



Date: January 17, 2023

Ministry of Municipal Affairs and Housing
777 Bay Street
Toronto, ON
M5G 2G2
To whom it may concern,

**Re: *Comment Response Letter Re: Official Plan Amendment 575
Etobicoke North GO Station MTSA
2200 – 2250 Islington Avenue, Toronto, Ontario***

We are the planning consultants to RCG Islington 401 Limited Partnership, the owner of the lands municipally known as 2200 – 2250 Islington Avenue, herein referred to as the “subject site”. This letter has been provided in response to ERO No. 019-5934 (Ref No.20-OP-227259) which pertains to Official Plan Amendment 575 which has proposed boundaries for Major Transit Station Areas (“MTSAs”) in the City of Toronto. This letter will provide an overview of the subject site, relevant planning policy context, and conclude with a planning justification for the subject site’s inclusion within the MTSA boundary.

As it pertains to the subject site, the current boundary of the proposed Etobicoke North MTSA, as set out in OPA 575, excludes the subject site in its entirety. Specifically, the site is subject to SASP 696 included in By-law 846-2022. It is our opinion that the proposed Etobicoke North MTSA does not represent a logical boundary, nor does it appropriately capture adjacent lands to facilitate intensification objectives as outlined in provincial policy for sites in proximity to higher order transit. We are requesting the Minister to modify the boundary of the MTSA to include the subject site.

Furthermore, the current boundary does not reflect the criteria of an MTSA as outlined in the Growth Plan which specifies lands generally in an 800 metre radius of a higher order transit station are considered to be MTSA. Given the site’s immediate proximity to higher order transit, among other factors as set out in this letter, it is our opinion that the subject site **should** be included within the Etobicoke North MTSA boundary.

Subject Site

The subject site is located at the southwest corner of the newly configured Rexdale Boulevard and Islington Avenue intersection, north of Highway 401. The subject site has a total area of approximately 26.8 hectares (see **Figure 1**, Location Aerial).

The subject site has historically served as a warehousing and distribution facility for Sears Canada Inc., which contained a mix of retail/service commercial and office space at 2200 Islington. There is currently a low-rise industrial warehouse complex situated on the west portion of the subject site that spans approximately 480 metres along an internal north south driveway.

On the east of the subject site (2250 Islington Avenue) is a 2-storey 'L' shaped building that was previously occupied by a printing business and is now vacant. At the northeast of the subject site is an under construction Costco Wholesale that will service the adjacent community as well as a construction staging area fronting Rexdale Boulevard.



Figure 1 – Subject Site, Location Aerial

Planning and Regulatory Analysis

Provincial Policy Statement (PPS) 2020

On February 28, 2020, the Province issued the 2020 Provincial Policy Statement, (the “2020 PPS”), which replaced the 2014 Provincial Policy Statement (the “2014 PPS”). The 2020 PPS policies took effect on May 1, 2020, and, in accordance with Section 3 of the *Planning Act*, all decisions affecting land use planning matters made after this date will be required to be consistent with the 2020 PPS.

The 2020 PPS includes additional policies related to addressing a changing climate and supporting green infrastructure, enhancing land use compatibility policies for sensitive land uses, increasing minimum requirements for housing land supply and clarifying policies related to market-based housing by adding a reference to affordable housing (i.e. Policies 1.4.3 and 1.7.1 of the PPS).

The 2020 PPS also includes additional language that encourages transit-supportive development. In particular, Policy 1.2.1 (which replaces Policy 1.1.1) provides that healthy, liveable and safe communities will be sustained by promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs.

Growth Plan for the Greater Golden Horseshoe (2019, as amended)

On May 16, 2019, A Place to Grow: The Growth Plan for the Greater Golden Horseshoe came into effect (the “2019 Growth Plan”), replacing the 2017 Growth Plan for the Greater Golden Horseshoe (the “2017 Growth Plan”). All decisions made on or after this date in respect of the exercise of any authority that affects a planning matter will conform with the 2019 Growth Plan, subject to any legislative or regulatory provisions providing otherwise. Subsequently, on August 28, 2020, the 2019 Growth Plan was amended by Growth Plan Amendment No. 1.

There are several changes from the previously applicable Growth Plan that are relevant to the subject site. In particular, the 2019 Growth Plan, as amended, identifies 29 Provincially Significant Employment Zones. Provincially Significant Employment Zones are areas defined by the Minister in consultation with affected municipalities for the purpose of long-term planning around job creation and economic development. These zones can consist of employment areas or mixed use areas with a significant number of jobs. The subject site is **not** within a Provincially Significant Employment Zone.

In our opinion, the subject site is a “strategic growth area” as defined by the Growth Plan (i.e. a focus for accommodating intensification and higher-density mixed uses in a more compact built form). The Growth Plan defines a “strategic growth area” as follows:

*Within settlement areas, nodes, corridors, and other areas that have been identified by municipalities or the Province to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form. Strategic growth areas include urban growth centres, **major transit station***

*areas, and other major opportunities that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields. **Lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors** may also be identified as strategic growth areas (Our Emphasis).*

In this regard, the subject site fronts onto two Major Arterial Roads (Islington Avenue and Rexdale Boulevard) with portions of the site in proximity to a major transit station, Etobicoke North GO. As part of the 2019 Growth Plan, the definition of *Major Transit Station Area* has been revised to include a 500 metre to 800 metre radius from a transit station. The definition is as follows:

“The area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.”

In our opinion, the site represents an opportunity for growth and intensification which is in line with the Growth Plan’s objectives for *Strategic Growth Areas* and *Major Transit Station Areas*.

City of Toronto Official Plan

Within the Official Plan’s urban structure, the subject site is identified as being designated *Employment Areas* (see **Figure 2**, Map 2 – Official Plan Urban Structure). From a land use perspective, the Official Plan designates the subject site as *General Employment Areas* (see **Figure 3**, Official Plan Land Use Map 13).

Lands surrounding the subject site include *Mixed Use Areas* to the north along Rexdale Boulevard and to the northeast side along Islington Avenue, as well as *Apartment Neighbourhoods* further north and *Neighbourhoods* to the east. To the immediate west of the subject site are lands designated *General Employment Areas* followed by a large swath of *Core Employment Areas* to the west and southwest.

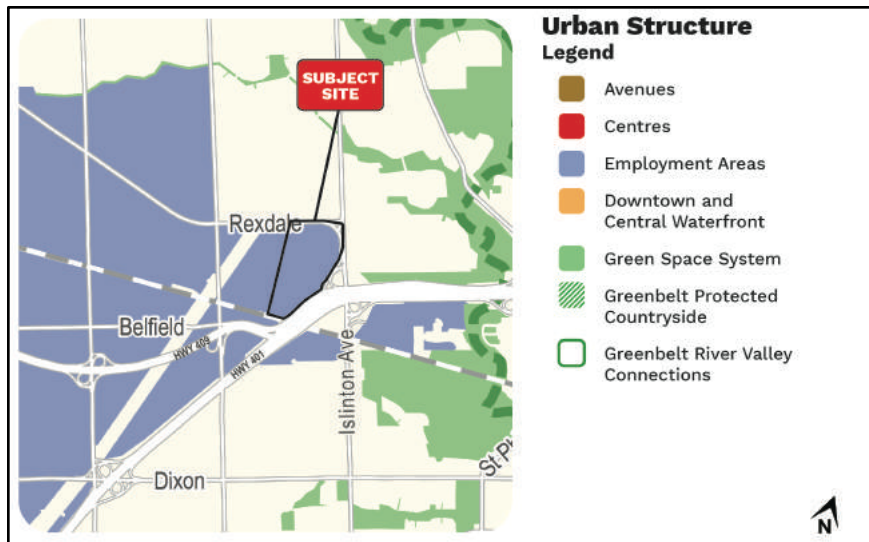


Figure 2 – City of Toronto Official Plan – Urban Structure (Map 2)

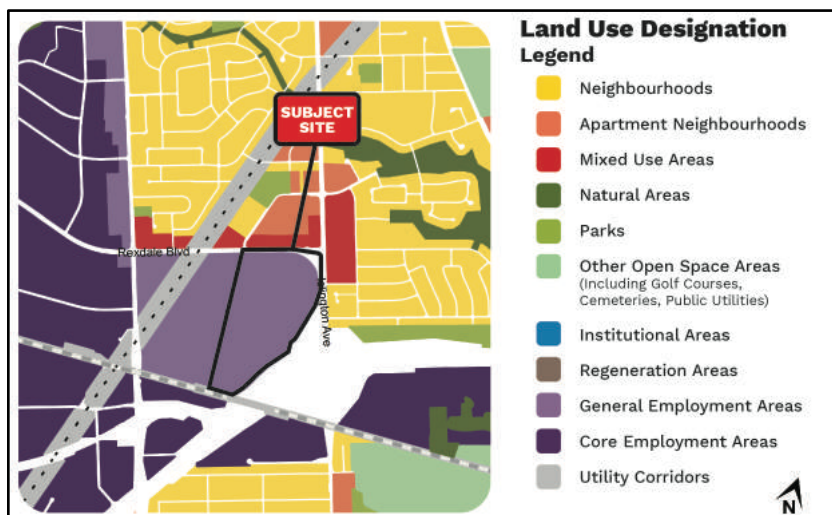


Figure 3 – City of Toronto Official Plan – Land Use Plan (Map 13)

Municipal Comprehensive Review – Employment Conversion Request

As part of the City of Toronto’s ongoing Municipal Comprehensive Review (“MCR”) process, a request for the south portion of the subject site to be considered for conversion from *General Employment Areas* to *Mixed Use Areas* was submitted as request #80 to the City of Toronto. This conversion request remains under review by City Staff. The Planning Justification Letter has been attached as **Appendix A**.

