

Written Submission to Committee of the Whole (Public Meeting), March 2, 2021, Item 5 – 72 Steeles Ave West & 7040 Yonge Street

Respectfully submitted by Jordan Max, President of the Springfarm Ratepayers Association

1. Introduction

The Springfarm Ratepayers Association (SFRA), has been formally registered with the City since 2016. Our boundaries in Ward 5 are from Yonge to Bathurst, and Steeles to Centre, and includes the proposed redevelopment site. The SFRA is not against redevelopment *per se*. We accept redevelopments that are within the established planning parameters set by the City, and that respect their local context.

We gave a deputation at Committee of the Whole in January in response to Chestnut Hill's proposal for 7080 Yonge Street, and last July about both the 100 and 180 Steeles Avenue West proposals. However, there are many similarities between this proposal and the previous ones, which we feel compelled to recount for the public record.

2. Positive Aspects

We want to emphasize that our task is not only to point out problems. So for starters, we praise the fact that the agent (Weston Consulting, along with Kirkor Architects) met with us in early March 2020 (prior to a community Open House event) to discuss their concept plan, and again late November 2020 and to answer questions before they formally submitted their proposal to the City. We appreciate that they engaged with us and the community at the Concept stage, rather than only at the Application stage. However, we also note that they promised to take that feedback into consideration, but in the end made no significant changes based on those questions and feedback.

We take note of the intended permeability of the site to north and northwest of site through a breezeway, north south pedestrian corridor and a shared automobile-pedestrian mews on the eastern edge, and significant inclusion of POPs along the north-south access road. There are pathways that connect to the existing community through the breezeway and rather than just have the buildings with a solid wall at their rear.

We also appreciate that the provided renderings incorporate other adjacent developments (7080 Yonge, Gupta, Mizrahi, Salz), including the shadow effects of adjacent buildings. This helps to illustrate the need for careful integration of buildings and open space in this area, to help us to identify where improvements can be made.

What follows is our constructive criticism of the parts of the proposal that are common to its neighbouring proposals, and those problems that are unique to it.

3. Common Concerns

The nature of development planning is more often than not episodic and unique, and each proposal is to be judged on its merits and demerits. Of course, no development is an island unto itself. The broader context must always be considered in any application.

This consideration is even more critical in the situation which we are facing today for Yonge and Steeles. Within the past thirty months, no less than five proposals for redevelopment in this area have been submitted to the City Planning Development Department and brought to Council's Committee of the Whole, all of them predicated on the construction of the future Yonge Subway North Extension's subway station at the corner of Yonge & Steeles.

The challenge for the City and its residents is to examine each proposal not only on its own merits and demerits, but alongside the adjacent proposals to look at their *adjacent and collective* impact on the area, and the timing of the subway extension, especially when the proposals are at similar stages of development. There is much to be integrated, consolidated, and rationalized between the five proposals as well as their transition to the established low-rise residential neighbourhood to the north and west of the development sites.

Figure 1 below, extracted from Humboldt Properties' Urban Design Brief, illustrates the combined development proposals submitted to the City. There is now a total of 20 towers proposed for the west side of Yonge Street and north side of Steeles Avenue West. The schematic inside the highlighted circle is 72 Steeles Ave West and 7040 Yonge Street. Table 1 illustrates the scale of the combined project proposals, and shows that this project will have the largest number of residential units and population of the five.



Figure 1- Architect's rendering of proposed redevelopments at Yonge & Steeles (source: Urban Design Brief, p. 7)

Table 1 – Yonge & Steeles area Redevelopment Proposals Summary

Location	2 Steeles/ 7028 Yonge	100 Steeles	180 Steeles	7080 Yonge	72 Steeles/ 7040 Yonge	Total
Owner	Gupta Group	Salz Corporation (100 SAW)	Mizrahi Constantine (180 SAW)	Chestnut Hill Developments	Humboldt Properties	
# towers	3	5	6	2	4	20
Date submitted	24-Sep-18	19-Feb-20	5-Mar-20	14-Oct-20	1-Dec-20	
Public Hearing Date	22-Jan-19	13-Jul-20	13-Jul-20	19-Jan-21	02-Mar-21	
Lot size (ha.)	1.14	2.065	2.09	0.5	1.97	7.765
YSCSP Allowable Height limits (storeys)	30	5/22	5/22	30	30/0 (park)	

Location	2 Steeles/ 7028 Yonge	100 Steeles	180 Steeles	7080 Yonge	72 Steeles/ 7040 Yonge	Total
Proposed Building heights (storeys)	50, 56, 65	4, 18, 18, 49, 54	16, 16, 25, 29, 39, 45	20, 40	38, 44, 56, 60	
YSCSP Allowable Density (FSI)	6.0	5.0/1.5	5.0/1.5	6.0	6.0/0.0 (park)	
Proposed Overall Density (FSI)	14.3	8.4	6.46	9.84	12.82	
# residential units	1,890	1,765	2,080	652	2,620	9,007
Projected # of residents*	3,137	2,648	3,120	978	3,930	13,813
Total Parking spaces	1,272	1,289	1,876	351	1,635	6,423
Projected population density/hectare	2,752	1,282	1,493	1,956	1,995	9,478

* assuming average of 1.5 persons per unit

In January 2021, we raised serious concerns about the 7080 Yonge Street proposal, similar to the ones we did last July about the 100 and 180 Steeles Ave West proposals:

- too many buildings;
- unsubstantiated precedents from the Vaughan Metropolitan Centre;
- too much land coverage;
- double the allowable height and density;
- flawed and inaccurate transportation and community services and facilities studies;
- no provision for public green space;
- too much shadowing from excessive buildings, height and massing;
- virtually non-existent commercial space;
- reduced underground parking;
- lack of affordable housing;
- building heights exceeding the 45-degree angular plane intersect;
- no provision for on-site community services and facilities to address both existing and new residents;
- delaying the Royal Palm extension until the end of construction; and
- no integration with adjacent sites or the existing residential neighbourhood to the north.

As this proposal is the last of the five most recently submitted to Council for this immediate area, we would have expected that Humboldt would have paid attention to our stated concerns with the previous proposals at 2 Steeles Ave West/7028 Yonge Street, 100 Steeles Ave. West, 180 Steeles Avenue West, and 7080 Yonge Street, and would have addressed them substantively in terms of the number of buildings, heights, density, and siting.

Unfortunately, this proposal contains most of these same flaws, and adds a few more of its own, which we will elaborate on below. We find it disconcerting that the rendering in Figure 2 below gives a false impression of the extent of open green space, as the foreground omits the three Gupta towers of 50, 56 and 65 storeys respectively. Despite the sunny picture portrayed, the more accurate reality is that most of these buildings will be in permanent shadowed darkness for most of the day, year-round, from the southern, eastern, and western faces.



Figure 2: Architectural Rendering (City of Vaughan VYCWG Renderings, p. 3)

4. Unique Major Concerns

In addition to the aforementioned common concerns, we have three major additional concerns with this proposal that stem from non-compliance with the Secondary Plan:

- Appropriation of Designated Public Park area
- 45-degree angle not illustrated at grade level (cross section)
- Powell & Royal Palm extensions only partially built as interim private roads

a) Non-compliance with the Secondary Plan

The Yonge-Steeles Corridor Secondary Plan was approved by Council in September 2010 and by York Region in January 2016. The Plan recognized Yonge and Steeles for reasonable intensification but respected the existing residential community to the north. It factored in a future TTC subway station at Yonge & Steeles. It features a linear park as a green space buffer, east-west internal roads north of Steeles, and Royal Palm Drive extended from Hilda to Yonge. It meets all Provincial, Regional and Municipal policies.

The Springfarm Ratepayers Association agrees with the Secondary Plan as a reasonable plan that carefully balanced transportation-related intensification with the existing neighbourhood, and the overall 3.5 FSI for the development block immediately adjacent to the Steeles Subway Station.

“Minimum densities for key development areas are to be established within Secondary Plans, consistent with a 3.5 Floor Space Index (FSI) per development block at, and adjacent to, the Steeles Station on the Yonge Subway Extension...” (Yonge Steeles Corridor Secondary Plan, 2010, p.8)

Figure 3 (and a close up in Figure 4) shows the Secondary Plan’s maximum height of 30 storeys for high-rise mixed residential use at the northwest corner of Yonge and Steeles (shaded red), and Density of 6.0, and to the north, a large square green space for public parkland. It also designated the northwestern corner of Yonge & Steeles as an “Office Priority Area”.

Since the Secondary Plan is under appeal to LPAT, it is not in effect, and therefore we understand that the prior Plan, Official Plan Amendment 210 (Thornhill Vaughan Community Plan)(“OPA 210”) prevails. In OPA 210, the Subject Lands are designated C1, “General Commercial Area”, which permits the existing commercial uses to continue.

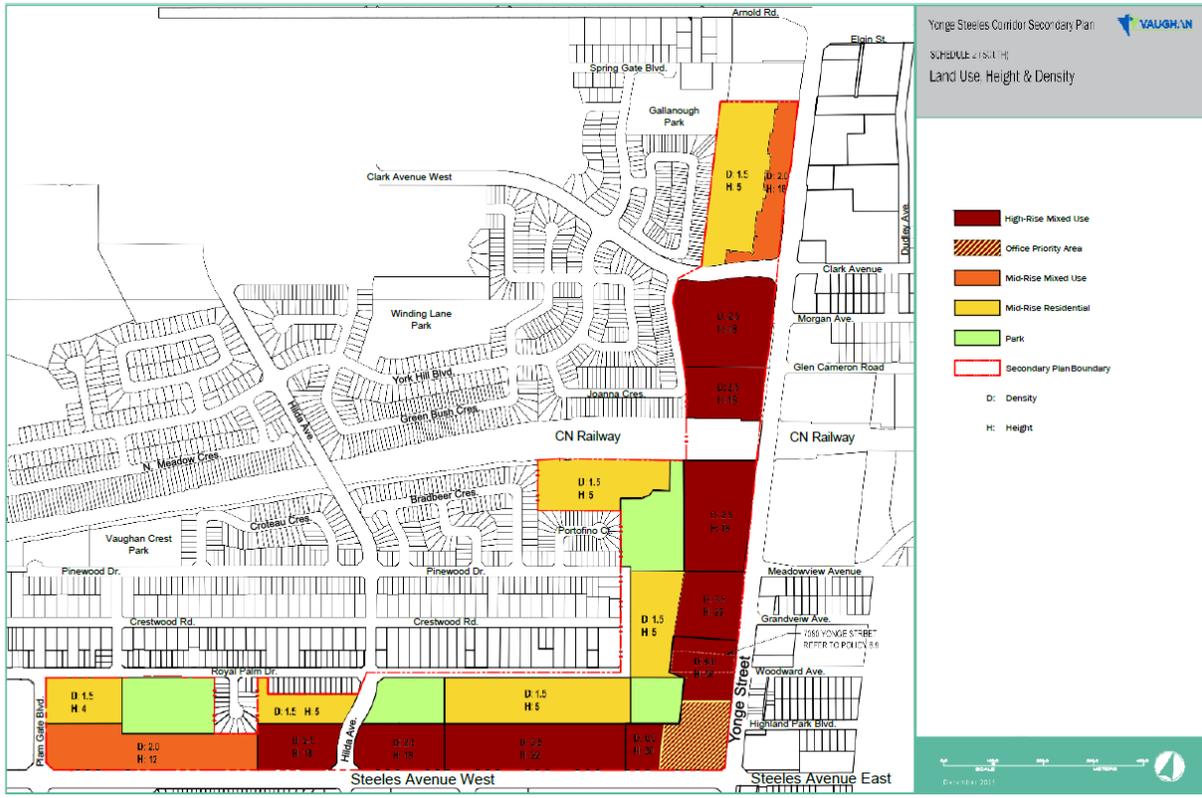


Figure 3: Land Use, Height and Density (Schedule 2) of Secondary Plan

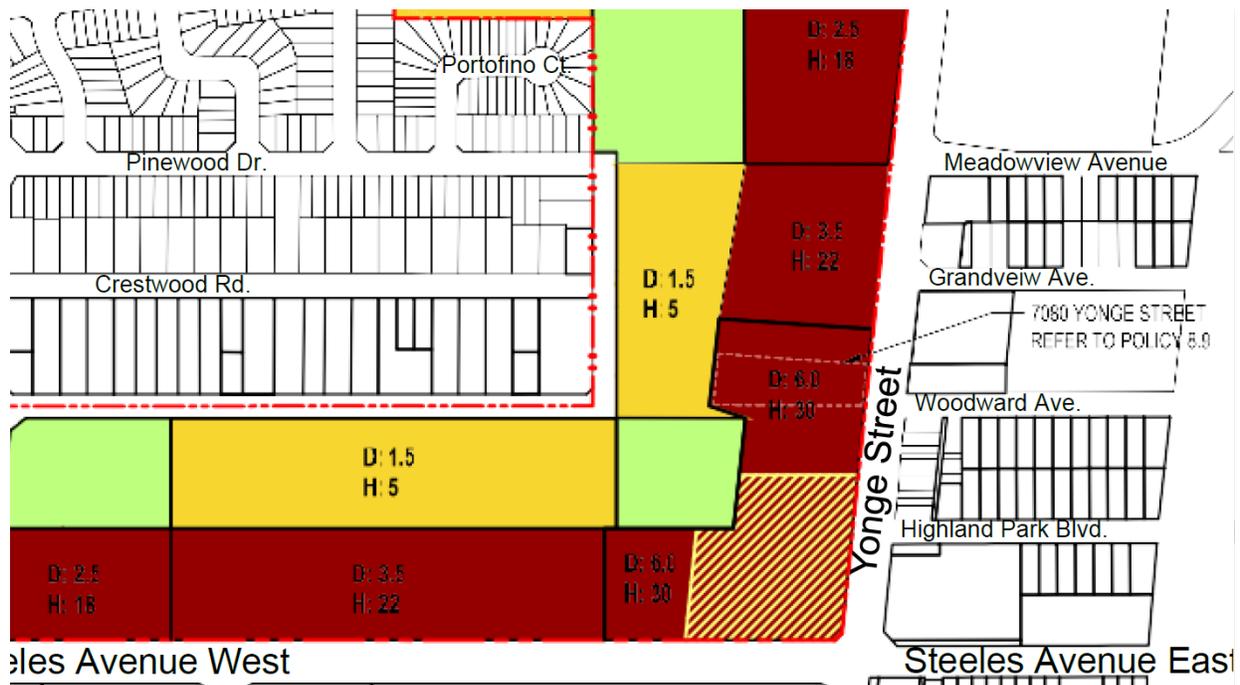


Figure 4- close up of Figure 3

Humbold Properties' proposal for 72 Steeles Ave. West and 7040 Yonge Street, for four towers ranging from 38 to 60 stories draws its inspiration from the Yonge Steeles Corridor Secondary Plan, but at the same time notes that the Secondary Plan is not yet in effect due to an outstanding LPAT appeal by most of the landowners in the area (including Humbold Properties). Humbold is therefore seeking to amend the Zoning By-Law from C1 to RA3 Apartment, which itself only allows for a maximum of 44 metres of height (~12 storeys) and hence it is asking for up to 5.42 times the height allowance, 65 storeys or 238m, that is, 542% above even the RA3 height allowance.

