

January 15, 2024

Hon. Paul Calandra
Minister of Municipal Affairs and Housing
777 Bay Street – 17th Floor
Toronto, ON M7A 2J3

**RE: ERO # 019-7441
1530-1536 Midland Avenue
Comments on City of Toronto Official Plan Amendment 644
Consideration for Employment Lands Conversion**

The Biglieri Group Ltd. (“TBG”) represents Nova Construction Company Ltd., the owner of 1.14 hectares of land municipally known as 1530-1536 Midland Avenue (“Subject Site” or “Site”). In 2021 TBG submitted a request for an Employment Land Conversion (“ELC”) on the Subject Site through the City of Toronto’s Municipal Comprehensive Review (“MCR”) process.

On behalf of Nova Construction Company Ltd., we are writing to request the Minister consider modifying OPA 644 to facilitate the proposed ELC.

SUMMARY OF MCR PROCESS

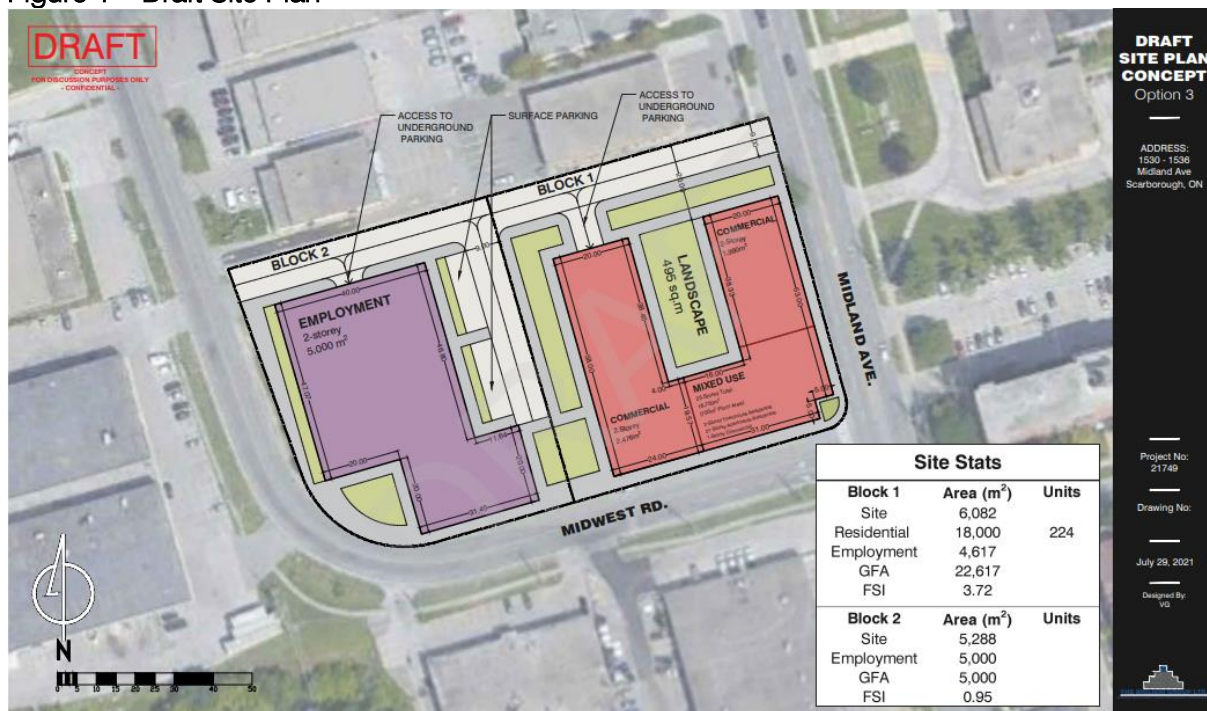
To date, the following work has been undertaken by the project team in support of the ELC request:

- August 3, 2021: Submission of ELC request to the City of Toronto. This included the following materials:
 - Cover Letter - The Biglieri Group Ltd. (July 2021);
 - Planning Rationale Report - The Biglieri Group Ltd. (July 2021);
 - Employment Area Impact Study – Urban Metrics Inc. (July 2021);
 - Land Use Compatibility/Mitigation Study - SONAIR Environmental Inc. (July 2021);
 - Preliminary Servicing and Stormwater Management (SWM) Memo - Crozier & Associates Consulting Engineers (July 2021).
- December 5, 2022: Response to Peer Review of Land Use Compatibility/Mitigation Study by RJ Burnside, provided by SONAIR Environmental Inc.
- January 4, 2023: TBG submission of response to concerns in Staff Report and Peer Review with supporting documentation.
- April 27, 2023: Correspondence to City of Toronto submitted in advance of May 17, 2023 Open House.
- June 1, 2023: Correspondence to City of Toronto and deputation in support of ELC submitted to the Planning and Housing Committee (PHC).

SUMMARY OF PROPOSED DEVELOPMENT

The ELC request proposes to re-designate Block 1 (the eastern portion of the Site) from “General Employment Area” to “Mixed Use Area” while Block 2 (the western portion of the Site) would be re-designated from “Core Employment Area” to “General Employment Area”. As such, the ELC does not request to remove the entire site from an Employment Area. The ELC will support a proposed development which includes a 25-storey mixed use building on Block 1 and a 2-storey employment building on Block 2. In total the proposal will provide for 224 rental units and 9,617m² of employment/commercial space, as indicated in the draft Site Plan Concept (Figure 1). Conversely, the Site currently houses approximately 5,100m² of employment GFA. The proposed development seeks to facilitate employment intensification on the Site and introduce a range of affordable housing types, built near higher-order transit and in close proximity to public services and community amenities.

Figure 1 – Draft Site Plan



SUMMARY OF PLANNING OPINION

It is TBG's opinion that the proposed ELC represents good planning, is consistent with the Provincial Policy Statement, conforms to the Growth Plan and should as a result be reconsidered:

- Employment Protection and Creation
 - The proposed development would generate **triple** the number of expected employment opportunities on the site, producing ~316 jobs in comparison to the ~108 jobs per existing permitted uses (per Urban Metrics).

- Staff were in receipt of this study, however, no comments were received with respect to the same and the increase in employment was not acknowledged.
- Affordable Housing
 - The applicant is committed to providing 100% rental housing (224 purpose-built rental apartment units) as well as a **minimum** of 5% affordable rental housing in support of stimulating the production of rental housing supply in Toronto.
 - Additionally, the Owner has existing working relationships with three non-profit housing groups, with whom he is consulting to determine the most effective options for provision of affordable housing on the Site.
- Land Use Compatibility and Transition
 - Mixed-use and residential land uses already occur directly east and south of the Site, comprising of high-rise residential apartment buildings, townhouses, single-detached dwellings, and mid-rise apartment buildings.
 - The Land Use Compatibility Study undertaken concluded that the proposed ELC is not expected to adversely impact the operations of neighbouring employment land uses, nor be impacted by these uses.

CLOSING

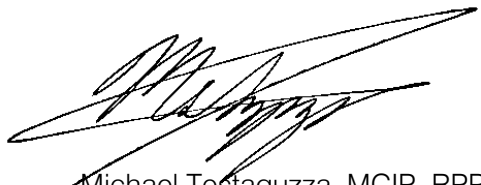
This Site represents a logical area for employment lands conversion as Mixed-use and Residential land uses already occur directly east and south of the Site. The Site therefore proposes to provide for an on-site transition between these existing uses and the existing employment area to the north/west. Furthermore, the proposal supports the development of a complete community that affords residents the opportunity to live close to work and community existing amenities.

For your benefit in reviewing this request, all materials submitted to the City and those received from the City throughout the ELC review process have been provided as an appendix (**Appendix A**) to this Letter.

It remains TBG's professional planning opinion that the proposed ELC represents good planning and is appropriate for approval. Should you have any questions, or require further clarity, do not hesitate to contact the undersigned.

Respectfully Submitted,

THE BIGLIERI GROUP LTD.



Michael Testaguzza, MCIP, RPP
Partner



Shilpi Saraf-Uiterlinden, M.E.S., Pl.
Planner

APPENDIX A

August 3, 2021

Strategic Initiatives, Policy & Analysis, City Planning Division

City of Toronto

Metro Hall, 55 John Street, 22nd Floor

Toronto, Ontario, M5V 3C6

Attention: Kerri A. Voumvakis, Director and Jeffrey Cantos, Project Manager

**RE: Requests for Employment Area Conversion
 1530 – 1536 Midland Avenue, Toronto
 TBG Project No. 21749**

The Biglieri Group Ltd. (“TBG”) represents Nova Construction Company Ltd., the owner of 1.14 hectares of land located at the northwest corner of Midland Avenue and Midwest Road in the City of Toronto, municipally known as 1530 – 1536 Midland Avenue and referred to here-after as “the Subject Site” or “Site”.

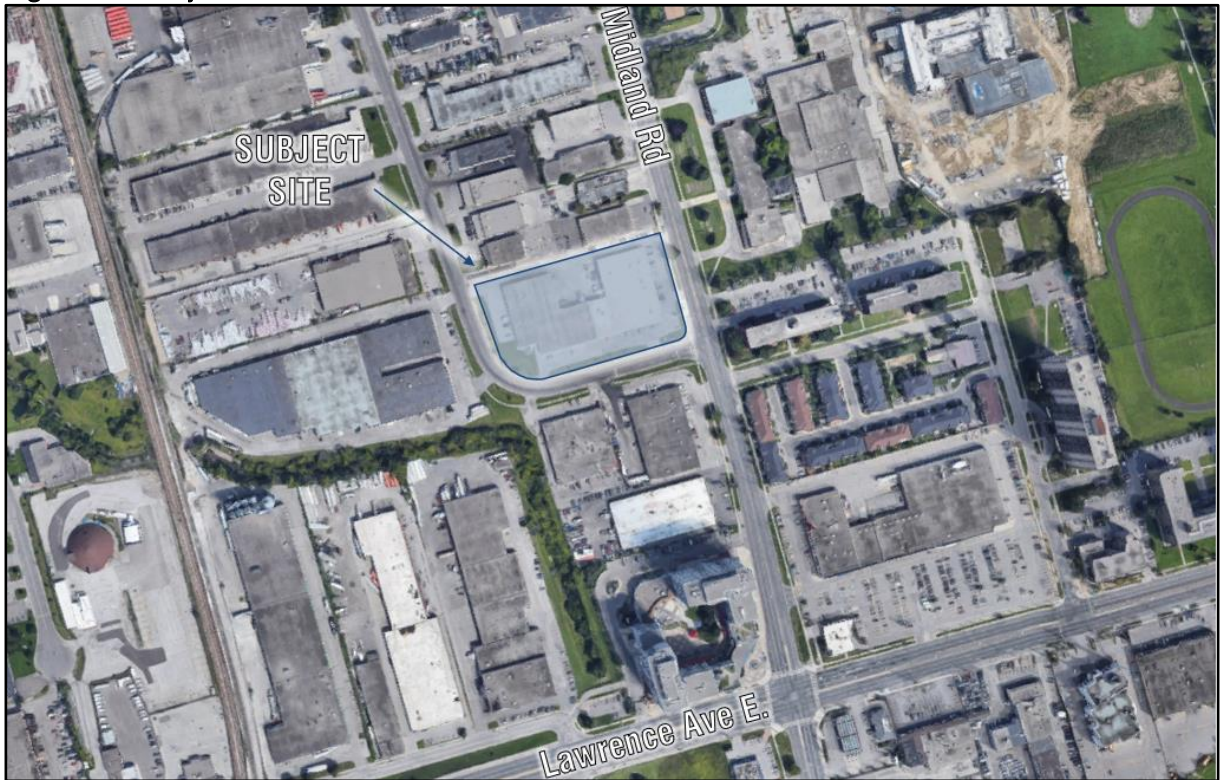
Nova Construction Company Ltd. is seeking approval of an Employment Conversion at the Subject Site, thus we have prepared a planning rationale report in addition to the coordination of supporting materials to support the conversion request. The submitted materials will provide an overview of the proposed Concept Plan for the Subject Site, a review of existing Provincial and City policies affecting the Subject Site, and provide an analysis of the proposed Concept Plan in consideration of the Conversion and Removal Policies for Employment Areas as outlined in the City of Toronto Official Plan.

