

January 13, 2023

Louis Bitonti
Municipal Services Office - Central Ontario
Ministry of Municipal Affairs & Housing
Province of Ontario
777 Bay Street, 13th floor
Toronto, Ontario
M7A 2J3

Dear Mr. Bitonti:

**RE: SUBMISSION ON OPA 575 – ERO #019-5934; MINISTRY #20-OP-227259
3675-3685 KEELE STREET, TORONTO
OUR FILE: 07132DZ-1**

On behalf of our client, Lissard Holdings Limited and 3685 Keele Street Ltd. under the direction of their agent, SmartCentres, regarding the review by the Province of the City of Toronto's Official Plan Amendment 570 ("OPA 570") respecting the lands located at 3675 and 3685 Keele Street (hereinafter the "Subject Lands") and shown below on Figure 1. These lands are also subject to an Employment Conversion Request to allow mixed use development. **We are requesting the inclusion of the Subject Lands within the Downsview Park Major Transit Station Area (Site and Area Specific Policy 732).**

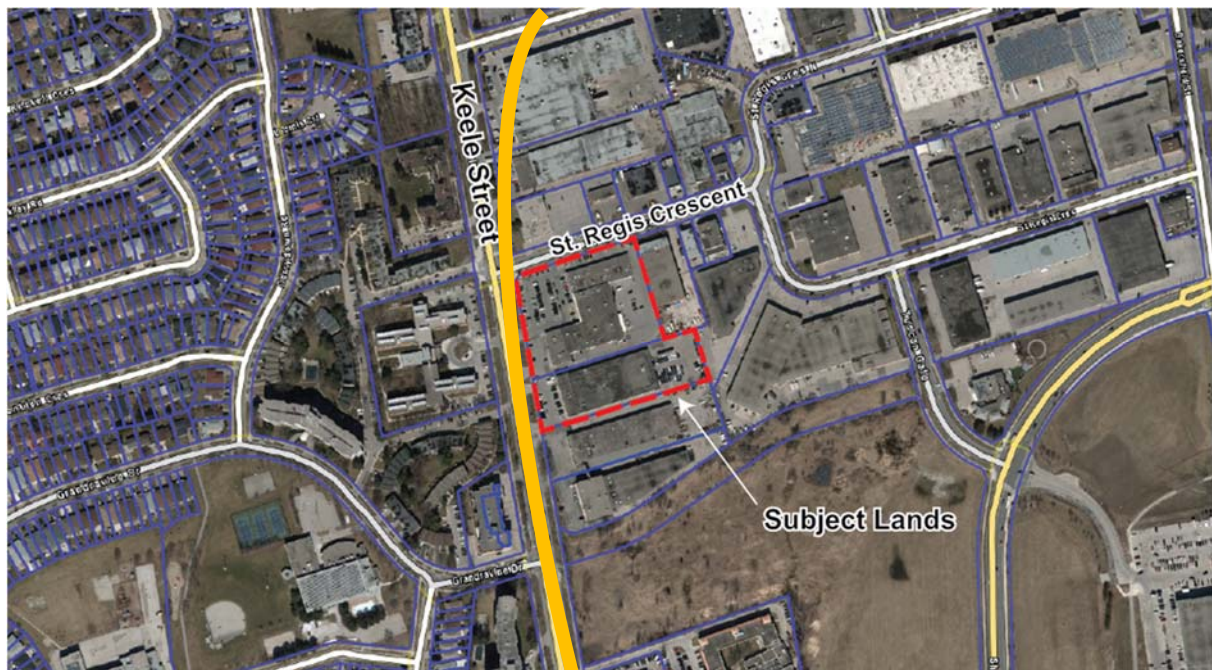


Figure 1 – Location of the Subject Lands (in red; 800 metre MTSA radius in yellow)

Through OPA 575, the City have proposed that the limits of the Downsview Park Major Transit Station Area be less than that provided for in the Growth Plan. Specifically, SASP 732 of OPA 575 excludes the lands owned by our client. See **Figure 2 below** which depicts the limit of SASP 732 with our client's lands shown approximately in green. From our review of the materials there is no rationale for the boundary provided in this case, and in fact it appears that this area was specifically excluded by the City. Therefore **we are requesting that SASP 732 be modified to include our client's lands which would otherwise fall entirely within the 800 m MTSA radius of the Downsview Park Station** (shown in yellow below).

