

# URBAN STRATEGIES INC .

January 19, 2026

Planning and Housing Committee  
Toronto City Hall  
100 Queen St. W.  
Toronto, ON M5H 2N

Dear Chair and Members of Planning and Housing Committee,

**Re: Item PH27.3, Scarborough Centre Secondary Plan – Final Report**

Urban Strategies Inc. is acting on behalf of Oxford Properties Group (Oxford) to advance planning and development on the Scarborough Town Centre (STC) lands, municipally known as 300 Borough Drive, 1755 Brimley Road, 400, 410, 420, 430, 480, 500, 510, 520, 530, and 580 Progress Avenue and 350 Town Centre Court (“the Site”). We were recently engaged in the Official Plan Amendment (OPA) for the STC lands, which included a Site and Area Specific Policy (SASP) within the existing Scarborough Centre Secondary Plan. This OPA was approved by the OLT on November 19, 2024 through a mediated process. Most recently, we are actively working with Oxford to advance development of Block 2 on the STC lands, located adjacent to the future Line 2 Scarborough Centre Station; an initial Zoning By-law Amendment application for this Site was submitted in December 2022, with a subsequent resubmission made in August 2025.

On March 28, 2025, the City released an initial Draft Scarborough Centre Secondary Plan. In our review of this document, we found a strong alignment with the STC SASP but noted some discrepancies between the draft plan and the SASP and identified several areas of concern related to the STC lands. We appreciated the opportunity to discuss these concerns with City Staff at a meeting on April 24th, 2025, as well as in a follow-up comment letter submitted on May 2, 2025 (attached).

We want to congratulate Staff on the recently released draft of the Scarborough Centre Secondary Plan submitted for the Committee’s consideration. We commend them for the substantial effort put into the exercise and thank them for their collaboration and engagement with the Oxford team throughout the process.

We are pleased to see Staff’s consideration of many of our comments in the proposed Secondary Plan and overall, with the alignment of the Plan with the STC SASP. Four outstanding issues remain, two of which are technical and editorial in nature. We have flagged these issues with City Staff and outlined them below for your consideration.

## **KEY ISSUES**

### **Section 14: Implementation – Coordinated Development**

Proposed Policy 14.2.4 states,

*“The expansion of the street network in the Plan Area into a finer grid of streets identified on Map 5-6 Street Network will occur incrementally with development through the direct construction and conveyance of new streets on development sites or contributions towards the acquisition of land and construction of transportation infrastructure off site as secured through the development approvals process. The expansion of the street network will occur as follows:*

- a) if a required network improvement forms part of a site that is subject to a development application, that improvement will be secured and/or constructed prior to development proceeding;*
- b) when required network improvements are not part of a site that is subject to a development application, the development proponent of that site will make best efforts to coordinate the required improvements with other landowners in the Plan Area;*
- c) if the off-site network improvements required for a proposed development are not in place or constructed, development proponents must demonstrate to the satisfaction of the City that the transportation network will function appropriately until the required improvements have been implemented; and,*
- d) if the required network improvement is an off-site improvement, and the development has satisfied the provisions of Policy 14.8 b) and c) [sic], the City will require a financial contribution towards the costs associated with the future land acquisition and construction of the required transportation improvement as determined through the development application review process.”*

Oxford is concerned that the language in 14.2.4(a) may suggest that an improvement must be constructed prior to any form of development proceeding, including below-ground permits or earthworks. In our experience, this is not how such network improvements are typically secured; such sequencing would significantly delay construction. As it relates to 14.2.4(b), Oxford is concerned that “best efforts” is a legal term that imposes an extraordinarily high onus, beyond what may be commercially reasonable, and hence creates liability around the issue of coordination that may be out of Oxford’s control given patterns of ownership. As it relates to 14.2.4(d), Oxford is concerned that the current language is broad and may unintentionally apply to transportation improvements covered by Development Charges. As currently written, the policy lacks clarity on how it would interact with existing funding tools and mechanisms for delivering network improvements that are not triggered by or required to support a development application.

We request that the following amendments to Policy 14.2.4 be considered to address these concerns.