It is acknowledged that an existing approval through By-law 808-2018 for the north portion of the subject site conforms with the existing *General Employment Areas* land

uses. The requested employment conversion would require a redesignation of the southern portion of the subject site to *Mixed Use Areas* to allow for redevelopment.



Figure 4 – Lands to be Converted to Mixed Use Areas

The conversion and a subsequent development application would present opportunities for new housing, publicly accessible open spaces, parkland or improvements to community amenities that would complement the subject site's proximity to the existing GO Station. Increased land use flexibility is appropriate and would facilitate a desirable form of redevelopment which in turn will generate a greater number of residents and jobs than what is currently supported on the site today.

Furthermore, there is potential to establish an attractive public realm and a new public and private road network that responds to the transit-oriented nature of the subject site. Finally, the conversion is strategically located to take advantage of existing and future commercial-retail opportunities at the north end of the subject site, while optimizing higher order transit to the south.

Official Plan Amendment 575

Official Plan Amendment 575 seeks to delineate and plan for twenty-five (25) major transit station areas across the City of Toronto. The proposed Site and Area Specific Policies ("SASPs") has prescribed a minimum density target of 150 jobs and persons per hectare for the Etobicoke North MTSA. The proposed boundary illustrated in **Figure 5** excludes the subject site. Given MTSA's are generally defined as within 500-800 metres of a major transit station as per the Growth Plan, it is our opinion that the site merits inclusion due to its proximity to the station.

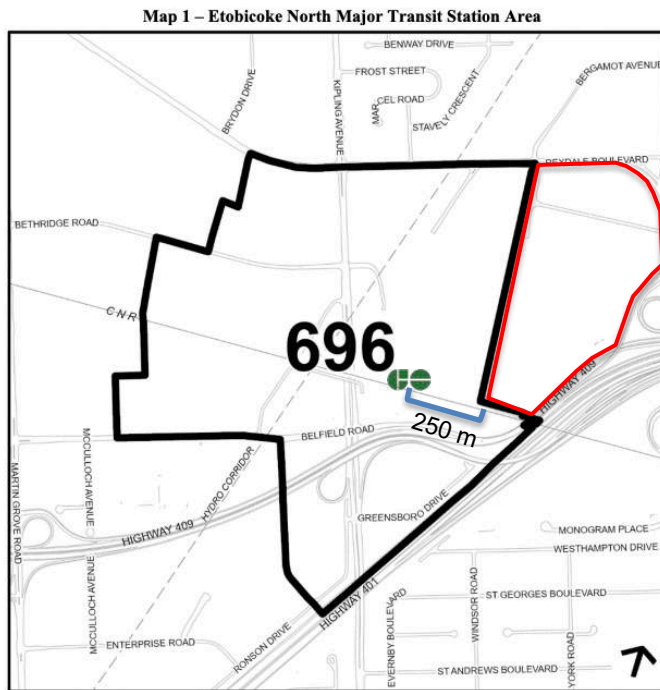


Figure 5 – Proposed Etobicoke North MTSA (Subject Site in Red and distance to Site))

Planning Analysis for MTSA Inclusion

Intensification

Given the existing policy context and support for transit-oriented development at both the provincial and municipal levels, it is our opinion that the proposed MTSA boundary does not effectively achieve the intensification objectives which aim to optimize lands in proximity to the Etobicoke North GO Station. The subject site is a 26.8 hectare contiguous land parcel under a single ownership which represents a significant intensification opportunity that will provide investment in both jobs and housing that is close to higher-order transit. With regard for proximity, the subject site is largely contained within an 800 metre radius of the station as shown in **Figure 6**.

As stated above, the Growth Plan definition of an MTSA are lands that are generally located within 500 – 800 metres of a higher order transit station, representing a 10 minute walk. It should be noted that approximately 40% of the subject site is contained within a 500 metre radius when considering a hypothetical MTSA boundary. However, the subject site in its entirety has been omitted from this boundary. It is our opinion that these lands represent a logical continuation of the proposed MTSA boundary and are similarly if not more suited for intensification when compared to the broader lands within the MTSA.



Figure 6 – Etobicoke North MTSA Overlay Map

In conclusion, intensification on the subject site is both desirable and encouraged by provincial and municipal policy and merits inclusion within the Etobicoke North MTSA boundary.

Land Use

In terms of land use context, the majority of lands within the MTSA boundary west of Kipling Avenue are designated *Core Employment Areas*, while lands to the northeast are designated *General Employment Areas*. The subject site was **not** included within the MTSA boundary, yet it is designated *General Employment Areas*, a more permissive land use than its counterpart *Core Employment Areas*.

On a land use principles basis, the lands that are located west of Kipling Avenue contain a variety of existing industrial uses which are unlikely to redevelop in the short to medium term with a mix of residential or higher density employment given their varying scales, sizes and irregular lot fabric and *Core Employment Designation*. In contrast, the subject site is currently designated *General Employment Areas*, is under a single ownership, and is available for significant redevelopment in the short and medium term which creates an opportunity for significant uplift in both residential population and employment. Moreover, a redevelopment would enhance the viability of the Go Transit Station which is consistent with provincial and municipal policy objectives.

The adjacent land use context to the north and northeast of the subject site is characterized by a mix of uses including townhouses, apartment buildings, commercial retail plazas, big-box stores and low-rise detached and semi-detached dwellings. A mixed use development on the subject site would build upon the existing context of the broader community with a focus on more dense forms of housing, employment opportunities such as office spaces as well as everyday commercial retail amenities.

Overall, the subject site offers a far more flexible parcel that could be developed into a complete community that establishes a mix of uses, public and private roads and a significant increase in housing stock to compliment the retail uses currently under construction on the north portion of the site.

Provincially Significant Employment Zones

In addition to its *General Employment Areas* designation, the subject site was **removed** from a Provincially Significant Employment Zone, further reinforcing the potential for redevelopment and eliminating its requirement for the long term economic viability of employment lands across Toronto and the Province. The applicant received a letter from the Minister of Municipal Affairs and Housing on December 20, 2019 acknowledging the request to remove the lands from the PSEZ and stating that the online mapping had been updated to reflect the revised conditions. The letter is attached hereto as **Appendix B**.

It is acknowledged that **all lands** included in the Etobicoke North MTSA as adopted are currently designated as a Provincially Significant Employment Zone, which subject to Policy 2.2.5.10 of the Growth Plan, may be considered for conversion outside a Municipal Comprehensive Review as they are located within a major transit station area.

Despite Policy 2.2.5.10, it is our opinion that the underlying Official Plan policies and land use designation of *Core Employment Areas* of the MTSA remain more restrictive than that of the subject site. It is our opinion that the northeast quadrant of the current MTSA boundary, as well as the inclusion of the subject site, represents a more logical boundary for the MTSA and would more effectively facilitate the first phase of a new complete community adjacent to the Etobicoke North GO Station.

Furthermore, it is our opinion that the large parcels and lot fabric and the existing road infrastructure east of Kipling Avenue provides a more comprehensive foundation for a redevelopment than those lands west of Kipling Avenue.

Transit Accessibility

Finally, the subject site is strategically positioned to take advantage of numerous forms of public transportation. First, the Kitchener GO Line serviced by Etobicoke North GO station operates on 30 minute intervals from 6:00 am to 9:00 am on weekdays connecting to Downtown Toronto and additional higher order transit infrastructure. The existing Etobicoke North GO Station can be accessed via daily parking lots located on the west side of Kipling Avenue, west of the station platform. Although no direct connection exists currently from the Etobicoke North GO Station to the subject site, a future walkway could be explored through redevelopment resulting in convenient access from a new transit-oriented community to a GO Station. The subject site also benefits from multiple TTC bus routes including Route 37 and 37A, with 4 stops located within 100 metres of the site.

Conclusion

In summary, it is our opinion that the exclusion of the subject site from the Etobicoke North MTSA is an unjustified error. The subject site merits inclusion within the proposed boundary of the Etobicoke North MTSA due to strong provincial and municipal policy support for transit oriented, mixed-use communities which aim to optimize these strategic lands. The unique size and scale of the site under a singular ownership offers a flexible land parcel to be redeveloped efficiently and in conjunction with any future improvements of Etobicoke North GO Station. The site has significant frontages along major arterial roads and has already secured new public roads through an associated Zoning By-law Amendment Application at the north end of the subject site (By-law 808-2018).

In addition, the majority of lands within the Etobicoke North MTSA are designated *Core Employment Areas*, while the northeast quadrant of the proposed MTSA and the subject site are designated *General Employment Areas*, a more permissible land use. As such, the northeast quadrant including the subject site and lands at 65, 71 and 75 Rexdale Boulevard and 1983 Kipling Avenue create a logical first phase of any mixed-use redevelopment concept adjacent to the Etobicoke North GO Station.

