

Project No. 22115

January 21, 2026

Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of Planning and Housing Committee:

**Re: *Letter of Objection*
Scarborough Centre Secondary Plan – Final Report
Item PH27.3 – Planning and Housing Committee (January 22, 2026)
710 Progress Avenue**

We are the planning consultants for Progress City Centre Ltd., the registered owner of the property municipally known as 710 Progress Avenue (the “subject site”). The subject site is located along the north side of Progress Avenue, east of Consilium Place and west of East Highland Creek. In June 2024, on behalf of our client, we submitted an application for Official Plan Amendment and rezoning (“OPA” and “ZBA”, respectively) to permit a mixed-use development on the subject site. The applications were deemed complete on February 24, 2025 and are currently under review.

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. We reviewed the draft SCSP that was released by staff in April 2025 and also attended the City’s open house which was held on April 7, 2025. We submitted a letter on May 2, 2025 that provided our comments on the April 2025 version of the draft SCSP for staff’s consideration, particularly as it relates to the subject site. We also met with staff in May 2025 to discuss our comments on the draft SCSP.

We have reviewed the updated draft SCSP that was recently released by staff, which will be considered by the Planning and Housing Committee on January 22, 2026 (Item PH27.3). While we appreciate some of the revisions made by City staff and support the draft SCSP’s inclusion of somewhat less restrictive policies related to built form and the public realm, we continue to have a number of concerns with the draft SCSP, particularly with respect to the proposed heights and the use of prescriptive numerical standards, among others, as outlined below. This letter has been prepared to outline these concerns for staff’s consideration, particularly as it relates to the subject site.

Background

As mentioned, in June 2024, Bousfields submitted applications for OPA and ZBA to permit a mixed-use development on the subject site. The proposed development consists of two towers, 46 and 41 storeys in height, connected by a shared 6-storey podium, with retail space along Progress Avenue. The proposal includes a 5-metre wide, 706 square metre Privately-Owned Publicly Accessible Space ("POPS") space on the east side of the building and a walkway on the west side of the building. The proposed POPS on the east side of the building will abut a planned 1,652 square metre land dedication along the East Highland Creek bank to the east, widening the ravine lands through additional public ownership and contributing to the renaturalization of the ravine. Overall, the proposed development includes an approximate total gross floor area ("GFA") of 57,897 square metres, comprised of approximately 57,529 square metres of residential GFA and 368 square metres of retail GFA, resulting in a density of 6.52 FSI. A total of 935 new residential units are proposed, in a mix of unit types, and parking is provided above ground, within the podium, given the high water table in the area.

The subject site is in the Scarborough Centre, is designated *Mixed Use Areas* in the Toronto Official Plan, and is zoned City Centre Office Zone and City Centre Residential Zone in the Scarborough Employment Districts By-law 24982.

Comments on Secondary Plan:

1. Vision and Guiding Principles

Proposed Policy 3.2 establishes the Guiding Principle policies to support the Vision of Scarborough Centre, including Policy 3.2.1 which provides that:

"The Plan Area will feature Districts unique in character and support a range of uses and mix of building types, with heights and densities organized in a harmonious and attractive manner. Each district will feature its own distinct street and block configurations and open space layouts. The highest densities will be located around the SC Transit Station to support the significant public investment in infrastructure. Landmark buildings and the conservation of cultural heritage resources will reinforce and contribute to the identity of Scarborough Centre as a modern and dynamic place."

Proposed Policy 3.2 provides that the highest density will be located "around" the planned transit station. While we agree in principle that the greatest densities should be located close to the planned transit station, the word "around" can be construed to be limited only to sites that are adjacent to the planned transit station. There are several sites within walking distance of the station, including the subject site, which can leverage their

proximity to the station to achieve the goal of intensification around transit. It should be noted that the subject site forms part of a major transit station area (MTSA), as defined by provincial policies (and draft-delineated as a protected major transit station area (PMTSA) in OPA 570), which encourages development that optimizes the use of land and infrastructure, particularly with respect to public transit.