Proposed Amendment

“...The expansion of the street network will occur as follows:

- a) if a required network improvement forms part of a site that is subject to a development application, that improvement will be secured and/or constructed prior to *and/or concurrent with* development proceeding;
- b) when *a development application results in identification of the need for a network improvement as shown required network improvements on Map 5-6 Street Network* that are not part of a *the* site that is *the subject to a of the development* application, the development proponent of that site will make best reasonable efforts to coordinate *implementation of* the required improvements with other landowners in the Plan Area;
- ...
- d) if the required network improvement is an off-site improvement, and the development has satisfied the provisions of Policy 14.8 *14.2.4* b) and c), the City *will may* require a financial contribution towards the costs associated with the future land acquisition and/or construction of the required transportation improvement, *taking into account other funding tools such as development charges*, as determined through the development application review process.”

**Section 8.7: Scarborough Rapid Transit Line 3 (SRT)**

Proposed Policies 8.7.1 and 8.7.2 refer to the decommissioned Scarborough Rapid Transit Line 3 (SRT) and propose exploring opportunities for public use and city-building along this corridor. Specifically, they state,

8.7.1. Scarborough Rapid Transit Line 3 (SRT) helped move people and shape Scarborough Centre over decades. City building opportunities along the former SRT corridor may include:

- a) mobility, such as a pedestrian pathway;
- b) public realm improvements, such as landscaping enhancements and accessible public spaces;
- c) commemoration, such as public art, murals or plaques; and
- d) activations and local events, such as open-air markets.

8.7.2. In addition to 8.7.1., retention of a continuous and connected corridor is encouraged, where feasible. The future continuous and connected corridor may vary in alignment from the former SRT.

Oxford continues to have concerns regarding the application of Policy 8.7.2 as it relates to the STC lands, where a portion of the former SRT is within private property that is contemplated for development in the OLT-approved SASP for the Site. This portion of the SRT falls on Block 1 of the STC lands, which is located adjacent to the future Line 2 Scarborough Centre Subway Station and accordingly planned for high-density development, up to 60 storeys (Figure 1). While retention of the corridor might be technically feasible, it would significantly impact the development potential of this small block, which is located in a height peak and adjacent to the future Station where significant development is encouraged and prioritized by other policies of the Secondary Plan.

While we appreciate Staff's response to Policy 8.7.1, we request that the following amendment to Policy 8.7.2 be considered to address these concerns.

#### Proposed Amendment

*8.7.2. In addition to 8.7.1., retention of a continuous and connected corridor is encouraged, where feasible **and aligned with other objectives of this Plan**. The future continuous and connected corridor may vary in alignment from the former SRT.*

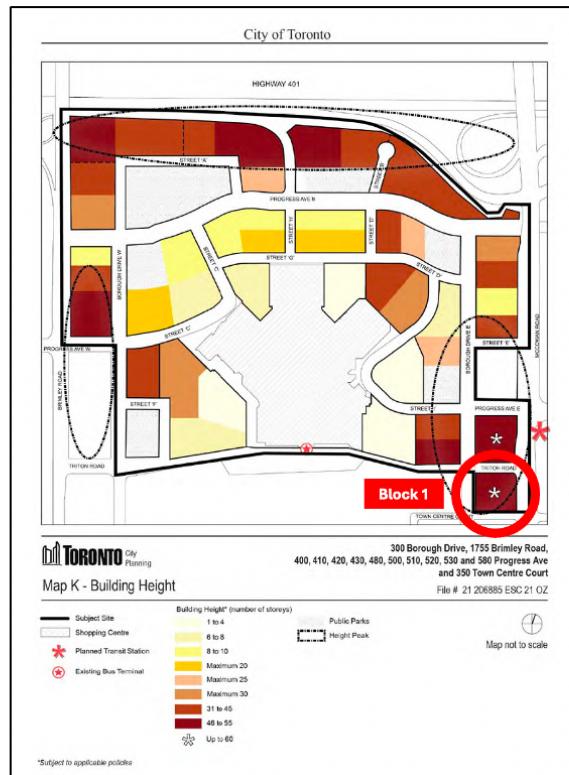


Figure 1: Map K – Building Height, STC SASP

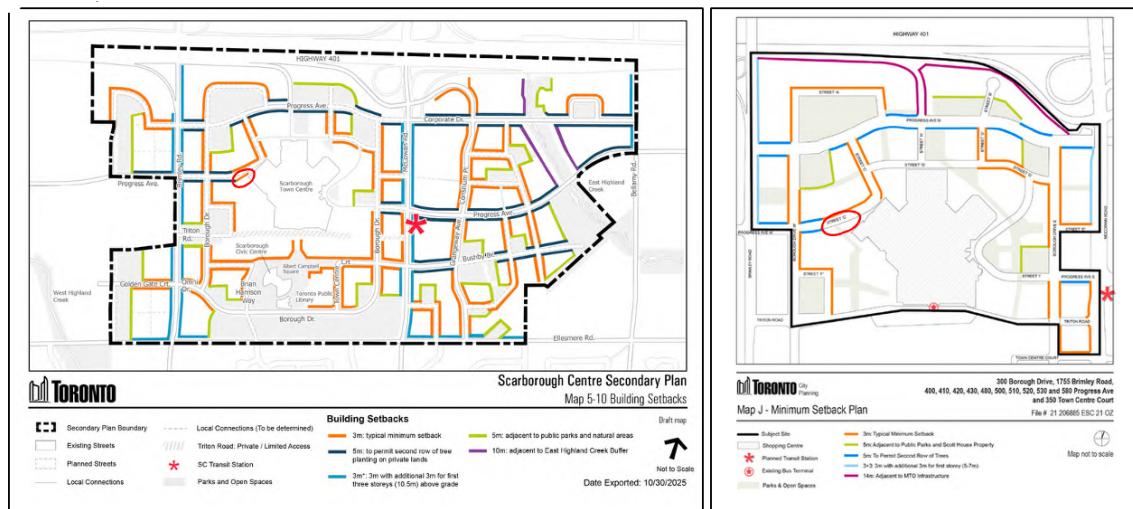
## MINOR ISSUES

### Section 7.2 and Map 5-10: Building Setbacks

Proposed Policy 7.7 and Map 5-10 identify required building setbacks throughout Scarborough Centre. There remains one discrepancy between the setbacks identified in Map 5-10 and the SASP Map J: while the SASP does not require a 3-metre setback along the south side of 'Street C', the Secondary Plan Setback Map suggests one is required (Figure 2). This discrepancy may create confusion and lead to inconsistent application of setback requirements in the future.

We request that an amendment to Map 5-10 be considered to remove the additional setback identified in Figure 2 below to align it with the OLT-approved SASP for the STC lands.

**Figure 2: Comparison of Map 5-10 Building Setbacks, Scarborough Centre Secondary Plan versus Map J – Minimum Setback Plan, STC SASP**



### STC SASP Section 17.7: Reconfiguration of the Existing Streets

While Oxford has no material concern with Policy 17.7, we will note that the version of this policy included in the proposed Secondary Plan is slightly different than that which was approved by the OLT. We request that this discrepancy be reconciled prior to the enactment of the Secondary Plan.

#### OLT-Approved SASP Policy 17.7

- Progress Avenue, former Borough Drive East, Corporate Drive, and the McCowan off-ramp (in their existing alignment **as of** November 20, 2024 and shown on Map A) are included within the Site for the purposes of this SASP. Existing rights-of-way for these streets, identified as "Existing Street Right-of-Way" and partially shown within Block 2, Block 3, Block 4, Block 5, Block 7, Block 10 and Block 14 on Map C: Block Plan, are City-owned land.

Proposed Secondary Plan SASP Policy 17.7

b) *Progress Avenue, former Borough Drive East, Corporate Drive, and the McCowan off-ramp (in their existing alignment as-of November 20, 2024 and shown on Map A) are included within the Site for the purposes of this SASP. Existing rights-of-way for these streets, identified as "Existing Street Right-of-Way" and partially shown within Block 2, Block 3, Block 4, Block 5, Block 7, Block 10 and Block 14 on Map C: Block Plan, are City-owned land.*

We once again would like to thank the staff for the ongoing engagement on this work and appreciate your consideration and response to the above. Please do not hesitate to contact me directly should you have any questions regarding this application.

Yours very truly,

**URBAN STRATEGIES INC.**



Craig Lametti, MCIP, RPP  
Partner