Finally, the removal of the subject site from a Provincially Significant Employment Zone while other areas with the MTSA remain included in a PSEZ reinforces the site's viability as candidate for mixed use redevelopment. A future development scheme would optimize lands to accommodate an increase in residential housing complimented by employment opportunities.

With regard for sensitive land uses, it is acknowledged that a Land Use Compatibility Study was conducted for the subject site in July 2021 which concluded that adverse air quality impacts from surrounding industrial sources are not anticipated. An Employment Area Impact Assessment was also conducted by Urban Metrics in July 2021 and was submitted in conjunction with the site's employment conversion request.

In conclusion, it is our opinion that the MTSA boundary merits a revision to include the subject site to better optimize and achieve intensification and increase ridership of the Etobicoke North GO Station. We respectfully recommend the Minister include the subject site within the Etobicoke North MTSA Boundary.

In addition to the inclusion of the site, the Employment Conversion request and subsequent land use compatibility studies submitted to the City of Toronto concluded that the southern portion of the site would be suitable for redesignation from *General Employment Areas* to *Mixed Use Areas*. This would facilitate a new complete community adjacent to higher order transit which is aligned with provincial and municipal intensification objectives. Accordingly, we respectfully recommend that the MTSA boundary adjustment request be considered in conjunction with the Employment Conversion Request to redesignate the site to *Mixed Use Areas*.

Should you have any questions or inquiries regarding the contents of this letter, please do not hesitate to reach out to Charlie Smith of our office at csmith@bousfields.ca or the undersigned.

Sincerely,

Bousfields Inc.



Tony Volpentesta MCIP, RPP



Charlie Smith MCIP, RPP

APPENDIX A



August 3, 2021

SENT VIA EMAIL: Kerri.Voumvakis@toronto.ca & Jeffrey.Cantos@toronto.ca

City Planning Division
Strategic Initiatives, Policy & Analysis
Metro Hall, 55 John Street, 22nd Floor
Toronto, ON, M5V 3C6

Dear Ms. Voumvakis & Mr. Cantos:

Re: *Municipal Comprehensive Review: Conversion Request to Mixed Use Areas – 2200 - 2250 Islington Avenue*

We are the planning consultants to RCG Islington 401 Limited Partnership (“the Applicant”), the owner of the lands municipally known as 2200 - 2250 Islington Avenue, herein referred to as the “subject site”. The subject site is located at the southwest corner of Rexdale Boulevard and Islington Avenue, north of Highway 401 and has a total area of 26.8 hectares (see **Figure 1**, Location Aerial).



Figure 1 – Subject Site, Location Aerial

As part of the City of Toronto’s ongoing Municipal Comprehensive Review (“MCR”) process, we are writing on behalf of the Applicant to request that 10.8 of the 26.8 hectare subject site be considered for conversion from *General Employment Areas* to *Mixed Use Areas* under the City of Toronto Official Plan (“Official Plan”).

Existing Approval

A Draft Plan of Subdivision to permit four development blocks and new public roads was reviewed and approved in 2018 (**Appendix A**).

Portions of the subject site have an existing site-specific by-law (By-law 808-2018) which was approved in 2018. The Zoning By-law Amendment to the Etobicoke Zoning Code provides for additional retail uses within the IC1 outlined in **Table 1** below. The as-of-right permissions for the IC.1 Zone continue to apply which include:

- business, professional, or administrative offices
- manufacturing uses,
- warehouses,
- hotels,
- restaurants,
- banquet halls,
- banks and
- vehicle-related uses

Table 1 – Additional Permitted Uses as per By-law 808-2018

Retail Uses	Vehicle-related Uses
<ul style="list-style-type: none"> • ancillary retail and pharmacy; • home improvement warehouse; • ancillary restaurants (including take-out service); • outdoor storage and garden centre area; • personal service shop; a supermarket; • outdoor patios associated with bake shops, • specialty food shops, • grocery stores and restaurants; • drive-through facilities; • automated banking machines; • dry cleaning establishments; • eating establishments; • Brew Your Own Operation; Beer Production Facility; • financial institution. 	<ul style="list-style-type: none"> • gas bar; • service station; service station/retail store with food services; • ancillary car wash; • ancillary public garages; and • vehicle rental establishments.

Zoning By-law 808-2018 also permits a maximum of 83,818 square metres of gross floor area of which a minimum of 33,800 square metres must be allocated toward warehouse and/or office uses. A minimum of 3,000 square metres of Privately Owned Publicly Accessible Spaces (POPS) shall also be provided to the satisfaction of City Staff in terms of orientation and location. Multiple site-specific parking ratios were determined for the new uses permitted on the subject site. Finally, a Holding Symbol was placed on the eastern development Block 2 of the subject site until conditions are met to the satisfaction of the City such as intersection improvements at Rexdale Boulevard and Islington Avenue. The Hold conditions are now satisfied, and the H was

lifted on May 5, 2021. The full version of By-law 808-2018 can be found in **Appendix B** of this Letter.

Despite this approval, the subject site remains within the *General Employment* designation as per Land Use Map 13 of the City of Toronto Official Plan. The Applicant also owns the property; 2250 Islington Avenue. The property comprises the remainder of the quadrant located at the southwest corner of Islington Avenue and Rexdale Boulevard (See **Figure 2**). The land holdings of 2250 Islington Avenue is approximately 51,300 square metres (5.1 hectares). This property adds a substantial amount of land to the original properties creating a comprehensive assembly of lands at the southwest quadrant of Rexdale Boulevard and Islington Avenue and presents an opportunity to further enhance the subject site with a mix of uses.



Figure 2 – New Lands Acquired by Applicant – Post Media Lands Acquired August 2017

Subject Site

The majority of the subject site has historically served as a warehouse and distribution facility for Sears Canada Inc., which contained a mix of retail/service commercial and office space at 2200 Islington, in addition to other traditional industrial activities. There are currently two low-rise industrial warehouses situated on the southern portion of the subject site. The first is an elongated 1-storey rectangular industrial building that spans approximately 670 metres along the west side of the subject site. Within the building is a food distribution and packaging operation (Ya Ya Foods), a transportation / logistics operation (XTL) and warehouse operations (Sim-Tam). On the east of the subject site (2250 Islington Avenue) is a 2-storey 'L' shaped building that is occupied by a printing business (Post Media). This operation currently supports approximately

100 to 125 employees. The northern portions of the subject site bordering Rexdale Boulevard are being redeveloped through the Site Plan Application file: 19 255712 WET 01 SA.

The buildings have a total floor area of approximately 65,800 square metres. In terms of access, the subject site has two vehicular driveways from Rexdale Boulevard, one that is aligned with Bergamot Avenue to the north and a second which is midway between Bergamot Avenue and Islington Avenue. Notably, a new public road network has been dedicated as a U' shaped public road for the redevelopment as outlined in Schedule A of By-law 808-2018. **Table 2** provides a high-level overview of the subject site and relevant statistics as they pertain to the conversion request.

Table 2: Summary Site Statistics, Official Plan Designations & Zoning

Conversion Area	Lands For Conversion (10.8 hectares) Total Site Area (26.8 hectares)
Site Frontage	Approx. 200 metres – Islington Avenue Approx. 400 metres – Rexdale Boulevard (With revised intersection as per By-law 808-2018)
Existing Building Footprints (Approx)	43,500 square metres (2200 Islington Avenue) 21,368 square metres (2250 Islington Avenue)
Existing Uses	Warehousing, food manufacturing and packaging, small-scale office, light industrial (printing)
Official Plan	<i>Employment Areas</i> (Map 2 – Urban Structure), <i>General Employment Areas</i> (Map 13 – Land Use Plan)
Right-of-Way Width	33 metres (Rexdale Boulevard) 33 metres (Islington Avenue)
Zoning By-law 569-2013	E 1.0 - Employment Industrial Zone (2250 Islington Ave)
Etobicoke Zoning Code (808-2018)	IC1 and IC1(H) – Industrial Class One (H) has been lifted as of May 2021

The total area of the lands converted to Mixed Use Areas from General Employment would be 91,686 square metres (10.8 hectares). This conversion makes up 40% of the total land assembly, whilst the remaining 60% would remain as *General Employment Areas*, 177,060 square metres (16.0 hectares)

Within the Official Plan's urban structure, the subject site is identified as being designated *Employment Areas* (see **Figure 3**, Map 2 – Official Plan Urban Structure). From a land use perspective, the Official Plan designates the subject site as *General Employment Areas* (see **Figure 4**, Official Plan Land Use Map 13).

