



Project No. 25152

February 3, 2026

City Clerk's Office  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Dear Mayor and Members of City Council:

**Re: *Draft Scarborough Centre Secondary Plan – Item No. PH27.3  
675 Progress Avenue (Related Application Nos. 13 175197 ESC 38 OZ and 13  
175005 ESC SB)***

We are the planning consultants for 1512642 Ontario Limited, the registered owner of the property municipally known as 675 Progress Avenue (the “subject site”). The subject site is located along the south side of Progress Avenue, west of Bellamy Road and east of McCown Road.

The subject site was subject to applications for high-rise mixed-use development, which were endorsed by City Council at its meeting of July 7, 8 and 9, 2015 (the “Original Applications” - File 13 175197 ESC 38 OZ). While the Original Applications were ultimately approved, with an Official Plan Amendment in the form of a Site and Area Specific Policy coming into force, the Zoning By-law was not enacted due to the outstanding execution of the Section 37 agreement.

As it relates to the subject site and the Original Application, we have been monitoring the City’s ongoing review of the Scarborough Centre Secondary Plan (the “SCSP”), which was originally approved by Council in 2005. In this respect, we have reviewed the draft SCSP that was released by staff in April 2025, including the May 2025 Consolidation of the draft SCSP.

While we appreciate some of the revisions made by City staff and support the draft SCSP’s policies which “encourage” non-residential uses (as opposed to the previous requirement for the replacement of non-residential space), we have concerns with components of the draft SCSP, particularly with respect to the requirement to include a minimum of 13,000 square metres of office floor area on the subject site, the use of prescriptive numerical standards, and inconsistencies with proposed Maps 5-2, 5-9 and 5-10 and the Council-endorsed draft Zoning By-law.

This letter has been prepared to outline these concerns for staff’s consideration, particularly as it relates to the subject site

## **Background**

As mentioned, Official Plan and Zoning By-law Amendment applications were considered and endorsed by City Council at its meeting of July 7, 8 and 9, 2015. While the Council Approval did not enact the proposed Zoning By-law Amendment, it directed amendment of the existing zoning substantially in accordance with the draft Zoning By-law Amendment presented to City Council.

### **Comments on Secondary Plan:**

#### **1. Site and Area Specific Policy 4**

As it relates to land use, we support the general policy approach which seeks to encourage rather than require the inclusion of new office and non-residential uses as components of mixed-use development around the Transit Station.

Despite this general policy approach, and pursuant to the Original Applications, Site and Area Specific Policy 4 to the draft SCSP continues to require a minimum of 13,000 square metres of office floor area. Given the flexibility recommended through the recent Office Space Needs Study undertaken by the City, along with the general approach of the draft SCSP to “encourage” non-residential space, we request that this requirement be removed, as a requirement for a minimum amount of office space in the current market is not reasonable and it will only serve to frustrate the achievement of new housing on the subject site. We are open to a discussion about the ability to achieve other objectives of the City.

#### **2. Numerical Standards**

With respect to building setbacks, proposed Policy 7.2.1 states that new development will provide minimum setbacks from streets, *Parks*, *Natural Areas* and open spaces as identified on Map 5-10 – Building Setbacks. It further provides that minor adjustments to the required setbacks may be made without amendment to this plan, where appropriate, provided the adjacent public realm components can be accommodated.

As it relates to the Original Approvals, Map 5-10 of the draft SCSP does not accurately reflect the setbacks in Schedule ‘2’ of the draft Zoning By-law Amendment presented to City Council in 2015 (included as Attachment 6 to the Final Report, dated May 29, 2015).

It is also our opinion that numerical standards are more appropriate for implementation tools such as zoning by-laws or guidelines rather than policy documents. We note that, with other recent policy documents (e.g. the King-Spadina Secondary Plan, the North Downtown Yonge Site and Area Specific Policy 382), City staff have recognized the

appropriateness of such an approach and have deleted most, if not all, numerical standards from the documents through modification. Further, numerical standards may have the unintended effect of encouraging costly and inefficient OPA applications dealing with minor matters.

In our opinion, the inclusion of prescriptive numerical standards in the draft SCSP is inappropriate. As such, we recommend that Map 5-10 be deleted and that proposed Policy 7.2.1 be revised to include language that speaks to providing appropriate setbacks, rather than on a prescriptive numerical standard.

### 3. Mapping

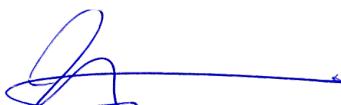
Maps 5-2, 5-9 of the draft SCSP shows a “Planned Park” at the southwest corner of the subject site and an east-west mid-block connection through Blocks 1-2 (i.e. Phase 1 of the development scheme). The exact configuration of the on-site parkland dedication, and the proposed mid-block connection, will need to be reviewed and confirmed in relation to the draft Zoning By-law Amendment, as well as with relevant technical, environmental and/or geotechnical studies (to confirm the appropriate location of the park). As well, a portion of the building on Block 2 appears to cantilever into the proposed mid-block connection.

### **Conclusion**

As noted in this letter, we support some of the overall land use policy direction in the draft SCSP as it relates to the subject site. However, we recommend revisions to the maps and policies, as outlined above, to reflect the Original Approval for 675 Progress Avenue and, more generally, to provide additional flexible policy direction at the Secondary Plan level.

If you require any clarification or wish to discuss these matters further, please do not hesitate to contact the undersigned of our office.

Respectfully Submitted,  
**Bousfields Inc.**



Mike Bissett, MCIP, RPP