Appropriation of Publicly Accessible Open Space

In the Urban Design Brief, P.3, the following statement is made

“While the site is not immediately adjacent to any Natural Heritage Features, the Yonge Steeles Corridor Secondary Plan proposes a local open space/park system that will thread through the lands along Yonge Street and Steeles Avenue. The proposed development provides a central open green space that will tie into the local future park system and surrounding context via east-west and north-south mid-block connections. This central space will offer ecological resources through open air, soil and vegetation.”

So it would appear that the developer generally supports the Yonge Steeles Corridor Secondary Plan. However, most significantly, as Figures 5, 6 and 7 illustrate, the developer has actually proposed to build two buildings on three-quarters of the largest designated green space in the entire Secondary Plan. **This is an unconscionable appropriation of critically necessary, designated “land to be conveyed to the City for Park Purposes” (ie. Park)** as a “Private-owned Publicly accessible Space” (POPS), which will only be built during Phase 2 (Building B, with the 38 and 44 storey tower on top of a 12-storey podium. So there will be zero provided green space at grade for the occupants of the first buildings. And no public park. This is appropriation of public space for private use, which must be vigorously challenged.

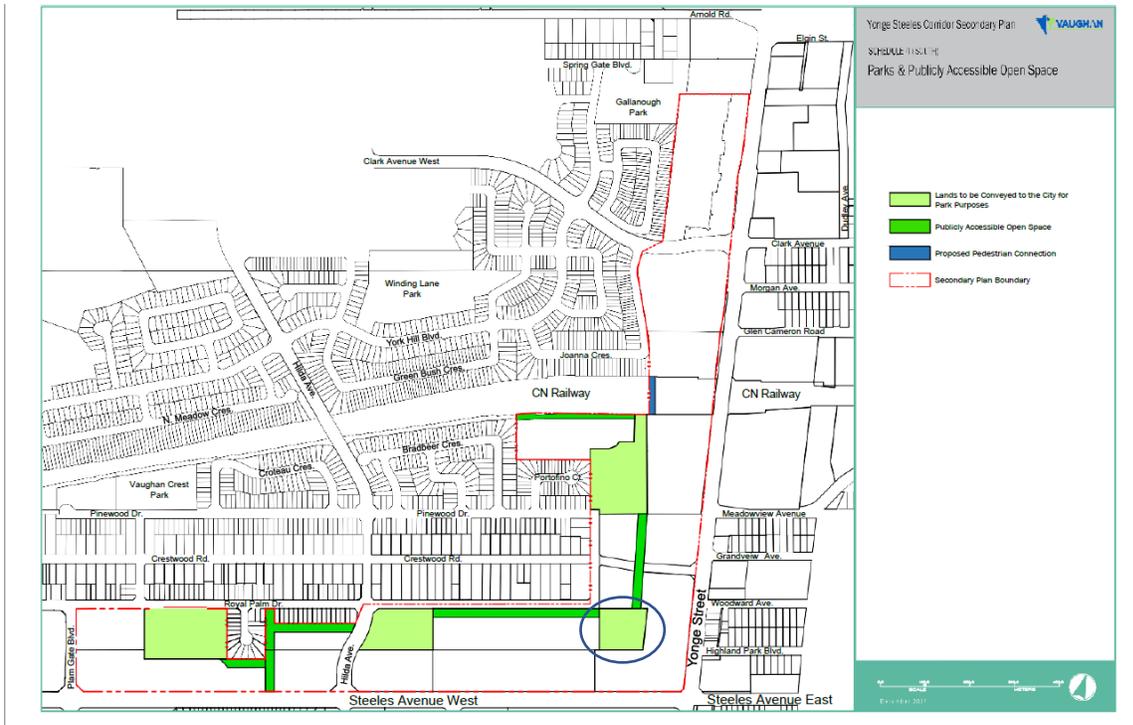


Figure 5 – Yonge Steeles Corridor Secondary Plan Schedule 4 (Parks and Publicly Accessible Open Space)



Figure 6 – Overlay of site (black dashed line) on Secondary Plan Schedule 2 (Park land use in light green) (source: Urban Design Brief, p.14)

Open with ▾

Figure 4 – Concept Plan



Figure 7: Concept Plan (Architectural Drawings, p. 12) superimposed on Schedule 2 of Secondary Plan green space location

b) Location, Lot Coverage, and Setbacks

The current site contains two commercial buildings; a 2-storey commercial space (primarily a private school) and retail menswear store at 72 Steeles Ave W., and an ethnic supermarket (the Galleria) at 7040 Yonge St.

As illustrated by Figures 8, 9, 10, and 11, the site appears to have a 7m setback for the private interim road, and small setbacks between the road and the building perimeter. (The Zoning by-law requires a 7.5m setback for an RA3 apartment zone, and half of the height where a building exceeds 11m in height).

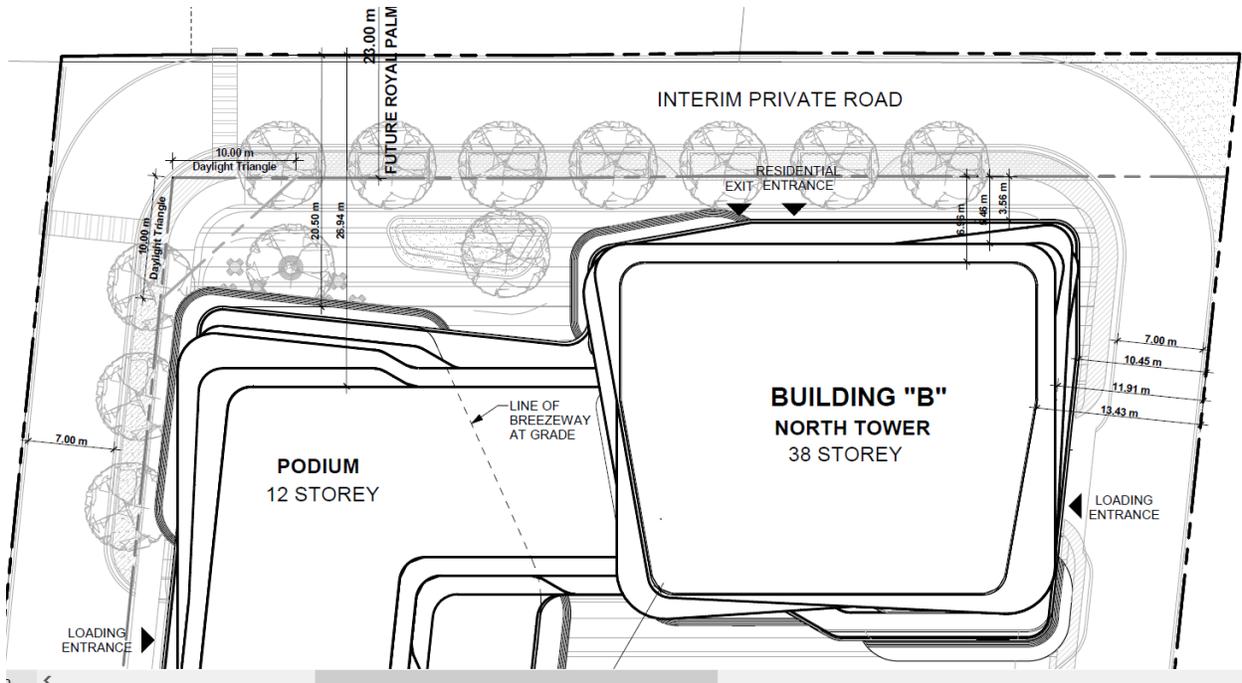


Figure 8: Site Setbacks – Building B North Tower (Source: Architectural Drawings, p. 7)

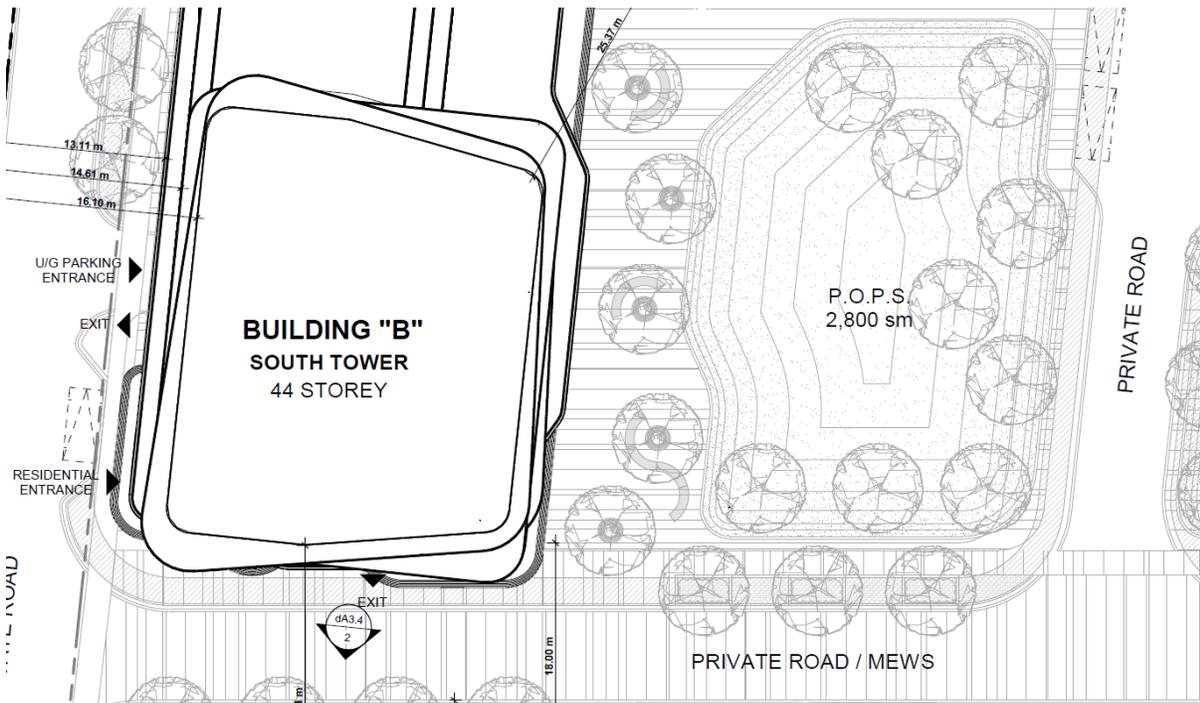


Figure 9: Site Setbacks - Building B South Tower (Source: Architectural Drawings, p. 7)

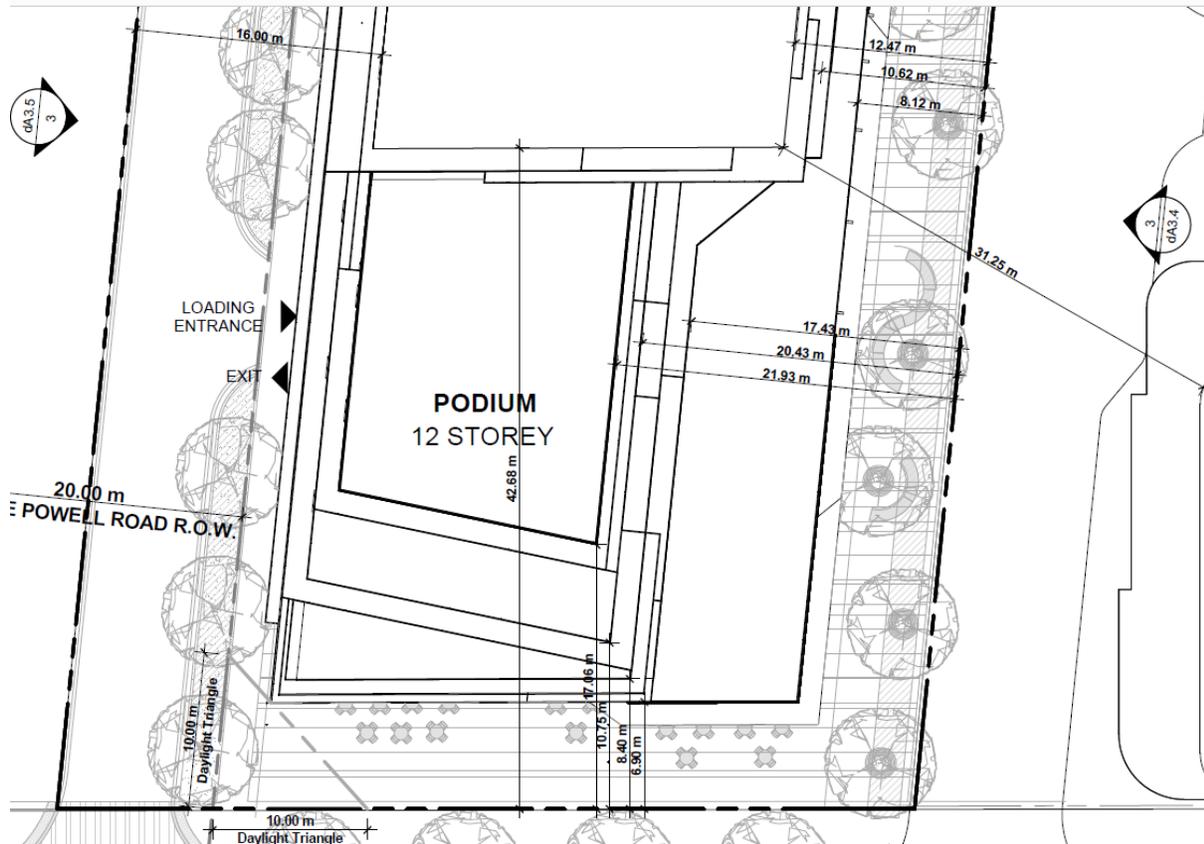


Figure 10: Site Setbacks - Building A (Source: Architectural Drawings, p. 7)