Policy 8.6 of the City of Toronto Official Plan, as introduced by OPA 540, provides that City-initiated zoning will permit a floor space index (FSI) of 6 FSI or more where the lands are located within 200-500 metres of an existing or planned transit station. The subject site is located approximately 480 metres east of the planned subway station, and the proposed development includes a density of 6.52 FSI, which would conform with Policy 8.6 once it applies to the subject site (i.e. when the PMTSA is approved by the Minister).

In this regard, we recommend replacing the word “around” with “in proximity to” to optimize use of the planned transit station and surrounding land and maximize transit ridership, as directed by provincial policies with respect to MTSAs/PMTSAs.

2. Area Structure

With respect to area structure, proposed Policy 4.7.1 provides guidance for development in the East Highland Creek District, which the subject site would be located within, and Proposed Policy 4.7.1(a)(i) directs this district to “prioritize on-site parkland dedication for lands immediately adjacent to East Highland Creek”. The development application that is currently under review by the City does not propose a park or public open space area on the subject site, as discussed with staff.

In this regard, we recommend revising proposed Policy 4.7.1(a)(i) to include “where appropriate” after the word “dedication” to provide flexibility with respect to prioritizing on-site parkland dedication for lands immediately adjacent to East Highland Creek.

3. Height

With respect to built form, proposed Policy 7.5.1 provides that building height ranges, as identified on Map 5-11 Building Heights, will guide the built form. Furthermore, proposed Policy 7.5.2 states that “*Height Peak Areas are defined as areas of 45-55 storeys in height. The tallest buildings will be located within the following three Height Peak Areas: the Scarborough Centre Transit Station (proposed Policy 7.5.2(a)); the intersection of Progress Avenue and Brimley Road (proposed Policy 7.5.2(b)); and Highway 401 between McCowan Road and Brimley Road (proposed Policy 7.5.2(c)).*” We note that the Height Peak Areas shown on Map K of Site and Area Specific Policy 2 (“SASP 2”) are up to 60 storeys in height and are not reflected on Map 5-11.

Proposed Policy 7.5.3 further provides that building heights between the Height Peaks Areas will be lower in range to define the three Height Peak Areas and create a varied skyline for Scarborough Centre.

Proposed Policy 7.5.5 provides that building heights outside the Height Peak Areas adjacent to and near *Parks, Natural Areas, Employment Areas, and Neighborhoods* will be lower in height to limit shadow impact and provide transition down from the Height Peak Areas to the existing surrounding low scale building areas.

In this regard, the heights shown on Map 5-11 with respect to the subject site do not align with the development application that is currently under review by the City.

We request that Map 5-11 be revised to show a height range of 45 to 55 storeys on the southerly portion of the subject site and a height range of 30 to 44 storeys on the northerly portion of the subject site to align with the development application that is currently under review. In addition, Map 5-11 appears to mistakenly omit a height range on the northern portion of the subject site. In this regard, even if the City disagrees with our requested height changes, the map should be adjusted to apply a height range to the entirety of the site.

A detailed analysis regarding the appropriateness of those heights can be found in the Planning and Urban Design Rationale submitted with the application.

Furthermore, we request that the legend of Map 5-11 be revised to align with the Building Height of up to 60 storeys and Height Peak areas as shown on Map K of Site and Area Specific Policy 2, by revising the tallest height area from “45 to 55 (Height Peak Areas)” to “45 to 60 (Height Peak Areas)”.

Finally, we request that some flexibility be incorporated to proposed Policy 7.5.3 by adding the word “generally” before “be lower in range”, to accommodate locations where additional height can be located without unacceptable built form impacts. We also request that flexibility be incorporated to proposed Policy 7.5.5 by adding the word “generally” before “be lower in height” for the same reason.

