

Planning and Housing Committee
Toronto City Hall
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Sent via email to: phc@toronto.ca

Date: January 20, 2026

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Subject: **Item PH27.3 - Scarborough Centre Secondary Plan – Final Report,
Statutory Public Meeting, Planning and Housing Committee Meeting, January 22, 2026
Luiza Investments Limited Comments**

Dear Chair and Members of Planning and Housing Committee,

Arcadis Professional Services (Canada) Inc. ("Arcadis") is the land use planning consultant for Luiza Investments Limited ("Luiza"), who are the owners of the lands municipally known as 1600 Brimley Road, 26 & 34 Golden Gate Court ("subject site"). We have been following the progress of the City's Our Scarborough Centre Study for the updated Scarborough Centre Secondary Plan. On April 7, 2025, we attended the Public Open House for the previous draft of the Secondary Plan released on March 28, 2025. We submitted a comment letter on May 2, 2025, and we appreciate City staff's consideration of some of our comments and suggestions in the updated draft Secondary Plan for Scarborough Centre. On behalf of Luiza, we submit our comments and suggestions ahead of the Statutory Public Meeting regarding the updated draft Scarborough Centre Secondary Plan ("SCSP") for your consideration.

The subject site currently consists of three single-storey commercial and industrial buildings with associated surface parking area. Luiza is seeking a comprehensive redevelopment of the subject site to facilitate the development of a high density mixed-use community consisting of 4 high-rise mixed-use buildings ranging in heights between 37 and 42 storeys, and 1 mid-rise residential building at 8 storeys. On behalf of Luiza, Arcadis submitted an application for zoning by-law amendment (File Number 25 186182 ESC 21 OZ) to facilitate the proposed development on June 30, 2025. The application was recently deemed complete on December 19, 2025. The development proposal will provide a total of 1744 apartment dwelling units, 115,722.8 m² of total gross floor area ("GFA"), 715.4 m² GFA of non-residential space for commercial, retail and community uses, an overall density of 7.87 FSI (based on total lot area), 551 vehicle and 1310 bicycle parking spaces, and a proposed public park at 2,201.6 m².

Over the last 3 years, Arcadis and Luiza have engaged with City staff several times regarding our proposal and how it may align with the emerging policies in the draft Secondary Plan. The discussions with staff provided helpful guidance in our proposal, and through these discussions we have gained a deeper understanding of the City's objectives and strategies for the future of Scarborough Centre.

We continue to be generally supportive of the updated draft SCSP and appreciate the City's collaboration with the landowners, businesses and residents of Scarborough Centre throughout its review process. We appreciate and support the City's efforts in aligning the draft policies and maps with Luiza's vision and proposal for a high-density

mixed-use development on the subject site. We remain committed to participating in any further ongoing consultations with staff on the SCSP as it approaches its final draft for Council approval.

We appreciate the City addressing some of the comments that were raised in our previous letter, notably:

- **Page 12:** The change in wording for commercial uses being 'encouraged' in Policy 4.6.1. c). Specifically, "*retail and commercial uses at-grade along Brimley Road are encouraged to provide a vibrant pedestrian environment.*"
- **Page 21:** We appreciate the removal of Privately Owned Publicly Accessible Spaces ("POPS") from the subject site in the draft Secondary Plan maps. We support POPS being secured through the Site Plan Approval process, as stated in Policy 6.6.
- **Page 24:** We appreciate the addition of a policy on building height minimums, specifically Policy 7.5.6., which states "*Building heights lesser in height than the proposed height ranges may be considered in appropriate locations through the development review process.*"

The following are our comments, suggestions and concerns regarding the draft SCSP for your consideration:

- **Page 15:** Policy 5.2.1. states, "*To support the economic function of the Plan Area: a) development is strongly encouraged to provide a net gain of non-residential gross floor area, that facilitates a broad range of diverse employment opportunities; and b) development resulting in the displacement of businesses and services will generally provide for the replacement of non-residential gross floor area through redevelopment.*"

Additional clarity on the replacement of non-residential GFA is needed. Some *Mixed Use Areas* have existing industrial uses within large low-rise buildings with a significant amount of GFA that would be very challenging to fully replace through redevelopment. It is unrealistic and unfeasible to expect the replacement of the industrial GFA in a mixed use residential redevelopment. To maintain job numbers and support job growth, we suggest you consider ensuring the replacement of existing jobs in a new redevelopment rather than the replacement of existing non-residential GFA. We also suggest offering some incentives in the form of additional height equivalent to that required for non-residential uses above the ground floor of a building, which may result in more new homes and a greater mixture of uses that support a complete community.