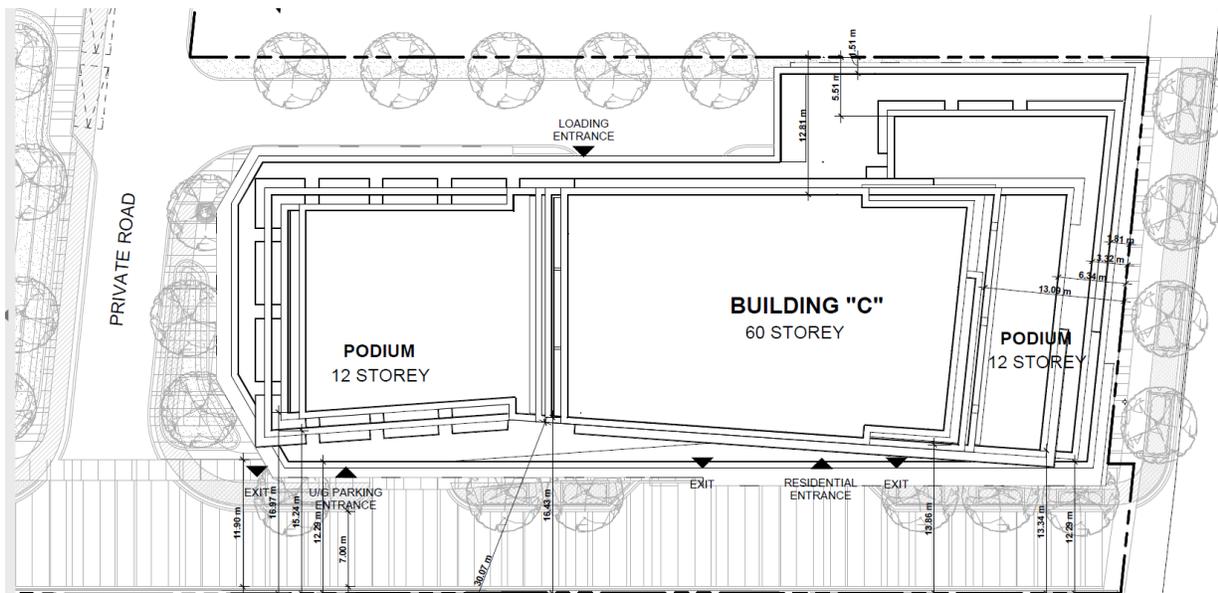


Figure 11: Site Setbacks – Building C (Source: Architectural Drawings, p. 7)

The narrowest setbacks from Figures 8 through 11 are illustrated in Table 2, as follows:

Table 2: Perimeter setbacks from Humboldt property line (source: Architectural drawings, p. 7)

Side	RA3 Required Setback for interior side yard (where more than 11m height, half)	Proposed Setback from property line	Setback from inner edge of road (road is 7m wide)
North (Royal Palm extension)	62.2m	12.56m	3.5 m
West (Powell Road extension)	62.2m	13.0m	6.0 m
South (Steeles Ave)	71.0m	6.9m	6.9 m
East (Building A)	89.5m	8.12m	8.12 m
East (Building C)	89.5m	1.81m	1.81 m

We also note that Humboldt has chosen to build only interim private roads around the northern and western perimeter of the site. Thus, the outside edge of the private road is considered to be the property line. Whereas were Humboldt to build the permanent Right of Way for Powell and Royal Palm, the inner edge of the road would become the property line, and therefore the setback to the building perimeter would start there. So, in reality, the setbacks, even though less than the minimum requirement of the Zoning By-Law for an RA3 Apartment zone, the building perimeter should actually start at least 10 m further inside the property, which would constrain the building footprint.

The fact that the developer chose to build on a small, narrow parcel of land on the western side does not mean that they can skirt around the City’s required setback requirements by delaying the construction of the Powell and Royal Palm extensions until the adjacent property owners agree.

For more implications of the roads, see section d).

c) Excessive Lot Coverage

According to the data on page 2 of the Architectural drawings, as tabulated in Table 3 below, the buildings (9,133 m² GFA of residential, indoor amenity and retail spaces) use up approximately 46% of the 1.97 hectares (19,700 m²) site at grade. Total outdoor amenity GFA (excluding roads) is 2,983m² or 15%. Private interim roads (Powell and Royal Palm extensions), are 2,036m² or 10% of the lot. This leaves 5,942m² or 18% of the ground level GFA unaccounted for.

Table 3 – Gross Floor Area at Ground Level (m²) as supplied in the Architectural Drawings, p. 2

Building	Residential GFA – Ground level (m ²)	Indoor Amenity – Ground level (m ²)	Retail GFA – Ground level (m ²)	Total (m ²)
A	987	454	541	1982
B (2 towers +podium)	2861	727	615	4203
C	1737	686	525	2948
Total GFA	5585	1867	1681	9133

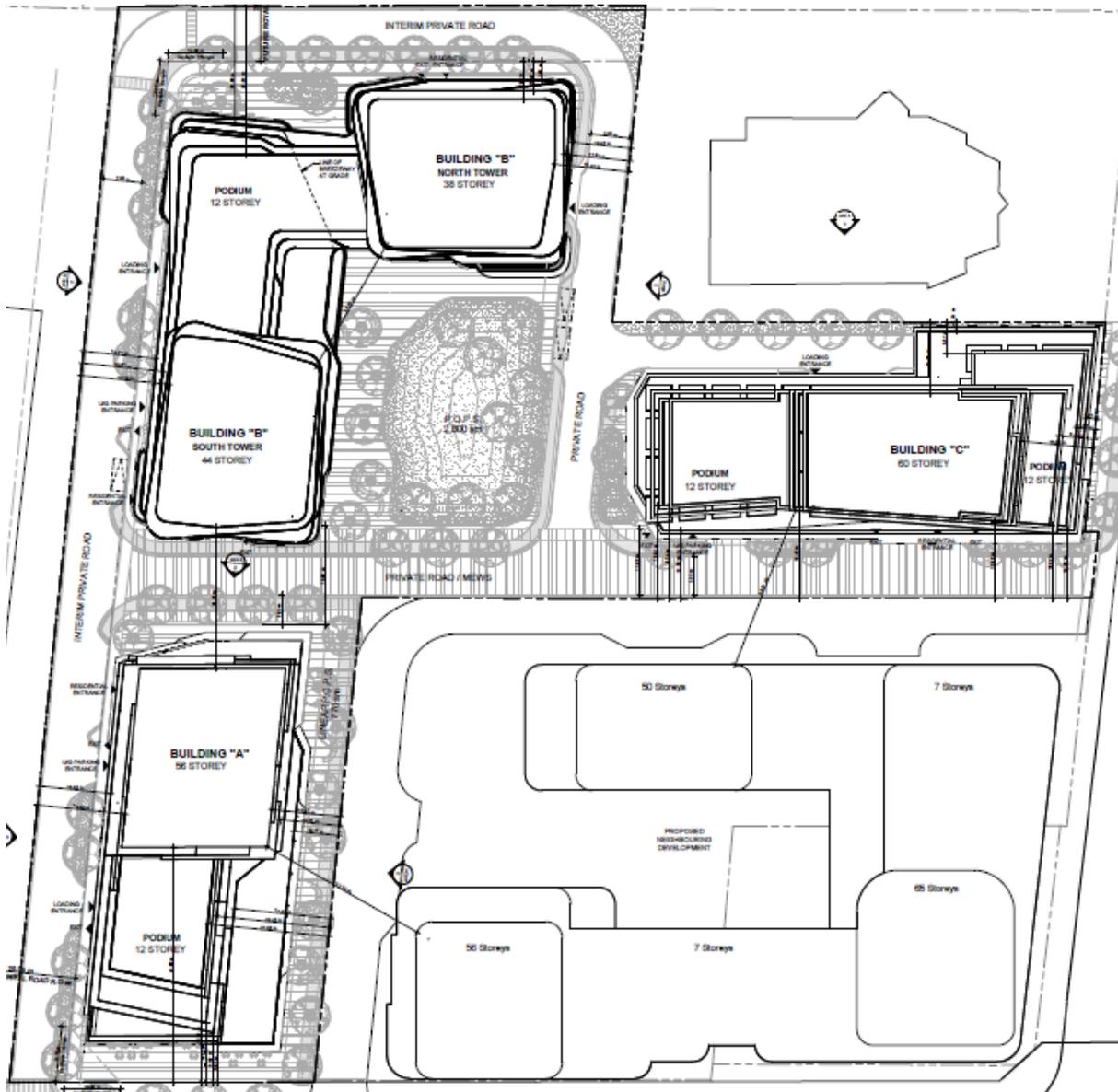


Figure 12 Privately-owned publicly accessible spaces (source: Architectural Drawings set, p.7)

Figure 12 illustrates that there is 3,570m² private accessible open space (POPs), however 78% of that is taken up by the central private green space. Setbacks from roads are all less than the 7.5m required by the Zoning By-Law for an RA3 High Rise Apartment Zone.

d) Inadequate Allowance for Roads, Transportation and Parking

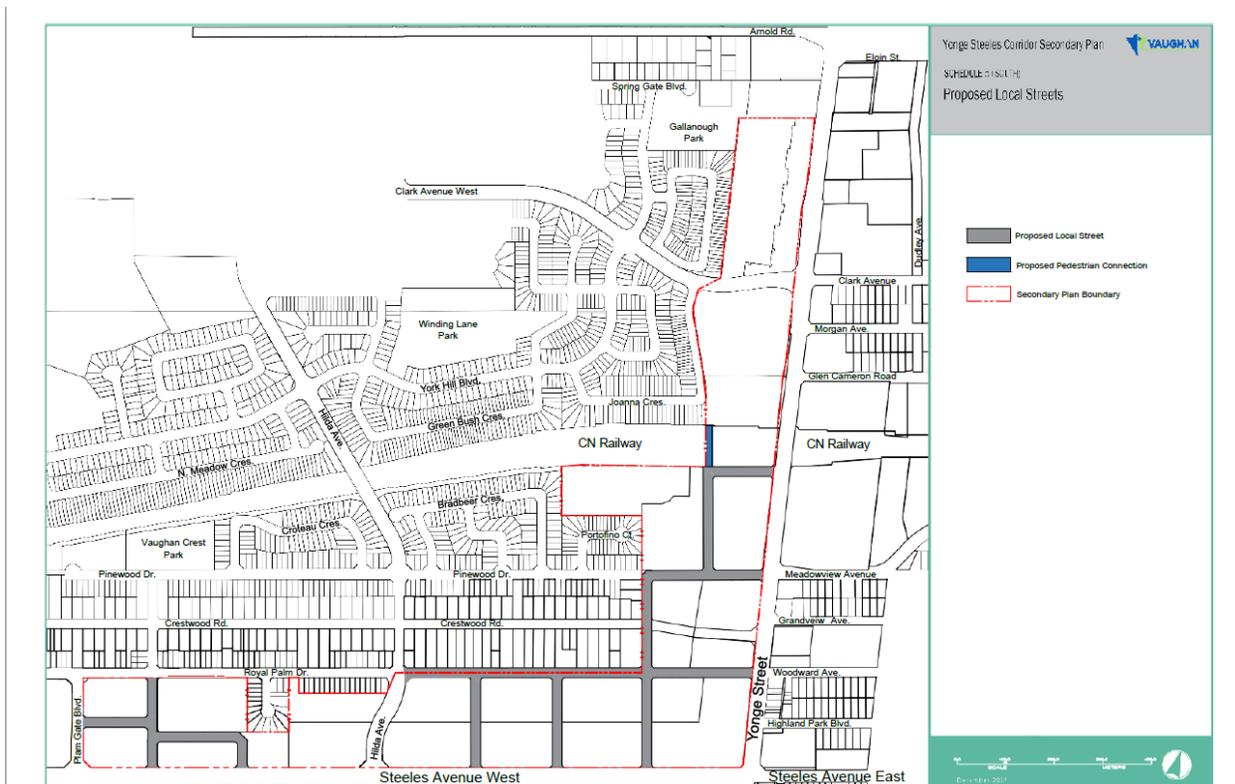


Figure 13: Proposed Local Roads (source: Yonge Steeles Corridor Secondary Plan, Schedule 5(South))

As illustrated in Figure 13, Section 2.0 (Vision) of the Yonge Steeles Corridor Secondary Plan included the following principles:

“In the South Area, a new road network will divide the blocks fronting along Yonge Street and Steeles Avenue West into new blocks that **provide regular opportunities to access Yonge Street and Steeles Avenue West from the lands to the rear of the Yonge Street and Steeles Avenue West frontages by foot, bicycle or motorized vehicle, while at the same time providing opportunities to disperse traffic onto Yonge Street and Steeles Avenue West. A key component of this street system is the extension of Royal Palm Drive from Hilda Avenue to Yonge Street. In addition to providing a critical basis for organizing streets and blocks, this street extension will also provide the opportunity to sever deep lots fronting onto Crestwood Road and redevelop these lands with houses or townhouses along the new Royal Palm Drive frontages.**

Generally, block frontages along Yonge Street and Steeles Avenue West are approximately 200 metres in length. **The road system has been designed to minimize**

traffic penetration into existing residential neighbourhoods to the north and west (see Schedule 5). Servicing access to buildings fronting onto Yonge Street and Steeles Avenue West will take place from the adjacent streets or service lanes, and not from the arterial streets.”

