used for the Sherway Area Secondary Plan as follows in Policy 6.2.2:

"While the ultimate redevelopment of the Downsview area is anticipated to realize the vision set out in Section 2 of this Plan, it is acknowledged that existing large scale, stand alone retail stores in Wilson South, not contemplated by this Plan to continue in future redevelopment plans, are likely to remain while large-scale redevelopment proceeds nearby."

Further we request that existing uses and expansions thereto should be permitted. Similar to language used for the Sherway Area Secondary Plan we request the following be added to Section 12.4:

"The following applies to the Downsview Power Centre:

1. Notwithstanding Policy 6.2.2 large scale, stand alone retail uses and power centres shall continue to be permitted.
2. New buildings, addition or expansion of a building and/or structure is permitted provided they do not exceed 10 percent of the gross floor area of the Downsview Power Centre as it existed on the date of adoption of this Plan.
3. Any new buildings, additions or expansion of a building and/or structure that exceeds 10 per cent of the gross floor area of the Downsview Power Centre as it existed on the date of adoption of this Plan will require the submission of an Interim Development Strategy as part of a complete application for any proposal requiring a Zoning By-law Amendment or Site Plan Approval application for the interim use.
4. An Interim Development Strategy submitted pursuant to the above policy will demonstrate to the City's satisfaction that such interim development:
 - a. is not intended to be long-term and is appropriate over the short to medium term;
 - b. does not preclude the long-term redevelopment of the site as envisioned by this Plan;
 - c. does not preclude the achievement of the parks, public realm and mobility policies set out in this Plan and any applicable District Plan endorsed by Council;
 - d. does not exceed the maximum height permitted by the Zoning By-law in force at the time of application;
 - e. does not include residential uses; and
 - f. conforms with the Built Form and Public Realm policies of the Official Plan.
5. Any renovation within buildings and/or structures existing on the date of adoption of this Plan is exempt from providing an Interim Development Strategy."
3. The Wilson South Policies (Section 12.4) sets out specific policies regarding open space and transportation. As noted above, this area will develop over time. We therefore request the following modifications to the policies (bold represents additions; strikeouts represents deletions):

"12.4.1 Within the lands identified in Figure 4: Wilson South, a minimum of 3 hectares of new publicly accessible space will be achieved, inclusive of parks, open spaces, natural areas, POPS, greenways, and the Green Spine. **As development proceeds, each development will provide their equitable share of this**

requirement and / or provide confirmation of cost sharing to address said provisions.

- 12.4.2 The minimum of 3 hectares will include a **future** Major Park ~~which is centrally located within these lands~~ **whose location will be determined through the District Plan process.**
- 12.4.3 A new network of local public streets, **private streets and active transportation routes** will be developed to create new east-west and north south mobility connections."

While these changes are requested, we believe these modifications will provide additional certainty and assist in the long term redevelopment of the Wilson South District.

Thank you.

Yours truly,

MHBC



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Vice President & Partner

cc: Clients
Project Team
Alicia Rinaldi & Jessica Krushnisky, City of Toronto