SITE & SURROUNDING AREA

The Subject Site currently contains a one-storey commercial industrial building and is situated in the Dorset Park Employment Area bound by Midland Avenue, Midwest Road, Kennedy Road, and Highway 401. The surrounding area of the Subject Site is host to several community services and facilities, including police/fire services, places of worship, and parks and open spaces. The Subject Site is located approximately 290m north of Lawrence Avenue East which is a major east-west arterial road that extends from the eastern limits of the City of Toronto in the east, through Scarborough, and terminates at the Royal York Road in Etobicoke.

The Subject Site has 72.18m of frontage on Midland Avenue, which is a major north-south arterial road which extends northly from Kingston Road to Steeles Avenue East. Midland Avenue connects the low-rise, low-density residential neighbourhood at the south end of this road network to Highway 401 and the City of Markham at the north end. Additionally, the Site has 100.84m of frontage along Midwest Road (south property line) and 53.21m of frontage along the west property line formed by Midwest Road (**Figure 1**).

Figure 1 – Subject Site Location



PROPOSAL

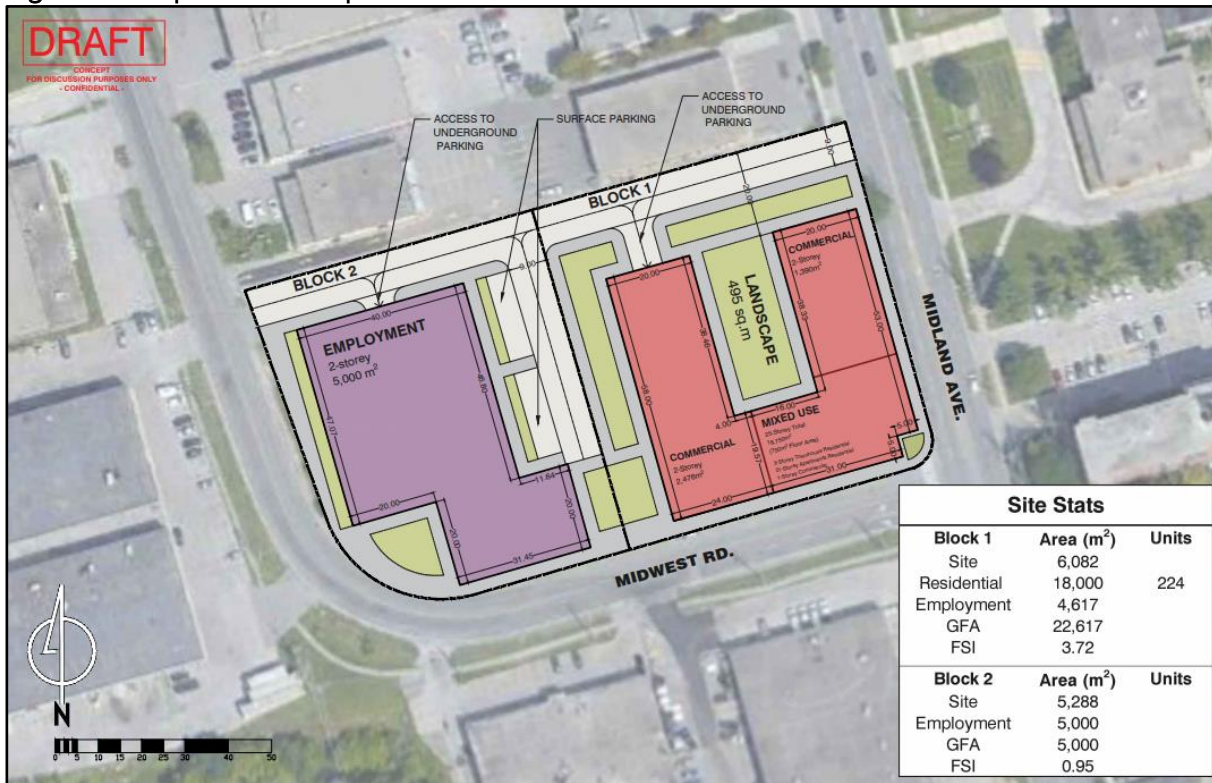
The current proposal is to re-designate the eastern portion of the Subject Site as *Mixed Use* while the western portion of the site would be re-designated to *General Employment Area*. This would facilitate mixed-use high-density development of the Subject Site; however special policies and design features would be incorporated such that the Site acts as a transitional space between the existing employment area to the north/west and the sensitive land uses to the east/south.

In addition to providing for an appropriate transition between uses, the proposal will also allow for employment intensification on the Subject Site. This will be facilitated by providing for compatible commercial uses within the mixed-use portions of the site including offices, professional offices, and retail uses, within the mixed-use building. No stand-alone residential buildings are proposed.

The proposed Concept Plan provides for 9,617m² of space for employment opportunities inclusive of 4,617m² of space for commercial uses within Block 1 and 5,000m² of space for tech industrial uses within Block 2. In addition to this, approximately 224 residential units are proposed inclusive of both townhouse and apartment units that will introduce affordable living, which will offer opportunities to employees for living near their place of work.

The studies completed in support of the proposal confirm that the scale of the proposed development is appropriate based on market conditions and would produce approximately 217 jobs. This number of employment opportunities more than doubles the expected job yield of the site when compared to existing use permissions (108 jobs).

Figure 2 –Proposed Concept Plan



SUPPORTING DOCUMENTS

Please find enclosed the following materials, in addition to this Cover Letter, in support of the Employment Conversion request as outlined above:

- **Conceptual Site Plan** - The Biglieri Group Ltd. (July 2021);
- **Planning Rationale Report** -The Biglieri Group Ltd. (July 2021);
- **Employment Area Impact Study** - urbanMetrics Inc. (July 2021);
- **Land Use Compatibility/Mitigation Study** - SONAIR Environmental Inc. (July 2021) and,
- **Preliminary Servicing and Stormwater Management (SWM) Memo** - Crozier & Associates Consulting Engineers (July 2021).

We trust you will find all in order, however if you have any questions or require additional information, please do not hesitate to contact the undersigned.

Respectfully,
THE BIGLIERI GROUP LTD.

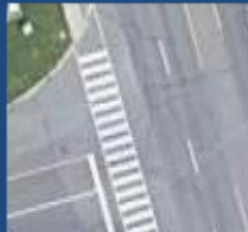
Manny Zanders, B.A.
Planner

Cc: Lorne Shiff, Nova Construction Company Ltd

PLANNING RATIONALE REPORT

Employment Conversion Request

1530 – 1536 Midland Avenue, Toronto
Prepared for: Nova Construction Company Ltd.



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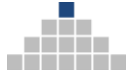
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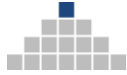
1.0

INTRODUCTION

The Biglieri Group Ltd. (“TBG”) represents Nova Construction Company Ltd., the owners of 1530 – 1536 Midland Avenue, Toronto (the “Subject Site” or “Site”). Currently the Subject Site is primarily surrounded by commercial, industrial, and residential uses.

This Planning Rationale Report supports a request for conversion of Employment Areas designations for the Subject Site which requires amendment of the City of Toronto Official Plan. This request is facilitated, as required, through the City’s current Municipal Comprehensive Review (the “MCR”) Process. The request proposes to convert the land use designation of the Subject Site from *Core Employment Area* to *General Employment Area* on the west half of the site and from *General Employment Area* to *Mixed Use Area* on the east half of the Site. This would in turn facilitate mixed-use high-density development of the Subject Site; however special policies and site design features would be incorporated such that the Subject Site acts as a transition area between existing *Neighbourhoods*, *Apartment Neighbourhoods*, and *Mixed Use Areas* and the ‘Dorset Park Employment Area’.

As an input to the regional MCR process, this Report will provide an overview of the Conceptual Development Plan (CDP) for the Subject Site, a review of existing Provincial and City policies affecting the Subject Site, and provide an analysis of the Conceptual Development Plan in consideration of the in-effect conversion policies as outlined in the City of Toronto Official Plan (2019) and the provincial policy framework.



2.0

SITE LOCATION AND CONTEXT

2.1 The Subject Site

The Subject Site is currently host to a one-storey commercial industrial building. The Subject Site is located approximately 290m north of Lawrence Avenue East and directly fronts on the west side of Midland Avenue in the Dorset Park area of the City of Toronto (**Figure 1**). The Subject Site has three frontages with 72.18m of frontage on Midland Avenue, an arterial road that runs north from Lawrence Avenue E, and 100.84m of frontage along the south property line and 53.21m of frontage along the west property line, both of which front onto Midwest Road (**Figure 2**).

2.2 Surrounding Area

The Subject Site is situated in the 'Dorset Park Employment Area' bound by Midland Avenue, Midwest Road, Kennedy Road, and Highway 401.

North of the Subject Site are employment uses that consist of 1- to 2-storey buildings that support a bakery, auto repair shops, vehicle parts retail stores, a place of worship, home renovation supply stores, and Toronto Fire Station No. 232. (See **Figure 3**).

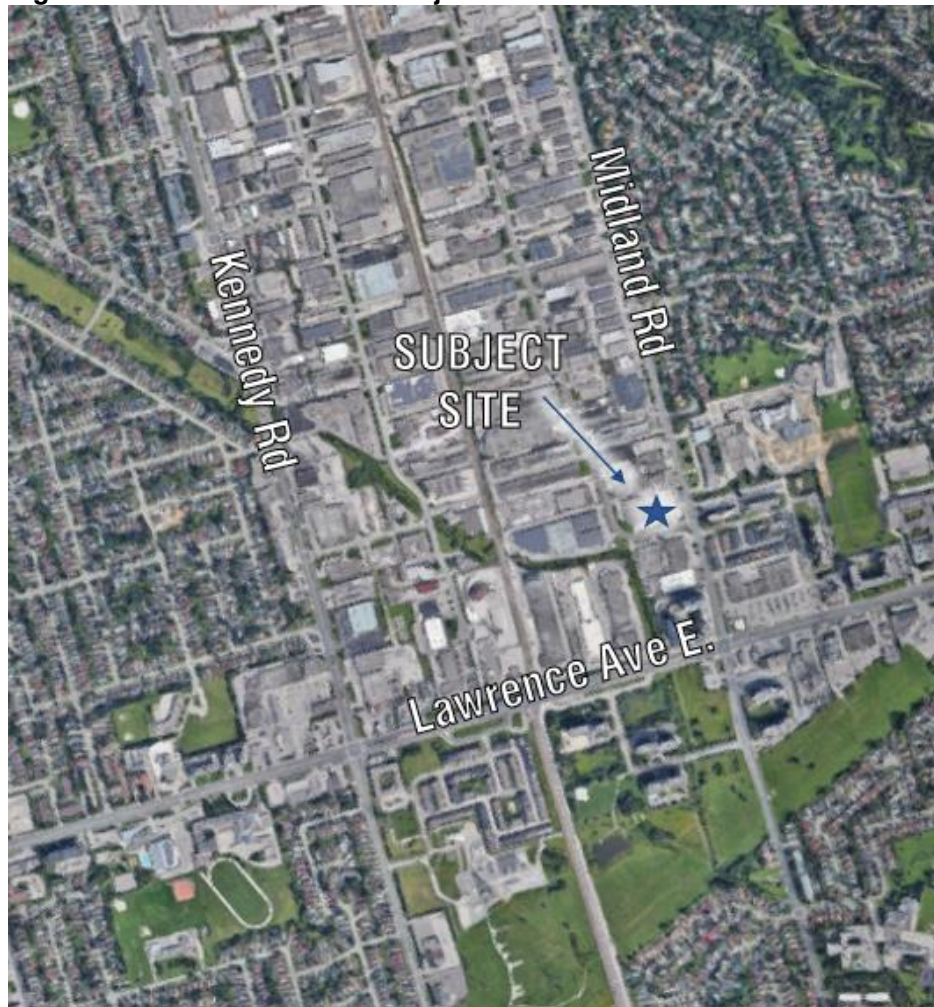
South of the Subject Site is a mixed-use area that supports commercial and mixed-use buildings. Directly south of the Subject Site on the south side of Midwest Road, are two (2) 1-storey commercial buildings that support furniture, home appliance, and flooring retail stores; an aquarium hobby store; and two automotive part retail stores. Further beyond is a mixed-use development that supports two (2) high-rise residential apartment buildings with retail uses at grade, as well as Northern College (See **Figure 4**).