....

Redevelopment of the lands within the Secondary Plan Area will occur incrementally over many years. Over time, individual development proposals will be assessed in the context of existing and anticipated development on adjacent properties to determine how they fit into the planned context and meet the objectives of this Secondary Plan. Assessment of development will include considerations such as:

- a phasing strategy for large development areas which provides for the **equitable sharing of the costs of public infrastructure among benefitting landowners;**
- achieving parcel sizes that can support the high and mid-rise buildings anticipated along the Yonge Street and Steeles Avenue West frontages;
- **provision of parkland and open space in accordance with the system described in this Plan;**
- **conveyance of lands to create the internal road network as described in this Plan;**
- urban design objectives; and
- environmentally sustainable site and building design practices.

(Secondary Plan, pp. 15-16) (our emphasis in bold)

So the plan anticipated the conveyance of lands to the City to create the internal road network. Since in our current situation, there have been five redevelopment proposals submitted for this area within the past two and a half years, none of which have been approved by Council and subject to resolution of the LPAT appeal of the Secondary Plan, it is both reasonable and necessary that the internal streets common to and servicing them be built at the same time as these projects are eventually constructed. The Landowners Group, which represents the local owners and includes the five developers, must produce a working formula to share the costs of conveying their portions of land and constructing the complete Royal Palm extension from Hilda to Yonge Street, at the beginning of project construction, not afterwards. Otherwise, if Council allows piecemeal approval and construction of individual projects, there are no guarantees that Royal Palm will be conveyed or built.

There is a precedent for this when Royal Palm Drive was originally constructed west of Hilda to Jacob Fisher Avenue. In that instance, the developer on the north side of Steeles agreed to:

- 1) build the road
- 2) pay for the entire construction cost
- 3) providing water and hydro service to the lot line for the Crestwood properties, and
- 4) build a row of single-family homes on the south side of Royal Palm, to provide for an easier transition from Crestwood to the buildings on Steeles.

Were Council to allow the Humboldt proposal, as well as the Gupta and Chestnut Hill proposals to proceed without conveying and building the full 23m Right of Way for Powell Road, (Chestnut Hill has proposed to convey and construct the portion of Royal Palm from Yonge Street to its western boundary), there is considerable risk that the neighbourhood may never see the extensions of Powell and the rest of Royal Palm built.

Now, let us turn our attention to what Humboldt has proposed.

The drawings on page 7 (Master Plan Proposed Site overview in the Urban Design Brief) indicates a final 20m right of way for Powell Road southern extension and a 23m Right of Way for the Royal Palm extension as part of the Secondary Plan. The City's Engineering Design Standard¹ (2018) width road allowance for a Minor Collector Road is 24m Right of Way. The proposal (in Figure 14) indicates that both the future Royal Palm extension and Powell Road extensions are Minor Collector roads (a 23m Right of Way), however, Powell Road is only given a 20m Right of Way, three meters short of the required. Furthermore, the detailed architectural drawings show both Royal Palm and Powell as interim private roads with only 7m width of pavement.

¹ Found at <https://www.vaughan.ca/services/DesignCriteria/files/Standard%20Drawings.pdf>, p.4

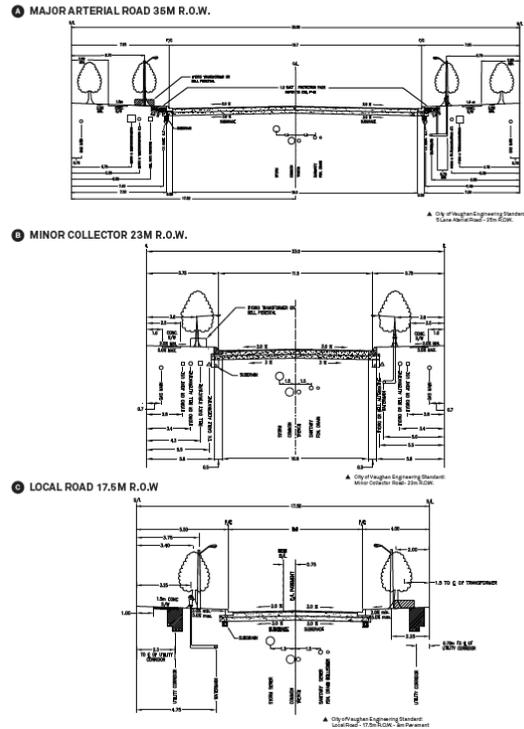
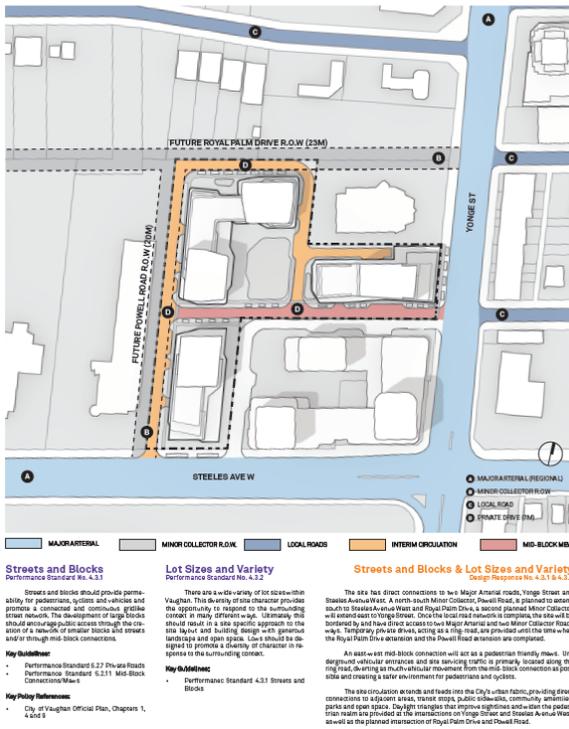


Figure 14: Streets and Blocks plan (Source: Urban Design Brief, page 10)

The Planning Justification Report provides the following information regarding internal roads: (Macaulay, Shiomi Howson, PJR, p. 11):

“The west portion of the proposed development includes the southerly extension of Powell Road to Steeles Avenue, half of the future right of way (ROW) is provided by Humboldt and the remaining ROW would be provided by the property to the west. The intention is to provide an interim access condition, until such time as the full road can be built.

Along the north end of the property are lands proposed as part of the future Royal Palm Drive extension to Yonge Street. Again, a portion of the road is provided along with an interim condition until surrounding lands come forward for development.

Connections and portions of future public roads are proposed as part of the development, along with private roads and driveways that will facilitate access around and through the site. An east-west meek is provided through the site which provides for right-in, right-out vehicular access to Yonge Street, along with additional pedestrian

connection.”

The proposal indicates “interim private roads” for the Royal Palm and Powell Road extensions, each less than half the width of each of the future roads. Half of the Powell Road ROW will require agreement by the adjacent property owner, Sisley Honda, but Humboldt has not provided any indication on Sisley Honda’s agreement as such.

Even though these roads are intended in final width to be built upon completion of the project, the proposal only builds 10m (half of the intended width) as an interim road. Adequate servicing demands the full width ROW to be constructed at the same time as the projects’ Phase 1 and 2 are built, otherwise the interim roads will be crowded as the only servicing road.

Powell Road Extension

As we noted above, Schedule 5 (South) of the Secondary Plan (Figure 13) shows Powell Road being extended directly south to Steeles. However, the Humboldt Plan shows that the extension of Powell Road starts at least 15m further east of where Powell Road is shown on the Secondary Plan, as that portion is within the Sisley Honda property. This variation must be addressed.

We note, as shown in Figure 15 that the 20m ROW demarcation for Powell (which should be 23m) actually intrudes onto the Sisley Honda property, and since Sisley is not included in this proposal, they cannot be expected to demolish the eastern wall of their building for the ROW. So it is only appropriate that the ROW be entirely within the Humboldt property, which would push the ROW eastward by at least 3 metres for the required ROW, plus another 1 or 2 metres to allow for sidewalk and setbacks to the building edge.

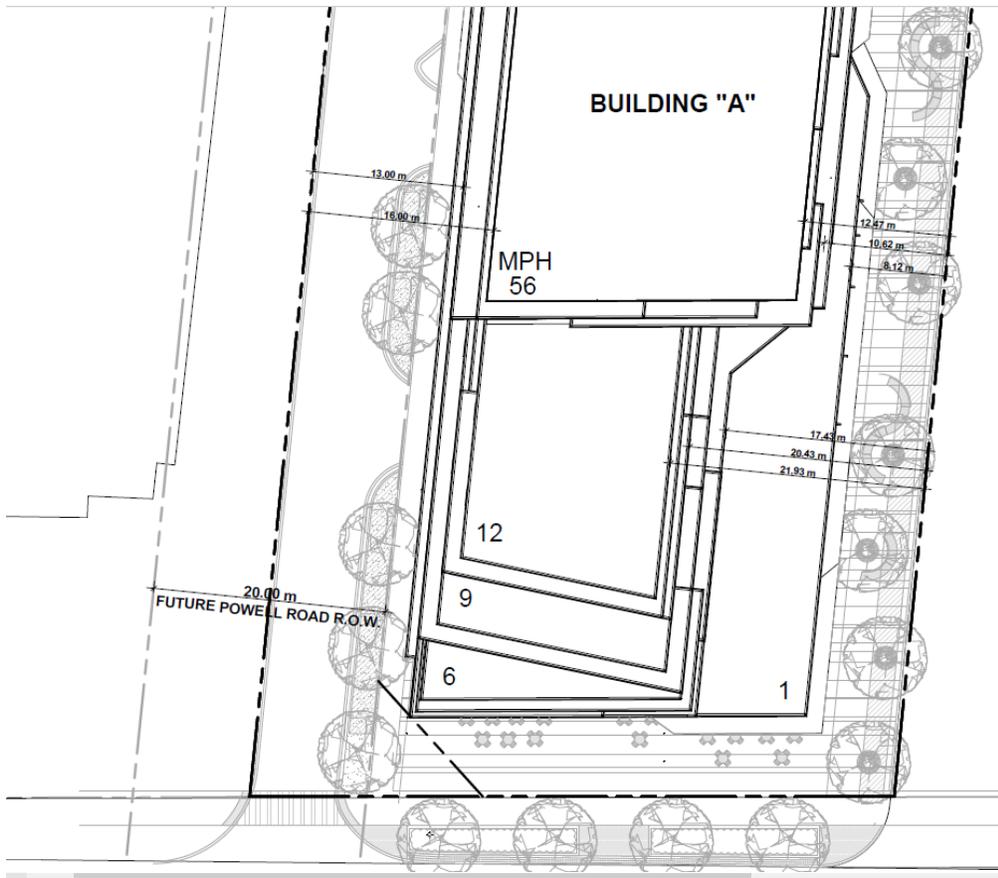


Figure 15: Western boundary setbacks (source: Architectural drawings, p. 29)

Royal Palm Extension

With respect to the Royal Palm extension, as shown in Figure 16, there is a discrepancy between this proposal and the one from 7080 Yonge Street, which is northeast of this site. For 7080 Yonge Street, the developer, Chestnut Hill, has proposed to both convey and construct the portion of Royal Palm, in its full width Right of Way (23m wide) from Yonge Street to the western edge of its property. As illustrated in Figure 16, the western end of 7080 Yonge Street meets the mid-block of the Humboldt site (shown by the red line). Yet, Humboldt does not intend to construct the full width Right of Way from that point to the western end of its property, but to only build a private, interim road of 10m width. Thus, the Royal Palm extension would be 23m wide from Yonge Street to the western end of 7080 Yonge, and then abruptly shrink to only 10m width from that point westward, where it would join up with the private interim Powell road. This is a clear example of the lack of integration and co-ordination of the Humboldt project with adjacent projects. Simply put, we believe that Humboldt must at least convey the full 23m width Right of Way for Royal Palm from the western boundary of the 7080 Yonge Street site to the western end of the Humboldt site. The remaining section is shown in a red shaded box in Figure 16.

- **Ensure each development or phase of development will not proceed until the transportation impact mitigation measures or improvements have been instituted by the developer or others and such mitigation measures have been evaluated to the satisfaction of York Region and the City of Vaughan.** “ (Yonge Steeles Corridor Secondary Plan, p. 35)

Humboldt Properties used Nextrans to do its Transportation Impact Study. Our analysis of this report, provided by our member Martin Rosen (in italics) is as follows:

The subject property is located at 7040/7054 Yonge Street and 72 Steeles Avenue West in the City of Vaughan. The proposed development consists of three phases.

Phase 1 consists of a 56-storey mix-used building with a total of 735 dwelling units and 541m² GFA of retail on the related ground floor, a total of 448 vehicle parking spaces and 457 bicycle parking spaces will be provided; as part of the proposed development, a Right-In Right-Out (RIRO) via Steeles Avenue West will be provided.