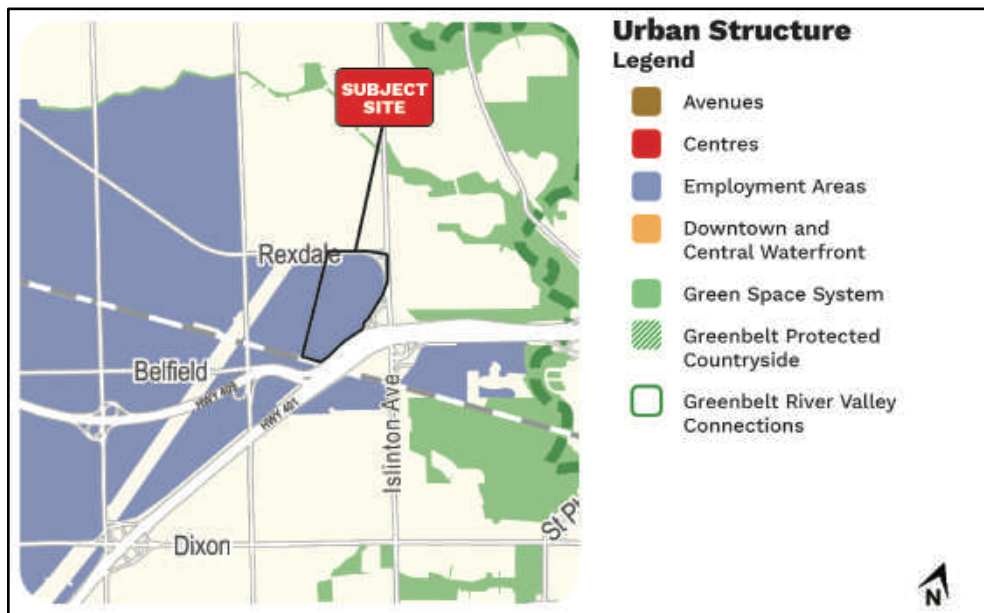


Figure 3 – City of Toronto Official Plan – Urban Structure (Map 2)

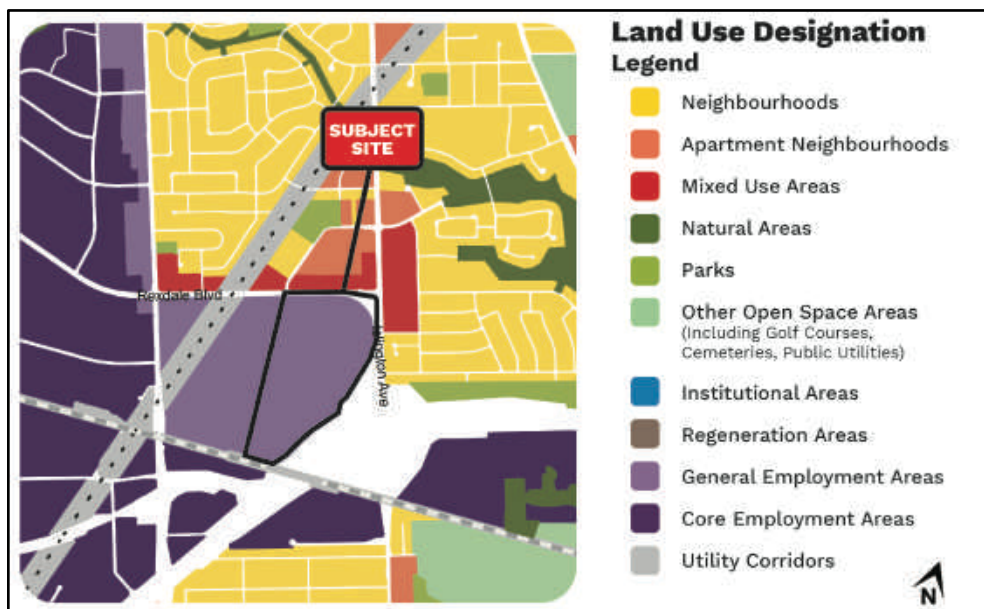


Figure 4 – City of Toronto Official Plan – Land Use Plan (Map 13)

Proposed Concept Plan

The long-term vision for the proposed Concept Plan is to introduce three new high density office buildings on the lands known as 2250 Islington Avenue, and to concentrate mixed use residential intensification such as mid-rise and taller built forms at the south end of the subject site, closest in proximity to the Etobicoke North GO Station. The proposed Concept Plan can be found in **Appendix C** of this Letter. The

lands on the north of the subject site which have been approved for retail and commercial permissions through by-law 808-2018 – along with the northern portions of 2250 Islington Avenue – would continue to provide a range of retail, commercial and office uses to support the proposed residential uses, resulting in a new Complete Community.

At approximately 26.8 hectares in size, and with a frontage of 400 metres along Rexdale Boulevard as well as 200 metres along Islington Avenue and proximity to higher order transit – Etobicoke North GO – the subject site represents an important opportunity for a conversion to permit additional transit-supportive uses, thereby enhancing the existing retail and office permissions established in By-law 808-2018.

In this regard, the area of conversion to *Mixed Use Areas* would be directed towards the lands south of the new 'U' shaped public road identified in By-law 808-2018 Schedule A and a potential future eastbound extension of this road. The remainder of the lands would maintain their *General Employment* designation (See **Figure 5**). As previously mentioned, the proportion of land use would be distributed as 40% *Mixed Use Areas* and 60% *General Employment Areas*.



Figure 5 – Lands to be Converted to Mixed Use Areas

With regard for the conversion to *Mixed Use Areas*, this would allow for a desirable redevelopment comprised of residential uses in immediate proximity to the Etobicoke North GO Station. It should be noted that the newly acquired lands at 2250 Islington Avenue is proposed to be redeveloped for higher density office uses as demonstrated in the proposed Concept Plan, thereby retaining a large employment population on the subject site.

The southwest corner of the subject site is also approximately 150 metres east of the existing GO Station platform and would be conveniently accessible to both the future residential development and new office buildings. A conversion and subsequent development application would also present opportunities for the additional provision of publicly accessible open spaces, parkland or improvements to community amenities that would complement the subject site's proximity to the existing GO Station.

We believe that increased land use flexibility is appropriate, and the proposed Concept Plan would facilitate a desirable form of redevelopment that would generate a greater number of residents, employment, and jobs than what is currently supported on the site today. Furthermore, a future redevelopment has the potential to establish an attractive public realm and new road network that responds to the transit-oriented nature of the subject site.

Finally, the conversion is strategically located to take advantage of both future retail and commercial opportunities at the north end of the subject site, while optimizing higher order transit. The ultimate build out of the proposed Concept Plan would also be complimentary to the adjacent *Mixed Use Areas* surrounding the intersection of Rexdale Boulevard and Islington Avenue.

Surrounding Context

The subject site is located at the southwest corner of Rexdale Boulevard and Islington Avenue, north of Highway 427 in the West-Humber Clairville neighbourhood. The majority of the neighbourhood to the west is occupied by employment uses generally bound by Highway 401 to the south, Highway 400 to the west, Rexdale Boulevard to the north and Kipling to the east. The neighbourhood extends further north to Steeles Avenue West which transitions to low-rise residential uses. (See **Figure 6**).

To the north of the subject site is a mix of commercial-retail plazas that contain front yard surface parking with residential uses above and larger slab apartment buildings ranging from 4 to 12 storeys. The properties fronting onto Rexdale Boulevard are designated *Mixed Use Areas* and while properties further north containing apartments are designated *Apartment Neighbourhoods*. Rexlington Park, is also located to the north and designated *Parks*.

To the east of the subject site, east of Islington Avenue, is a power centre plaza anchored by a Walmart and Fresh Value Grocery as well as single detached dwellings. The power centre is designated *Mixed Use Areas*, while the low-rise detached dwellings are designated *Neighbourhoods*. To the southeast is Pine Point Park, a linear park space that runs parallel to Highway 401 and contains amenities such as an indoor Arena, an outdoor pool and soccer field.

To the south of the subject site is the existing GO Rail corridor that serves Etobicoke North GO Station providing access into Downtown Toronto. Highway 401 and 409 are also situated to the south of the site which separates low-rise residential uses known as Kingsview Village which is designated *Neighbourhoods*.

To the immediate west of the subject site are additional employment uses. It should be noted that this quadrant of *General Employment Areas* is isolated from the broader Provincially Significant Employment Zone known as Zone 14 Toronto-Peel. Further to the west is an approximate 115 metre hydro corridor that extends southwest, further dividing and separating this quadrant of employment uses. As mentioned above, to the southwest is the existing GO Rail Corridor that also creates a physical barrier and reduces connectivity to additional employment lands to the south. Beyond Kipling Avenue to the west are designated *Core Employment Areas* that are contained within Zone 14 – Toronto-Peel.



Figure 6 – Site and Surrounding Context

The subject site is not located within a *Provincially Significant Employment Zone* (PSEZ) as per the 2019 Growth Plan¹.

¹ The subject site was removed from the PSEZ Zone 14 as described in **Appendix D**.

Immediate Surroundings

To the immediate north of the subject site is a 3-storey mixed use plaza that contains a variety of electronics stores, restaurants, and fashion outlets, as well as ample surface parking at grade fronting onto Rexdale Boulevard (16 – 50 Rexdale Boulevard). To the north of the plaza are three 'H'-shaped apartment buildings ranging from 4 to 7-storeys that are accessed from an internal road network off Bergamot Avenue to the west and north (9, 11 and 27 Bergamot Avenue). Further north is a cluster of five 2-storey townhouse blocks that are accessed off Bergamot Avenue and are separated by landscaped open space (15, 17, 19, 21 and 23 Bergamot Avenue). To the east of the townhomes are two additional apartment complexes; an 'H' shaped 4-storey apartment building fronting Bergamot Avenue to the north (25 Bergamot Avenue), and a 12-storey apartment building that frames the southwest corner of Bergamot and Islington Avenue (2314 Islington Avenue).

To the west of the subject site, along the north side of Rexdale Boulevard is a 1-storey restaurant (Solarium Family Restaurant) with associated surface parking (54 Rexdale Boulevard) and a 6-storey apartment building that is setback from the street to accommodate front yard surface parking (Rexdale Court) (70 Rexdale Boulevard). To the north of the apartment building is a complex of 2-storey townhouses with underground parking garages accesses off Bergamot Avenue.