- **Page 15:** Policy 5.2.3. states "*Existing office buildings may be permitted to convert to alternative uses provided other non-residential uses and/or affordable rental housing is included in the development.*"

We suggest removing "rental" in this policy to provide additional opportunities and greater flexibility for other forms of affordable housing, and office building conversions.

- **Page 15:** For the policies in section 5.3 – Compatibility and Mitigation, we are concerned that the compatibility and mitigation policies are not sufficiently balanced to ensure that all Secondary Plan objectives, including new mixed-use development, can be fulfilled. Policy 3.5.1 of the Provincial Planning Statement, 2024 provides that development should be planned to "minimize and mitigate any potential adverse effects for odour, noise and other contaminants... in accordance with provincial guidelines, standards and procedures." We recommend that the policies in section 5.3 be revised to provide that the sufficiency of mitigation measures for a particular development in relation to a particular industry is based on the objective standards provided in the provincial guidelines, standards and procedures.

- **Page 17 and 18:** Brimley Road is designated as an Arterial Road, as per Policy 6.2.1. Policy 6.2.3. states “*Arterial streets and Mixed-use streets, should: a) incorporate separated cycle tracks; and b) include a double row of tree planting on streetscape frontages.*”

We suggest providing some flexibility in this policy for a double row of tree planting given the existing utilities within the west boulevard of Brimley Road. The west boulevard of Brimley Road between Progress Road and Ellesmere Road have existing aboveground and underground utilities that may conflict with proposed trees within the public boulevard. We suggest including a policy to allow enhanced landscaping in the boulevard in lieu of a row of trees should conflicts exist with overhead or underground utilities to avoid the relocation of major utilities, which impacts the feasibility and delivery of new homes.

- **Page 18:** Policy 6.2.8. states “*The secondary east and west Green Loop streets, Bushby Drive, Corporate Drive, Golden Gate Drive, Omni Drive and Progress Avenue (north leg), should: a) incorporate one-way dedicated bikeway; and b) include a double row of tree planting on boulevard frontages.*”

Note the incorrect street name *Golden Gate Drive* – it should be *Golden Gate Court*. Similar to our comment above for Brimley Road, we suggest providing some flexibility in this policy for a double row of tree planting given the existing major utilities within the north boulevard of *Golden Gate Court*.

- **Page 23:** Policy 7.2.1. states “*Development will provide minimum setbacks from streets, Parks, Natural Areas, and open spaces as identified on Map 5-10 Building Setbacks. 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.*”

Requiring minimum building setbacks in Policy 7.2.1. is too prescriptive for the Secondary Plan and it should be determined through site specific provisions in a zoning by-law. Minimum building setbacks are already stated in the Scarborough Centre Urban Design Guidelines, which should be sufficient for encouraging particular setbacks.

- **Page 24:** Policy 7.6.4 states “*The minimum separation between the tower components of tall buildings will be 30 metres within Scarborough Centre to improve sunlight access and sky-view from the pedestrian realm.*”

We suggest providing more flexibility in the minimum 30 metres tower separation by allowing adjustments without amendments to the Secondary Plan, where deemed appropriate. For instance, a minimum 25 metres tower separation would still allow adequate sunlight penetration and access to sky views and provide further opportunities to optimize development potential for much needed housing in Scarborough Centre. The reduction in the minimum tower separation distance would also contribute to the built form character of the neighbourhood by providing visual variety and interest in the placement of built form and providing a denser skyline of Scarborough Centre. We also suggest that Policy 7.6.5. include the Brimley District for allowing a minimum 25 metres tower separation.