Phase 2 consists of a 38 & 44-storey mix-used building with a total of 1097 dwelling units and 615m² GFA of retail on the related ground floor, a total of 758 vehicle parking spaces and 661 bicycle parking spaces will be provided; as part of the proposed development one additional full movement access via Royal Palm to Crestwood Road will be provided.

Phase 3 consists of a 60-storey mix-used building with a total of 788 dwelling units and 686m² retail GFA of on the related ground floor, a total of 479 vehicle parking spaces and 476 bicycle parking spaces will be provided; as part of the proposed development one additional Right-In Right-Out (RIRO) access via Yonge Street will be provided

The proposed development is expected to generate:

- 848 total new two-way trips (232 inbound and 616 outbound) during the weekday morning and 1100 total new two-way trips (647 inbound and 453 outbound) during the afternoon peak hours, respectively;
- 415 total new two-way **transit** trips (114 inbound and 302 outbound) during the weekday morning and 539 total new two-way transit trips (317 inbound and 222 outbound) during the afternoon peak hours, respectively;
- 314 total new two-way **auto** trips (86 inbound and 228 outbound) during the weekday morning and 407 total new two-way auto trips (239 inbound and 168 outbound) during the afternoon peak hours, respectively;
- 59 total new two-way **active** trips (16 inbound and 43 outbound) during the weekday morning and 77 total new two-way auto trips (45 inbound and 32 outbound) during the afternoon peak hours, respectively

It is important to be noted that the existing access count data were estimated by the Institute of Transportation Engineers (ITE) Trip Generation and Transportation Tomorrow Study (TTS) data.

But in final analysis, the TTS data for the area was rejected and was replaced with data from other locations that were more favorable.

2.2. Existing Active Transportation Network

Bicycle Facility

Currently, there are no bicycle facilities in the vicinity of proposed development. It is Nexttrans' opinion that cycling facilities could be improved in the area, as part of the future City of Vaughan and York Region Master Plan. These types of projects are beyond the scope of the proposed development.

In other words, there are absolutely no bike lanes or safe places to cycle in the immediate vicinity of the development. Despite this, cycling is a key part of the transportation plan, with a huge number of bike parking spaces (instead of car parking).

Transit Mode Assessment

With the future transit condition such as Yonge Subway extension, Yonge BRT and Steeles BRT, it is our opinion that the proposed transit trips will be accommodated.

3.0 TRANSPORTATION PLANNING CONTEXT IN THE AREA

3.1. Yonge Steeles Corridor Secondary Plan

The proposed development is located at the south area, cities of Markham, Vaughan and Toronto have been conducting individual land use and transportation studies to help direct and manage new developments in this area. The studies indicate that the Yonge Subway Extension is the most critical transportation infrastructure improvement for this Area, it plays an important role in accommodating existing and future transportation and transit demand along this corridor. It will support new development at higher densities and in more compact built forms that are integrated with other modes of transportation, such as walking, cycling for short or long-distance trips.

The report justifies all its transportation recommendations on the guidelines in the YS Corridor Secondary Plan. But the entire development is in such extreme misalignment with that Plan that it is being contested at LPAT. So on the one hand, they completely reject the guidance of the SP, but at the same time they use it for the entire justification of their plan!

Based on Nextrans' comprehensive review of the study area, it is evident that there is a wide range of different types of land uses currently exist in this area within 2 to 10 minutes walking distance.

The report lists places like a school, medical centre and financial institution. But nowhere are there specific names of these supposed institutions.

Other than high-rise condos, it would seem that most of the existing other uses will be removed by this and the other developments... resulting in even less of a true mixed use area than currently..

As indicated, the proposed development is located about 100 m to TTC Bus Route 60 Steeles West, 53 Steeles East, 320 Yonge Blue Night Bus and 353 Steeles Blue Night Bus; YRT Bus Routes 2 Milliken, 5 Clark, 77 Highway 7, 98/99 Yonge, Viva Blue, 23 Thornhill Wood, 88 Bathurst. From this perspective, it is Nextrans' opinion that the proposed development represents good transportation and land use planning since it promotes the future residents to walk, cycle and take transit instead of driving, as the area is well served by the YRT/VIVA system.

Most of the routes, especially the YRT routes run every half hour at peak times. To describe this as "good transportation" is a stretch by any standard. While it will certainly force future residents to not drive too much,... but not because of any decent alternatives. .. more because they mostly will not have a car because of no place to park it.

Future Background Corridor Growth

A comparison of the historical traffic volumes between 2006-2012 for Yonge Street and Steeles Avenue West indicates the growth rate of 0.5% per annum for both Yonge Street and Steeles Ave W. As such, the growth rate of 0.5% per annum was used to prorate the turning movement count data for two signalized intersections as well as future background corridor growth.

Using the historic growth rate of 0.5% is disingenuous given the massive scale of development between this project and the many other proposals all along Yonge and Steeles. Even if there is a massive restriction on parking, it is certain that these thousands of new residents will cause indirect generation of increased vehicular traffic due to deliveries (UPS, Amazon), ride hailing (Uber, Lyft), service calls (plumber, repair), etc.

Also, to accommodate all the new transit riders, the number of buses on these routes will have to increase considerably. Especially with a new bus terminal at Yonge and Steeles.

It is suggested that the City of Vaughan and York Region monitor these movements in the future and make appropriate adjustments to signal timing plans, as required, when the proposed development and other developments in the area are fully occupied.

This intersection is under the City of Toronto.

5.0 SITE TRAFFIC

The 2016 Transportation Tomorrow Survey (TTS) and the Trip Generation Manual, 10th Edition published by the Institute of Transportation Engineers (ITE) information was reviewed to estimate the modal split, trip distribution and trip generation for the proposed development

As such, the **29% (i.e. 2016 TTS Data) of transit trip will be applied for Phase 1,**

- 40% (i.e. reduced from BA Group’s 46% for conservative analysis) of transit trip will be applied for Phase 2 and
- 49% (i.e. Yonge and Finch TTS) of transit trip will be applied to Phase 3

BA Group’s aspirational goal is for full build out of RT on Steeles and completion of the Subway extension.

Table 11 – Trip Distribution for Residential Component

Mode	Toronto South	Toronto East	Toronto West	York Region	Peel Region	Total
Auto	24%	10%	15%	44%	7%	100%
Transit	69%	2%	29%	0%	0%	

This table shows that currently no one is using transit to commute from the area to anywhere in York Region, yet it represents the largest share of driver trips. How will these trips be handled if a significant share of new residents work in York region? The Yonge north subway won’t help as the largest share are heading west, and less than 10% are going north.

Signalized Yonge Street/Steeles are expected to have some turning movements with higher delay due to heavy turning movements. It should be noted that the proposed

development contributes negligible delay or queues to the existing intersections and transportation work in the area.

Even if we were to accept the various assumptions made that there will only be minimal additional delays contributed by new developments, and that traffic will be pretty much at capacity, but some adjusting of timing of the lights will help keep it manageable..

One fatal flaw here. All of the transit share is based on Metrolinx putting in bus rapid transit along Steeles. That will mean the reduction in lanes for cars, and separate traffic signal timings at intersections. None of this has been included in any of the traffic projections.

8.0 PARKING ASSESSMENT

Table 19 – City of Vaughan Zoning By-law No. 1-88 Vehicle Parking Requirements

Phase	Type	No. of Unit	Parking Rates	Parking Requirement	Parking Provide	Diff.
Building A	Residential - Multiple Retail	735 units and 541 m ²	1.5 spaces/unit for residential	1319 spaces	448 spaces	-871
Building B		1097 units and 615 m ²	0.25 spaces/unit for visitor	1957 spaces	758 spaces	-1199
Building C		788 units 686 m ²	6.0 spaces/100m ² of GFA for retail	1418 spaces	479 spaces	-939
Total				4694 spaces	1685 spaces	-3009

Based on the City's Zoning By-Law 1-88, a total of 4694 parking spaces are required for the proposed development. It is our understanding that the proposed development provides a total of 1685 vehicle parking spaces including spaces for residential, visitor and retail, this presenting a technical shortfall of 3009 parking spaces (64% reduction).

It is Nextrans' opinion that there will be more viable and convenient modes of transportation to and from the proposed development instead of driving vehicles. It is our opinion that these recommended parking rates are suggested to support transportation demand management measures and to encourage more active modes of transportation such as walking and cycling, as well as public transit to and from the proposed development.

Agreed, if only a fraction of residents have a parking space, then it will definitely manage their use of cars. But this is more a discouragement to drive than encouraging other modes. As pointed out in the study, there is no cycling network in the area. Walking isn't much of an option with very little office spaces within reasonable distance. Which is why this bold statement is absurd.

Given that the proposed development is well-served by existing active transportation network, based on the following justifications:

1. Proposed development context; *what does this mean?*
2. Existing mode share; *parking rates are way below existing (see TTS)*
3. ITE Parking Generation Manual 5th Edition; *even below this*
4. Household demographic in the area; *area demographic is currently auto-centric*
5. Existing TTC and YRT Transit Service; *service levels on YRT or minimal and TTC is at capacity*
6. Available On-Street Parking and Carshare Locations in the Area *where???? Map in Fig 19 only shows a few car **rental** locations.. And does not show on-street parking.*
7. Neighbourhood Context; and *current context is suburban.. Not downtown*
8. Transportation Demand Management *this is circular*

8.1.10. Neighbourhood Context

Based on Nextrans' comprehensive review of the study area, it is evident that there is a wide range of different types of land uses currently exist in this area

The aerial map of nearby amenities provided in Fig. 20 does not show a school as promised. It mostly shows stores at Centerpoint mall which has an uncertain future, and a car dealership.

This proposal's density justification ultimately relies on support for the unbuilt Yonge North Subway Extension, which includes five subway stations in York Region, most significantly the one at Steeles relevant to this proposal. It needs to be recognized that the subway extension to Steeles was already fully justified and approved based on the existing proposed density levels in the Secondary Plan. In fact, even under current densities (pre-Covid) thousands of riders were coming in by bus from Steeles and further north to Finch Station during AM Peak. Rather than providing further unneeded justification for the extension, substantial increases to the currently approved densities would aggravate loading and crowding issues especially if it is overwhelmingly residential and therefore all heading in the same direction during peak hours.

The provincial government has promised that the Yonge North Subway Extension will be built by 2030, however given the Province's financial state to address COVID-19, this is an unlikely timing scenario. It would NOT be good planning to allow this residential development or any of the others in the area, whose additional density are predicated on the subway station, to be built before the subway station is. For one, the land use and designs for all lands on both sides of Yonge and Steeles will be determined first and foremost by the needs of the subway station and its underground bus depot. Secondly, we would prefer to reduce the total construction disruptions that will ensue for all of these developments and the subway station. We do not

want to see a repeat of the disruption to local businesses and traffic experienced by Eglinton Avenue in Toronto during the lengthy construction of the Crosstown LRT.

We therefore submit that this development not be approved until construction of the Steeles subway station is near completion. The residents of this area should not be subjected to a tremendous increase in development, population, and traffic congestion without the subway station and underground bus terminal in place or nearing completion to provide the promised public transit improvements which are the fundamental basis of these proposed developments.

e) 45-Degree Angular Plane – where art thou?

Section 5.3.6 of the Design Review Guidelines reads as follows

c. Where a rear yard transition to a Low-Rise property exists, High-Rise, Mid-Rise and Low Rise buildings should provide the following transitions:

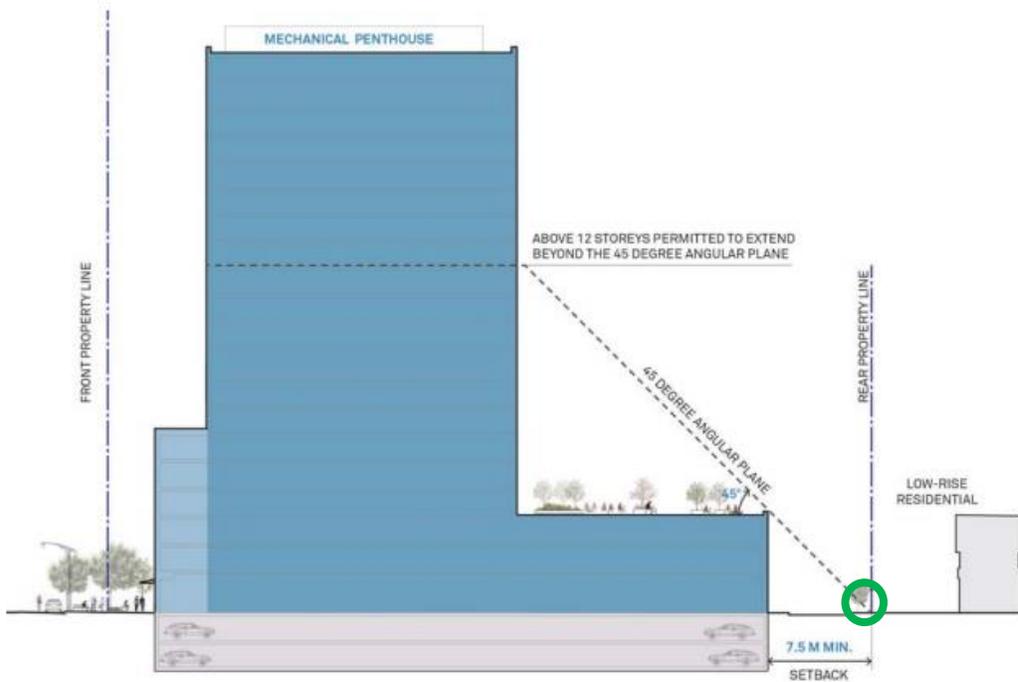
- High-Rise buildings should be set back a minimum of 7.5 metres from the rear property should be contained within a 45 degree angular plane from the rear property line. Above the twelfth storey, an angular plane is not required.
- Mid-Rise and Low-Rise buildings should be set back a minimum of 7.5 metres from the rear property line and should be contained within a 45 degree angular plane from the rear property line.

d. Where a rear yard transition to a Low-Rise residential neighbourhood exists, new High-Rise or Mid-Rise building sites are encouraged to create a transition that incorporates townhouse units between the new building and the existing neighbourhood.