To the immediate west of the subject site is a 2-storey commercial building that contains a fireworks wholesaler and an International Muslim Organization community space (65 Rexdale Boulevard). To the south is an additional 2-storey commercial office building that is occupied by Toronto Hydro and contains large areas of surface parking (71 Rexdale Boulevard). Also to the west of the subject site is two large 1-storey industrial buildings that contain a Transportation business (XTL Transport) and a home improvement retailer (The Home Depot) (75 Rexdale Boulevard and 1938 Kipling Avenue). To the southwest of the subject site is the Etobicoke North GO Station (1967 Kipling Avenue) and a Ministry of Transportation Office located off Kipling Avenue (1927 Kipling Avenue). Also, to the southwest is Highway 409 and Highway 401 that run in a general east-west direction.

To the east of the subject site, between Chilcot Avenue and Allenby Avenue is a mix of multi-unit, semi-detached and single-detached dwellings. This condition of low-rise residential uses continues east until the Humber River. To the south of the low-rise dwellings is Pine Point Park that borders Highway 401 and buffers the residential uses. To north of the residential uses is a large rectangular power centre that borders the east side of Islington Avenue and is anchored by a Walmart and Fresh Value Grocery Store (2245 and 2267 Islington Avenue). The lands between the two anchor stores consists of surface parking, as well as three commercial-retail buildings including a stand-alone Scotiabank, and two retail plazas that support a Dollarama, a medical

walk-in clinic as well as various restaurants (2251, 2257 and 2261 Islington Avenue). A stand-alone gas station (Esso) is also located along Islington Avenue within the power centre complex (2291 Islington Avenue).

To the northwest of the subject site, at the northwest corner of Rexdale Boulevard and Islington Avenue is a 2-storey mixed use plaza with commercial-retail uses at grade and residential units above (2 – 10 Rexdale Boulevard). At the northwest corner of Rexdale Boulevard and Islington Avenue is a stand-alone retail building that is surrounded by surface parking (Cash Money) (2280 Islington Avenue). To the north of 2280 Islington Avenue is another 2-storey mixed use commercial-retail plaza that is setback from Islington Avenue to accommodate surface parking in the front yard (2282 – 2300 Islington Avenue). Further north along Islington Avenue is a 2-storey medical clinic (2304 Islington Avenue) and a 1-storey commercial building with surface parking that the rear (2310 Islington Avenue).

Transit Accessibility

The subject site is strategically positioned to take advantage of higher order transit infrastructure that provides convenient access into the GO Transit rail network that connects into the Downtown Core of Toronto. The travel time from Etobicoke North GO Station to Union Station is approximately 21 – 25 minutes. The existing Etobicoke North GO Station can be accessed via daily parking lots located on the west side of Kipling Avenue, west of the station platform.

Although no direct connection presently exists from the Etobicoke North GO Station to the subject site, a future connection will be explored as a refinement to the proposed Concept Plan. As the southern edge of the subject site is approximately 150 metres east of the station platform, this presents a logical opportunity to establish a transit-oriented community within walking distance of existing higher-order transit.

In terms of surface transit accessibility, the subject site benefits from multiple Toronto Transit Commission (“TTC”) bus routes 37 and 37A, which is located on the northwest corner of the site, just east of Bergamot Avenue, and another stop at the northeast corner of the site at Islington Avenue. TTC bus route 37 also serves the subject site on the east side of the property along Islington Avenue. The Route 37 bus route connects future residents to Islington Station on Line 2 of the Bloor-Danforth subway, with the areas of Woodbine Racetrack, Humberwood Boulevard and Islington Avenue with Steeles Avenue West.



Figure 7 – GO Network Map

South of the site, along Islington Avenue and just south of Westhampton Drive, is a station for TTC bus route 927. Route 927 will connect future residents to Kipling Subway Station and will also connect residents to the GO Transit Train Network at Kipling Station.

Vision for a Complete Community

The introduction of high-density residential uses adjacent to Highway 401 in proximity to higher order transit is a well-established form of development in the City of Toronto. For example, nodes such as Yonge Street and 401, Bayview and 401, and Leslie and 401 are representative of this form of development. The long-term vision for the subject site is to establish a new Complete Community that includes opportunities to live, work and play close to higher order transit.

Although the portion of the subject site that is proposed to be converted from employment to mixed use is close to existing higher order transit, the Complete Community being proposed may introduce an opportunity to have a sustainable new community that may not necessarily depend on access to the Downtown. The benefit of a Complete Community rests on its ability to meet the daily needs of its residents.

The components necessary for the proposed Complete Community include:

- high density office uses;
- mixed use residential intensification ranging from low-rise to taller built forms;

- Retail and service commercial amenities to meet the daily and weekly needs of residents; and
- well-appointed mixed use buildings containing indoor and outdoor amenities.

The proposed Concept Plan would establish multiple high density office buildings and residential uses, complimented by retail and commercial opportunities at the north end of the subject site. In our opinion, permitting a broader mix of uses represents good planning principles in the context of an existing mixed use intersection of Islington Avenue and Rexdale Boulevard. Furthermore, the proposed residential uses would support the approved commercial retail uses on the northern half of the site as proposed in By-law 808-2018 and allow for residents to work, live, and play in a Complete Community. A transit-supportive mixed use development inclusive of new office space would be well suited to retain employment uses on the site while pursuing a net-gain for overall jobs. In support of this conversion request, urbanMetrics has prepared an Employment Area Impact Assessment that details the specific benefits, pertaining to job creation that the proposed Concept Plan would achieve. The full version of this report is appended as **Appendix C**.

As noted in the Employment Area Impact Assessment prepared by urbanMetrics, the proposed Concept Plan—including the already approved retail/service commercial component—could accommodate a total of some 4,300 jobs. The non-retail components alone could amount to a total capacity for some 2,980 full-time equivalent (FTE) employment positions, representing an increase of up to 24 times the number of individuals employed at the site today, and 3.5 times what can be accommodated in the remaining buildings on the subject site at full capacity. Furthermore, the key considerations in assessing the planning merits for the conversion and arriving at our planning opinion, include:

- 1) the subject site's proximity to existing higher-order transit, specifically the subject site's adjacency to Etobicoke North GO Station to the southwest.
- 2) the ability to retain and expand upon existing employment uses, while also introducing new residential opportunities close to amenities, parks and transit.
- 3) the potential for the subject site to contribute towards an evolving mixed use node at the intersection of Rexdale Boulevard and Islington Avenue, and
- 4) the possibility for a future redevelopment resulting in community benefits such as streetscape enhancements, publicly accessible open spaces, parkland or affordable housing.

In addition to the above planning merits, the analysis undertaken by urbanMetrics indicated that the proposed Concept Plan would result in an approximate one-time payment of \$85 million dollars in application fees and development charges.

In our opinion, the addition of residential and office uses, would complement the *Apartment Neighbourhoods and Mixed Use Areas* to the north and east, and provide a mixture of uses that can support existing higher order transit and existing services in the area. Due to the existing commercial-retail permissions secured on the northern portions of the subject site through By-law 808-2018, a redesignation to *Mixed Use Areas* will only be pursued on the southern portion of the subject site closest to the Etobicoke North GO Station. The total area of the lands converted to *Mixed Use Areas* from General Employment would be approximately 108,000 square metres (10.8 hectares). This conversion makes up 40% of the total land assembly, whilst the remaining 60% would remain as General Employment Areas, 160,000 square metres (16.0 hectares).

As such, we believe it is appropriate to redesignate this portion subject site from *General Employment Areas* to the *Mixed Use Areas* designation while the north half will remain as *General Employment*. The applicant also remains open to a potential site-specific policy to ensure a certain number of jobs are maintained on the subject site.



PLANNING POLICY FRAMEWORK

Provincial Policy Statement (PPS) 2020

On February 28, 2020, the Province issued the 2020 Provincial Policy Statement, (the “2020 PPS”), which replaced the 2014 Provincial Policy Statement (the “2014 PPS”). The 2020 PPS policies took effect on May 1, 2020, and, in accordance with Section 3 of the *Planning Act*, all decisions affecting land use planning matters made after this date will be required to be consistent with the 2020 PPS.

The 2020 PPS includes additional policies related to addressing a changing climate and supporting green infrastructure, enhancing land use compatibility policies for sensitive land uses, increasing minimum requirements for housing land supply and clarifying policies related to market-based housing by adding a reference to affordable housing (i.e. Policies 1.4.3 and 1.7.1 of the PPS).

The 2020 PPS also includes additional language that encourages transit-supportive development. In particular, Policy 1.2.1 (which replaces Policy 1.1.1) provides that healthy, liveable and safe communities will be sustained by promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs.

With respect to the conversion of employment areas to non-employment uses, Policy 1.3.2.4 states that:

“Planning authorities may permit conversion of lands within employment areas to non-employment uses through a comprehensive review, only where it has been demonstrated that the land is not required for employment purposes over the long term and that there is a need for the conversion.”

