



PLANNING
URBAN DESIGN
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January 18, 2024

Alejandra Perdomo
Municipal Services Office - Central Ontario
Ministry of Municipal Affairs & Housing
Province of Ontario
777 Bay Street, 16th floor
Toronto, Ontario
M7A 2J3

Dear Ms. Perdomo:

**RE: SUBMISSION ON OPA 644 – ERO #019-7441; MINISTRY #20-OP-232096
1100 O'CONNOR DRIVE, TORONTO
OUR FILE: 07132DZ-7**

On behalf of Stephen-Mitchell Realty Limited and Ledbrow Investments Limited under the direction of their agent, SmartCentres, please accept this submission regarding the review by the Province of the City of Toronto's Official Plan Amendment 644 ("OPA 644") respecting the employment conversion of 1100 O'Connor Drive in Toronto (hereinafter the "Subject Lands") and shown below on **Figure 1. *We are requesting designation of the lands from General Employment Area to Mixed Use Areas.***

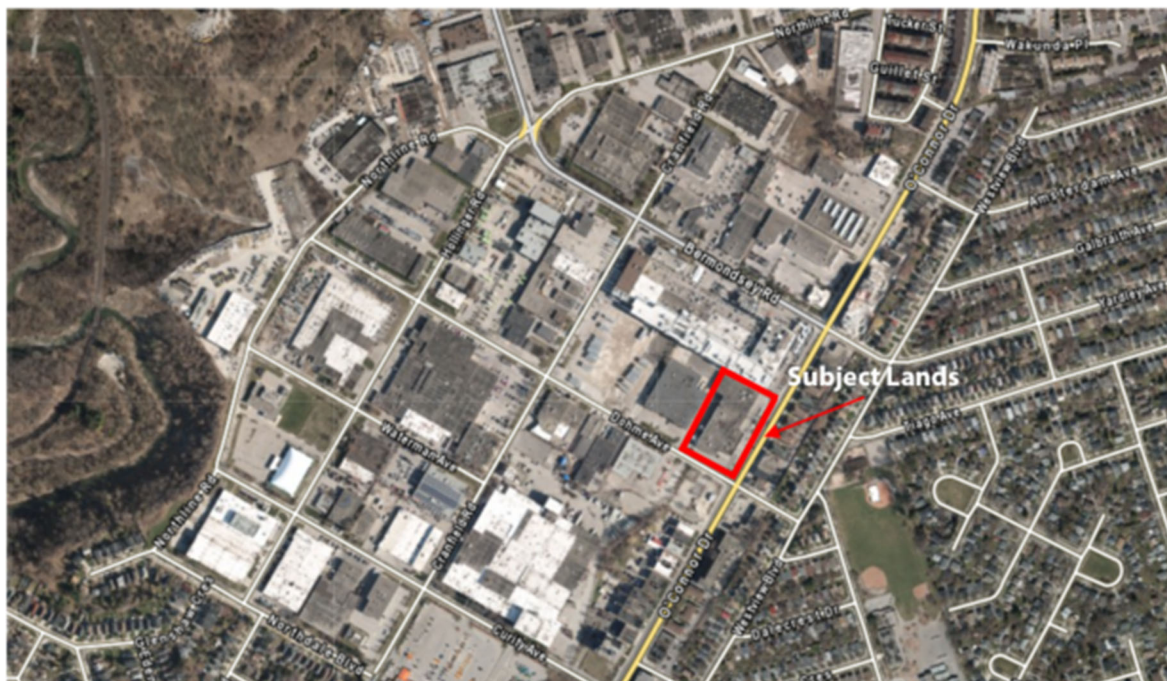


Figure 1 – Location of the Subject Lands

History of Request & The Proposal

On August 3, 2021, a request was made to the City of Toronto to redesignate the Subject Lands from General Employment Area to permit a mixed use development to occur. This request was supported by a Planning Justification, Traffic Impact Assessment and a Compatibility Study which are provided with this submission to the Province.