4. Natural Areas

With respect to *Natural Areas*, proposed Policy 6.3.3 provides that pedestrian connections to and alongside East Highland Creek will be designed to provide views and enjoyment of the *Natural Areas* and will be located outside the natural heritage features and their buffers.

Furthermore, Proposed Policy 6.3.4 states that access to *Natural Areas* will be improved through maintaining and adding new pedestrian linkages such as walkways and trails. Protective fencing or naturalized landscape buffers will be provided along pedestrian linkages to balance access with protection of ecological function for plant and animal communities.

In our opinion, proposed Policies 6.3.3 and 6.3.4 are inconsistent as they would both promote views to East Highland Creek and require protective fencing, and a specific design for the pedestrian connections and linkages that may not be feasible on certain sites. **In this regard, we request that proposed Policy 6.3.3 be revised to include the words “where appropriate” after “*Natural Areas*”, and include the word “generally” after “and will” so that the policy reads: “Pedestrian connections to and alongside East Highland Creek and Frank Faubert Woodlot, will be designed to provide views and enjoyment of the *Natural Areas*, where appropriate, and will generally be located outside the natural heritage features and their buffers.”**

In addition, we request that proposed Policy 6.3.4 be revised to include the word “generally” before “be provided along” and the words “having regard for Policy 6.3.3” be added at the end of the policy.

5. Numerical Standards

There are several proposed policies in the draft SCSP that prescribe numerical standards, such as setbacks, stepbacks, and separation distances, among others. As a matter of good planning principle, it is our opinion that the inclusion of prescriptive numerical standards in the draft Secondary Plan, for example in proposed Policies 7.2.1, 7.6.3, 7.6.4, 7.10.3 and 7.10.5, inappropriately blurs the relationship between policy and regulation. The introduction of numerical standards would have the unintended effect of encouraging costly and inefficient OPA applications dealing with minor matters. These types of OPAs would introduce an unnecessary step to the planning process, as OPAs should typically only be required when addressing more fundamental planning matters.

It is 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.

Finally, we note that prescriptiveness in the Plan would undermine the Plan’s vision and guiding principles, as set out in Sections 3.1 and 3.2, which include evolving the Scarborough Centre area into a transit-oriented community with a diverse mix of land uses

including residential and employment uses, providing a range of housing options, including affordable housing, and supporting a mix of building types, to create opportunities for residents and businesses. In our opinion, providing flexibility to achieve good planning and urban design outcomes should be the focus of the Secondary Plan rather than focusing on specific numerical standards.

We recommend removing these numerical standards to allow for greater flexibility in responding to site-specific conditions and rewriting these policies with a focus on a planning and urban design outcome, rather than on a prescriptive numerical standard.

Specifically 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.

In our opinion, and as further outlined above, the inclusion of prescriptive numerical standards in the draft SCSP is inappropriate. As such, we request that Map 5-10 be deleted and that proposed Policy 7.2.1 be revised to include language that speaks to providing appropriate setbacks to achieve planning and urban design outcomes, rather than on a prescriptive numerical standard.

6. Land Use, Density, and Economy Policies

With respect to non-residential uses, proposed Policy 5.2.1(a) states that development is strongly encouraged to provide a net gain of non-residential gross floor area. In our view, it is more appropriate to encourage non-residential uses through policy in a similar approach that was taken for the King-Spadina Secondary Plan (recently approved through OLT settlement), specifically Objective 3.1.2. **We request that Proposed Policy 5.2.1(a) be revised to “Development in the Plan Area is encouraged to provide non-residential gross floor area on development sites to ensure the continued support and enhancement of the cluster of employment in Scarborough Centre.”**

Furthermore, proposed Policy 5.2.1(b) states that development resulting in the displacement of businesses and services will generally provide for the replacement of non-residential gross floor area through redevelopment. While this policy provides some flexibility through the word “generally”, it should be acknowledged that not all sites with existing non-residential gross floor area will be able to accommodate a replacement of non-residential gross floor area through redevelopment. **In this regard, we request the deletion of Policy 5.2.1(b).**

7. Additional Public Realm Policies

Proposed Policy 6.2.3(b), with respect to “Mixed-use streets”, such as Progress Avenue, among other streets, states that the street should “*include a double row of tree planting on streetscape frontages.*”

While we appreciate that staff have removed the setback requirement, as we previously requested, we request that Policy 6.2.3(b) be revised to “include a double row of tree planting on streetscape frontages, where feasible.”