- **Page 32:** Policy 10.2 states “*To achieve a balanced mix of residential unit types and sizes, a minimum of 40 percent of new units in developments containing more than 80 new residential units will have two or more bedrooms, including: a) a minimum of 15 percent of the total number of units as two-bedroom units; and b) a minimum of 10 percent of the total number of units as three-bedroom units.*”

We request clarification, as the minimums of 15 percent and 10 percent add up to 25 percent, not 40 percent as stated in the policy. The City's Growing Up Urban Design Guidelines state that a building should provide a minimum of 25 percent large units: 10 percent of the units should be three-bedroom

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units and 15 percent of the units should be two-bedroom units. Please clarify the policy's required minimums and whether a minimum of 40 percent is appropriate.

We would appreciate your response and consideration to our comments above. Thank you again for this opportunity to participate in the ongoing public engagement for the updated SCSP. If you have any questions or require further information, please contact the undersigned.

Sincerely,

Arcadis Professional Services (Canada) Inc.



Simon Yee MCIP, RPP
Associate – Manager, Planning

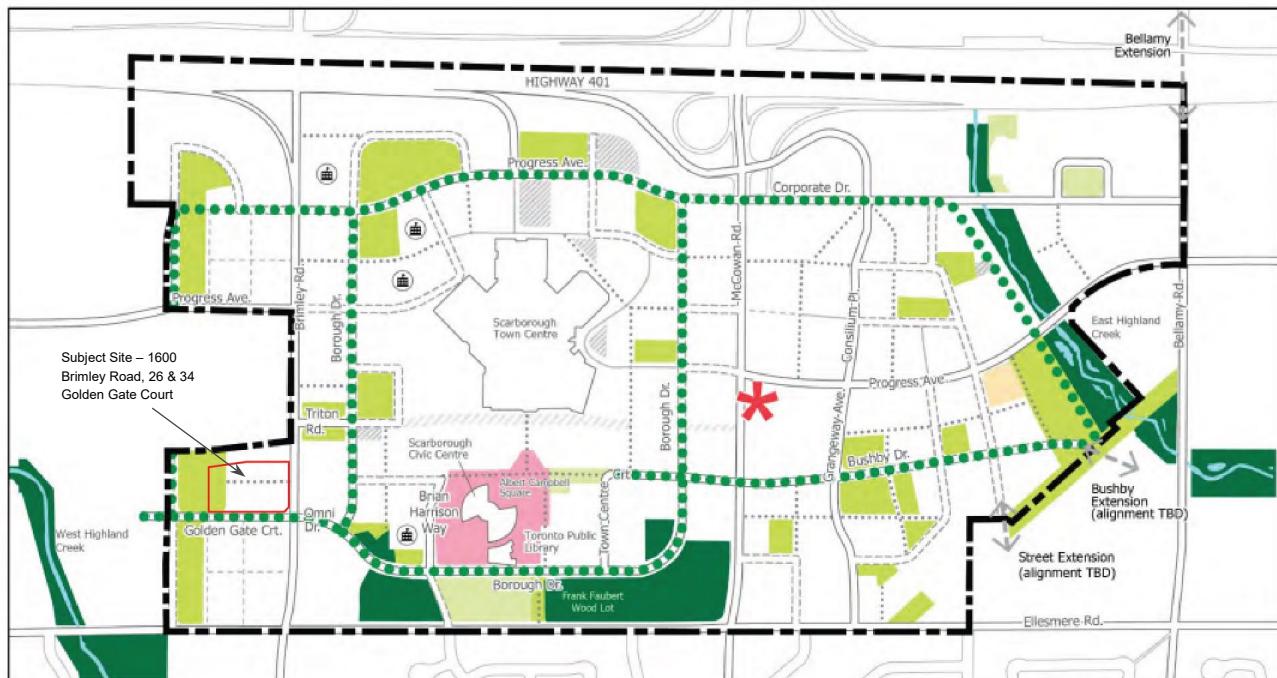
Enclosures:

- Attachment 1 – Draft SCSP Map 5-2 Structure Plan
- Attachment 2 – Draft SCSP Map 5-4 Land Use Map
- Attachment 3 – Draft SCSP Map 5-10 Building Setbacks
- Attachment 4 – Draft SCSP Map 5-11 Building Heights