Policy 1.3.2.5 goes on to states that:

“Notwithstanding policy 1.3.2.4, and until the official plan review or update in policy 1.3.2.4 is undertaken and completed, lands within existing employment areas may be converted to a designation that permits non-employment uses provided the area has not been identified as provincially significant through a provincial plan exercise or as regionally significant by a regional economic development corporation working together with affected upper and single-tier municipalities and subject to the following:

- a) *there is an identified need for the conversion and the land is not required for employment purposes over the long term;*
- b) *the proposed uses would not adversely affect the overall viability of the employment area; and,*
- c) *existing or planned infrastructure and public service facilities are available to accommodate the proposed uses.”*

As noted earlier, the subject site is not located within *Provincially Significant Employment Zone* under the Growth Plan, and therefore, could be converted pursuant to Policy 1.3.2.5. However, given that City of Toronto has commenced its official plan review, the conversion is being sought pursuant to Policy 1.3.2.4. In this regard, it is noted that Policy 5.2.1(2) of the Growth Plan states that:

“A municipal comprehensive review that is undertaken in accordance with this Plan will be deemed to fulfill the requirements in the PPS to undertake a comprehensive review.

Growth Plan for the Greater Golden Horseshoe (2019, as amended)

On May 16, 2019, A Place to Grow: The Growth Plan for the Greater Golden Horseshoe came into effect (the “2019 Growth Plan”), replacing the 2017 Growth Plan for the Greater Golden Horseshoe (the “2017 Growth Plan”). All decisions made on or after this date in respect of the exercise of any authority that affects a planning matter will conform with the 2019 Growth Plan, subject to any legislative or regulatory provisions providing otherwise. Subsequently, on August 28, 2020, the 2019 Growth Plan was amended by Growth Plan Amendment No. 1.

There are several changes from the previously applicable Growth Plan that are relevant to the subject site. In particular, the 2019 Growth Plan, as amended, identifies 29 *Provincially Significant Employment Zones*. *Provincially Significant Employment Zones* are areas defined by the Minister in consultation with affected municipalities for the purpose of long-term planning around job creation and economic development. These zones can consist of employment areas or mixed use areas with a significant number of jobs. The subject site is **not** within a *Provincially Significant Employment Zone*.

Policy 2.2.5.9 states that the conversion of lands within employment areas to non-employment uses may be permitted only through a municipal comprehensive review where it is demonstrated that:

- a) *there is a need for the conversion;*
- b) *the lands are not required over the horizon of this Plan for the employment purposes for which they are designated;*

- c) *the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;*
- d) *the proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan; and,*
- e) *there are existing or planned infrastructure and public service facilities to accommodate the proposed uses.*

Policy 2.2.5.10 goes on to state that:

Notwithstanding policy 2.2.5.9, until the next municipal comprehensive review, lands within existing employment areas may be converted to a designation that permits non-employment uses, provided the conversion would:

- a) *satisfy the requirements of policy 2.2.5.9 a), d) and e);*
- b) *maintain a significant number of jobs on those lands through the establishment of development criteria; and,*
- c) *not include any part of an employment area identified as a provincially significant employment zone unless the part of the employment area is located within a major transit station area as delineated in accordance with the policies in subsection 2.2.4.*

Since the subject site is not located in a *Provincially Significant Employment Zone*, it could be converted outside of an MCR. However, since the City has initiated its MCR as of August 4, 2020, a conversion of employment areas to non-employment uses is being sought, subject to the criteria referenced in Policy 2.2.5.9.

The subject site responds well to the policies set out in Policy 2.2.5.9, which are generally consistent with the conversion policies contained in the City of Toronto Official Plan, as amended by Official Plan Amendment 231. In summary, there is a need for conversion as it will create an opportunity to further intensify the subject site with both residential and employment uses that are located within a both a *Major Transit Station Area and Strategic Growth Area* which has access to existing Higher-order transit as defined by the Growth Plan.

In our opinion, the subject site is part of a “strategic growth area” as defined by the Growth Plan (i.e. a focus for accommodating intensification and higher-density mixed uses in a more compact built form). The Growth Plan defines a “strategic growth area” as follows:

*Within settlement areas, nodes, corridors, and other areas that have been identified by municipalities or the Province to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form. Strategic growth areas include urban growth centres, **major transit station areas**, and other major opportunities that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields. **Lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors** may also be identified as strategic growth areas (Our Emphasis).*

In this regard, the subject site fronts onto two Major Arterial Roads (Islington Avenue and Rexdale Boulevard) and is in close proximity to a major transit station (Etobicoke North GO).

As part of the 2019 Growth Plan, the definition of *Major Transit Station Area* has been revised to include a 500 metre to 800 metre radius from a transit station. The definition is as follows:

“The area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.”

In this regard, the subject site falls within 500-800 metres of a *Major Transit Station Area*, Etobicoke North Etobicoke GO Station. In our opinion, a conversion to *Mixed Use Areas* would help facilitate the provision of transit-supportive development on the subject site in line with the Growth Plan’s objectives for current *Strategic Growth Areas* and *Major Transit Station Areas*.

Official Plan Amendment 231

The City of Toronto-initiated Official Plan Amendment 231 (“OPA 231”) was part of the City’s last MCR exercise, which included a review of all lands designation *Employment Areas* to permit non-employment uses. OPA 231 was adopted by Council on December 18, 2013 and resulted in the creation of two new employment lands designations, *Core Employment Areas* and *General Employment Areas*. OPA 231 is largely in effect as it relates to the subject site, except for the office replacement policies.

Through the OPA 231 process, the subject site was redesignated from *Employment Areas* to *General Employment Areas* on Land Use Map 13 of the Official Plan (see **Figure 4**, Land Use Plan). In accordance with Policy 4.6.3 of OPA 231, *General Employment Areas* are places for business and economic activities generally located

on the peripheries of *Employment Areas* where, in addition to all the uses permitted in *Core Employment Areas* (i.e. manufacturing, warehousing, wholesaling and offices, among others), retail and service uses, and restaurants may also be permitted.

While the permissions of *General Employment Areas* are generally more flexible than those of the *Core Employment Areas*, residential uses are currently not permitted.

The lands municipally known as 2200 Islington Avenue were previously subject to an appeal of OPA 231. In compliance with conditions associated with approving by-law 808-2018, the outstanding appeals had to be resolved to allow the site-specific by-law to proceed to City Council for approval. The outstanding appeal was withdrawn by the Applicant prior to the adoption of by-law 808-2018.

ZONING

As set out below, the subject site is subject to both the new City-wide Zoning By-law 569-2013 and the former City of Etobicoke Zoning Code. The new City-wide Zoning By-law was adopted on May 9, 2013, but was appealed to the Ontario Municipal Board in its entirety. Substantial portions of the by-law have subsequently been approved and it is now largely in force; for the remaining portions that are under appeal, the previous municipal zoning by-laws remain in force.

By-law 569-2013

Only a portion of the subject site (2250 Islington Avenue) is zoned E 1.0 under the new City-wide Zoning By-law 569-2013, as amended. The E (Employment Industrial) zone permits a wide range of industrial and commercial uses including light industrial, warehousing and wholesaling uses, as well as offices and service shops. Additional uses are permitted subject to conditions, including eating establishments, recreation uses, accessory retail stores and vehicle repair uses.

The E zone permits a maximum height of 20.0 metres for an office building; otherwise, there is no maximum height. In terms of setbacks, the zone prescribes a minimum front yard setback of 3.0 metres, a minimum side yard setback of 3.0 metres and a minimum rear yard setback of 7.5 metres. Any lot line abutting a street must also have a 3.0 metre strip of soft landscaping.

Etobicoke Zoning Code

The remainder of the subject site (2200 Islington Avenue) is zoned Class One Industrial Zone (I.C1) and (I.C1 (H)) by the Etobicoke Zoning Code as amended by By-Law 808-2018. The I.C1 zone permits a wide range of industrial and commercial uses, including a limited range of manufacturing uses, warehouses, business, professional or administrative offices, hotels, restaurants, banquet halls, banks and

vehicle-related uses. One accessory residential unit is permitted for caretakers or officials associated with a place of worship.

Height and density restrictions are applicable only to business, professional and administrative offices, specifically a maximum height of 5 storeys and a maximum density of 0.6 FSI. Setback requirements include:

- Front Yard – minimum 4.5 metres.
- Rear Yard – minimum 6.0 metres.
- Side Yard – on lots of over 60.0 metres frontage, minimum total side yards of 12.0 metres, provided no side yard is less than 3.0 metres.

A copy of By-law 808-2018 is attached in **Appendix B**

Municipal Comprehensive Review

On June 29, 2020, City of Toronto Council adopted staff recommendations outlined in the *Growth Plan Conformity and Municipal Comprehensive Review – Work Plan Report*, dated May 19, 2020. The staff report outlines City Planning's recommended approach to aligning the Official Plan with the 2019 Growth Plan. The commencement date for the MCR was August 4, 2020 and the window to receive conversion requests closes on August 3, 2021.

The report outlines recommendations concerning an employment lands strategy which will be undertaken to satisfy the 2019 Growth Plan requirements to complete the conformity exercise and MCR. In Attachment 3, the report lists the relevant conversion and removal policies to be applied to *Employment Areas*, in addition to those set out in the 2019 Growth Plan.

Our analysis of the conversion request against Policies 2.2.4.14 through 2.2.4.18 of the Official Plan, as outlined in Attachment 3 of the May 19, 2020 staff report, is outlined in **Table 3** below.