With respect to development adjacent to *Parks*, proposed Policy 6.5.4 provides several criteria to evaluate development and ensure appropriate transition and interface with public parks. Prior to the criteria, proposed Policy 6.5.4 states “*Development adjacent to Parks will:...*”, suggesting that each criterion must be adhered to, otherwise an OPA would be required to provide relief. **While we generally agree with the criteria described in this policy, we request adding “be encouraged to” after “will” to provide some flexibility in the interpretation and avoid the need for unnecessary OPAs where the criteria may not be achievable on certain sites for rational reasons.**

Further, proposed Policy 6.5.5(c) provides that the design and development of new and/or enhancement of existing parks in the Secondary Plan area will be guided by the objective of providing a design for thermal comfort, including maximizing sunlight during the spring and fall, providing shade during the summer, and minimizing wind impacts. **While we generally agree with the policy in principle, it may not be possible to either maximize sunlight or minimize wind on every site. We request that the policy be revised to add “while having regard to the other objectives in this Plan” to the end of this policy.**

With respect to POPS, proposed Policy 6.6.2(a) states that POPS should “*be provided at grade and where feasible be coordinated with active at grade uses in adjacent buildings.*” This policy is vague regarding what is meant by POPS being “coordinated” with active at grade uses and it should be understood that not every site is able to accommodate active at grade uses adjacent to POPS.

While we appreciate that prior to the criteria in proposed Policy 6.6.2, the word “will” was replaced with “should”, as we had requested, we suggest modifying the words “where feasible” to “where appropriate” to provide some flexibility in delivering POPS in different site-specific conditions.

8. Additional Built Form Comments

Proposed Policy 7.4.3 states that “*Above grade parking is strongly discouraged but may be considered in appropriate locations through the development review process. Above grade parking will be integrated within built form and wrapped with active uses facing public streets, Parks, Natural Areas, and POPS to ensure animation of the public realm.*” In our view, this policy is overly restrictive with respect to the development of above grade parking integrated into podiums of mixed use developments. Underground parking is generally more costly than above grade parking and can be complicated due to physical limitations such as soil conditions and groundwater level, an issue on the subject site. As demonstrated by the development proposal for the subject site, above grade parking can be integrated within the built form through appropriate architectural design and materiality. **In this regard, it is our opinion that it is sufficient to say that above grade may be considered in appropriate locations through the development process, and we request that the words “is strongly discouraged but” be deleted, and that the words “encouraged to be” are added before “wrapped with active uses”, to recognize that it may not be reasonable to wrap all facades with active uses, in every circumstance.**

Proposed Policy 7.7.1 provides that mid-rise buildings are recommended throughout the plan area to achieve a variety of building forms, to promote a pedestrian- friendly scale of building that limits shadow and wind impact on streets, *Parks*, and *Natural Areas* and to provide transition to lower scale *Employment Areas* and *Neighborhoods*. **We request that the word “adequately” is added before “limits shadow” to align with the shadow-related policies of the Official Plan, such as 2.3.1(2), 2.3.1(3)(c), 4.2.2(b), 4.2.4(b)(iii), and 4.5.2(d).**

Proposed Policy 7.7.2 speaks to the development of mid-rise building locations and states that mid-rise building locations are recommended on sites along *Parks*, Green Loop streets and existing *Natural Areas* such as East Highland Creek (Proposed Policy 7.7.2(b)). In our opinion, tall buildings can be designed harmoniously with these types of areas, as proposed in the development application on the subject site. **As such, we request that Policy 7.7.2(b) be deleted.**