East of the Subject Site on the opposite side of Midland Avenue, is an established residential neighbourhood that consists of townhouses, single-detached dwellings, and apartment buildings. Directly east of the Subject Site is a new residential development (City File No. 13 218652 ESC 37 OZ / 19 242195 ESC 21 SA) currently under construction that consists of townhouses, semi-detached and single detached dwellings for a total of 95 residential units. Also to the southeast are existing apartment buildings seven (7) storeys in height (See **Figure 5**).

West of the Subject Site is an Employment Area, which supports industrial and commercial employment uses that consist of an auto repair shop and a roofing supply use. Further beyond is the Metrolinx-TTC Rail Corridor, which bisects the Dorset Park Employment Area'. (See **Figure 6**).

Within the surrounding area is significant existing residential neighbourhoods and development, as well as new emerging residential development (See **Figure 7**).

Figure 1 – Aerial Context of Subject Site



Source: Google Maps, 2021

Figure 2 – Subject Site Location



Source: Google Maps, 2021



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Figure 3 – Employment to North



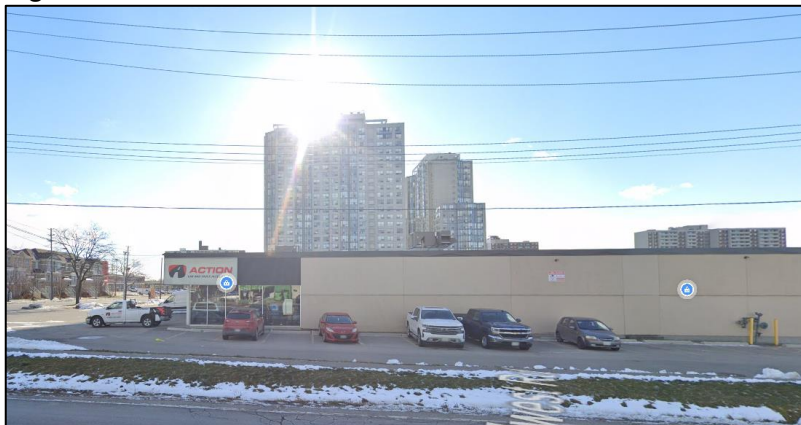
Source: Google Maps, 2021

Figure 5 – Residential to East



Source: Google Maps, 2021

Figure 4 – Mixed-Use to South



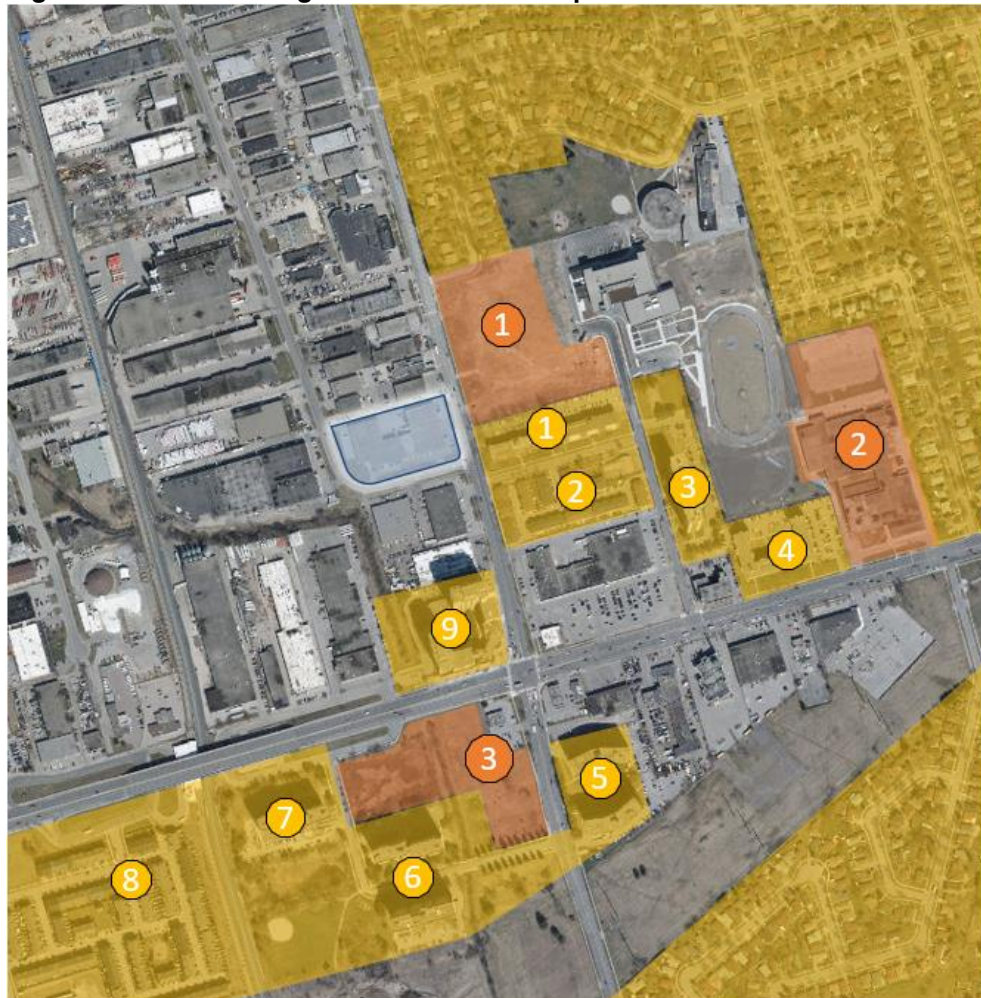
Source: Google Maps, 2021

Figure 6 – Employment to West



Source: Google Maps, 2021

Figure 7 – Surrounding Residential Development

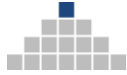


LEGEND

- Existing Residential
- Proposed Residential

| No. | Address | Existing Development |
|-----|---|---|
| 1 | 2 & 4 Treewood Street | Two 7-storey apartments |
| 2 | 1491 Midland Avenue | Ten 3-storey townhouse blocks |
| 3 | 5 Brockley Drive | One 20-storey apartment |
| 4 | 2700 Lawrence Avenue E | One 7-storey apartment |
| 5 | 1375 & 1385 Midland Avenue | Two 13-storey apartments |
| 6 | 100 – 101 Prudential Drive | Two 16-storey apartments |
| 7 | 301 Prudential Drive | One 16-storey apartment |
| 8 | Jenkinson Way, Mike Myers Drive, Pat Brooks Terrace, Kiriakou | Twenty-four 3-storey townhouse blocks |
| 9 | NW Corner of Midland Avenue and Lawrence Avenue E | Multi-tower mixed-use block. Residential towers from 7- to 21-storeys |

| No. | Address | Proposed Development | Status |
|-----|------------------------|---|--------------------|
| 1 | 1555 Midland Avenue | 111 dwelling units inclusive of single detached, semi-detached & townhouses | Under Construction |
| 2 | 2740 Lawrence Avenue E | 65 Townhouse Units & 36 Single Detached Dwellings | Under Construction |
| 3 | 1380 Midland Avenue | Seven mixed-use buildings ranging from 6- to 27-storeys | Appealed |



2.3 Transportation Network

2.3.1 Road Network

The Subject Site fronts onto Midland Avenue, a major north-south arterial road in the City of Toronto. Midland Avenue extends northly from Kingston Road to Steeles Avenue E. It connects the low-rise, low-density residential neighbourhood at the south end of this road network to Highway 401 and the City of Markham at the north end.

The Subject Site is located north of Lawrence Avenue a major east-west arterial road that extends from the eastern limits of the City of Toronto in the east, through Scarborough, and terminates at the Royal York Road in Etobicoke.

2.3.2 Transit Network

The area surrounding the Subject Site is well-served by existing public transit facilities (**Figure 8**). Midland Avenue and Lawrence Avenue both serve as a major transit routes for the City of Toronto, consisting of TTC Bus Routes 54 and 57. The Subject Site is within walking distance to the TTC Subway Line #3. It is located southwest of the Subject Site, and takes 11 minutes to walk to from the Subject Site.

