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Municipal Services Office - Central Ontario  
16th floor, 777 Bay Street  
Toronto, ON M7A 2J3  
Attention: The Honourable Steve Clark

February 3rd, 2023

**Re: ERO Number 019-5937 (City of Toronto Official Plan Amendment 570) written submission on behalf of Republic Developments and Harlo Capital**

Dear Minister Clark,

Republic Developments and Harlo Capital appreciate the opportunity to comment on the City of Toronto Official Plan Amendment 570, which delineates and plans for fifty-seven protected major transit station areas (MTSA) in the City of Toronto, including the Scarborough GO Station MTSA.

Republic and Harlo own 26.2-acres of land within the Scarborough GO Station MTSA at 3569, 3577, 3585 and 3595 St. Clair Avenue East, 636-646, 641, 661, and 663 Danforth Road; and 411-415 Kennedy Road (the site) and has made an application to the City of Toronto to develop a transit-oriented master-planned community (the "Project") on the site, which will provide over 7,300 new units of attainable housing.

Through this submission we hope to provide you with additional context with which to make your decision on OPA 570 and to demonstrate the need for a minimum density on the site of 5.0 Floor Space Index (FSI) to create a viable, functional, and vibrant complete community. As such, we respectfully request that in addition to approving OPA 570, you set a site-specific minimum density of 5.0 FSI for the site.

The Project will convert the heavily contaminated and underutilized brownfield site, used for legacy industrial purposes, into a complete community with a mix of uses and built forms which will include:

- two new parks: a 5-acre central park and a secondary plaza style park;
- multiple plazas, squares, and public spaces;
- a new state-of-the-art community centre;
- a new childcare facility;
- a new urban GO transit station;
- a much-needed new grocery store servicing one of the City's largest food deserts;
- a vibrant and animated retail mix with over 180,000 sq.ft of new shops, entertainment, and services; and
- over 7,300 new homes.

The Project aligns with the policy direction of the municipal, provincial, and federal governments in several areas and has received positive feedback from the local community, the local City Councillor, Member of Provincial Parliament and Member of Parliament, and the Toronto Design Review Panel, which unanimously supported the Project vision and design.

The Project will provide much needed attainable housing stock (in the bottom 40% of market pricing) with over 7,300 new homes in an established and well-connected area of the city. Over 25% of the new homes will be two- and three-bedroom units and connect families with public space, community facilities, shopping, and employment opportunities onsite. Furthermore, Republic is meeting increasing sustainability standards (i.e., the Toronto Green Standard) for this Project and is proposing the creation of a community garden within the parks, and urban farm plots on building rooftops that will allow future residents to grow healthy food and sell it back to local restaurants through a planned partnership with non-profit food providers, creating a circular economy within this new community.

Republic and Harlo are leveraging existing transit infrastructure and the planned expansion and electrification of GO rail service along the Lakeshore-East line by working with Metrolinx to build a new Scarborough GO Station integrated into the new development on the north side of the line and a new tunnel to connect the development to the existing station on the south side of the tracks. The Project also aligns with the City's direction on transportation and mobility by



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providing multiple new bike share stations, new bicycle infrastructure throughout the site, a new street network that encourages active transportation and providing reduced parking ratios.

In addition to serving as a new “city-centre” for south Scarborough, the Project will be a substantial economic driver for the province, helping to create more than 28,000 one-time jobs during planning, design, and construction; and over 870 full-time permanent jobs – approximately three-times the number of jobs currently accommodated on the site. The Project will also generate \$1.4 billion in tax revenue, including over \$450 million for the provincial government and a 26-fold increase in property tax revenue for the City of Toronto.

From an urban planning and design perspective, the application for the Project aligns with Ontario’s Provincial Policy Statement and Growth Plan as well as the City of Toronto’s Official Plan policies on density, built form, sun-shadow impacts, public realm, parks and open spaces, mobility and networks, housing, community services and facilities, economic health, and retailing. The Project also aligns substantively with multiple City guidelines including the Midrise, Tall Building, Growing Up, Retail Design Manual, Pet Friendly, and Complete Streets guidelines. Additionally, Republic and Harlo voluntarily undertook a public engagement process where feedback from hundreds of area residents and businesses were received and incorporated into the Project’s design.

Republic and Harlo are supportive of City of Toronto’s Official Plan Amendment 570; however, to create a viable, functional, and vibrant complete community and to enable Republic to deliver on the public and community benefits proposed, a minimum density of 5.0 FSI is required on the site. The current proposal before the Minister sets minimum density requirements ranging from 0.5 to 2.0 FSI as shown in Map 2 of Schedule “49” to Amendment 570 of City of Toronto By-Law 889-2022. These minimum densities are far below what the site can accommodate and what is appropriate given the proximity to existing higher-order transit and existing civil infrastructure.

We therefore request that the province set a site-specific minimum density requirement of 5.0 FSI for the lands located at 3569, 3577, 3585, and 3595 St. Clair Avenue East, 636-646, 641, 661, 663, and 411-415 Kennedy Road within the Scarborough GO Station MTSA. We have attached to this submission a proposed alternative minimum density map prepared by Bousfields Inc. a leading community planning firm, reflecting our proposed change.

Minister, we sincerely appreciate the opportunity to comment on this proposal. Please do not hesitate to contact us if you require any further background information or material with respect to this submission.

Sincerely,

Matt Young  
President & CEO  
Republic Developments on behalf of Toronto  
(Scarborough Junction) Limited Partnership  
[myoung@republicdevelopments.com](mailto:myoung@republicdevelopments.com)  
M: 416.709.5224  
5700 – 100 King St W, Toronto ON M5X 1C7  
RepublicDevelopments.com

Jeffrey Kimel  
President & CEO  
Harlo Capital

[jkimel@harlocap.com](mailto:jkimel@harlocap.com)  
M: 416.551.7115  
1204 – 2 St. Clair Ave. E, Toronto, ON M4T 2T5  
[www.harlocapital.com](http://www.harlocapital.com)

#### ABOUT REPUBLIC DEVELOPMENTS

Republic Developments is a Toronto based city-builder focused on creating transformative communities that enrich the lives of those who live, work, and play within them, and strengthen the neighbourhoods which they are a part of. Over the past decade, our leadership has managed 13.5 million square feet of residential and mixed-use projects, representing approximately 16,000 homes, and over 12.6 billion in development value—each leaving a distinctive mark on Toronto’s iconic skyline.

#### ABOUT HARLO CAPITAL



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Harlo Capital is a Toronto-based private equity company identifying and investing in real estate developments across Canada. We endeavour to deliver sustained, above market returns for our investors and partners by facilitating the flow of capital and knowledge to our co-developed projects.