Since the Guidelines' Glossary, page 211 defines "mid-rise" as

"...buildings between six and twelve storeys in height. These buildings help provide access to sunlight for pedestrians and trees at the street level, and the density of Mid-Rise neighbourhoods help support small retail, active transportation and active public spaces"

and the smallest tower is 38 storeys, all four towers are therefore high-rise.



High-Rise building rear yard transition.

Figure 17 – Vaughan Urban Design Guide – Standard 5.3.6 (page 134)

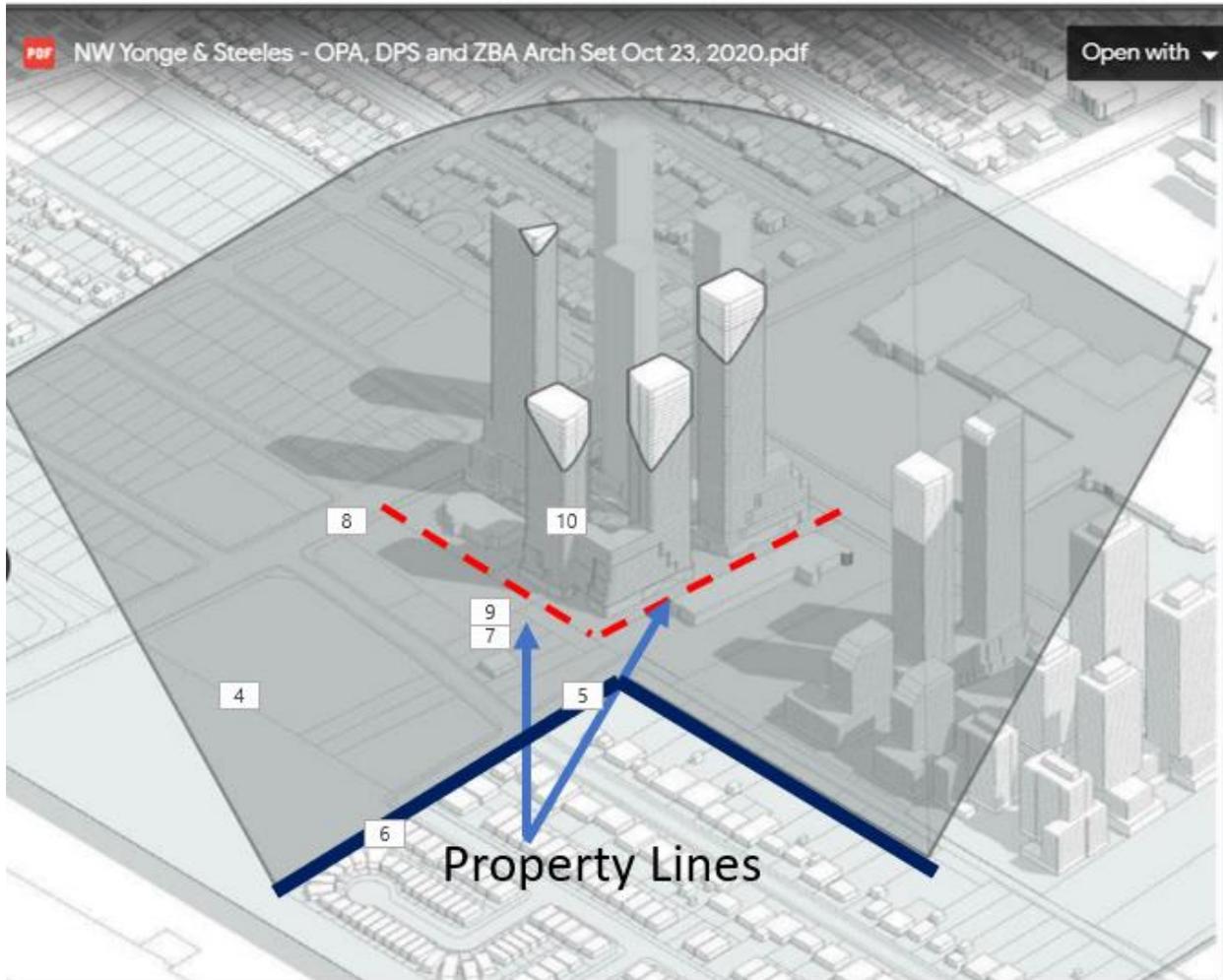


Figure 18: Angular plane renderings from the northwest, source: Architectural Drawings, p. 35)

The architect has supplied a 3D schematic shown on page 35, (Figure 18) but the only point of origin appears to be the northwest corner of the site (shown in heavy dark blue lines), taken from the opposite side of the Powell Road extension, and not on the rear property line (the eastern edge of Powell Road) (marked in dashed red lines). The architectural drawings do not illustrate the 45-degree angular plane originating from the rear property line required in the City's Design Review Guidelines (see Figure 17) to transition to the residential neighbourhood to the west. We also note that the architect has chosen to exclude the 7080 Yonge Street rendering on the northeastern side of the property.

We submit that the 45-degree angular plane must be illustrated along every property line on the western and northern site boundaries, which are adjacent to low-rise residential areas. Given that the setback on the northern boundary is a maximum of 10m, a 45-degree angular plane would undoubtedly intersect at 10 metres, (e.g. a 3-storey podium), and thus if continued upward, it would require a substantially greater setback from the podium to the tower. However, since the architectural drawings do not show the 45-degree angular plane from the

northern and western rear property lines, it is not possible to see what the appropriate maximum height of those towers would be. We believe that they would be significantly less height than the 38 and 44 storey towers proposed. Of course, if the proposal would have respected the designated parkland and not built anything on it, those towers would simply not exist.

If the architect does not wish to supply the 45-degree angular drawings, we request that an independent third party be commissioned (at the owner's expense) to do so.

f) *Disproportionate Height and Density, no Mixed Land Use*

Density

With respect to density, sections 3.3 and 3.6.11 of the 2010 Secondary Plan included the following:

“3.3 Density

Notwithstanding Section 9.2.1.5 of the Official Plan, the maximum density limits in the Secondary Plan Area shall not exceed the FSI indicated by the number following the letter D, as shown on Schedule 2.

In the area where the maximum FSI is shown as 6.0, any development in excess of an FSI of 4.5 shall be used exclusively for non-residential uses, including retail uses provided the retail uses are grade related and office uses as prescribed in Policy 3.6.11 “Office Priority Area.” (our emphasis)

In the area where the FSI is shown as 3.5, any development in excess of a FSI of 3.0 shall be used exclusively for non-residential uses, including retail uses provided the retail uses are grade related.”

....

“3.6.11 Office Priority Area

Within the are shown as “Office Priority Area” on Schedule 2 (South) Land Use, Height & Density, the following policies shall apply:

- i. The lands within the Office Priority Area, shown on Schedule 2 (South) shall be the subject of a comprehensive Development Plan, as set out in Policy 8.5;
- ii. The maximum Floor Space Index and Building Height shall be 6.0 and 30 storeys respectively, as shown on Schedule 2 (South);
- iii. **In accordance with Policy 3.3 the maximum FSI shall be 6.0 and any development in excess of 4.5 FSI shall be used exclusively for non-residential uses, including retail uses provided the retail uses are grade related;**
- iv. **A minimum of 50 percent of the gross floor area devoted to Non-Residential Uses shall be located in a high-rise or mid-rise building, devoted exclusively to office uses;**

- v. Such office building shall be located and designed in accordance with the following criteria:
 - a. It will provide a high-profile massing and architectural presence at the intersection of Yonge Street and Steeles Avenue as the primary non-residential focus of a mixed-use development;
 - b. The design of the building will provide for a direct connection to the planned Steeles Avenue Subway/Bus Station;
 - c. The nature of the integration of the office building component into the mixed use development will be confirmed through the Development Plan and implementing development review process. Such consideration will include the accommodation of required parking, the potential for a “PATH” system, the integration of retail uses and the provision of secondary accesses to the residential and non-residential (podium) uses.

- vi. Should the office building, including its portion of any podium structure, provide the gross floor area equivalent of 1.0 FSI, based on the approved Development Plan and implementing development application, then the maximum building height within the area of such Development Plan, may be increased from 30 stories to 35 stories. Such increase will be reflected in the implementing zoning by-law; and agreement under Section 37 of the Planning Act as may be required by the City.”

However, as noted earlier, the general Secondary Plan, which allows for a site-specific height of 30 storeys and density of 6.0 FSI, is not yet in effect. Which means that the prior Plan, Official Plan Amendment 210 (Thornhill Vaughan Community Plan)(“OPA 210”) prevails. In OPA 210, the Subject Lands are designated C1, “General Commercial Area”, which permits the existing commercial uses to continue. The proposed development for 38 to 60-storeys mixed-use apartment buildings with a density of 10.95 FSI does not conform to the “General Commercial Area” policies of the OPA 210. However, the developer still claims the Secondary Plan’s validity for certain purposes (pocketing the allowable height and density and asking for more).

The current area Population density shown below in Figure 19 (in orange) is 43 persons/hectare. The proposed population density (persons per hectare) for 72 Steeles Ave West and 7040 Yonge Street is $2,620 \text{ units} \times 1.5 \text{ ppu} = 3,930 \text{ persons}$, when divided by the lot size of 1.97 hectares is 1,995 persons per hectare, which is 4,639 percent greater than the current density level. If approved as is, this site would become the **third most dense** population site in the entire GTA (the highest, at 2,752 pph is the Gupta proposal at 2 Steeles Ave West & 7028 Yonge St, and the second at 2,215 pph, is Metropolis Suites at Peter and Adelaide Street in downtown Toronto, as seen in Figure 20). So, one gets a sense of just how out of proportion this development is for a site of this size and contextual location.

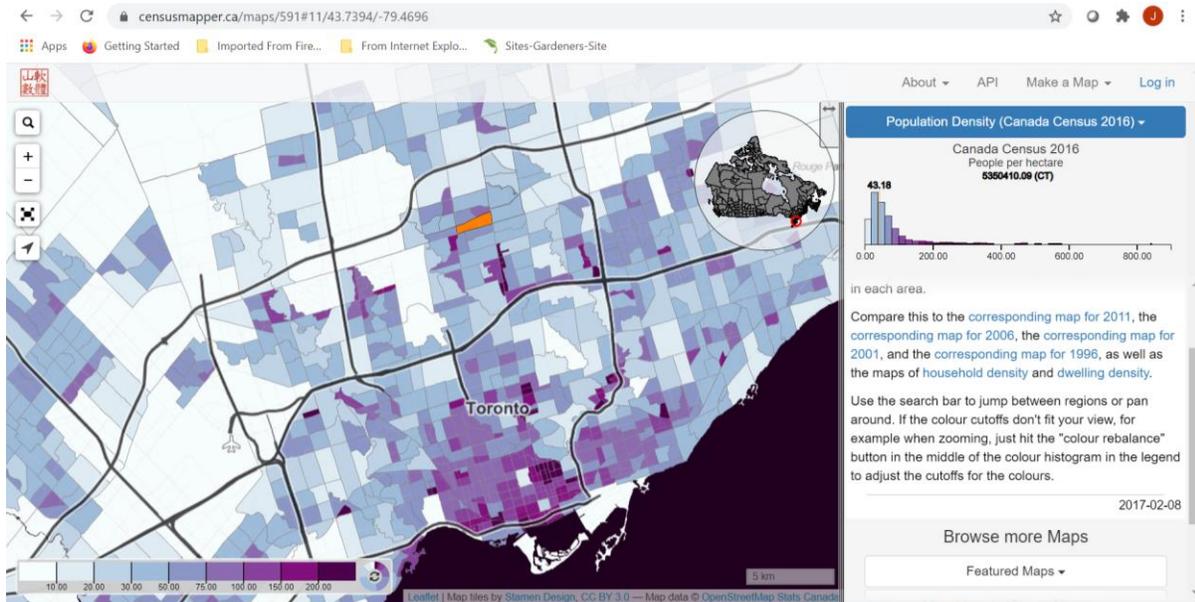


Figure 19 – Population Density for Yonge-Steeles area, 2016 (Source: www.censumapper.ca)

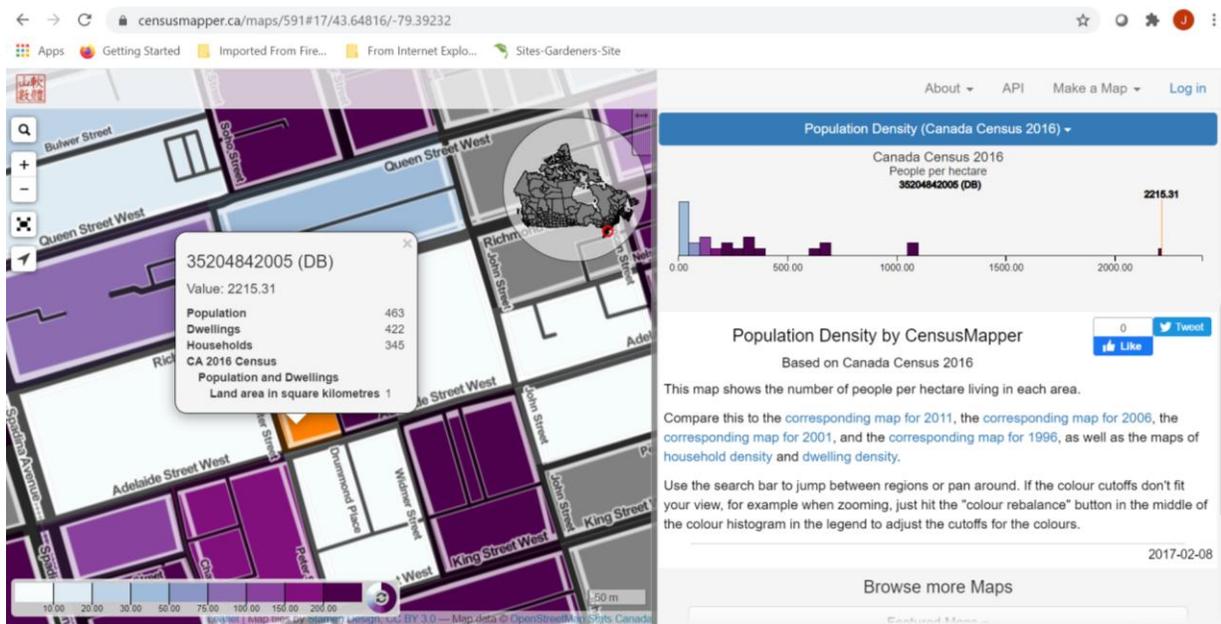


Figure 20 – Population Density – Adelaide Street and Peter Street, Toronto (Source: *ibid*)

Land Use

We noted previously that section 3.3 of the Secondary Plan states thusly:

“In the area where the maximum FSI is shown as 6.0, any development in excess of an FSI of 4.5 shall be used exclusively for non-residential uses, including retail uses provided the retail uses are grade related and office uses as prescribed in Policy 3.6.11 “Office Priority Area.”

