

Project No. 23230

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)**  
**85 Corporate Drive (“referred to as Lot D”)**

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We are the planning consultants to 8104476 Canada Inc., the owner of the above-noted lands located at the southeast corner of Corporate Drive and Consilium Place (the “subject site”).

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 regard, we reviewed the Our Scarborough Centre Phase 4 Final Study Report, dated March 2023, and provided our comments to staff in a letter dated November 13, 2024. As well, we reviewed the draft SCSP that was released by staff in April 2025 and attended the City’s open house which was held on April 7, 2025. We submitted a letter on May 22, 2025, that provided our comments on the April 2025 version of the draft SCSP for staff’s consideration. We also met with staff in June 2025 to discuss our comments on the draft SCSP.

We have now reviewed the draft SCSP that was recently released by staff. This letter has been prepared to provide our objections and comments on the draft SCSP for staff’s consideration, particularly as it relates to the subject site.

While we support the overall direction for less restrictive policies related to built form and the public realm in the most recent draft of the SCSP, we continue to have a number of comments and concerns, particularly with respect to the following themes, which are outlined below:

- Prescriptiveness;
- East Highland Creek;
- Shadows;
- Development sequencing;

- Consistency; and
- Clarity required/miscellaneous.

### **Subject Site Background**

An Official Plan Amendment and rezoning application for the subject site was submitted in July 2007 by the previous owner, which included four buildings situated at the corners of the site and arranged around an internal driveway system, courtyard and amenity facilities. The heights of the towers were 36, 36, 40 and 45 storeys, including a total gross floor area of 118,630 square metres, resulting in an overall density of 5.0 FSI.

A Final Report from Community Planning dated June 4, 2010 recommended that City Council approve the proposed Draft Official Plan Amendment and Draft Zoning By-law Amendment, among other matters. In particular, the recommendation provided that, before introducing the necessary Bills to City Council for enactment, matters related to removing the subject site from the floodplain associated with the East Highland Creek be addressed, including a Holding (H) provision in the zoning by-law, tied to the eastern portion of the subject site, that would not be removed until these matters had been resolved. City Council adopted the recommendations at its meeting on July 6, 7 and 8, 2010. However, the conditions were never fully resolved and the Official Plan Amendment and Zoning By-law Amendment were not adopted.

The recent change in ownership of the subject site has provided an opportunity to re-evaluate the 2010 approval within the current policy framework and built form context. As you are aware, our client has decided that they will not be proceeding with the 2010 approval/application as it was understood that this was the City's preference and our client had initiated pre-application consultation with City staff with a view to submitting a new Official Plan Amendment, Rezoning and Draft Plan of Subdivision application for the subject site.

To date, there have been two pre-application consultation ("PAC") meetings for the pending application, and several follow up meetings. Formal PAC comments from the City were issued on August 14, 2024 and January 17, 2025, related to these respective meetings. In this regard, we have worked with City staff to refine the design and respond to the emerging directions in the new Scarborough Centre Secondary Plan, including meeting with staff on numerous occasions, including:

- meeting with Engineering and Construction Services on February 1, 2024 to discuss servicing;
- a pre-PAC meeting with City Planning and Urban Design on March 25, 2024 to discuss the concept plan for the subject site and the Our Scarborough Centre Focus Review;

- a PAC meeting with various City departments on August 14, 2024 to discuss the updated concept plans for the subject site, which included several changes following the pre-PAC meeting;
- a second PAC meeting with various City departments on December 19, 2024 to discuss the updated concept, which included several changes following the PAC meeting. Matters related to natural heritage, transportation, parks and built form were discussed;
- a meeting with City Planning and Urban Design staff to discuss the draft Scarborough Centre Secondary Plan on June 6, 2025. The proposal was further revised to respond to the emerging directions in the draft Scarborough Centre Secondary Plan;
- a meeting with City Planning, Urban Design and Parks staff on July 31, 2025 to discuss the location of the park and parkland dedication amount; and
- a meeting with City Planning, Urban Design, and Transportation Review on November 26, 2025 to discuss the rights-of-way for two new portions of public roads within the subject site, and Consilium Place and Corporate Drive.