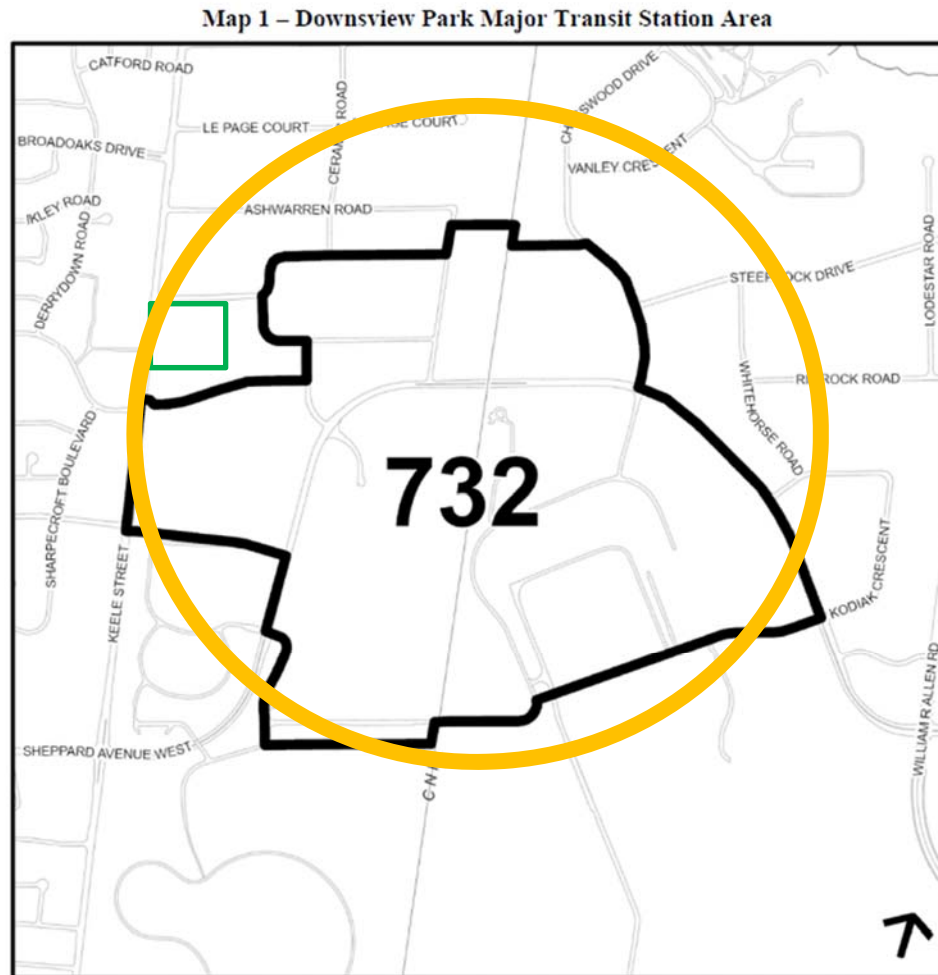


Figure 2 – Location of the Subject Lands in relation to Proposed MTSA Boundary (800 m radius outlined in yellow)

Our rationale for inclusion in the MTSA is as follows:

1. The Subject Lands are comprised of two parcels that have a net site area of approximately 2.0 ha (4.9 acres). The Subject Lands are currently occupied by a single-storey commercial plaza on the northern parcel, which consists of a No Frills grocery store and a range of restaurant, retail and service commercial uses, and a 1- to 2-storey commercial building on the southern parcel, which consists of an auto dealership and a furniture store. This low density commercial use makes the Subject Lands ideal for redevelopment to higher intensity forms of development which will aid the City in achieving its intensification goals within the MTSA. In fact, our client has requested an employment conversion for the Subject Lands (no decision being made yet by the City) which would allow for significant intensification beyond that which exists today. The demonstration

plans for the employment conversion request included a mix of residential (including seniors housing) and employment uses at an approximate density of 4.0 FSI. The demonstration plans are depicted below in **Figures 3 and 4**.



Figure 3 – Demonstration Plan for a Possible Mixed Use Community



Figure 4 – Conceptual Massing of the Demonstration Plan for a Possible Mixed Use Community

2. As is shown below, the Subject Lands are within 800 metres of the Downsview Park Subway Station / GO Station (**Figure 5**). It is unclear why the City did not utilize the full 800 metre radius, given Policy 2.2.4.2 of the Growth Plan states that municipalities "...will delineate the boundaries of major transit station areas in a transit-supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station."

By virtue of this proximity to the Downsview Park Subway Station / GO Station and the fact that they can be developed for higher intensity forms of development, these lands should have been included in the MTSA boundary.



Figure 5 – Location of the Subject Lands in relation to Downsview Park Subway / GO Station

3. Redevelopment of the Subject Lands to more intensified uses will optimize the use of existing municipal infrastructure and will also have access to nearby public service facilities, all in accordance with Provincial policy direction. This is exactly what was envisioned by the Province when the concept of MTSA's were conceived – intensify in proximity to transit infrastructure to optimize its use. The Subject Lands can do so through intensified redevelopment.

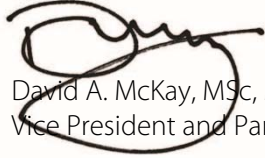
In conclusion, we respectfully request that SASP 732 be modified to include the Subject Lands within the MTSA boundary.

Should you have any questions or clarifications, please contact the undersigned.

Thank you.

Yours Truly,

MHBC

A handwritten signature in black ink, appearing to read "David A. McKay", is written over a light orange rectangular background.

David A. McKay, MSc, MLAI, MCIP, RPP
Vice President and Partner

cc: *Clients*