The proposal for conversion envisions the Subject Lands being redeveloped with a mix of uses including an eight storey retirement residence facility with ground floor retail and service commercial uses and a four storey non-residential mixed use building containing retail, service commercial and office space (**Figures 2 and 3**). The conversion would apply to half (0.5 ha) of the 1.0 ha parcel.



Figure 2 – Demonstration Plan for a Possible Mid Rise Retirement Residence and Commercial Building



Figure 3 – Conceptual Massing of the Possible Mid Rise Retirement Residence and Commercial Building

The existing non-residential floor area would be maintained through the redevelopment of the Subject Lands, with an equivalent or greater amount of commercial and office space included within the proposed mixed use proposal. Private amenity space between the two buildings will be shared and will activate and animate the space between the two buildings. At grade retail and service commercial space will be located along the Dohme Avenue and O'Connor Drive street frontages, creating a pedestrian friendly streetscape.

With the over 64 age cohort expected to increase by 1.9 million persons over the next 25 years to over 22% of the population, there is a likewise increasing need for seniors housing¹. Furthermore over the next 20 years, the 75+ segment of the Canadian population is expected to grow by almost 4.0% per year and will account for 13.5% of the total population by 2040. The National retirement home supply reported by CMHC for 2020 was 262,338 spaces, or ~10.9 spaces per 1,000 seniors aged 75+. In order to maintain the current level of seniors housing inventory per capita, the total supply will need to more than double over the next 20 years just to maintain equilibrium. In addition to the new supply required just to maintain equilibrium, it's worth noting that a portion of the existing seniors housing inventory will become obsolete and will need to be replaced, adding further to the projected need for additional seniors housing. Further, fiscal constraints will likely limit the government's ability to finance the anticipated growth in the long-term care system, let alone being able to meet any of the seniors housing needs, so this demand will need to be met by the private sector, by the likes of SmartCentres and Revera, as is proposed on the Subject Lands. Given the above, the proposed retirement residence facility would help meet the need for seniors housing, which is increasingly become apparent in the City and the Province. The proposed retirement residence facility would help fulfill Provincial Policy mandates accordingly.

Decision of Council

On June 18, 2023 the City of Toronto Council adopted OPA 644. Despite the above substantial city building proposal by our client, Council did not support the conversion request through the OPA 644. Our client sees this as a significant failure by the City to recognize the redevelopment potential of the Subject Lands which would provide significant amounts of housing as well as employment opportunities in a rejuvenated and revitalized urban format.

Given the deepening housing crisis and the substantial planning merit of the proposal, our client has decided to address the Minister in the context of his consideration of OPA 644 and seek the Minister's modification requested in this submission.

Request of the Province

The delays resulting from this ongoing process are unnecessary. On behalf of our client, we are requesting that the Province utilize its powers as the approval authority to modify OPA 644 to grant the conversion request for 1100 O'Connor Drive. To this effect we request the following modifications:

¹ Province of Ontario, [2020-2046 Population Projections](https://www.ontario.ca/govt/population-projections) [Ontario population projections](https://www.ontario.ca/govt/population-projections) | [Ontario.ca](https://www.ontario.ca/govt/population-projections)

1. We request **removal of the Subject Lands from Employment Areas on Map 2** of the Official Plan as shown below.

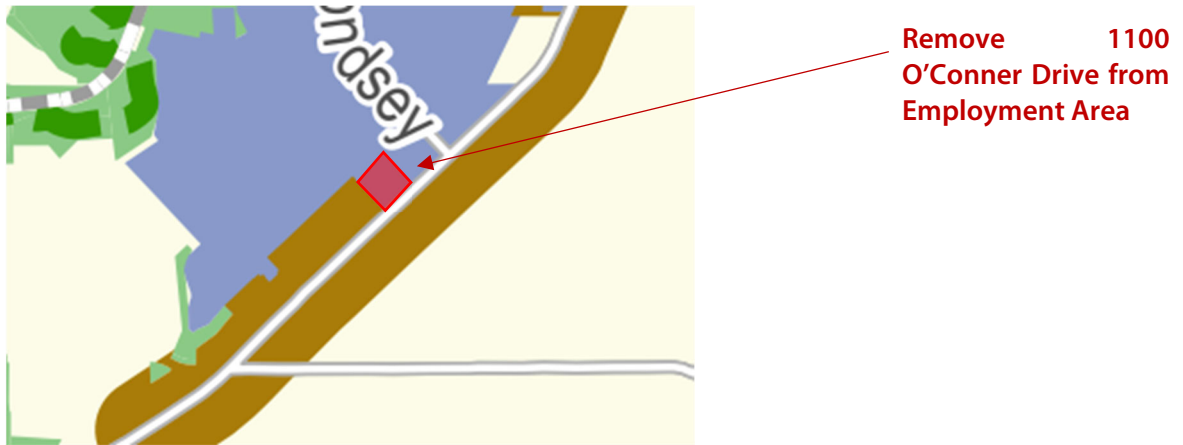


Figure 4 – Removal of Subject Lands from Employment Area as shown on Map 2 of the Official Plan

2. We request the Subject Lands be **designated Mixed Use Areas on Land Use Designation Map 20** (part of Tile Index Map 31 of Appendix 2 of OPA 644) as shown below.



Figure 5 – Designate Subject Lands from General Employment Area to Mixed Use Areas as shown on excerpt from Official Plan Land Use Designation Map 20 (Tile Map 31 of OPA 644, Appendix 2)

Overall Conclusion

The proposal envisioned for the Subject Lands, if converted, is one that will contribute to and better serve the surrounding residential neighbourhood than the existing condition while remaining compatible with the employment lands to the east and south. The proposed conversion is consistent with and conforms to Provincial Policy and structured around the optimization of existing municipal services, infrastructure and transit services.

The Subject Lands represents a situation where a conversion is appropriate, given that the existing use of the Subject Lands represents an underutilization of the Subject Lands in comparison to the proposed mixed use development that could occur through the conversion of the lands and also considering the marginal impact of the removal of 0.5 ha of the 1 ha Subject Lands would have on the City's supply of employment lands.

It is also important to identify that the current use of the Subject Lands is not for employment land employment uses, but rather for an existing retail / commercial plaza. ***We note that this request is in alignment with the proposed revisions to the Provincial Policy Statement / Growth Plan where retail areas will no longer be considered "areas of employment" and therefore not "conversions" thereto.*** The proposed redevelopment will allow for the more efficient use of the land and the optimization of infrastructure while maintaining the existing retail-commercial planned function through integration of these uses into an urban format.

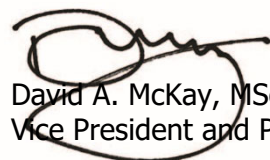
The proposed conversion of employment lands to a Mixed Use Areas designation meets the intent and purpose of the policies with respect to employment land conversions as outlined in the Growth Plan and the City of Toronto Official Plan and has been demonstrated as follows:

- The proposed development will provide much needed seniors housing in this area of the City and fulfill employment needs.
- The proposal for the Subject Lands is compatible with existing surrounding employment uses and represents the logical extension of the Mixed Use Area designation of the current lands south of the Subject Lands along the west side of O'Connor Drive (also considering the location of the Subject Lands on the edge of an Employment Area and directly along a major arterial road).
- The Urban Transportation Considerations Report by BA Group (Appendix C) confirms that the proposed conversion can be accommodated by the existing transportation system.
- The proposal, together with the mitigation measures considered for the development, will not affect the ability of surrounding facilities to comply with applicable Provincial and City of Toronto regulations, as identified in the RWDI Land Use Compatibility & Mitigation Study.
- The Subject Lands are fully serviced with water, wastewater and stormwater services that ensure the optimization and efficient use of existing municipal infrastructure for the proposed development.

Please feel free to contact us if you have any questions or wish to discuss in further detail.

Yours Truly,

MHBC



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

*cc: Client
Project Team*