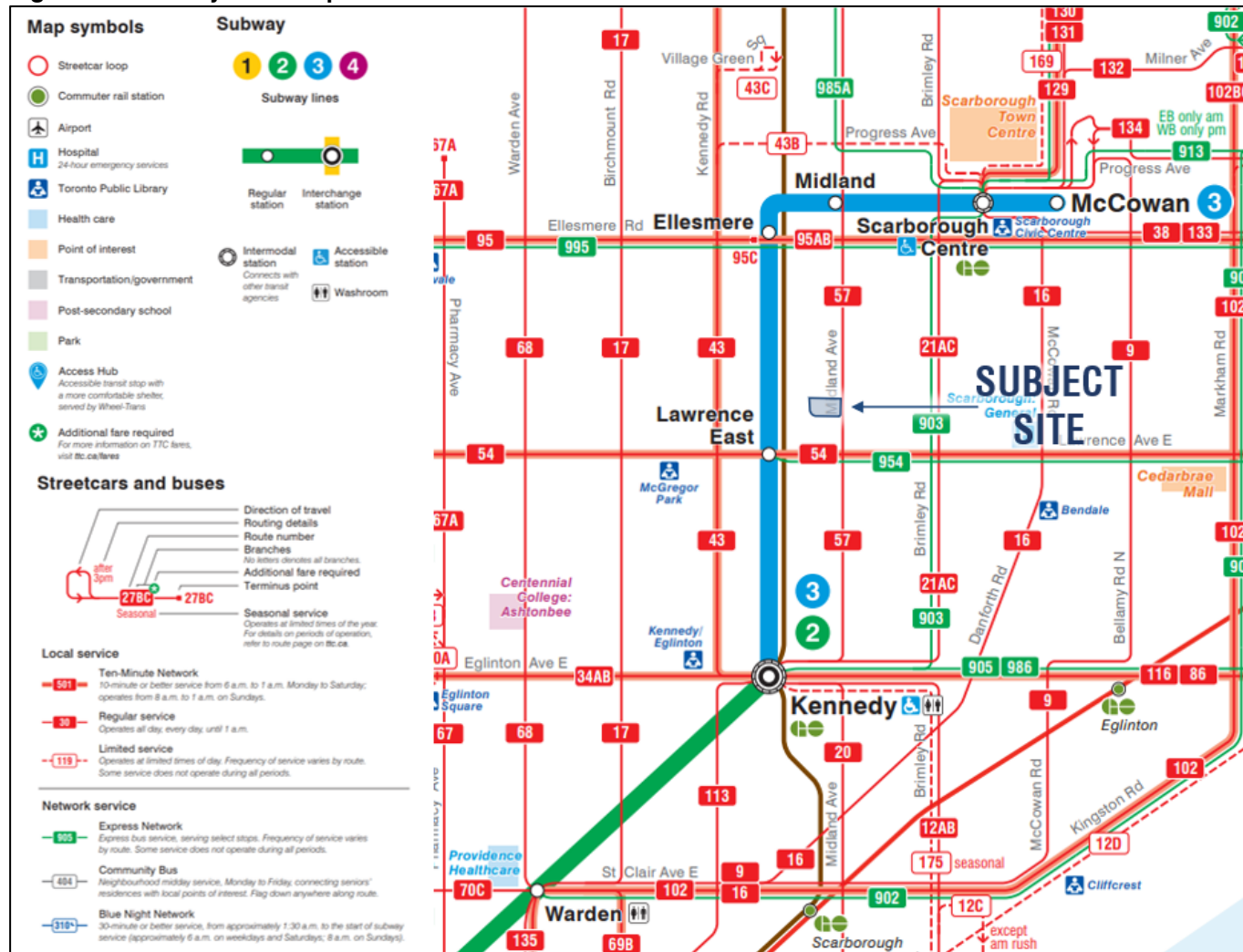
2.3.3 Active Transportation Network

Midland Avenue and other streets in the vicinity contain sidewalks that contribute to the communities' walkability. While no identified bike lanes are found in the neighbourhood, cyclists are able to utilize the road right-of-way for bike transportation.

2.4 Community Services and Facilities

The surrounding area of the Subject Site is host to several community services and facilities, including police/fire services, places of worship, and parks and open spaces. **Figure 9** identifies several community services and facilities within the vicinity of the Subject Site. The Subject Site is located directly south of Fire Station #232, and is located approximately 450 m northeast of Paramedic Services Station #20. An all-ages child care centre is located 500m southeast of the Subject Site. The Thomson Memorial Park is located 850 m east of the Subject Site, and contains tennis courts, walking trails, playground, soccer field, baseball diamond, and connections to the walking trail in the Birkdale Ravine. Donwood Park Public School, and the future Lawrence Midland Secondary School are located east of the Subject Site.

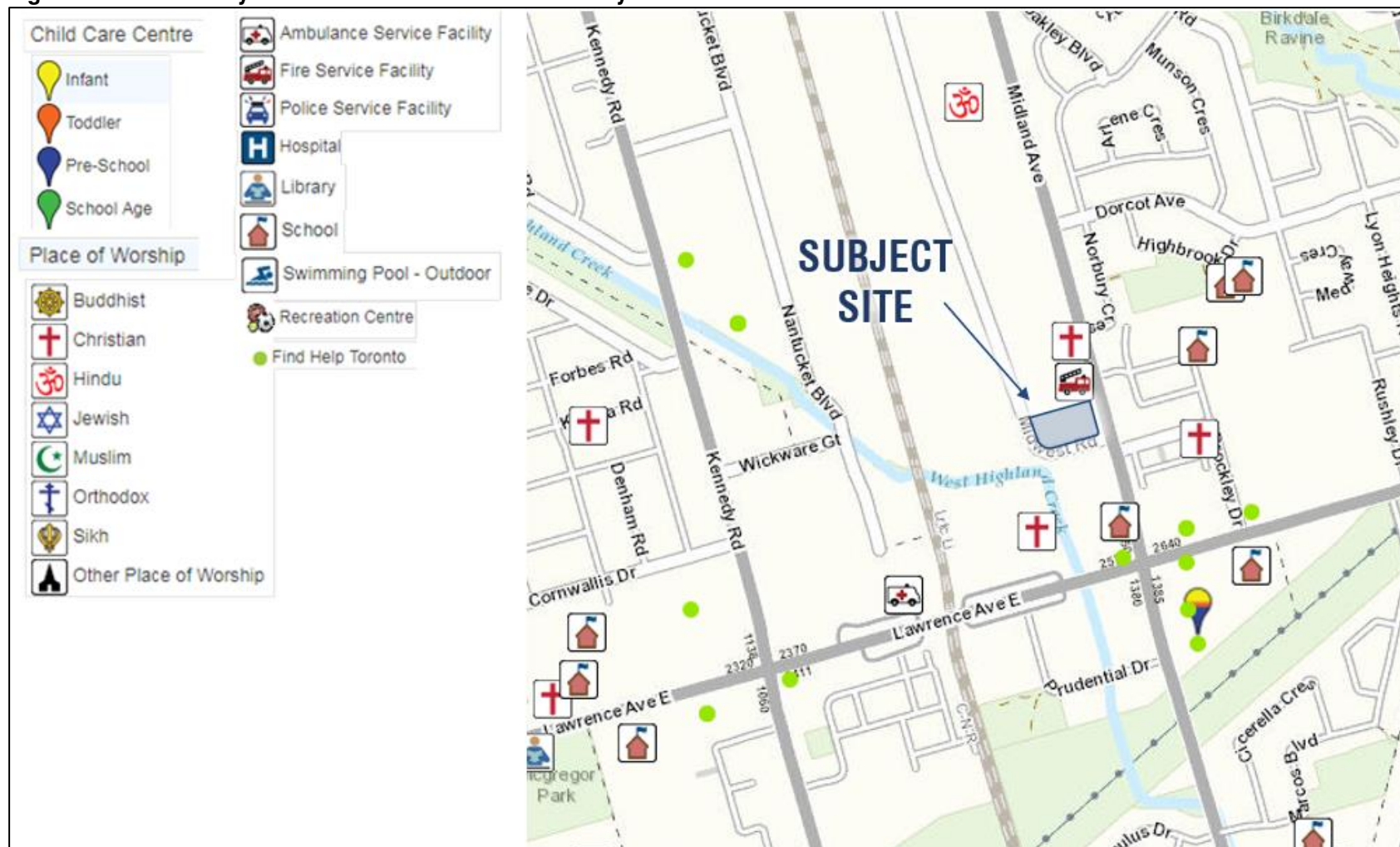
Figure 8 – TTC System Map



Source: Toronto Transit Commission, 2021



Figure 9 – Community Services and Facilities in the City of Toronto



Source: City of Toronto, Toronto Maps v2, 2021

3.0 PROPOSAL

3.1 Description of Proposed Development

A Conceptual Development Plan (“CDP”) (Figure 10) has been prepared by TBG in support of the Employment Conversion Request. The CDP proposes mixed-use and employment development. The western half of the property contemplates a 2-storey employment building, while the eastern half of the property proposes a 25-storey residential building with a 2-storey podium consisting of townhouse units and retail space. The site statistics are as follows:

| Use | GFA (m²) | Units |
|-------------------------------|---------------|------------|
| Western Half – Block 2 | | |
| General Employment | 5,000 | |
| Eastern Half – Block 1 | | |
| Residential | 18,000 | 224 |
| Employment | 4,617 | |
| Site Total | 27,617 | 224 |

Access to the Site will be provided from both Midland Avenue and Midwest Road at the northern end of the Site through a shared drive aisle. From the drive aisle access is provided to the underground parking for both the employment building and mixed-use building. Surface parking will be provided to the east of the employment building for customers.

3.2 Required Approvals

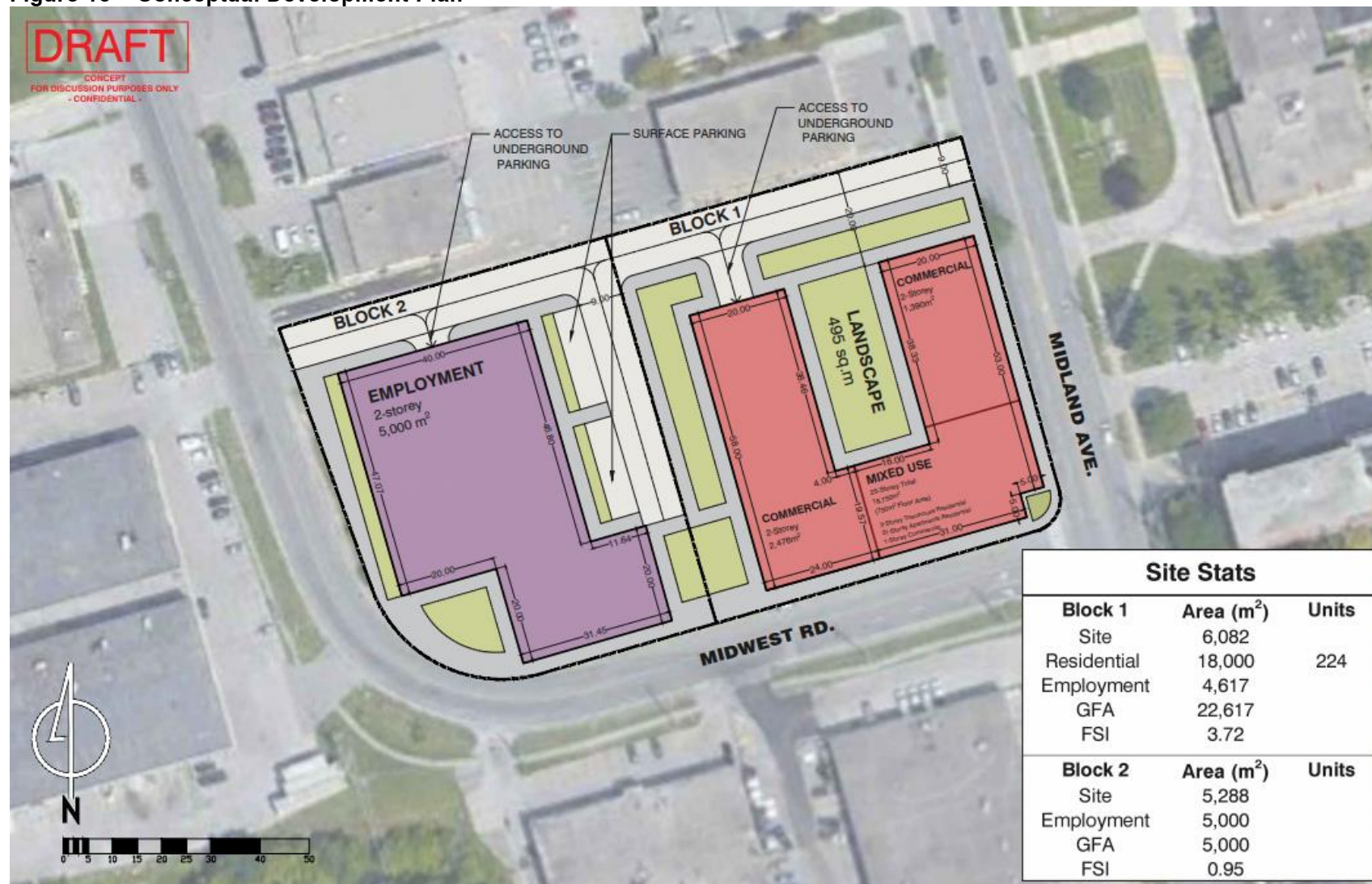
This Planning Rationale Report supports an employment land conversion request through the City of Toronto Municipal Comprehensive Review (MCR) process which if approved will culminate in a Local Official Plan Amendment. The Amendment would re-designate the eastern half of the Site (Block 1) from *General Employment Areas* to *Mixed Use Areas* while the western half (Block 2) would remain as employment but would be re-designated from *Core Employment Areas* to *General Employment Areas*.

Following, or concurrent with, the aforementioned amendments to the Local Official Plan, Zoning By-law Amendment, Site Plan approval, and Draft Plan of Condominium applications will also be required to facilitate the ultimate development of the Site per the CDP.



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Figure 10 – Conceptual Development Plan



Source: The Biglieri Group, 2021

4.0

Supporting Documents

4.1 Land Use Compatibility Study

A Land Use Compatibility/Mitigation Study (“LUC”) has been prepared by Sonair Environmental Inc. (“Sonair”) dated July 2021 in support of the proposed employment conversion request. The LUC includes a discussion on the environmental aspects of noise, vibration, dust and odour emissions of the surrounding land uses and any potential impact on the proposed sensitive land uses that will be introduced through the CDP. The LUC was conducted in accordance with the Ministry of Environment, Conservation, and Parks (MECP) Guidelines, which include Guideline D-1: Land Use Compatibility and Guideline D-6: Compatibility between Industrial Facilities and Sensitive Land Uses. The LUC is provided under a separate cover.

Based on the assessment of surrounding land uses in the vicinity of the subject property and the MECP’s D-6 Guidelines, Sonair has concluded that there are no facilities that are expected to adversely impact the proposed development as a result of noise, vibration, dust, or odour. Additionally, the proposed CDP is not expected to adversely impact the neighbouring land uses, which is consistent with the other sensitive land uses located in proximity to the Subject Site.

Sonair has recommended that due to the Subject Site’s proximity to Midland Avenue, a major arterial road, and Midwest Road, a Noise Impact Study be completed to determine if any warning clauses, mitigation, or building component specifications will be required for the proposed residential units. This would typically be required at the time of a site-specific zoning by-law amendment and/or site plan application and should be deferred to that stage.

4.2 Employment Area Impact Study

An Employment Area Impact Study (“EAIS”) has been prepared by urbanMetrics Inc. dated July, 2021 in support of the proposed employment conversion request. The EAIS demonstrates that the proposed CDP meets the conversion test of *Employment Areas* to non-employment uses within the Provincial Policy Statement, Growth Plan for the Greater Golden Horseshoe, and the City of Toronto Official Plan.

The EAIS has concluded that the CDP will accommodate approximately 316 jobs on the Subject Site, which is nearly three (3) times more jobs than what could be currently accommodated on the Subject Site and the existing mix of uses and densities. The existing industrial building accommodates approximately 108 jobs with a density of 95 jobs per hectare. The proposed CDP in contrast will accommodate 316 jobs and 410 residents at full build-out, with an overall density of 637 jobs and residents per hectare.

urbanMetrics has also concluded that there is a lack of new non-residential space being built within the Study Area, in part, due to below average net rental rates that make the construction of new buildings not financially viable. The introduction of residential units as part of a mixed-used development on the Subject Site would subsidize the development of new non-residential buildings to accommodate business and job growth in the area. The Study analysed active development applications within the Study Area and noted that there are very few applications for new non-residential buildings. Applications that had been submitted were to



expand existing uses within existing buildings to allow for automotive uses or places of worship. This further indicates that there is difficulty in attracting new investment to the area to facilitate business growth.

The proposed CDP would add approximately 5,000 m² of industrial space in a two-storey building, which would replace the existing building on the site, as well as add nearly 4,617 m² square feet of retail/service commercial space on the eastern side of the Site. This new space will help support business and job growth in an area of Scarborough where there has been limited investment in recent years.

urbanMetrics is of the opinion that the proposed employment conversion request meets the Province and City's conversion criteria, based on the research and analysis completed in the EAIS. The proposed mixed-use development will accommodate more jobs than could currently be accommodated on the site. The proposed CDP could also be a catalyst for future investment in this area of Scarborough that has seen the amount of non-residential space decline in recent years. Overall, it is urbanMetrics opinion that the CDP represents a more productive use of lands when compared to the existing land uses.

4.3 Preliminary Servicing & Stormwater Management Report

A Preliminary Servicing and Stormwater Management Memo has been prepared by C.F. Crozier & Associates Inc. ("Crozier") dated July, 2021 in support of the proposed employment conversion request. The memo presents a high-level servicing and stormwater management strategy which includes sanitary servicing, water servicing, storm servicing, and stormwater management.

Crozier has concluded that:

- The Subject Site can be serviced by a proposed 250mm diameter sanitary sewer connection to the existing 600mm diameter sanitary sewer on Midwest Road;
- The existing watermain connection on Midwest Road has the potential to be maintained;
- The Subject Site can be serviced by a proposed storm sewer connection to the existing 1200mm diameter storm sewer on Midwest Road; and
- Stormwater management requirements are to control the 100-year post-development runoff rate to below the 2-year pre-development runoff rate, provide a minimum of 80% TSS removal efficiency to achieve water quality requirements and provide sufficient stormwater volume to meet the Site's water balance requirements.

Based on the above conclusions, Crozier recommends approval for the employment conversion request with regards to preliminary servicing and stormwater management.

5.0

POLICY CONTEXT

5.1 Overview

The proposed development is consistent with the policies of the Provincial Policy Statement (2020) (“PPS”), and conforms to the Growth Plan for the Greater Golden Horseshoe (2020) (“Growth Plan”) and the City of Toronto Official Plan (2019) (“OP”) as further described below.

5.2 Provincial Policy Statement (2020)

The PPS provides overall direction on matters of provincial interest related to municipal planning decisions. The PPS was issued under Section 3 of the Planning Act, 1990 and provides provincial direction in terms of land use planning and development in Ontario. The current PPS was issued by the Province of Ontario and came into effect on May 1st, 2020. Decisions related to planning matters, including Official Plan Amendments made under the Planning Act, shall be consistent with the PPS.

5.2.1 Intensification, Housing, and Complete Communities Policies

The PPS provides broad direction on housing provision and intensification. Throughout the PPS, intensification and the provision of a mix of land uses are central tools to be used in the creation of complete communities.

The PPS encourages efficient land use and development patterns to support healthy, livable, and safe communities by promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term (Policy 1.1.1). Specifically, Policy 1.1.1 e) highlights the importance of promoting the integration of land use planning, growth management, transit-supportive development, intensification, and infrastructure planning to achieve cost effective development. The PPS states that “settlement areas shall be the focus of growth and development and their vitality and regeneration shall be promoted”. Further, land use patterns within settlement areas shall be based on densities and a mix of uses which efficiently use land and resources, are appropriate for the infrastructure and facilities planned or existing, support active transportation and are transit supportive. Additionally, land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment (Policies 1.1.3.2 to 1.1.3.7).

Per policy 1.4.1a) and b) planning authorities shall plan for residential intensification and redevelopment by providing for a 15-year supply of appropriately designated and available land, and maintaining sufficient servicing capacity. Additionally, per policy 1.4.3 b) planning authorities are to provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs by “permitting and facilitating all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and permitting and facilitating all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3”.

Policy 1.1.3.3 directs that planning authorities shall promote opportunities for transit-supportive development and shall accommodate a significant supply and range of housing options through intensification and redevelopment where transit supportive development can be accommodated. Complementary to Policy



1.1.3.3, Policy 1.8.1e) directs that planning authorities shall support land use and development patterns which encourage transit-supportive development and intensification to improve the mix of employment and housing uses in support of shortening commutes and decreasing traffic congestion.

Collectively, the policies of the PPS that relate to housing and intensification emphasize the importance of efficient land use through intensification, the importance of providing for a mix of land uses to form complete communities, and this importance of supporting those land uses with public transportation. The CDP provides for mixed-use development and intensification in proximity to the TTC Subway Line southwest of the Subject Site.

5.2.2 Employment Area Policies

Per Policy 1.3.1 planning authorities shall promote economic development and competitiveness by (*emphasis added*):

- a) *“providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*
- b) *providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;*
- c) *facilitating the conditions for economic investment by identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;*
- d) *encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities, with consideration of housing policy 1.4; and*
- e) *ensuring the necessary infrastructure is provided to support current and projected needs.”*

Further to above, planning authorities are directed to protect and preserve employment areas to support current and projected needs especially in proximity to major goods movement facilities and corridors (Policies 1.3.2.1, 1.3.2.6). They are also directed to assess employment areas during times of official plan / comprehensive review to ensure that this designation is appropriate to the planned function of the employment area (Policy 1.3.2.2) and support conversion requests 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 1.3.2.4).

Collectively, the policies of the PPS as related to Employment Areas seek to ensure employment lands will support the long-term economic needs of the community, allow for compact and mixed-use development, and reduce barriers to investment and thereby creating more jobs than currently offered on Site. The proposed CDP will provide more jobs than the current existing industrial building as concluded by urbanMetrics (See Section 4.2). Further, the proposed mixed-used development will provide for a transition between the *Neighbourhoods, Apartment Neighbourhoods, and Mixed Use Areas* designations and the Dorset Park Employment Area.

5.2.3 Infrastructure and Servicing Policies

The PPS addresses the effective use of public service facilities (such as recreation centres and police/fire services) as well as infrastructure, (such as sewage/water/stormwater services and transportation). The PPS states that land use planning and infrastructure planning should be integrated to ensure the land use patterns efficiently use and optimize existing municipal sewage and water services as well as public service facilities and that these facilities meet the needs of the population over the long term. (Policies 1.6.6.1, 1.6.3, 1.6.6). The Subject Site has access to existing sewage/water/stormwater and transportation services. See the Crozier Servicing and Stormwater Management Memo for further information.

5.2.4 Land Use Compatibility Policies

The PPS also prioritizes land use compatibility as a principle and provides direction on ensuring land use compatibility. Per Policy 1.2.6.1 “*Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures*”. Further to this, and per Policy 1.2.6.2, planning authorities are directed to protect the long-term viability of existing or planned industrial/manufacturing uses by ensuring that the planning and development of proposed adjacent sensitive land uses are in accordance with provincial guidelines, standards and procedures. The western side of our site is designated core employment.

The proposed mixed-used development will provide for a transition between the *Neighbourhoods*, *Apartment Neighbourhoods*, and *Mixed Use Areas* designations and the Dorset Park Employment Area. The Site is located directly across the street from a mixed use development and therefore would not operate for traditional *Core Employment* uses due to the proximity of mixed use development. Therefore, conversion to the western portion of the Subject Site to *General Employment* can serve as a buffer between *Core Employment* and *Mixed Use Areas*.

The eastern side of the Site (Block 1) currently permits *General Employment* uses such as retail. Therefore, with the requested conversion of designation to *Mixed Use Areas*, residential uses would be added and the land’s employment potential will continue to contain existing uses. Existing development to the north and west will be general commercial, requiring 20m of separation distance per D6 (as General Employment uses would typically be Class I). This can be accommodated for and provided on Site as shown in the CDP.

5.2.4.1 D-6 Compatibility between Industrial Facilities Guidelines

Further to Policy 1.2.6.2 in the PPS, the Province, through the Ministry of the Environment, Conservation and Parks (MECP) has produced a series of guidelines for land use planning authorities with respect to land use compatibility – known as the D-6 Guidelines. The overall objective of the D-6 Guidelines is to “prevent or minimize the encroachment of sensitive land use on industrial land use and vice versa”.

The D-6 Guidelines categorize industrial facilities into three Classes according to the nature of their emissions, their size/scale, production volumes and/or the intensity and scheduling of operations. One or more of these factors may cause an adverse effect. Industrial facilities are divided into three Classes as described below.

- **Class I Industrial Facilities:** a place of business for a small scale, self-contained plant or building which produces/stores a product which is contained in a package and has low probability of fugitive emissions. Outputs are infrequent, and could be point source or fugitive emissions for any of the following: noise, odour, dust and/or vibration. There are daytime operations only, with infrequent movement of products and/or heavy trucks and no outside storage.
- **Class II Industrial Facilities:** a place of business for medium scale processing and manufacturing with outdoor storage of wastes or materials (i.e. it has an open process) and/or there are periodic outputs of minor annoyance. There are occasional outputs of either point source or fugitive emissions for any of the following: noise, odour, dust and/or vibration, and low probability of fugitive emissions. Shift operations are permitted and there is frequent movement of products and/or heavy trucks during daytime hours.
- **Class III Industrial Facilities:** a place of business for large scale manufacturing or processing, characterized by: large physical size, outside storage of raw and finished products, large production volumes and continuous movement of products and employees during daily shift operations. It



has frequent outputs of major annoyance and there is high probability of fugitive emissions.

Further to these classifications, Section 4.3 of the D-6 Guidelines provides recommended minimum separation distances from sensitive land uses by Facility Class to ensure adequate buffering of incompatible land uses. Recommended separation distances are as follows:

- Class I—20 metres
- Class II—70 metres
- Class III—300 metres

Further, per the D-6 Guidelines, separation distance is generally calculated from lot line to lot line; however, any setback required per zoning or easement which has the effect of limiting development of the noxious use may be added to effective separation distance.

Sonair Environmental Inc. ("Sonair") has prepared a Land Use Compatibility/Mitigation Study in accordance with the D-6 Guidelines. Sonair concluded in their assessment of the industrial, commercial, and residential land uses in the vicinity of the Subject Site that there are no facilities that are expected to adversely impact the proposed CDP as a result of noise, vibration, dust, or odour. Further the proposed CDP is not expected to adversely impact the neighbouring land uses.

5.2.5 Summary

The PPS provides overall direction on matters of provincial interest related to local municipal planning decisions. Collectively, the policies of the PPS support targeted growth and development through intensification and the optimization of services and facilities. Transit supportive-development and a mix of land uses are supported through the policies of the PPS. With regards to employment lands, the PPS requires that employment lands provide opportunities for diversified and intensified employment uses. Further, the PPS requires that employment lands address barriers to investment and policies allow for mixed use development

within employment lands. Subject to evaluation criteria, the PPS permits for the conversion of employment lands based on the long-term needs of a municipality as identified during the Municipal Comprehensive Review Process. Lastly, the PPS directs for compatibility between land uses and directs that this be achieved through, among other methods, the provision appropriate separation distances between potentially incompatible land uses. As described above the CDP is consistent with these policies.

5.3 Growth Plan for the Greater Golden Horseshoe (2020)

The Growth Plan for the Greater Golden Horseshoe (2020) (also referred to as the "Growth Plan") was approved under the authority of the *Places to Grow Act, 2005* by the Lieutenant Governor in Council of the Province of Ontario, and came into full force and effect on June 16th, 2006. Amendment 1 to the Growth Plan came into effect on August 28, 2020.

The Growth Plan provides a framework for managing growth in the Greater Golden Horseshoe including: direction on where and how to grow and the provision of infrastructure to support growth, among other matters (Section 1.2.1). The Growth Plan carries forward many of the principles and policies of the PPS relating to land use. The Subject Site is located in the *Built-Up Area* identified by the Growth Plan. Further, the Site is not within a *Provincially Significant Employment Zone* ("PSEZ").

5.3.1 Complete Communities

Section 2.1 of the Growth Plan provides policies related to where and how to grow. This section directs the majority of growth be directed to settlement areas that have existing water and wastewater systems and can support the achievement of complete communities (policy 2.2.1.2a) (see also Section 3.2.6). Per Policy 2.2.1.4 Complete communities (among other items):

- feature a diverse mix of land uses;
- provide a diverse range and mix of housing options;
- provide access to a range of transportation options including active transportation (see also Sections 3.2.2, 3.2.3);
- provide access to public service facilities (see also Section 3.2.8); and,
- provide an appropriate supply of safe, publicly accessible open spaces, parks, trails, and other recreational facilities (see also Section 4.2.5).

The CDP has been specifically designed to function as a complete community as well as a transition from the *Employment Area* to the north and west to the *Mixed Use Area*, *Apartment Neighbourhoods*, and *Neighbourhoods* to the south and east. It will feature a mix of uses and housing options, access to public transit, and support walkability and live-work opportunities.

5.3.2 Employment Lands

Section 2.2.5 provides policy direction specific to Employment areas. Per policy 2.2.5.1 (emphasis added):

“Economic development and competitiveness in the GGH will be promoted by:

- a) making more efficient use of existing employment areas and vacant and underutilized employment lands and increasing employment densities;*
- b) ensuring the availability of sufficient land, in appropriate locations, for a variety of employment to accommodate forecasted employment growth to the horizon of this Plan;*
- c) planning to better connect areas with high employment densities to transit; and*
- d) integrating and aligning land use planning and economic development goals and strategies to retain and attract investment and employment.”*

Further to these general policies, the Growth Plan provides specific policies with regards to the location of employment lands and associated sensitive uses. The Plan directs that municipalities designate and preserve lands located near major corridors for manufacturing, warehousing and logistics, as well as appropriate associated uses (policy 2.2.5.5). However, in strategic growth areas with existing or planned frequent transit service and in areas where development can support active transit the Plan specifically directs for major office and institutional development as well as retail uses (2.2.5.2-3). Lastly, the plan directs that municipalities provide an appropriate interface between employment areas and adjacent non-employment areas (policy 2.2.5.7).

The CDP will facilitate the development of major office and institutional development in proximity to public transit options in a high-density, mixed-use setting; therefore, making more efficient use of the ‘employment land’. It further provides a transition between sensitive land uses. As such it conforms to the policies of the Growth Plan.

5.3.3 Employment Use Conversions

Policy 2.2.5.9 a) through e) provides criteria for conversion of employment lands within employment areas to non-employment uses. This policy indicates that such a conversion can only be considered through a municipal comprehensive review and only under certain conditions, including:

- 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"*

In addition, Policy 2.2.5.7 notes that Municipalities will plan for all employment areas within settlement areas by:

- a. *prohibiting residential uses and prohibiting or limiting other sensitive land uses that are not ancillary to the primary employment use;*
- b. *prohibiting major retail uses or establishing a size or scale threshold for any major retail uses that are permitted and prohibiting any major retail uses that would exceed that threshold; and*
- c. *providing an appropriate interface between employment areas and adjacent non-employment areas to maintain land use compatibility.*

Policy 2.2.5.8 notes that the development of *sensitive land uses*, *major retail* uses or *major office* uses will, in accordance with provincial guidelines, avoid, or where avoidance is not possible, minimize and mitigate adverse impacts on industrial, manufacturing or other uses that are particularly vulnerable to encroachment.

5.3.4 Summary

The Growth Plan provides a framework for managing growth in the Greater Golden Horseshoe region, specifically providing direction on where and how to grow, and the provision of infrastructure to support growth. The Growth Plan highlights the importance of complete communities and the role that employment lands have within complete communities. Similar to the PPS, intensification, a mix of land uses, and transit supportive developments emerge as key characteristics of efficient land use planning. With regards to employment conversion, the Growth Plan provides specific criteria to be used when evaluating conversions at the time of municipal comprehensive review. The Growth Plan contains language that is supportive of conversion requests that are able to demonstrate there is a need for the conversion, there are sufficient employment lands available to the growth horizon of the Growth Plan, there is sufficient infrastructure and facilities, and the proposed uses will not negatively impact the viability of neighbouring employment

areas. As described above, as well as later in this report, the CDP conforms to these policies. The Employment Area conversion criteria outlined in Policy 2.2.5.9 of the Growth Plan are generally consistent with conversion criteria contained within the City of Toronto Official Plan.

5.4 City of Toronto Official Plan (Office Consolidation April 2021, as amended)

The City of Toronto Official Plan (office consolidation, April 2021) was approved by the OMB in July 2006. The OP sets the planning and land use framework for local decision-making. The policies of the OP guide the physical, economic and social development of the city to manage growth, and economic development, to protect the natural environment, resources, and agricultural lands, as well as to provide infrastructure. The policies in the OP are meant to help co-ordinate detailed planning. The Subject Site is designated as *Employment Areas* on Map 2: Urban Structure of the OP (Figure 11) and as *General Employment Areas* and *Core Employment Areas* on Map 16: Land Use Plan of the OP (Figure 12).

5.4.1 Employment Areas Conversion Policies

Policies 2.2.4.14 to 2.2.4.18 under the Official Plan, as a result of the final LPAT Order issues on May 8, 2020, outlines in-effect conversion policies that are required to be addressed when an employment conversion request is contemplated. These policies under Section 2.2.4 include:

14. *The redesignation of land from an Employment Area 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 Employment Area is a conversion of land within an Employment Area and is also a removal of land from an Employment Area, and may only be permitted by way of a Municipal Comprehensive Review. The introduction of a use*

that may be permitted in a General Employment Area into a Core Employment Area or the redesignation of a Core Employment Area into a General Employment Area designation is also a conversion and may only be permitted by way of a Municipal Comprehensive Review.

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.*
16. *Applications to convert lands within an Employment Area will only be considered at the time of a municipal review of employment policies and designations under Section 26 of the Planning Act 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 be not be considered unless Council directs that a Municipal Comprehensive Review be initiated.*
17. *The City will assess requests to convert lands within Employment Areas, both cumulatively and individually, by considering whether or not:*
 - a. *There is a demonstrated need for the conversion(s) to: 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:*
 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.*
18. *When assessing proposal(s) to convert lands within Employment Areas, the City will:*
- a. *notify all major facilities whose influence area(s) includes any portion of the lands proposed to be converted; and*
 - b. *notify all facilities that store, distribute or handle propane whose required separation distances by law and/or regulation may include any portion of the lands proposed to be converted.*

As described and analysed below in Section 6.0 the CDP conforms to these policies.

5.4.2 Employment Areas Policies

The Subject Site is located within the City's *Employment Area* as per Map2: Urban Structure of the City's Official Plan. *Employment Areas* are places of business and economic activities that are vital to the City's economy and future economic prospects. The City's *Employment Areas* are comprised of *Core Employment Areas* and *General Employment Areas*. *Core Employment Areas* are typically located within the interior of *Employment Areas* while *General Employment Areas* are located along the periphery. Within the City's *Employment Areas* development is to contribute to the creation of competitive, attractive, and highly functional *Employment Areas* (Policy 4.6.7).