Lastly, with respect to the East Highland Creek floodplain, the owners and consultant team met with the TRCA on two occasions (February 24, 2025 and October 22, 2025) and submitted a Concept Development Application in March 2025. Further to those meetings, the TRCA confirmed (through letter dated July 16, 2025), that the cut and fill and phasing approach proposed by Husson Engineering is accepted in principle, and agreed on the technical requirements associated with determining the long-term stable top-of-slope assessment.

Our client is actively working to address City comments, and the draft Secondary Plan introduces a number of policies that require clarification. In the spirit of working collaboratively and continuing to advance this application, we are providing the following comments on the draft policies and will seek to discuss these with City staff in the coming weeks.

### **Comments on Secondary Plan**

#### **1. Prescriptiveness**

Applicable proposed Policies: Policies 6.5.4, 6.6.2(a) and (c), 7.2.1, 7.3.1(a), 7.5.3, 7.5.5, 7.6.3, 7.6.4, 7.9.1, 7.9.2, 8.5.2(a) and 10.2.

In our opinion, as a matter of basic planning principles, Official Plans (including Secondary Plans) should consist of policies that provide a land use planning framework and high-level vision for how areas should grow and develop over time, including land use

designations, compatibility, transition and character, among other matters. They should not consist of specific prescriptive, mandatory or numerical regulations - - that is the purpose of the zoning by-law.

There are both issues of principle and practical issues associated with the proposed numerical and/or mandatory prescriptiveness in the Secondary Plan. From a principled perspective, the inclusion of prescriptive numerical standards in the Secondary Plan inappropriately blurs the relationship between policy and regulation. It is important for the Official Plan to articulate the rationale for a vision (the “why”) rather than how that vision is achieved and regulated (the “what”).

In other recent policy documents (e.g. the King-Spadina Secondary Plan, the North Downtown Yonge Site and Area Specific Policy 382, etc.), City staff have recognized the appropriateness of such an approach and have deleted most, if not all, numerical standards from the documents through modification.

From a practical perspective, there are significant challenges with Secondary Plan policies that include prescriptive, mandatory and numerical standards, including:

- An Official Plan Amendment would potentially be required in order to vary the standard. This 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.
- Such standards do not recognize site-specific context or provide the required flexibility in design approaches that may be able to achieve the overall intent of the policy direction in a different way.
- Applying mandatory and prescriptive policies in the Secondary Plan limits the discretion of Council in considering otherwise desirable built form solutions which are at variance with prescriptive policies but otherwise meet the objectives of the Secondary Plan.
- Prescriptiveness undermines the Plan’s vision and guiding principles, as set out in Sections 3.1 and 3.2, which include the evolution of 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 the prescriptive and 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. Our suggested amendments are as follows:

- Proposed Policy 6.5.4 add “be encouraged to” following “will”;
- Proposed Policy 6.6.2(a) delete “where feasible” and replace with “where appropriate”;
- Proposed Policy 6.6.2(c) delete “where possible” and replace with “where appropriate”;
- Proposed Policy 7.2.1 be revised to include language that speaks to providing appropriate setbacks, rather than on a prescriptive numerical standard, and delete Map 5-10 entirely;
- Proposed Policy 7.3.1(a) add “where appropriate” following “and Natural Areas”;
- Proposed Policy 7.5.3 add “generally” before “be lower in range”;
- Proposed Policy 7.5.5 add “generally” before “lower in height”;
- Proposed Policy 7.6.3 delete and replace with: “Tall buildings facing streets, Parks, Natural Areas and open spaces will generally be stepped back between the base building and the tower main wall. Greater stepbacks are encouraged for taller buildings where necessary to mitigate wind downdraft.”;
- Proposed Policy 7.6.4 delete and replace with: “The tower components of tall buildings will be appropriately separated to improve sunlight access and sky-view from the pedestrian realm.”;
- Proposed Policy 7.9.2 replace “recommended” with “encouraged”;
- Proposed Policy 8.5.2(a) add “where appropriate” following “active frontages”; and
- Proposed Policy 10.2 delete and replace with: “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 generally include:
  - a minimum of 15 per cent of the total number of units as 2-bedroom units;
  - a minimum of 10 per cent of the total number of units as 3-bedroom units;
  - 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.”