Table 3 – Analysis of Official Policies 2.2.4.14 to 2.2.4.16

POLICIES
Policy 2.2.4.14: The redesignation of land from an <i>Employment Area</i> designation to any other designation, by way of an Official Plan Amendment, or the introduction of a use that is otherwise not permitted in an <i>Employment Area</i> is a conversion of land within an <i>Employment Area</i> and is also a removal of land from an <i>Employment Area</i> , and may only be permitted by way of a Municipal Comprehensive Review. The introduction of a use that may be permitted in a <i>General Employment Area</i> into a <i>Core Employment Area</i> or the redesignation of a <i>Core Employment Area</i> into a <i>General Employment Area</i> designation is also a conversion and may only be permitted by way of a Municipal Comprehensive Review.

<p>Policy 2.2.4.15: The conversion of land within an Employment Area is only permitted through a City-initiated Municipal Comprehensive Review that comprehensively applies the policies and schedules of the Provincial Growth Plan.</p>
<p>Policy 2.2.4.16: Applications to convert lands within an <i>Employment Area</i> will only be considered at the time of a municipal review of employment policies and designations under Section 26 of the <i>Planning Act</i> and a concurrent Municipal Comprehensive Review under the Growth Plan for the Greater Golden Horseshoe. Applications to convert lands within an Employment Area received between such City-initiated Official Plan Reviews will not be considered unless Council directs that a Municipal Comprehensive Review be initiated.</p>
<p>ANALYSIS</p>
<p>Based on Official Plan Policies 2.2.4.14 through 2.2.4.16, redesignating the subject site from <i>General Employment Areas</i> to <i>Mixed Use Areas</i> is a conversion to be considered through the City's Municipal Comprehensive Review process.</p>

Our analysis of the conversion request against the assessment criteria of Policy 2.2.4.17 is outlined in **Table 4** below. In addition, on behalf of the Applicant, an Employment Area Impact Assessment was undertaken by urbanMetrics (See **Appendix E**). Where applicable, responses to employment conversion criteria attributable to urbanMetrics can be found in **Table 4**. In addition, a Land Use Compatibility Study was also undertaken by SLR Consulting to analyze the compatibility criteria with adjacent employment uses triggered by employment conversion requests (See **Appendix F**). Similarly, responses to employment conversion criteria contributed by SLR have been outlined below.

Table 4 – Analysis of Official Policies 2.2.4.17

<p>POLICIES</p>
<p>Policy 2.2.4.17: The City will assess requests to convert lands within Employment Areas, both cumulatively and individually, by considering whether or not:</p> <ul style="list-style-type: none"> a) There is a demonstrated need for the conversion(s) to: <ul style="list-style-type: none"> 1. meet the population forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe; or 2. mitigate existing and/or potential land use conflicts; b) The lands are required over the long-term for employment purposes; c) The City will meet the employment forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe; d) The conversion(s) will adversely affect the overall viability of an Employment Area and maintenance of a stable operating environment for business and economic activities with regard to the: <ul style="list-style-type: none"> 1. compatibility of any proposed land use with lands designated Employment Areas and major facilities, as demonstrated through the submission of a Compatibility/Mitigation Study in accordance with Policies 2.2.4.5, 2.2.4.7 and 2.2.4.8 and Schedule 3 for any proposed land use, with such policies read as applying to lands within Employment Areas; 2. prevention or mitigation of adverse effects from noise, vibration, and emissions, including dust and odour; 3. prevention or mitigation of negative impacts and minimization of the risk of complaints;

4. ability to ensure compliance with environmental approvals, registrations, legislation, regulations and guidelines;
 5. ability to provide appropriate buffering and/or separation of employment uses from sensitive land uses, including residential;
 6. ability to minimize risk to public health and safety;
 7. reduction or elimination of visibility of, and accessibility to, employment lands or uses;
 8. impact upon the capacity and functioning of the transportation network and the movement of goods for existing and future employment uses;
 9. removal of large and/or key locations for employment uses;
 10. ability to provide opportunities for the clustering of similar or related employment uses; and,
 11. provision of a variety of land parcel sizes within the Employment Area to accommodate a range of permitted employment uses;
- e) The existing or planned sewage, water, energy and transportation infrastructure can accommodate the proposed conversion(s);
 - f) In the instance of conversions for residential purposes, sufficient parks, libraries, recreation centres and schools exist or are planned within walking distance for new residents;
 - g) Employment lands are strategically preserved near important transportation infrastructure such as highways and highway interchanges, rail corridors, ports and airports to facilitate the movement of goods;
 - h) The proposal(s) to convert lands in an Employment Area will help to maintain a diverse economic base accommodating and attracting a variety of employment uses and a broad range of employment opportunities in Toronto; and,
 - i) Cross-jurisdictional issues have been considered.

ANALYSIS

With respect to the conversion **Policy 2.2.4.17(a)**, the proposed conversion would facilitate increased residential and employment densities in proximity to existing transit routes (937 Islington Express, 37 Islington and 30 High Park), an existing higher order transit station (Etobicoke North GO), and therefore would be positioned to contribute to the City's 2051 population and jobs forecasts as well as the minimum target densities for the Etobicoke North MTSA (i.e. a minimum of 150 residents and jobs per hectare for those served by GO Transit).

A mixed use redevelopment of the subject site would allow for a new public and private road network that does not exist on the subject site – adding to the existing roads secured in By-law 808-2018. Furthermore, a revitalized public realm and intersection of REXDALE Boulevard and Islington Avenue will be achieved through the conditions of By-law 808-2018.

In considering the mitigation of existing land use conflicts, the non-residential uses to the west of the subject site do not appear intensive in nature as they are comprised primarily of distribution, retail, and office use. Further, the submitted Land Use Compatibility Study prepared by SLR has indicated that adverse air quality impacts from surrounding industrial sources are not anticipated.

When considering the long-term capability of the subject site to accommodate more intensive employment uses adjacent to existing *Apartment Neighbourhoods* to the north and *Neighbourhoods* to the east, it is our opinion that these industrial uses would be less compatible with the current and future development potential at the intersection of Islington Avenue and Rexdale Boulevard. Furthermore, as these lands were removed from PSEZ, it is not anticipated they will be required to meet the long-term employment forecasts of the City.

In summary, it is our opinion that the proposed conversion would facilitate a compatible and complementary mix of uses on the subject site that would not result in any negative impacts on the existing employment uses to the west. The redesignation of the southern portion of the site to *Mixed Use Areas* would allow for increased residential while the northern portions would support increased employment densities, including a net gain in jobs on the subject site.

With respect to the conversion **Policy 2.2.4.17(b) and (c)**, the subject site is currently occupied by a food distribution centre, small scale office uses and a printing operation, while the northern portion of the subject site remains vacant. As such, these uses are not a significant generator of jobs. The redesignation to *Mixed Use Areas* would not only allow for the introduction of residential uses, but also create an opportunity to further intensify the subject site with employment uses, such as the introduction of new office space. By-law 808-2018 prescribes minimum gross floor areas for non-residential uses which can be further complimented by the redevelopment of the subject site – particularly new office buildings on the east portion of the subject site at 2250 Islington Avenue.

Higher density forms of residential and employment uses, such as office, would be well-suited to this location given the frontages on two Major Arterial Roads, visual access to Highway 401 as well as access to existing transit and higher order transit.

As noted in the urbanMetrics Study, the proposed development concept for the subject lands will accommodate more jobs than the existing buildings can currently accommodate, while also better serving the surrounding community (i.e., both on and off site).

With respect to the conversion **Policies 2.2.4.17(d)(1 – 6)**, which pertain to land use compatibility between sensitive land uses and non-sensitive employment uses, the lands to the west side of the subject are not occupied by heavy or intensive industrial uses that may pose significant air quality or noise concerns. These uses predominantly consist of transportation and distribution, office space and large-scale retail. The subject site is also granted significant separation (approx. 470+ metres) from heavier industrial uses further to the west of Kipling Avenue.

As per the findings of SLR Consulting's Land Use Compatibility Study, adverse air quality impacts from surrounding industrial sources are not anticipated. However, detailed quantitative assessments are recommended for the Islington Printing and Toronto Hydro facilities. These assessments are typically required during subsequent portions of the

Planning process (zoning by-law amendments or site plan approval applications) to fully identify potential impacts and any required mitigation measures. The extent and location of air quality or noise mitigation measures and warning clause requirements can be appropriately determined as part of future Planning application.

While consideration of noise and air quality impacts would be considered at a detailed level at the development stage, the surrounding uses do not appear to be of a type that would result in any undue impacts that would result in incompatibility of uses. Furthermore, there are already existing residential developments along the north side of Rexdale Boulevard and east of Islington Avenue.

With respect to the conversion **Policy 2.2.4.17(d)(7)**, the use of the subject site as a mixed use development that includes residential uses, would not reduce or eliminate the visibility or accessibility of the surrounding employment lands compared to how the subject site functions today as a low-rise warehousing facility and printing operation.

In our opinion, a conversion and subsequent redevelopment would enhance the visibility of any future employment uses provided on the subject site by utilizing prime frontage along Islington Avenue, Rexdale Boulevard and visible from Highway 401.

The current employment uses as well as surface parking, would be better optimized with a higher density form of development, activating the two frontages and future north-south street (Bergamot Avenue), whilst providing greater potential for employment as part of a mixed use development.