Proposed Policy 7.9.1 states that midrise buildings and low-rise buildings are recommended adjacent to *Parks* and *Natural Areas* to mitigate scale and limit shadow and wind impact, promoting pedestrian comfort within *Parks* and *Natural Areas*, and that the tower components of tall buildings are to be setback from *Parks* and *Natural Areas*. While we appreciate the addition of “are recommended”, and the removal of the word “significantly” from the previous version of this policy, the wording of the policy as currently drafted implies that scale cannot be mitigated, shadow and wind impacts cannot be limited and pedestrian comfort cannot be promoted with a tall building form. **In our opinion, the intent of the policy would be better achieved by removing the reference to “low-rise**

buildings” given the secondary plan’s objective of achieving intensification and the need to optimize the use of land, and by focusing on the intent. We recommend the policy be revised to: “Midrise buildings may be appropriate adjacent to Parks and Natural Areas to adequately mitigate scale and limit shadow and wind impact, promoting pedestrian comfort within Parks and Natural Areas. The tower components of tall buildings are to be setback from Parks and Natural Areas.”

With respect to shadowing on Parks, proposed Policies 7.10.3 and 7.10.5 prescribe minimum hours of sunlight and sunlight coverage on several existing and planned parks within the SCSP, specifically between 9:18 a.m. to 6:18 p.m. from March 21st to September 21st.

In our opinion, the proposed shadow policies should reflect the shadow tests in the parent Official Plan as introducing new tests results in confusion and a lack of clarity in the application of conflicting policies.

In this regard, we recommend that the policies be deleted, relying instead on the parent Official Plan policies that already address shadows on parks and the public realm.

If this is unacceptable, we would recommend that the words “*Development will achieve a minimum of [X] consecutive hours of sunlight on 75 percent of...*” in Policies 7.10.3 and 7.10.5 be replaced with “*Development will minimize shadows as necessary to preserve the utility of...*”, similar to Official Plan Policy 3.2.3(3).

9. Mobility Policies

Proposed Policy 8.4.6 provides that bicycle parking and bicycle supportive infrastructure such as bike lockers, repair stations and bikeshare, will be planned and located along street cycling routes, within Parks, and privately- owned publicly accessible open spaces to encourage cycling within Scarborough Centre. In our opinion, proposed Policy 8.4.6 is too prescriptive, as bicycle supportive infrastructure may not be feasible within some POPS or Parks. **Accordingly, we request that the word “will” be replaced with “are encouraged to”.**

Proposed Policy 8.5.2 speaks to mid-block connections and states that they should be, designed with active frontages, high quality materials and appropriately scaled for pedestrians to feel safe and comfortable (Proposed Policy 8.5.2(a)). As discussed above with respect to proposed Policy 7.4.3, the policy should recognize that it may not be reasonable to wrap all facades with active uses, in every circumstance. The policy should provide some flexibility, to recognize where it may not be feasible to locate active frontages for technical reasons, and to avoid the need for unnecessary OPAs. **As such, we request**

that Policy 8.5.2(a) be modified to add the words “where appropriate” after “active frontages”.

Proposed Policy 8.6.2 speaks to trail connections and provides that they will “*be designed as multiuse trails for pedestrians and cyclists*” (proposed Policy 8.6.2(a)) and “*generally be located outside of ecological buffers within the natural heritage system*” (proposed Policy 8.6.2(e)). In our opinion, flexibility is required as it may not be feasible to provide both pedestrian and cycling facilities, as well as locate the trail connections outside of ecological buffers within the natural heritage system on all sites. **In this regard, we recommend replacing the word “will” with “are encouraged to”.**

10. Housing Policies

Proposed Policy 10.2 would require a minimum of 40 percent of new units in developments containing more than 80 new residential units to have two or more bedrooms, including a minimum of 15 percent of the total units as two-bedroom units and a minimum of 10 percent of the total units as three-bedroom units.

In our opinion, proposed Policy 10.2 should be revised to be consistent with the approach the City has taken in other areas of the City, such as the Downtown Secondary Plan and Yonge-Eglinton Secondary Plan’s Policies 11.1 and 7.1, respectively.

We recommend replacing Policy 10.2 with the following:

“To achieve a balanced mix of unit types and sizes, and to support the creation of housing suitable for families, development containing more than 80 new residential units will include:

- a. a minimum of 15 per cent of the total number of units as 2-bedroom units;***
- b. a minimum of 10 per cent of the total number of units as 3-bedroom units;***
- c. an additional 15 per cent of the total number of units will be a combination of 2-bedroom and 3-bedroom units, or units that can be converted to 2-bedroom and 3-bedroom units through the use of adaptable design measures.”***

11. Community Services and Facilities

Proposed Policy 11.1.2 provides that “*Existing community service facilities will be renewed through redevelopment, wherever possible. Development on parcels involving the demolition of existing on-site community service facilities will replace the total gross floor area of the community service facility(ies) on-site. Off-site replacement of community service facilities will be at the City’s discretion.*” Furthermore, proposed Policy 11.1.3

provides that “*Development on parcels with existing on-site City-owned or leased community service facilities will replace the total gross floor area of the community service facility on-site*”.

Proposed Policy 11.1.4 states that “*Notwithstanding Policy 11.1.3, above, the replacement of any existing City-owned or leased community service facilities may be provided off-site at the City’s discretion provided the following matters are secured: a) a receiving site within the Plan Area and with no net loss in community service facility space has been secured to the City’s satisfaction and financial security equivalent to the City’s cost of replacing the existing community service facility is provided to ensure its timely replacement; or b) an amount of funding equivalent to the city’s cost of replacing the existing community service facility within the Plan Area is provided in lieu of the owner replacing the facility off-site.*”

In our opinion, flexibility is required for developments that result in the displacement of community service facilities, as it should be acknowledged that not all sites with existing community service facilities will be able to accommodate a replacement of total gross floor area through redevelopment, or that community service facilities will be interested in returning to those sites. **In this regard, we recommend replacing the three instances of the word “will” in proposed Policy 11.1.2 and the instance of the word “will” in proposed Policy 11.1.3 are replaced with “are encouraged to”, and deleting proposed Policy 11.1.4, as it would no longer be necessary.**

12. Servicing Policies

With respect to servicing, our client’s civil engineer (RV Anderson) has concerns with proposed Policy 12.8 which states “*Development blocks shall be overcompensated to the greatest extent possible to address the requirements for water balance and quantity control for public roads, parks, and City lands to the City’s satisfaction.*” This policy is not clear in providing direction to engineering design. Specifically, the words “greatest extent possible” are vague and fail to specify criteria for development to be evaluated against. Further, we understand that issues related to water balance and quality control are more appropriately addressed at the site plan approval stage and are not typically prescribed at the Secondary Plan level. For example, the City has established Wet Weather Flow Management Guidelines which, as we understand, outline drainage requirements (including water balance) and are used in the evaluation of development applications. **In this regard, we recommend deleting proposed Policy 12.8.**

13. Implementation Policies

Proposed Policy 14.1.2 states that “*the City will use its powers as the municipal approval authority to ensure that residential development does not outpace provision of municipal infrastructure, facilities, and amenities need to support intensification of the Plan Area.*”

We request the City delete the words “facilities, and amenities” in this policy as typically, new municipal facilities are subject to public funding and approval that may take several years to materialize. In our opinion, this policy could unnecessarily delay or preclude development and the introduction of much-needed housing within the SCSP area.

Proposed Policy 14.2.4 provides that:

“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), 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.”*

First, we note a technical error, which is that **the reference to Policy 14.8 should be revised to 14.2.4.**

Second, the policy should be clarified that certain elements of “development” should be able to proceed prior to the expansion of the street network occurring, such as demolition, excavation and shoring permits, etc. that might unnecessarily be held up, delaying the delivery of housing. **Development should be allowed to proceed concurrently, and we request that Policy 14.2.4(a) should be revised to add the words “and/or concurrent with” before the word “development”.**

Third, the term “best efforts” should be revised “reasonable efforts” in Policy 14.2.4(b), given that “best efforts” is a legal term that imposes a potentially onerous responsibility to coordinate with other parties.

Proposed Policy 14.3.1 includes conditions to be met prior to the removal of a Holding (“H”) provision, in addition to those listed in Policy 5.1.2 of the Official Plan. Furthermore, Proposed Policy 14.3.2 provides that City Council may remove the Holding (“H”) provision from all or some lands it is subject to only when associated conditions have been satisfied and matters are appropriately secured through a planning process. In our opinion, because the City has the authority to include conditions through a Holding provision in a zoning by-law amendment, it is unnecessary to include the list of conditions at the Secondary Plan level. **In this regard, we recommend deleting proposed Policies 14.3.1 and 14.3.2.**

Proposed Policy 14.4.1 states that “*New residential development will not proceed prior to the approval of Draft Plan(s) of Subdivision for the associated lands which implement(s) the public street network and parks contemplated by this Plan.*” Furthermore, Proposed Policy 14.5.1 provides that “*Applications for Zoning By-law Amendment(s) will implement the intent and objectives of the Plan and the Urban Design Guidelines adopted for the Plan Area.*” As well, Proposed Policy 14.6.1 provides that “*Applications for Site Plan Control will be used to implement the intent and objectives of this Plan and the Urban Design Guidelines adopted for the Plan Area.*” In our view, proposed Policies 14.4.1 and 14.5.1 are duplicative and unnecessary as complete application submission requirements can be determined through the Pre-Application Consultation process and need not to be included in a Secondary Plan. **We recommend deleting proposed Policies 14.4.1 and 14.5.1.**

14. Miscellaneous/Clarity

Proposed Policy 6.5.3 provides that development is required to prioritize the dedication of land to the City to meet parkland dedication requirements. As part of development, parkland provision will be considered in the following order of priority: a) on-site parkland dedication; b) off-site parkland dedication; and c) cash-in-lieu of parkland. Proposed Policy 6.5.3 requires clarity as it is unclear how the appropriate level of parkland provision would be determined on an individual site basis, and what would be the threshold required to satisfy the City that the next item on the hierarchy should be pursued. **We recommend that the policy be simplified to “The dedication of land to the City is to be prioritized through the development process to meet parkland dedication requirements, subject to section 3.2.3(2) of the Official Plan.”**

Proposed Policy 6.8.1 provides that conceptual public art locations are identified on the Public Art Plan in the Scarborough Centre Urban Design Guidelines. A Place of Green

Identity is identified on the subject site. It is unclear what obligations this identification implies. **We request that it be deleted.**

Map 5-5 shows three building outlines on the subject site. The development application that is currently under review by the City includes one building that includes two towers connected by a podium on the subject site. **Accordingly, we request that Map 5-5 be revised to align with the development application that is currently under review.**

Conclusion

As noted in this objection 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 current development proposal for 710 Progress Avenue that is under review by the City and, more generally, to provide additional a flexible policy direction at the Secondary Plan level.

Thank you for your consideration of these comments. We look forward to engaging in further discussions with staff as the draft Secondary Plan evolves and would be pleased to meet with you at your earliest convenience to discuss these comments as they relate to 710 Progress Avenue. We request to be notified of any further updates to the draft Secondary Plan.

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

Respectfully Submitted,
Bousfields Inc.



Mike Dror, MPL, RPP, MCIP

cc: *client*