5.4.2.1 General Employment Policies

The eastern half of the Subject Site is currently designated as *General Employment Area* as per Map 20 of the City's Official Plan. The western half of the Subject Site is designated *Core Employment Area*, however is proposed to be re-designated to *General Employment Area* as a result of the subject employment conversion request and a future Official Plan Amendment application. Section 4.6 of the Official Plan provides an overview of the objectives and policy framework for the *General Employment Area* designation. *General Employment Areas* as mentioned before are typically located on the periphery of *Employment Areas* on major roads where retail, service, and restaurant uses can serve workers as well as the broader public. Retail uses are frequently used to serve as a buffer between employment industries and nearby residential uses. Per Policy 4.6.3 *General Employment Areas* support businesses and economic activity that are generally located on the peripheries of *Employment Areas*. Permitted uses include: all types of manufacturing, processing, warehousing, wholesaling, distribution, storage, transportation facilities, vehicle repair and services, offices, research and development facilities, utilities, waste management systems, industrial trade schools, media, information and technology facilities, vertical agriculture, parks, small-scale restaurants, catering facilities, small-scale service uses such as courier services, banks and copy shops, restaurants, and all types of retail and service uses (Policy 4.6.1, 4.6.2, and 4.6.3).

5.4.3 Mixed Use Areas

In the City of Toronto, the *Mixed Use Areas* achieve a wide range of planning objectives through the integration of numerous uses that include residential, offices, retail and service uses, institutions, entertainment, recreation and cultural activities, and parks and open spaces. Ultimately, *Mixed Use Areas* allow Torontonians to live, work, and shop/play within a small area.

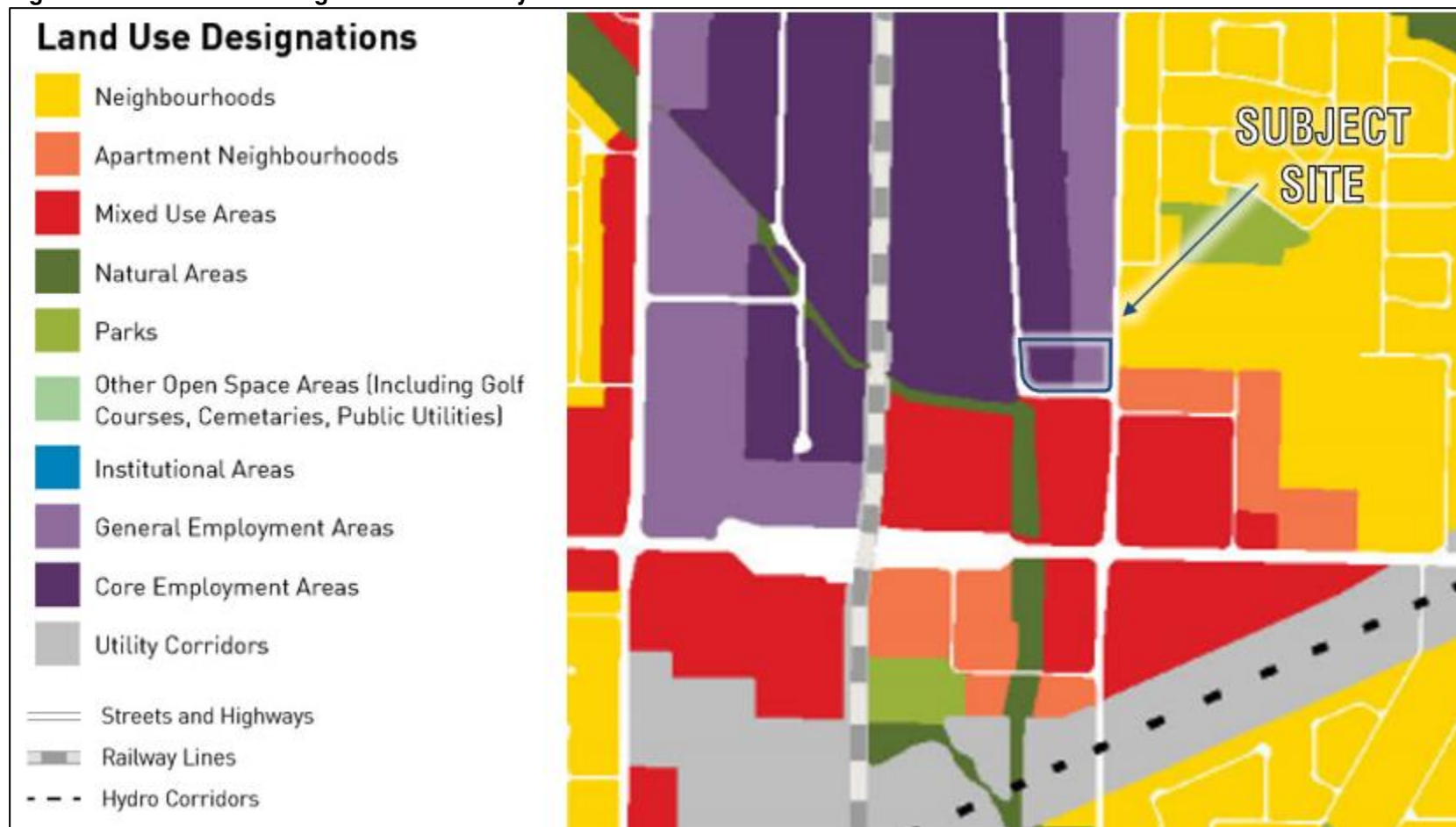
Figure 11 – Urban Structure in the City of Toronto Official Plan



Source: City of Toronto Official Plan, Map 2 (February 2019)



Figure 12 – Land Use Designation in the City of Toronto Official Plan



Source: City of Toronto Official Plan, Map 20 (February 2019)

5.5 City of Toronto Zoning By-laws

The Subject Site is subject to the City of Toronto City Wide Zoning By-law 569-2013 (office consolidation, May 1st, 2018) ("CWZBL") and the Former City of Scarborough Employment District By-law 24982 (Dorset Park) ("SEDBL") (**Figure 13**). The western half of the Subject Site is zoned as *E0.7(x192) – Employment Industrial* under the CWZBL and the eastern half is zoned as *MC (Exceptions 6, 10, 11) – Industrial Commercial* under the SEDBL.

Within the *Employment Industrial* zone under the CWZBL, the following uses are currently permitted:

| | |
|----------------------------------|--|
| Ambulance Depot | All Manufacturing Uses except: |
| Animal Shelter | ➤ Abattoir, Slaughterhouse or Rendering of Animals Factory; |
| Artist Studio | ➤ Ammunition, Firearms or Fireworks Factory; |
| Automated Banking Machine | ➤ Asphalt Plant; |
| Bindery | ➤ Cement Plant, or Concrete Batching Plant; |
| Building Supply Yards | ➤ Crude Petroleum Oil or Coal Refinery; |
| Carpenter's Shop | ➤ Explosives Factory; |
| Cold Storage | ➤ Industrial Gas Manufacturing; |
| Contractor's Establishment | ➤ Large Scale Smelting or Foundry Operations for the Primary Processing of Metals; |
| Custom Workshop | ➤ Pesticide or Fertilizer Manufacturing; |
| Dry Cleaning or Laundry Plant | ➤ Petrochemical Manufacturing; |
| Financial Institution | ➤ Primary Processing of Gypsum; |
| Fire Hall | |
| Industrial Sales and Service Use | |
| Kennel | |
| Laboratory | |
| Office | |
| Park | |
| Performing Arts Studio | |
| Pet Services | |
| Police Station | |
| Printing Establishment | |
| Production Studio | |
| Public Works Yard | |
| Service Shop | |

Software Development and Processing
Warehouse
Wholesaling Use [By-law: OMB PL130592]

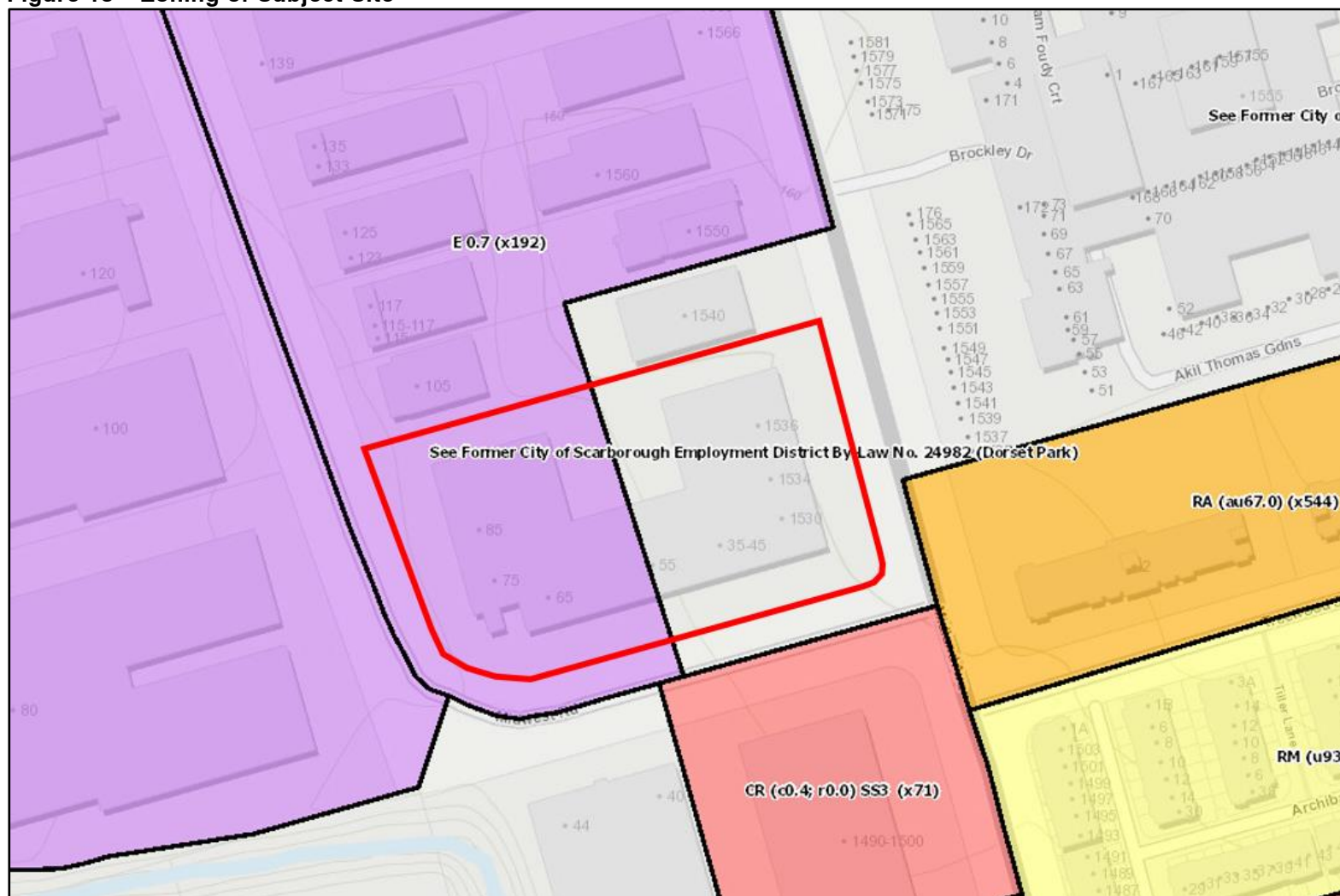
- Primary Processing of Limestone;
- Primary Processing of Oil-based Paints, Oil-based Coatings or Adhesives;
- Pulp Mill, using pulpwood or other vegetable fibres;
- Resin, Natural or Synthetic Rubber Manufacturing; and
- Tannery

Within the *Industrial Commercial* Zone, under the SEDBL, the following uses are permitted: Marketplace Signs; Places of Worship Vehicle Sales Operations; Vehicle Service Garages; Vehicle Service Stations; and Warehousing of Furniture and Gift items with an Ancillary Sales Outlet.