With respect to the conversion **Policy 2.2.4.17(d)(8)**, given the intensity of the surrounding employment uses to the west, as well as their access being physically separate from the subject site, it is not anticipated that a higher density form of mixed use development would negatively impact the functioning of that employment area or transportation network. The redevelopment of the subject site would continue to support a frontage and two accesses from Rexdale Boulevard (as shown on Schedule A on By-law 808-2018), a Major Arterial Road, as well as future accesses throughout the subject site from a future Bergamot Avenue extension southbound.

It should also be noted that this quadrant of *General Employment Areas* is isolated from the broader PSEZ Zone by existing physical barriers such as the Hydro corridor to the west and a GO corridor to the south. As such, it is not optimally connected with the broader network of industrial activities in this region of the City.

A detailed traffic study would be prepared in support of any future application to redevelop the subject site.

With respect to the conversion **Policy 2.2.4.17(d)(9)**, as the subject site is no longer identified as a PSEZ and is designated General Employment Areas, it no longer represents a strategic or key area of employment uses. The subject site is presently developed with two low-rise buildings containing a mix of distribution, printing and small-scale office uses, inclusive of surface parking and loading areas. The proposed Concept Plan would result in an increase of jobs on site as part of an overall mixed use development.

With respect to the conversion **Policy 2.2.4.17(d)(10)**, the subject site is comprised of distribution uses, small-scale office, and printing uses, which do not accommodate a unique or specific type of employment use that would cluster together. As 60% of the subject site is remaining as *General Employment Areas*, the proposed Concept Plan does not preclude the retention of similar uses on the site, subject to the proper zoning conditions, and will pursue more intensive forms of employment such as office space, that would generate an overall net-gain for jobs. Therefore, the requested conversion would not adversely impact the ability to provide opportunities for clustering of similar or related employment uses.

With respect to the conversion **Policy 2.2.4.17(d)(11)**, and as noted in Urban Metrics Report, given the magnitude of the employment areas extending across this part of Toronto and in particular further west of the site, a range of parcel sizes existing within the cluster of Employment Areas in this area already prevail. The conversion of the subject site—in and of itself—would not affect the provision of these parcels.

More intensive forms of industrial activities such as manufacturing and warehousing that typically require larger tracts of land would be plausible on this site, however, as these uses are currently not being optimized on the current site, a different land use framework may be more suitable in this location.

With respect to the conversion **Policy 2.2.4.17(e)**, the subject site is located within an area well served by existing transportation, water, and sewer infrastructure. Any future development application would include technical studies including a Transportation Study, Functional Servicing Study, Stormwater Management Study, and Hydrogeological Study which will confirm that the existing and planned infrastructure can accommodate the proposed conversion. However, should the City require any additional studies in support of this conversion, they will be provided upon request.

It should also be acknowledged that there have been municipal infrastructure improvements along Rexdale Boulevard which have future proofed the subject site for increased density.

With respect to the conversion **Policy 2.2.4.17(f)**, the subject site is located along the Islington Avenue and Rexdale Boulevard corridors which in this vicinity consist of low-rise mixed use retail and commercial buildings, apartments, low-rise multi-unit dwellings as well as single and semi-detached dwellings. These residential uses are complimented by a range of community services and facilities to support residents. Within 260 metres to the north of the subject site is Rexlington Park which contains a full-size baseball diamond, children's playgrounds, and a splash pad.

To the southeast of the subject site, approximately 150 metres walking distance, is Pine Point Park that supports multiple tennis courts, a basketball court, an outdoor swimming pool, and ice rink and full-sized soccer field. East of Pine Point Park is the Humber River Recreational Trail that continues south eventually linking into the Martin Goodman Trail along Lake Ontario.

In terms of local schools, Elmlea Junior School, St. Stephen Catholic School and The Elms Junior Middle School are located approximately 430, 830 and 910 metres northeast of the subject site.

A detailed Community Services and Facilities Study would be completed by Bousfields Inc. alongside a formal development application
<p>With respect to the conversion Policy 2.2.4.17(g), the subject site is currently occupied by distribution uses which do rely upon strategic transportation infrastructure such as highways to function but will likely be demolished to facilitate redevelopment. Given that the adjacent employment uses to the west also require transportation infrastructure, however they utilize a physically separated access for their facilities, it is not anticipated that the redevelopment of the subject site will impact these ongoing operations.</p> <p>The subject site's location is more conducive to a mixed use form of intensification due to its location along mixed use Major Arterial Roads, its proximity to existing transit routes and location within a major transit station area as defined by the Growth Plan. In this regard, the proposed Concept Plan which supports mixed use intensification supplemented by new high density employment uses such as office and retail is warranted on the subject site.</p>
<p>With respect to the conversion Policy 2.2.4.17(h), the conversion of the existing uses to a greater form of mixed use intensification will help maintain a diverse economic base in the West-Humber Clairville neighbourhood and explore opportunities for new employment uses. The introduction of residential, together with retail, commercial and office space as part of a Complete Community could generate a greater number of jobs compared to those generated on-site today. Discussion for a potential site-specific policy to ensure a certain number of jobs are maintained on the subject site remain open as well.</p>
<p>With respect to the conversion Policy 2.2.4.17(i), there are no cross-jurisdictional issues to be considered for the subject site.</p>

Conclusion

In our opinion, the subject site and proposed Concept Plan represents an excellent opportunity to provide mixed use intensification, consisting of residential, retail, commercial and office uses that can support a Complete Community. The subject site is located within a *Strategic Growth Area* as per the Growth Plan and has access to existing transit routes and is located within a *Major Transit Station Area*. Furthermore, this quadrant of *General Employment Areas* is isolated by existing physical barriers such as a Hydro corridor to the west and GO corridor to the south, making it an opportune area to establish a new land use framework for future growth.

As southern portions of the subject site are advantageously situated near the Etobicoke North GO Station, it is appropriate to prepare these lands to support a broader mix of uses through a more intense built form, thereby providing additional jobs and optimizing transit infrastructure.

Based on the policies set out in the 2020 PPS, the 2019 Growth Plan, and the City of Toronto Official Plan, it is our opinion that the conversion request satisfies the policy criteria to redesignate the portions of the subject site from *General Employment Areas* to *Mixed Use Areas* while maintaining the intent of By-law 808-2018 for the northern half of the site. The proposed conversion offers an opportunity to create a new

Complete Community, supportive of residential, retail and office uses that can evolve around the Etobicoke North GO Station.

We look forward to further discussion with staff in relation to any further required information to support this request, as well as to discuss specific language for a potential site-specific policy as it relates to the proposed use of the subject site.

If there are any questions with respect to this submission, please do not hesitate to contact the undersigned at 416-947-9744.

Yours truly,
Bousfields Inc.



Tony Volpentesta, MCIP, RPP.

cc: John McGovern, Rice Group
Jenny Stark, Rice Group
Michael Mendes, Rice Group

APPENDIX B

**Ministry of
Municipal Affairs
and Housing**

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**Ministère des
Affaires municipales
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December 20, 2019

Ira Kagan
Kagan Shastri LLP

Dear Ira Kagan:

I am writing to you as the representative of the RCG Islington 401 GP Inc. (Rice Commercial Group) to provide notification of changes to Ontario's provincially significant employment zone mapping. I would like to thank you for your interest in the zones and taking the time to submit your request for changes.

As you know, earlier this year our government introduced *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* as part of the **More Homes, More Choice: Ontario's Housing Supply Action Plan** to increase housing supply, create more jobs, attract business investments and better align our infrastructure. An important change in *A Place to Grow* was the inclusion of policies that give municipalities enhanced flexibility to change the use of lands from employment to other uses, while making sure key employment areas are protected for the longer term. To do this, the province introduced provincially significant employment zones as economic development tools that would require provincial approval for employment area conversions within the zone.

In May 2019, a revised map of provincially significant employment zones for the Greater Golden Horseshoe was released that addressed minor technical changes in the proposed mapping and clarified that provincially significant employment zones can include mixed use areas and do not change existing zoning. At that time, we committed to continuing our review of the mapping based on requests for reconsideration of lands within and outside of existing provincially significant employment zones as well as requests to add new zones.

Following a review of your requests and those from municipalities, businesses, landowners, non-governmental organizations, and industry associations, my ministry has adjusted some of the zone boundaries. Updated mapping is posted [online](#).

Concerning requests for potential new zones, the ministry continues to review these submissions. Additionally, in the new year, we will consider how provincially significant employment zones can support economic investment and growth over the longer term, including how the identification of zones can promote job creation and economic development throughout the province of Ontario. As such, we will be consulting further to obtain feedback on the potential long-term economic functions of these zones, which may result in further changes to the framework.

Should you or your staff have any questions about *A Place to Grow*, the policy framework for provincially significant employment zones, or the zones themselves, please feel free to contact us via growthplanning@ontario.ca.

Thank you for your ongoing commitment to strengthening the quality of life and the economic growth of your community and the province of Ontario.

Sincerely,



Steve Clark
Minister of Municipal Affairs and Housing

c: Stephen Hamilton
Senior Policy Advisor
Office of the Honourable Steve Clark
Minister of Municipal Affairs and Housing

Kate Manson-Smith
Deputy Minister
Ministry of Municipal Affairs and Housing

Cordelia Clarke Julien
Assistant Deputy Minister, Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing