

January 31, 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 653 – OPA 653 – ERO #019-7731; MINISTRY #20-OP-238506
155 CONSUMERS ROAD, TORONTO
OUR FILE: 21151K**

On behalf of Spotlight Developments, please accept this submission regarding the review by the Province of the City of Toronto's Official Plan Amendment 653 ("OPA 653") respecting the employment conversion of 155 Consumers Road Toronto (hereinafter the "Subject Lands") and shown below on **Figure 1**.

Requesting to redesignate the land use the Subject Lands from Employment to Mixed use.

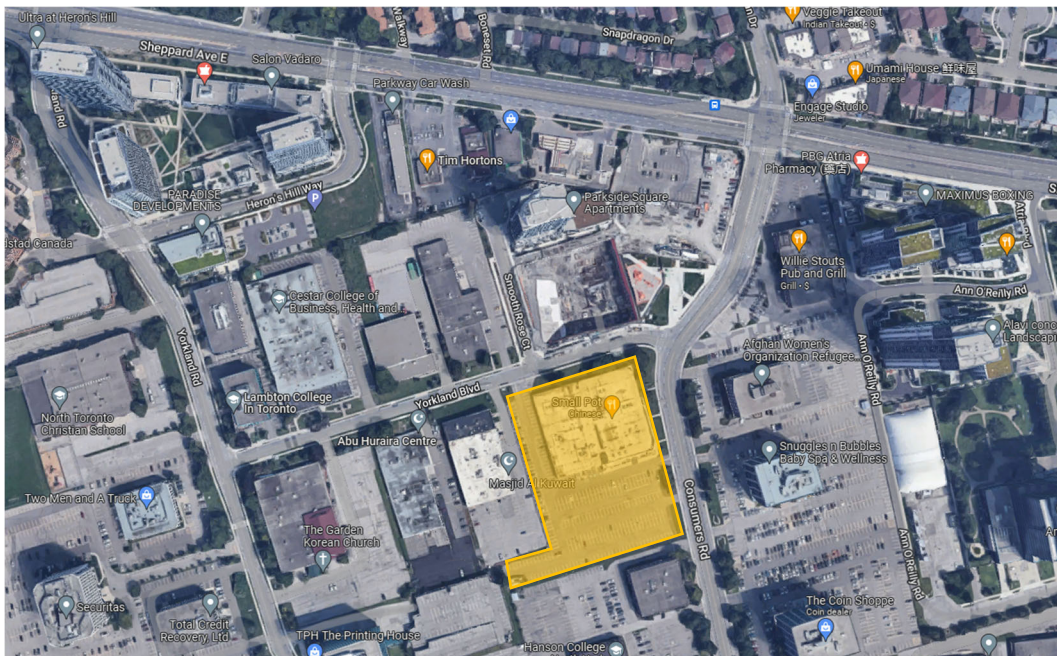


Figure 1: Subject Lands (in orange)

The Subject Lands (**Figure 1**) are approximately 1.6 ha (3.99 acres) in size with frontage on Consumers Road and Yorkland Boulevard. The Subject Lands are currently utilized for office, restaurant, and educational purposes.

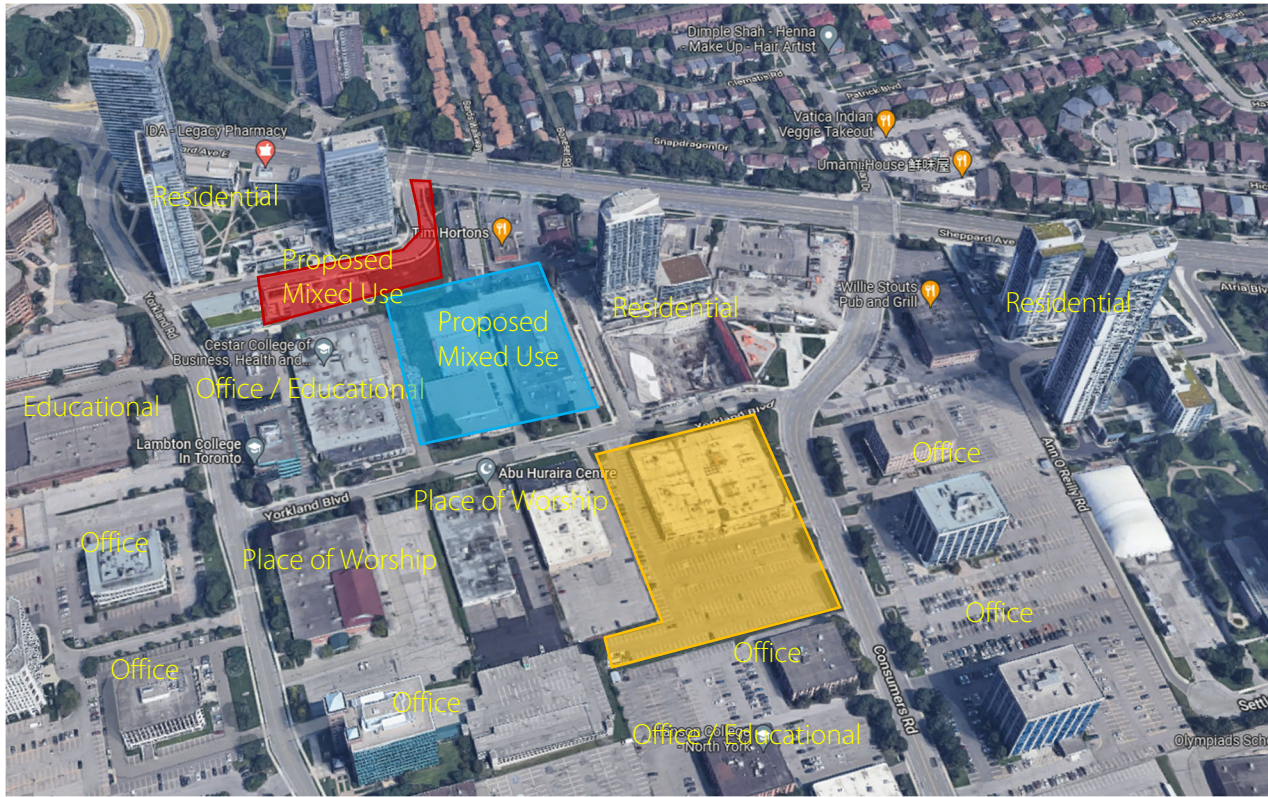


Figure 2: Bird's Eye View of the Subject Lands (in orange); Recent approved redesignation to *Mixed Use Areas* in red and requested in blue

The Subject Lands are located in the ConsumersNext Secondary Plan area, which includes an eclectic mix of land uses – residential / mixed use along Sheppard Avenue East; offices; educational establishments; places of worship; service commercial uses; automotive dealerships; and light manufacturing / warehouse uses. Land uses to the north include residential and park uses, along with a proposed mixed use (office and residential) proposal. To the immediate west are two major places of worship (Abu Huraira Centre and the Garden Korean Church), with educational (Lambton College in Toronto; Cestar College of Business, Health and Technology; North Toronto Christian School) and offices (Canadian Heart Research Centre; Paradise Developments; Colliers International) located further west. Offices (Onyx Guard Services; Investor Group), places of worship (Bodhi Meditation Centre; Carmel Logos Baptist Church) and educational uses (Hanson College) are located to the south. To the east, residential towers and several office buildings (including Amex Bank of Canada headquarters) exist.

In summary, the employment uses in immediate proximity to the Subject Lands are educational, office, or institutional in nature.

The Proposal

If granted, the proposed modification would permit the redevelopment of the Subject Lands for a mixture of residential, employment and service commercial uses through a conversion of employment lands. The mixed-use redevelopment would include medical facilities (offices, clinics), commercial offices and affordable and market housing.

Approximately 100,000 sq ft of commercial and medical offices are proposed, along with supportive commercial uses, including retail, restaurants and other service commercial uses would be provided at grade. It is anticipated that over 400 jobs will be accommodated in this floor space, a new increase of 338 jobs over that which exists today.

In addition to increasing employment on the Subject Lands, approximately 1,800 new housing units are proposed to be created of various unit sizes including provision for affordable housing units in accordance with Inclusionary Zoning policies when implemented by the City for this area. This increase in housing will assist the Province and City in responding to the widely known housing crisis.

Renderings of the proposed redevelopment are shown below in **Figures 3** and **4**.



Figure 3: Proposed Mixed Use Redevelopment of 155 Consumers Road



Figure 4: Proposed Mixed Use Redevelopment of 155 Consumers Road

The redevelopment would be phased, such that the employment uses would be developed before or concurrently with the residential components of the project, as outlined below.

Request of the Province

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



Figure 5 – Removal of Subject Lands from *Employment Areas* as shown on excerpt from OPA 653, Appendix 1: Map 2

2. We request the Subject Lands be **designated *Mixed Use Areas* on Land Use Designation Map 19** (part of Tile Index Map 13 of Appendix 2 of OPA 653) as shown below.

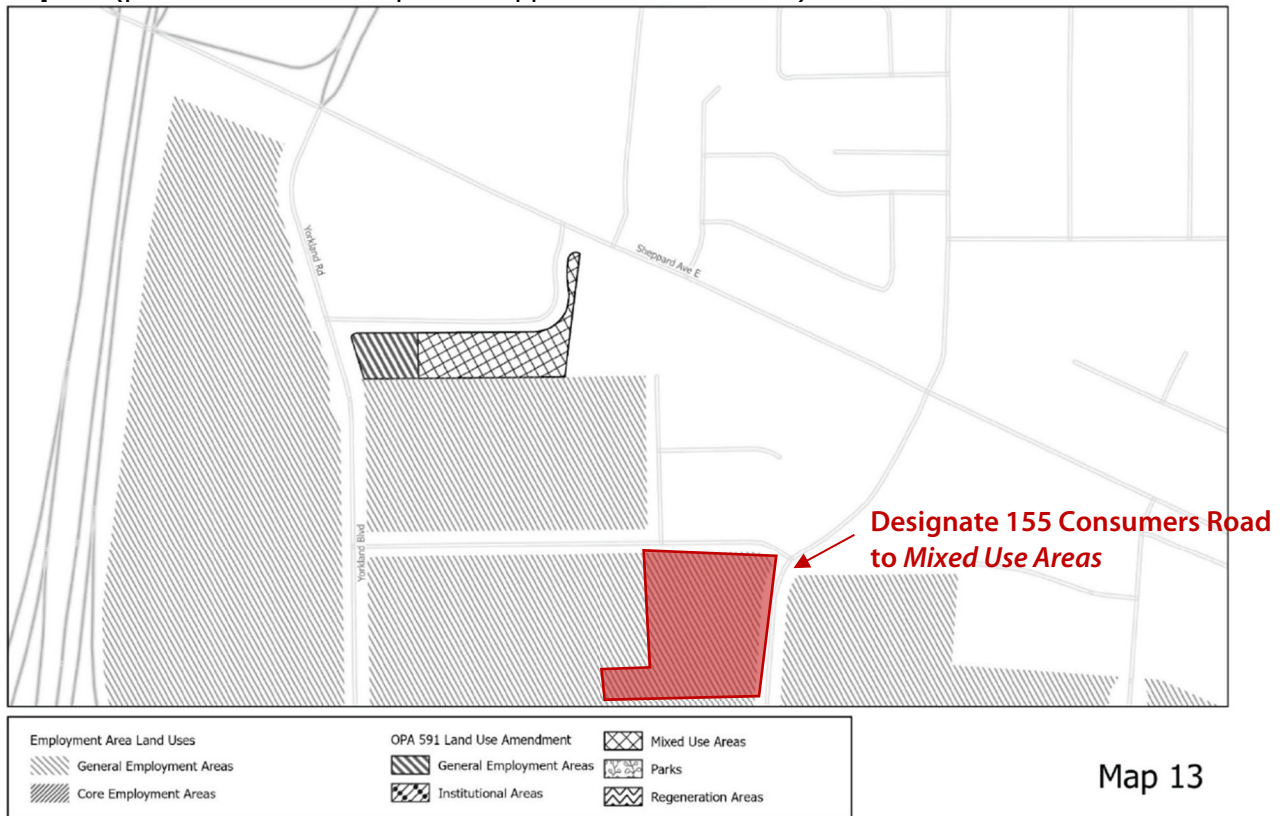
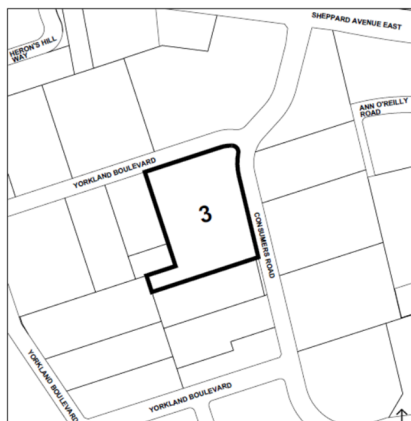


Figure 6 – Designate Subject Lands from General Employment Area to Mixed Use Area as shown on excerpt from Official Plan Land Use Designation Map 19 (Tile Map 13 of OPA 653, Appendix 2)

3. We request that Chapter 6, Secondary Plans, be amended as follows:
- A. Chapter 6, Section 38, ConsumersNext Secondary Plan is amended by adding Site and Specific Policy 3 for the lands known municipally in 2021 as 155 Consumers Road, as follows:

3. 155 Consumers Road



A mixed use development is permitted on the lands provided that:

- a) A minimum of 9,290 square metres of employment gross floor area of the total gross floor area across the entire lands will:
 - i) be developed and maintained concurrently with residential uses;
 - ii) be comprised of uses permitted in Core Employment Areas and General Employment Areas that are compatible with residential uses.
 - b) A minimum of 1,750 residential units will be permitted, with affordable housing units to be provided in accordance with the applicable Inclusionary Zoning Policy for this area of the City, all of which may be phased over time.
- B. Chapter 6, Section 38, ConsumersNext Secondary Plan Map 38-4, Potential Tall Building Locations and Maximum Densities is amended by adding a maximum permitted FSI of 11.0 calculated across the entire site on the lands known municipally in 2021 as 155 Consumers Road as shown on the map above as Site and Area Specific Policy 3.
- C. Chapter 6, Section 38, ConsumersNext Secondary Plan Map 38-5, Districts and Nodes Plan is amended by adding to the Sheppard and Victoria Park Corridor the lands known municipally in 2021 as 155 Consumers Road as shown on the map above as Site and Area Specific Policy 3.
- D. Chapter 6, Section 38, ConsumersNext Secondary Plan Map 38-6, Land Uses, is amended by adding Mixed Use Areas to the lands known municipally in 2021 as 155 Consumers Road as shown on the map above as Site and Area Specific Policy 3.

- E. Chapter 6, Section 38, ConsumersNext Secondary Plan Map 38-10, Potential Tall Building Locations and Maximum Heights is amended by adding Location with Potential Tall Building and a Maximum 160 metres tower permitted to the lands known municipally in 2021 as 155 Consumers Road as shown on the map above as Site and Area Specific Policy 3.

These modifications would implement the proposal as discussed above. They would ensure that the non-residential components are constructed prior to or concurrently with any residential development, ensuring that the lands remain as a source of significant employment. It is anticipated that mitigation of any potential undue adverse affects would be addressed in the detailed design stage in accordance with the policy of the Site and Area Specific Policy.

The proposed modifications to OPA 653 are appropriate, reasonable, represent good planning and are in the public interest.

Overall Conclusion

This proposal is in line with Provincial Policy and structured around the optimization of existing municipal services, infrastructure and transit services. The proposal contemplates a high-rise mixed use development that will provide office, retail / service commercial and medical employment opportunities. This will be combined with the provision of 1,800 residential units, include ownership and rental tenures.

It is acknowledged that the City is determined to preserve employment lands wherever possible. In this context, the Subject Lands represent a unique instance where a conversion to permit some residential uses is appropriate, given that the existing use of the Subject Lands represents an underutilization of the Subject Lands in comparison to the proposed high-rise mixed use development, and also considering that the employment potential of the them is enhanced not diminished by the proposal. Further, there is no removal of lands from the City's supply of employment lands (employment will still occur on the Subject Lands); merely the addition of a supply of badly needed housing.

In our opinion, the proposal and the modifications represent good planning and are in the public interest for the following reasons:

- The proposed conversion of employment lands to a land use designation which permits residential uses in addition to employment uses has addressed the Growth Plan and Toronto Official Plan conversion tests within the context of a MCR process.
- The Subject Lands are not located within a Provincially Significant Employment Zone which is where employment areas of Provincial interest are intended to be protected.
- The modification provides for much needed housing, including a substantial amount of affordable housing. Approximately 1,800 new residential units will be created through this proposal.
- While the conversion will permit residential uses within the *Mixed Use Area*, the SASP policies will ensure that the Subject Lands will continue to support economic development and help the City achieve its employment forecasts through the provision of 400 jobs, a net increase of 338 jobs

over what is accommodated on site today. It is not the type of conversion (i.e. provision of no employment) which the conversion policies of the Growth Plan were intended to prevent.

- The proposal for the Subject Lands is compatible and complementary with the surrounding eclectic mix of employment uses (retail, office, educational, institutional, service commercial). Where required, standard mitigation measures will be implemented to prevent or mitigate adverse effects on adjacent employment uses.
- 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.
- The proposed SASP policies are reasonable and appropriate.

In conclusion, the requested modification will achieve the twin planning objectives of providing badly needed housing, while also significantly increasing the number of jobs on the Subject Lands.

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

Thank you.

Yours Truly,

MHBC



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