Therefore, we would expect to see that *any density above 4.5 FSI* would be devoted to non-residential uses. The proposal as submitted shows that the residential portion has an FSI of 9.51, and the non-residential portions have 0.49 FSI. Thus, there is an excess of 6.45 FSI (10.95 minus 4.5) that is residential but is supposed to be non-residential.

In fact, only 1,842 out of 215,462m² or 0.8% of total gross floor area is indicated as commercial (at grade retail). (Architectural Drawings, p. 2). In our opinion, less than one percent hardly qualifies as “mixed use”. There is actually a higher percent (15%) of at-grade privately-owned public amenity space of 3,570 m² (2,800+ 770 for POPS, out of 19,700 m² at grade space) than commercial space on this site.

Height

The present zoning of this parcel reveals this site is zoned as C1 Restricted Commercial which permits only commercial, institutional and recreational development, and that the owner wants to change the zoning to “RA3 Residential Apartment Zone”, which has a maximum height of 44 metres (~12 storeys), to 130m (38 storeys), 148m (44 storeys), 185m (56 storeys), and 198m (60 storeys) buildings respectively. Compared to 44m, these buildings are, respectively, 295, 336, 420 and 450 percent greater than the allowable heights. **These variances are not an amendment of a zoning by-law; they are an obliteration of it.**

So even the RA3 zoning is insufficient for the owner’s needs. In contrast, the Secondary Plan designates this site as High-Rise Mixed Use Designation with a maximum height of 30 storeys (~97.5m). The proposed heights are respectively 134, 152, 190 and 204 percent greater.

However, despite recognizing the Plan, the developer’s reports have not provided any quantitative proof that 30 storeys and 6.0 density cannot where so designated meet local and regional planning objectives.

As the Secondary Plan has been under appeal since 2010, and is currently in multi-party mediation, it is critical that this proposal not be approved until the Secondary Plan’s appeal is resolved and clear indications of use, height, and density are given for the entire area to ensure consistency of application and good neighbourhood-wide planning.

We should not only examine this project in isolation, but rather we would submit that heights (and densities) must be coherent in the larger region.

The 60-storey building would be the second tallest building in all of Vaughan, (see Figure 21) second only to Transit City 6 (175 Millway Avenue), the tallest building in the new Vaughan Metropolitan Centre, Vaughan’s “downtown” which is identified in the Vaughan Official Plan 2010 as to have the tallest buildings in the City.

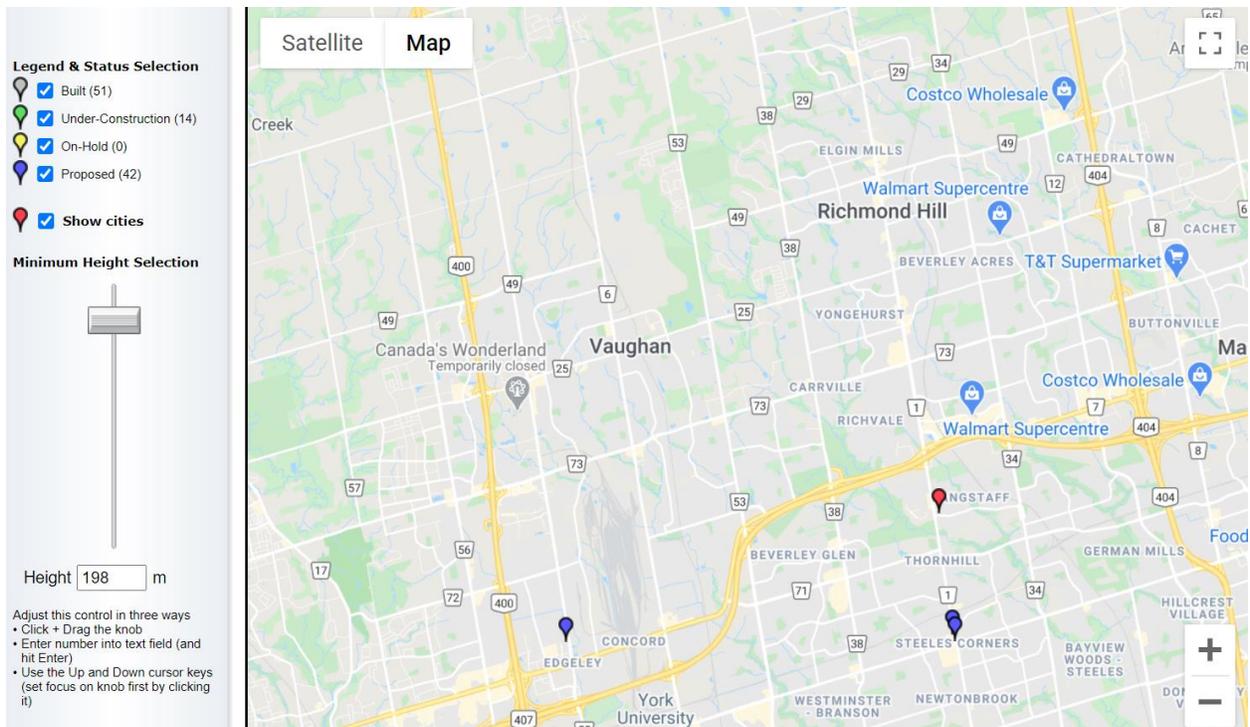


Figure 21: 7040 Yonge Street (blue pin) height in relation to other sites in Vaughan (source: www.skyscraperpage.com)

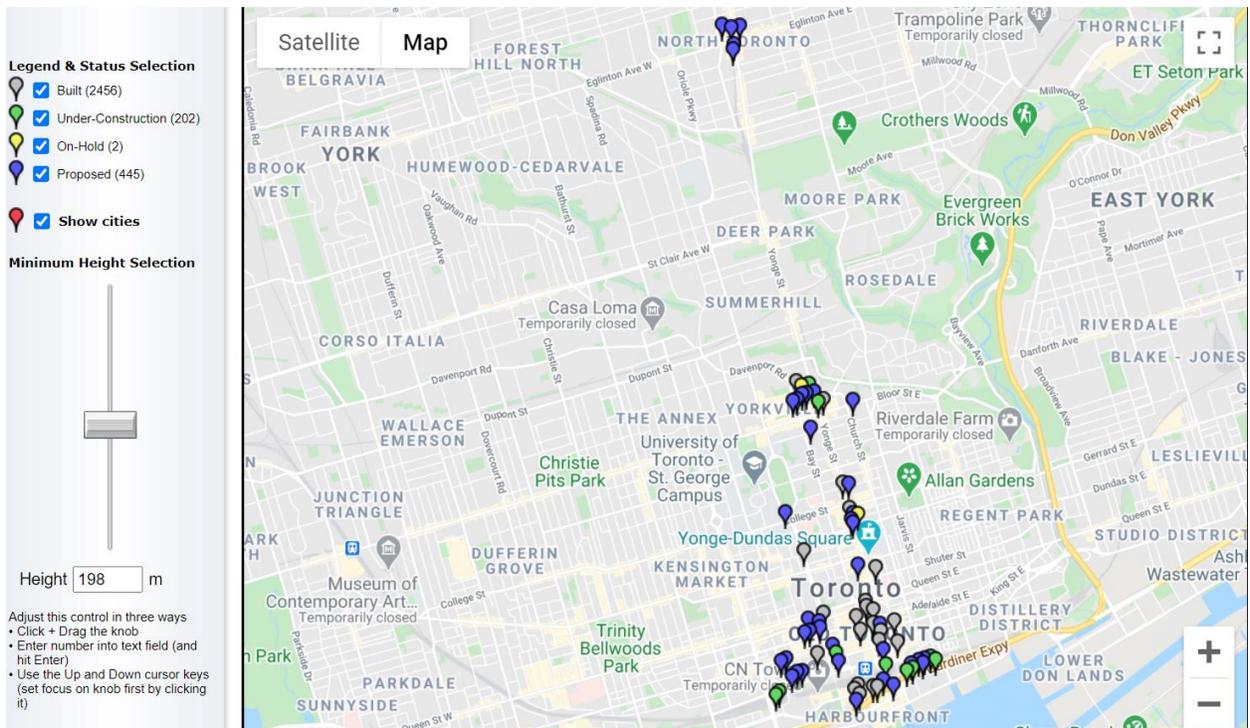


Figure 22: 7040 Yonge Street (blue pin) height in relation to other sites in Toronto (source: www.skyscraperpage.com)

Not only would this proposed building be the tallest in the City of Vaughan, we have to travel to Yonge & Eglinton in the City of Toronto to find similar heights, with far superior transit infrastructure and density. (see Figure 22)

Simply put, Yonge and Steeles is not Yonge & Eglinton. The latter has a major subway station, a soon-to-be-completed Eglinton Crosstown LRT, and substantial office, residential, and commercial uses.

g) Lack of Provided Community Services and Facilities

The City of Vaughan's Active Together Master Plan (ATMP, May 2018, p. 112) says the following with regard to walking distances to parkland:

“Playgrounds are neighbourhood-level facilities and are best provisioned based on walking distance from resident homes rather than a per capita rate. **A walking distance of 500-metres is recommended** as this generally represents a five to ten-minute walk time. The service radius should be unobstructed by major barriers such as waterways/ravines, railway lines, highways, etc. It is recommended that future playground installation and revitalization be based on demand and demographics/growth.” (our emphasis in bold)

The submitted Community Services and Facilities Study concludes that

“Based on the analysis above, the following are identified as areas of potential concern and further review of the Yonge Steeles Corridor Area and development applications:

- While the Study Area includes a large number of parks and a variety of facilities within them, **none of the parks are within a short walking distance (500m)** of the development site;
- While the Study Area includes a Community Centre and a Resource Library is also generally nearby, **they are again more than a short walking distance** from the development site;
- Busing to elementary schools in the area is likely to be necessary due to the distance of elementary schools from the site and capacity at Secondary Schools is an area for review with the School Boards;
- The **provision of licensed day care facilities within the mixed use portion** of the Yonge Steeles Corridor Area **would be encouraged**;
- The **provision of additional parks, community space and certain public facilities** within the Yonge Steeles Corridor Area **would be encouraged**. “(p. 17) (our emphasis in bold)

So, the consultants' study clearly notes that there are no current parks, schools, or community facilities within 500m of the site, and should be encouraged within this area. Despite such recommendations from its own hired consultants, the proposal does **not** include any publicly accessible space for community use, and in fact Building 2 (38 and 44 storeys towers)

encroaches on three quarters of the park land designated at the northwesternmost end of the site. This is another major shortcoming of this redevelopment proposal.

h) Excessive Shadow impact from Height

Shadows accrue from building height, massing and siting. The shadow study included in the Urban Design Brief (p. 59) shows (see Figures 23, 24, and 25) the Humboldt buildings' shadows in red, and the other buildings in the area (Gupta and Salz) in green. We note that the much-vaunted green space in the center of the proposal will be shaded for 23 of 24 hours of the day for much of the year, due to shadowing from Building 1 as well as the three proposed Gupta towers. This demonstrates a lack of integration and co-ordination between the Gupta and Humboldt projects, which will need to be resolved. Significant shadowing across the eastern side of Yonge Street in Markham must also be addressed. The simplest solution is to reduce building heights and the number of buildings.

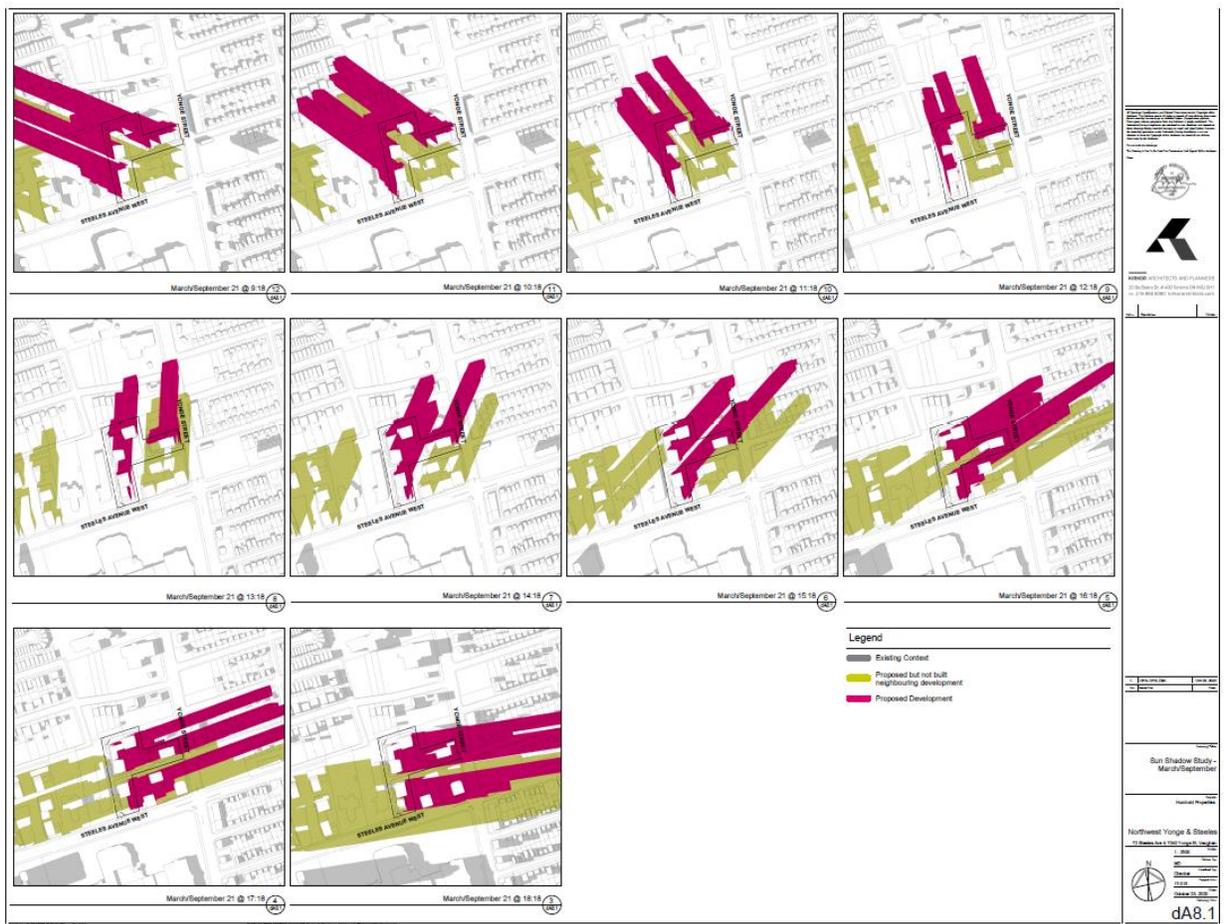


Figure 23 – Shadow Study- March/September (source: Architectural drawings, pp. 32)

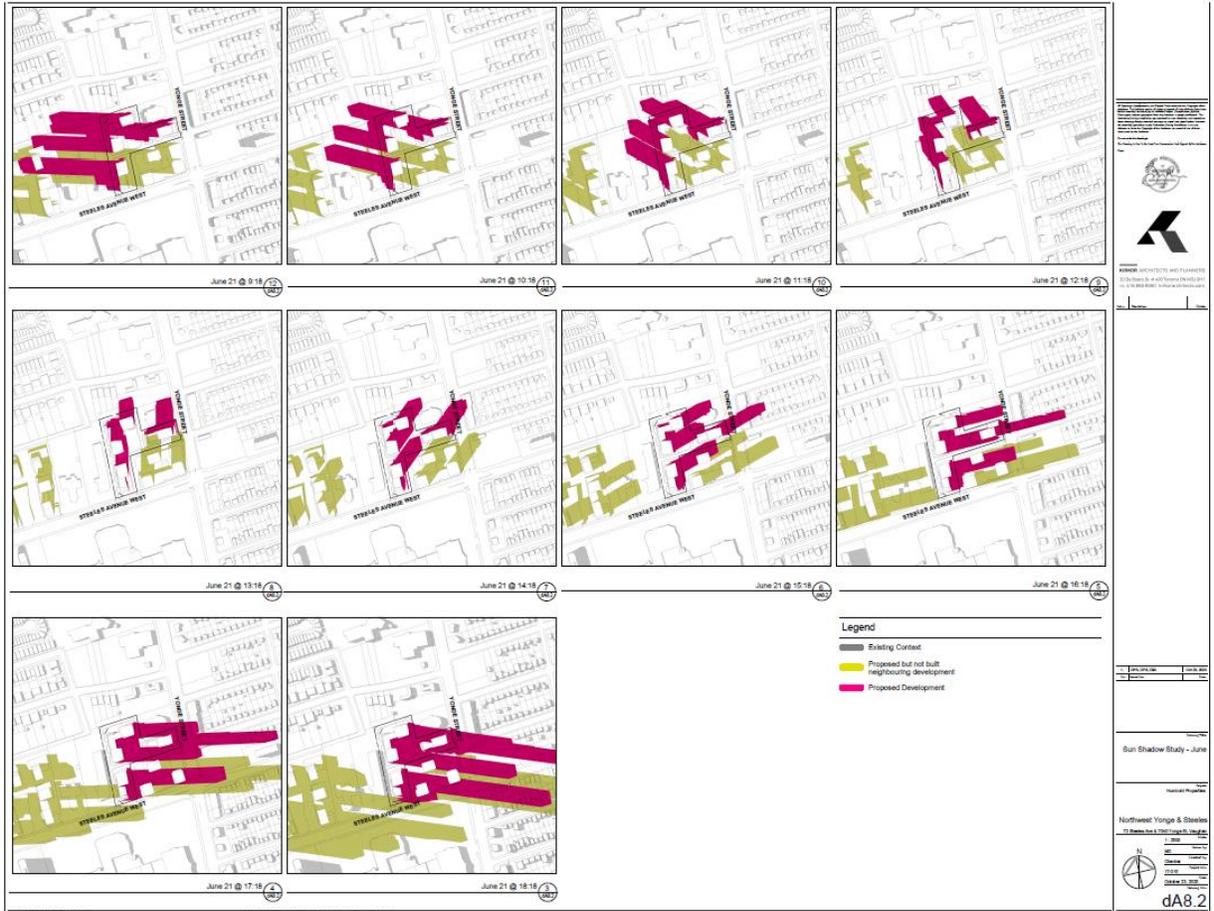


Figure 24 – Shadow Study – June (source: Architectural drawings, pp. 33)

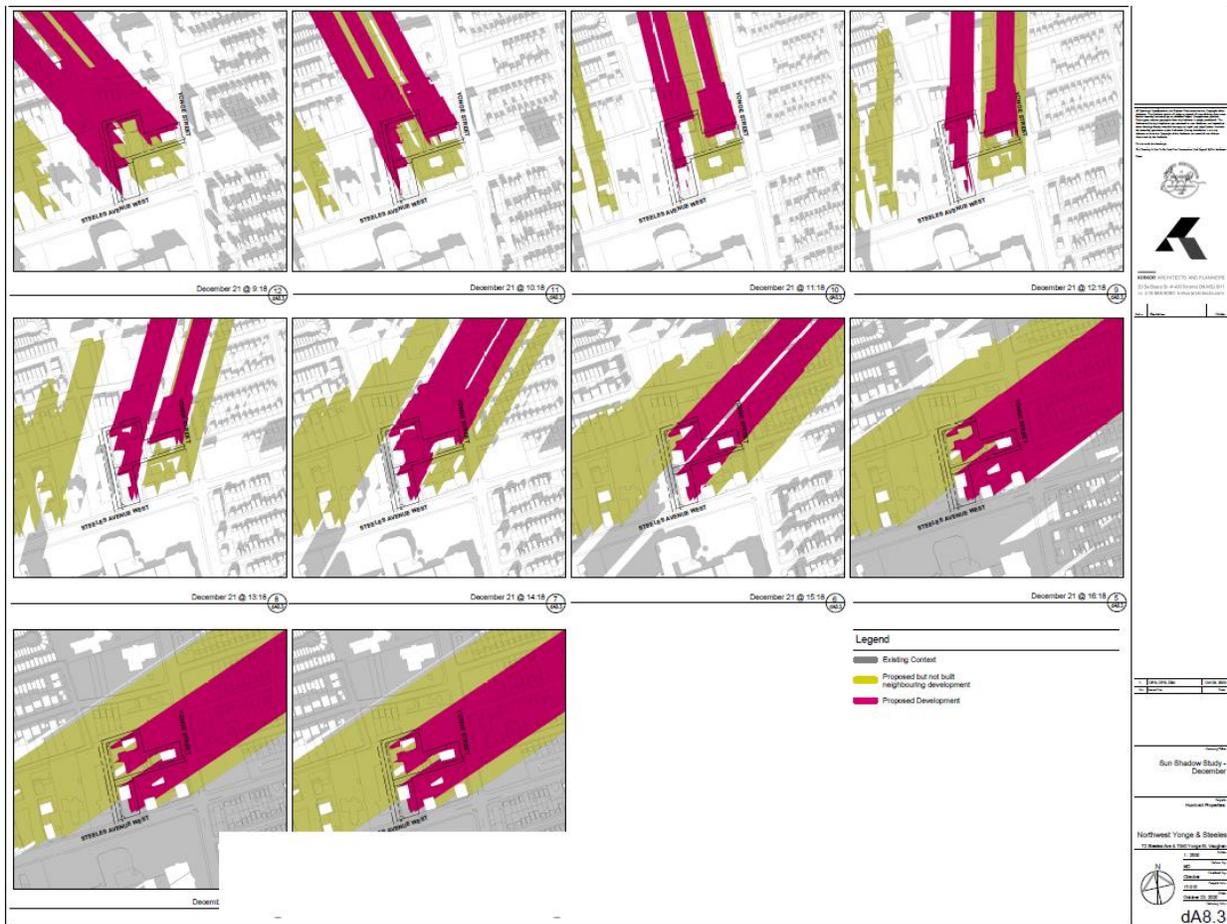


Figure 25 – Shadow Study – December (source: Architectural drawings, pp. 34)

i) Lack of Integration with adjacent projects or neighbourhood

As was mentioned at the beginning of this submission, this is the fifth redevelopment proposal submitted to the City for this area in the past two and a half years. There are two adjacent properties, by Gupta (at 2 Steeles West/7028 Yonge, submitted in 2018) and Chestnut Hill (at 7080 Yonge, submitted in late 2020). It is also noteworthy that Humboldt and Chestnut Hill have used the same Agent (Weston Consulting) and Architect (Kirkor) for their properties, so it is not unreasonable for there to be more integration and connection shown in the proposal.

We noted on page 31 that the Humboldt shadow studies factor in the Gupta towers, as well as the Salz and Mizrahi proposals, but exclude the Chestnut Hill towers. We also noted that the breezeway in Building B provides public access from the interior of the site to the adjacent residential neighbourhood, which will be operative once the extensions of Powell Road and Royal Palm are built.

But we are also surprised at the lack of integration between the Humboldt and Chestnut Hill proposals, in terms of connectivity and the sharing of the Royal Palm extension. Since

approximately half of the northern edge of the Humbold property faces the Chestnut Hill project, we would expect to see more visual connectivity as well, so that Chestnut Hill does not appear as a separate island. The northeastern face of the North tower of Building B is essentially a solid block, with minimal (3.56m) setback, and this would no doubt be visually unappealing and shadow-inducing to the Chestnut Hill residents. As the last proposal for the Yonge-Steeles area submitted to date, it is incumbent on Humbold to take into full account the cumulative impact of all of the preceding proposals and to address them head on. We doubt that there is a “project firewall” in the architect’s office between adjacent projects under development at the same time.

We want to be clear that Humbold is not unique in this regard. All of the five proposals submitted to the City for Yonge & Steeles, with very few exceptions, have been presented as standalone entities, unconnected to both the existing residential neighbourhood to the north and northwest, and with each others’ projects. Fortunately, there is a mechanism underway to address the area-wide integration and need for a master planned neighbourhood, the Vaughan Yonge Steeles Working Group, consisting of the five developers, local landowners, local residents (represented by the SFRA), politicians, and planning officials from Toronto, Markham, York Region, and Metrolinx. This group has now had two initial meetings. We further note that Humbold Properties, to its credit, is the founder of the Landowners Group.

j) Local retail impact

We are also concerned about the negative impact of this proposal on existing local businesses. The City touts its small business-friendly approach, as well as appreciation for ethnic diversity. It would be most unfortunate if local restaurants are forced to close permanently or to relocate elsewhere due to this and other redevelopment proposals (such as at the current 100 and 180 Steeles Avenue West plazas). In particular, the Galleria Supermarket is currently home to ten family-run Korean restaurants that will be displaced during construction of Building C. To minimize the disruption, we would expect that Humbold make a generous offer to relocate those businesses within Building A before the Galleria Supermarket is demolished for Building C to be constructed. As noted in the brief submitted by the Korean Canadian Business Association, there must be sufficient retail space, as well as access to underground parking for patrons to accommodate restaurants to function.

5. Conclusion

In sum, the 72 Steeles/7040 Yonge Limited proposal suffers from most of the pitfalls of previously submitted proposals for this area and adds a few of its own deficiencies. To address these, there is much work that remains to be done to radically revise this proposal, starting with removing the 38 and 44-storey buildings to convey the vitally necessary public park to the City, and reduce the height of the other towers to fit the 45-degree angular plane from the northern boundary of the site, adding commercial space, adding public amenities onsite, and

building the full 23m-wide Powell Road and Royal Palm extension right of ways necessary to service this site before the construction is complete.

Even without the aforementioned deficiencies, Council consideration of the entire project should also await resolution of the LPAT appeal of the Yonge-Steeles Corridor Secondary Plan, as well as the Yonge Subway North Extension (particularly the Steeles subway station) to ensure that there is adequate subway usage to warrant the proposed 2/3 reduction in underground parking spaces.

Springfarm Ratepayers Association is already participating with local landowners, developers and politicians in the early stages of the Yonge-Steeles Centre Working Group. We welcome Humboldt's continued involvement in shaping an integrated, well-planned neighbourhood that respects the Yonge-Steeles Corridor Secondary Plan.