## 2. East Highland Creek

Applicable proposed Policies: 4.7.1(a)(i) and (ii), 6.3.3, 6.5.1, 6.6.1, and 8.6.2.

With respect to area structure, proposed Policy 4.7.1 provides guidance for development in the East Highland Creek District, within which the subject site would be located. We support parkland on the subject site that enables effective park delivery. However, with respect to proposed Policy 4.7.1(a)(i), the Planned Park/Priority Park Expansion identified

on the subject site on Map 5-2 is located adjacent to the new north-south public road and does not connect directly to East Highland Creek. In this regard, we are requesting flexibility with respect to prioritizing on-site parkland dedication for lands immediately adjacent to East Highland Creek.

In our opinion, proposed Policies 4.7.1(a)(iii), 6.3.3, 6.5.1(a) and 6.6.1 are too prescriptive in that they would require trail connections to be in specific locations and include specific designs, which may not be feasible on certain sites. In our view, Secondary Plan policies should outline general policies for the purposes of guiding development and land uses rather than prescribing, and effectively limiting, specific designs on certain sites. Our suggested amendments are as follows:

- Proposed Policy 4.7.1(a)(i) add “where appropriate” following “dedication”;
- Proposed Policy 4.7.1(a)(iii) add “where appropriate” following “alongside East Highland Creek”;
- Proposed Policy 6.3.3 add “generally” before “be designed to” and add “generally” following “and will”;
- Proposed Policy 6.5.1(a) add “where appropriate” following “Frank Faubert Woodlot”;
- Proposed Policy 6.6.1 add “the following, where appropriate” following “may include”; and
- Proposed Policy 8.6.2 replace “will” with “are encouraged to”.

### 3. Shadows

Applicable proposed Policies: 6.5.5(c), 7.9.1, 7.10.2 and 7.10.3.

In general, it is our opinion that the proposed shadow-related policies in the draft SCSP are too prescriptive and should be consistent with the language in the City of Toronto Official Plan to “adequately limit” shadow impacts on shadow sensitive areas.

Proposed Policy 6.5.5(c) provides that the design and development of new parks will be guided by providing a design for thermal comfort, including maximizing sunlight during the spring and fall, providing shade during the summer, and minimizing wind impacts. In our view, the proposed policy should instead reflect the shadow tests in the parent Official Plan.

Proposed Policy 7.9.1 provides that mid-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. The tower components of tall buildings are to be set back from Parks and Natural Areas. While we support the general intent of this policy, we suggest that the policy be revised to provide some flexibility, where it may

not be feasible for mid-rise buildings to limit shadow and wind impacts, to avoid the need for unnecessary OPAs.

With respect to shadowing on *Parks*, proposed Policies 7.10.2 and 7.10.3 prescribe minimum hours of sunlight and sunlight coverage on several existing and planned parks within the SCSP area, specifically between 9:18 a.m. and 6:18 p.m. from March 21<sup>st</sup> to September 21<sup>st</sup>. In our opinion, the proposed shadow policies should reflect the shadow tests in the parent Official Plan. The introduction of new tests results in confusion and a lack of clarity in the application of conflicting policies. Our suggested amendments are as follows:

- Proposed Policy 6.5.5(c) replace “maximizing sunlight” with “adequately limits shadow”;
- Proposed Policy 7.9.1 delete “recommended” with “encouraged”, and add “appropriately” before “setback”;
- Proposed Policy 7.10.2 replace “Development will achieve a minimum of 6 consecutive hours of sunlight on 75 percent of existing Parks within Scarborough Centre, including Lee Centre Park, Hillsborough Park, and Hand of God Park between 9:18 am to 6:18 pm from March 21<sup>st</sup> to September 21<sup>st</sup>” with “Development will adequately limit shadows as necessary to preserve the utility of existing Parks within Scarborough Centre, including Lee Centre Park, Hillsborough Park, and Hand of God Park between 9:18 am to 6:18 pm from March 21<sup>st</sup> to September 21<sup>st</sup>”; and
- Proposed Policy 7.10.3 replace “Development will achieve a minimum of 5 consecutive hours of sunlight on 75 percent of existing Natural Areas including East Highland Creek and Frank Faubert Woodlot between 9:18 am to 6:18 pm from March 21<sup>st</sup> to September 21<sup>st</sup>” with “Development will adequately limit shadows of existing Natural Areas including East Highland Creek and Frank Faubert Woodlot between 9:18 am to 6:18 pm from March 21<sup>st</sup> to September 21<sup>st</sup>”.

#### 4. Development Sequencing

Applicable proposed Policies: 11.6.2, 11.6.3, 14.1.2, 14.2.4, 14.3.1, 14.3.2 and 14.4.1.

Proposed Policies 11.6.2, 11.6.3, 14.1.2, 14.2.4 and 14.4.1 could unnecessarily delay or preclude development and the introduction of much-needed housing within the SCSP area. While we understand the need to align development with hard services, soft services such as community facilities and amenities are outside the control of an individual development application. In our opinion, it is not reasonable for an individual development application to address the demand or sufficiency of soft or community services. In this

regard, new municipal facilities are subject to public funding and approval that may take several years to materialize.

In principle, we do not object to including policies related to Holding (“H”) Provisions in the draft Secondary Plan. However, it is our opinion that the criteria in proposed Policy 14.3.1 may be unclear and should be further scoped and refined.

Our suggested amendments are as follows:

- Proposed Policy 11.6.2 add “generally” following “Development that is phased should”;
- Proposed Policy 11.6.3 delete entirely;
- Proposed Policy 14.2.4 delete entirely;
- Proposed Policy 14.4.1 delete entirely; and
- Proposed Policies 14.1.2 and 14.4.1, should be reviewed by the City to consider whether community services, facilities, amenities, and parkland are appropriate to include in these implementation policies and whether these policies could delay or preclude the delivery of housing in the SCSP.

## 5. Consistency

Applicable proposed Policies 7.5.1 and 7.5.2.

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)).” 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.

Our suggested amendments are as follows:

- Map 5-11 be revised to align with Map K of SASP 2.

## 6. Clarity required/miscellaneous

Applicable proposed Policies: 6.2.4(a) and 8.4.6.

Proposed Policy 6.2.4(a) provides that neighbourhood streets accommodate a lower vehicle volume, are designed to encourage slower vehicle speeds, are primarily residential in nature with narrower rights-of-way, and should have generous planting zones within building front setbacks. While we support the general intent of this policy, we suggest that the policy be revised to provide some flexibility, where it may not be feasible to accommodate “generous” planting zones within some building front setbacks.

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 POPS or Parks in some locations.

Our suggested amendments are as follows:

- Proposed Policy 6.2.4(a) delete “generous” and add “where appropriate” following “building front setbacks”; and
- Proposed Policy 8.4.6 replace “will” with “are encouraged to”.

## Conclusion

As noted in this letter, we support 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 outlined above to provide clarity on the intent and flexibility.

Thank you for your consideration of these comments. We look forward to engaging in further discussions with staff as the draft Secondary Plan evolves. We request to be notified of any further updates, reports and/or decisions 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.**



Peter Smith, MCIP, RPP



Alex Savanyu, MCIP, RPP

cc: *Kristy Shortall, 8104476 Canada Inc.*  
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