Cc: Luiza Investments Limited

Attachment 1

Draft Scarborough Centre Secondary Plan – Map 5-2 Structure Plan



Scarborough Centre Secondary Plan
Map 5-2 Structure Plan

Draft map

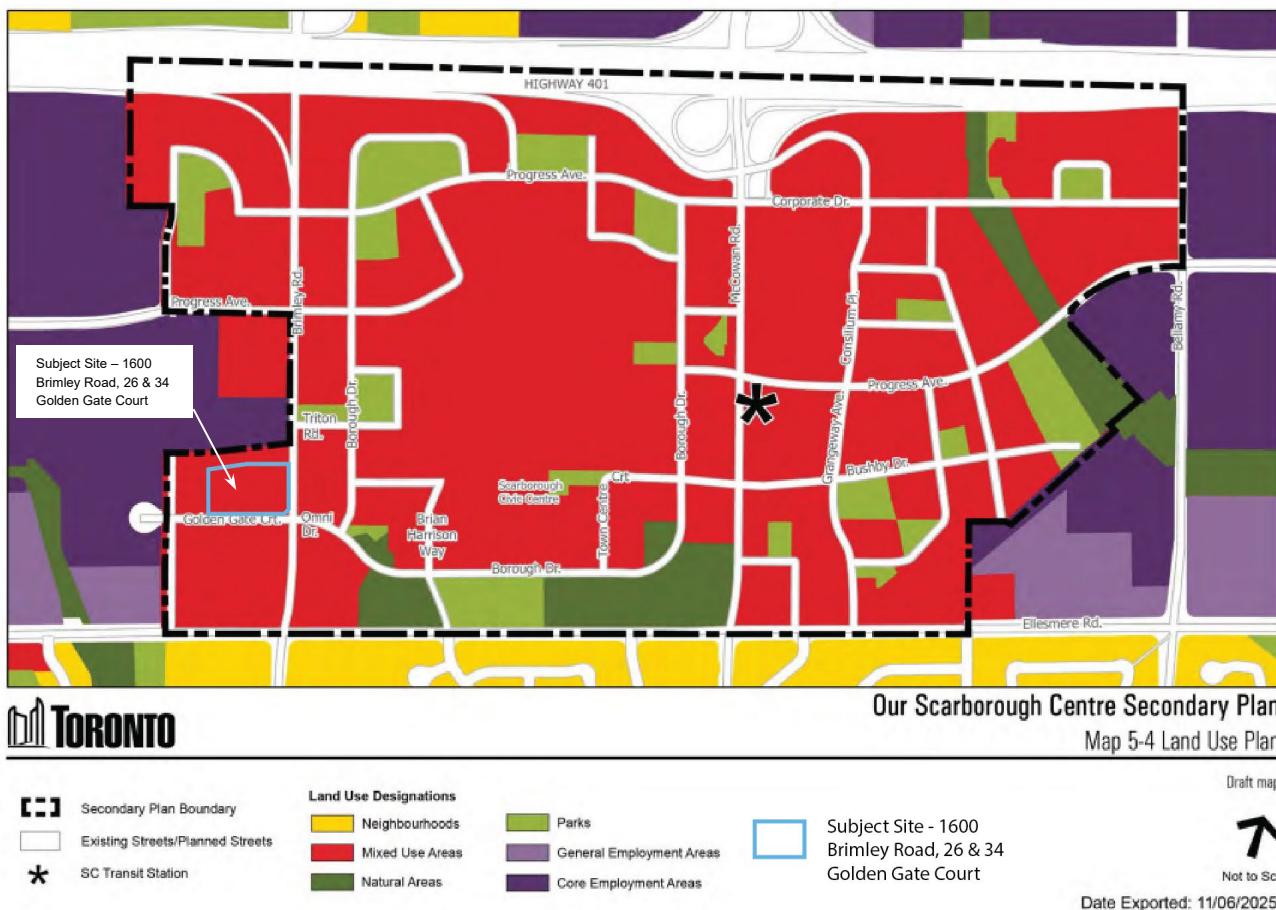
	Secondary Plan Boundary		Local Connections (To be determined)		Existing Parks		Triton Road: Private / Limited Access
	Existing Streets		SC Transit Station		Planned Parks/ Priority Park Expansion		Civic Space
	Planned Streets		Mid-block Connections		Existing Natural Areas		School Sites
	Local Connections		Green Loops		Private Open Space		Potential School Sites
		Subject Site – 1600 Brimley Road, 26 & 34 Golden Gate Court		Date Exported: 12/03/2025			

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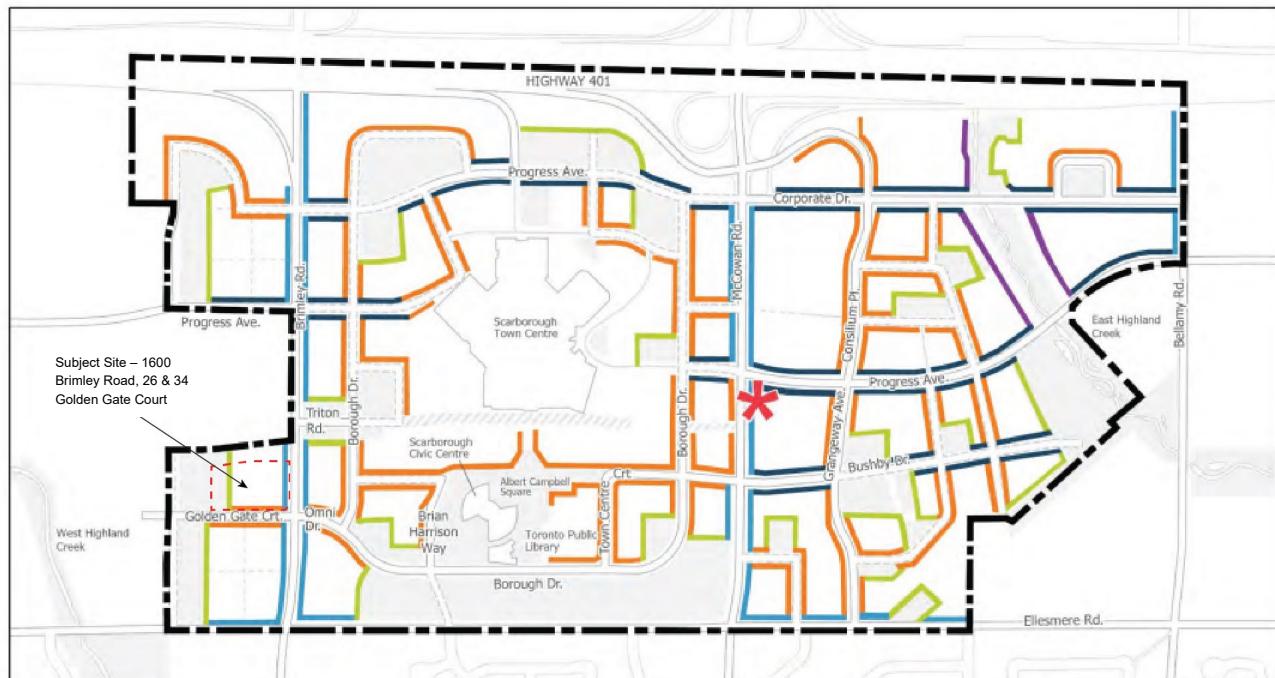
Attachment 2

Draft Scarborough Centre Secondary Plan – Map 5-4 Land Use Plan



Attachment 3

Draft Scarborough Centre Secondary Plan – Map 5-10 Building Setbacks



Scarborough Centre Secondary Plan
Map 5-10 Building Setbacks



Secondary Plan Boundary

Local Connections (To be determined)

Draft map

Existing Streets

Triton Road: Private / Limited Access

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Planned Streets

SC Transit Station

Building Setbacks

3m: typical minimum setback

5m: adjacent to public parks and natural areas

5m: to permit second row of tree planting on private lands

10m: adjacent to East Highland Creek Buffer

3m*: 3m with additional 3m for first three storeys (10.5m) above grade

Local Connections

Parks and Open Spaces

Date Exported: 10/30/2025

Attachment 4

Draft Scarborough Centre Secondary Plan – Map 5-11 Building Heights



- Secondary Plan Boundary
- Existing Streets
- Planned Streets
- Local Connections
- Local Connections (To be determined)

- / Triton Road: Private / Limited Access
- * SC Transit Station
- Parks and Open Spaces
- Existing or Approved Development

Building Heights (Number of storeys)	
	1 to 4
	5 to 14
	15 to 29
	30 to 44
	45 to 55 (Height Peak Areas)

Subject Site – 1600
Brimley Road, 26 & 34
Golden Gate Court

Date Exported: 11/03/2025



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