Should this conversion be approved, a future Zoning By-law Amendment will be required to rezone the lands to a Site-Specific Zone under the CWZBL in order to support the proposed mixed-use development.



Figure 13 – Zoning of Subject Site



6.0 POLICY ANALYSIS

The Growth Plan and City of Toronto Official Plan both provide a list of criteria that must be considered when an employment land conversion is considered. **Table 1** below provides an analysis of the criteria from both documents.

Table 1: Employment Land Conversion Criteria Analysis

| City of Toronto Official Plan Policy | Growth Plan Policy | Analysis |
|---|--------------------|---|
| <p>Policy 2.2.4.14 The redesignation of land from an Employment Area 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 Employment Area is a conversion of land within an Employment Area and is also a removal of land from an Employment Area, and may only be permitted by way of a Municipal Comprehensive Review. The introduction of a use that may be permitted in a General Employment Area into a Core Employment Area or the redesignation of a Core Employment Area into a General Employment Area designation is also a conversion and may only be permitted by way of a Municipal Comprehensive Review.</p> | | <p>The subject employment conversion request to redesignate the Subject to <i>Mixed Use Area</i> and <i>Core Employment Area</i> is proceeding by way of a formal submission through the City's Municipal Comprehensive Review.</p> |
| <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>This Employment Conversion Request is submitted as part of the City's Municipal Comprehensive Review. Please refer to this table as well as Section 5.3 for analysis of Growth Plan policies.</p> |
| <p>Policy 2.2.4.16</p> | | <p>The City of Toronto is currently reviewing their employment policies and designations as</p> |



| | | |
|---|---|--|
| <p>Applications to convert lands within an Employment Area will only be considered at the time of a municipal review of employment policies and designations under Section 26 of the Planning Act 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 be not be considered unless Council directs that a Municipal Comprehensive Review be initiated.</p> | | <p>part of the City's "Our Plan Toronto", the City's Official Plan review ("OPR") process. This conversion request is being formally submitted to the City during the OPR.</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> | <p>Policy 2.2.5.9 a) There is a need for conversion;</p> | <p>As per the EAIS, urbanMetrics opines that there is a need re-designate the Subject Site to increase the amount of non-residential space available to support business and job growth in an area of Scarborough that has not attracted significant investment in recent years. The net lease rates in the Study Area are below the City-wide average and most of the development applications within the southern portion of the Study Area do not propose to increase the amount of non-residential space. By permitting a mix of uses on the site, including retail/service commercial, industrial and residential, it will ensure that the need for new non-residential space will be accommodated for in the Study Area.</p> <p>As per the Land Use Compatibility/Mitigation Study, SONAIR has concluded, based on the assessment of surrounding land uses in the vicinity of the subject property and the MECP's D-6 Guidelines, there are no facilities that are expected to adversely impact the proposed development as a result of noise, vibration, dust, or odour. Furthermore, the proposed Conceptual Site Plan is not expected to adversely impact the</p> |
| <p>a. There is a demonstrated need for the conversion(s) to:</p> <ol 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; | | |

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| | | <p>neighbouring land uses, which is consistent with the other sensitive land uses located in proximity to the Subject Site.</p> <p>A conversion of the western portion (Block 2) from Core Employment to General Employment will alleviate land use compatibility issues caused due to the proximity of existing mixed-use development to the south of the Site.</p> |
| b. The lands are required over the long-term for employment purposes; | <p>Policy 2.2.5.9</p> <p>b) The lands are not required over the horizon of this Plan for the employment purposes for which they are designated</p> | <p>The proposed conversion area is not required over the long term for Employment Land employment purposes as concluded by urbanMetrics. As detailed in the Technical Report in conjunction with the recent Growth Plan amendment, it was concluded that although employment in the City is forecast to continue to grow to 2051, Employment Land employment is expected to decrease. The proposed Conceptual Site Plan will replace the existing industrial GFA on the Subject Site, while adding approximately 8,083 square metres of retail/service commercial space. This is consistent with the shift toward higher density Population Related employment that the City has been experiencing for some time.</p> <p>The requested change from Core Employment to General Employment will not impact the long-term employment prospects of the western portion of the Site due to this area's existing proximity to existing residential uses.</p> |
| c. The City will meet the employment forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe; | <p>Policy 2.2.5.9</p> <p>c) The municipality will maintain sufficient employment lands to</p> | <p>As noted in the "Sustainable Competitive Advantage and Prosperity – Planning for Employment Uses in Toronto" report</p> |



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| | accommodate forecasted employment growth to the horizon of this Plan | prepared by Malone Givens Parsons Ltd. ("MGP") in 2012, the City is well on its way to meeting its employment forecasts previously allocated to 2041. This study is the last in-depth analysis study completed by the City of its <i>Employment Areas</i> as part of its previous MCR. As per the MGP study, between the 2041 and 2051 horizon, the City of Toronto will remain a regional office node within the GGH and office employment will continue to grow. The concept plan for the proposed conversion area will also significantly increase the number of jobs that could be accommodated on the Subject Site. As per the EAIS, the proposed Conceptual Site Plan could accommodate nearly 320 jobs, which is significantly greater than the approximately 110 jobs that could be accommodated on the site based on the current uses. In this regard the proposed CDP and mixed-use development will provide an additional 210 jobs approximately to the existing employment numbers. |
| <p>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:</p> <ol 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; | | <p>A Land Use Compatibility/Mitigation Study ("LUC") accompanies the subject employment conversion request, and has been completed in accordance with Policies 2.2.4.5, 2.2.4.7, and 2.2.4.8, and Schedule 3.</p> <p>The LUC has concluded that there will be no adverse impacts as a result of the existing facilities within the vicinity of the Subject Site, nor will the Subject Site and the proposed CDP establish adverse impacts on the surrounding area in terms of noise, dust, vibration, and odour. The LUC indicates that as Midland Avenue is a major arterial road, a Noise Impact Study should be completed to determine if any warning clauses, mitigation,</p> |

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| <ol style="list-style-type: none"> 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; | | <p>or building component specifications will be required for the proposed residential units.</p> <p>The development of the proposed conversion area with high-density residential uses will not eliminate visibility of or accessibility to existing employment lands. The lands to the west of the site can still be accessed from Midwest Road and the one-storey industrial buildings located on Midwest Road are currently not visible from Midland Avenue.</p> <p>The proposed concept plan would not remove a large and/or key location for employment uses, as the site is only 1.1 hectares and it not located close the highways or rail corridors. Also, as noted previously, the concept plan for the proposed conversion area will increase the amount of non-residential GFA accommodated on the site.</p> <p>The concept plan for the proposed conversion area would increase the amount of non-residential GFA on the site in comparison to what currently exists. The increased non-residential space would provide additional opportunities for clustering of similar or related employment uses.</p> <p>The concept plan for the proposed conversion area increases the amount of industrial and retail/service commercial space within the local Employment Area that is available to accommodate a range of permitted employment uses.</p> |
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| | | Additionally, the CDP provides the separation distances needed to prevent land use conflicts. |
| e. The existing or planned sewage, water, energy and transportation infrastructure can accommodate the proposed conversion(s); | | As concluded in the Servicing and Stormwater Management Memo prepared by Crozier (See Section 4.2), the Subject Site can be serviced via connections to the existing 600mm sanitary sewer on and 1200mm storm sewer on Midwest, as well as maintaining the existing watermain connection to Midwest Road. |
| 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; | | In the surrounding area, there are a number of community facilities. Directly north of the Subject Site, is Fire Station No. 232. To the east of the Subject Site is the Lawrence Midland Secondary School, and to the south of the Subject Site is Centennial College. |
| 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; | | The Dorset Park Employment area is located south of Highway 401. The proposed ECR and Conceptual Site Plan will not intervene with the larger Dorset Park Employment area's connectivity to Highway 401. |
| 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 | | The proposed Conceptual Site Plan will continue to provide opportunity for General Employment uses on the western half of the Subject Site – which allows for an appropriate range of uses on this portion of the site given its adjacencies. Additionally, on the eastern half of the Subject Site retail uses are proposed which will support the employment area (and are already permitted on this portion of the site given its existing <i>general employment</i> designation). As such, both proposed re-designations will support the development of new industrial and |

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| | | <p>retail/service commercial space which will accommodate well-paying jobs and increase the Study Area's inventory of non-residential space. Furthermore, additional residents will ensure the nearby retail/service commercial uses, including those in the concept plan for the proposed conversion area, will have adequate market support to be healthy and sustainable.</p> <p>Additionally, through the proposed employment conversion request, the eastern half of the Subject Site will be redesignated from <i>Core Employment Area</i> to <i>General Employment Area</i>. The <i>General Employment Area</i> designation permits all uses that are permitted under the <i>Core Employment Area</i> designation, in addition to other uses including all retail and service uses, and restaurants. In this regard, the conversion request will not remove existing permitted employment uses but rather maintain them.</p> |
| i. Cross-jurisdictional issues have been considered. | | <p>The Subject Site is regulated by the Toronto Regional Conservation Authority (TRCA). Coordination with TRCA will occur in the future when prior to the submission of development applications.</p> |
| | <p>Policy 2.2.5.9</p> <p>d) The proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification or density targets in this Plan, as well as the other policies in this Plan.</p> | <p>The proposed Conceptual Site Plan will not adversely affect the overall viability of the employment area. The Subject Site and proposed conversion area is located at the southeastern fringe of the Employment Area and is bordered by residential uses to the east and a Mixed Use Areas designation to the south. In fact, the addition of 87,000 square feet of commercial space could re-invigorate the local Employment Area by</p> |



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| | | creating space for new businesses and the expansion of existing businesses. Also, the Conceptual Site Plan for the proposed conversion area will not adversely affect the achievement of the intensification target, as it is located within the delineated Built-Up Area. A separation distance of 70m between proposed residential from industrial activity is accomplished with the CDP. |
| Policy 2.2.4.18 When assessing proposal(s) to convert lands within Employment Areas, the City will: <ul style="list-style-type: none">a. notify all major facilities whose influence area(s) includes any portion of the lands proposed to be converted; andb. notify all facilities that store, distribute or handle propane whose required separation distances by law and/or regulation may include any portion of the lands proposed to be converted. | | Noted. City staff to undertake this action. |

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CONCLUSION

This Planning Rationale Report supports the request for an employment land conversion from *General Employment Area* and *Core Employment Area* to *General Employment Area* and *Mixed Use Area*. This request is being submitted through the City of Toronto's Municipal Comprehensive Review ("MCR") process, which will be followed by a City initiated Official Plan Amendment to the City of Toronto Official Plan to re-designated the Sites.

The proposed conceptual mixed-use development has been analysed against the evaluation criteria outlined in the Growth Plan and City of Toronto Official Plan.

The proposed conceptual mixed-use development is supported by the applicable policy framework articulated in the Provincial Policy Statement (2020), Growth Plan for the Greater Golden Horseshoe (2020), and City of Toronto Official Plan (2019). All of the aforementioned documents promote mixed use development on underutilized parcels to create complete communities.

From a land use perspective, the proposed development represents a suitable development on an underutilized parcel of land along Midland Avenue. The proposed development will be well-integrated into the existing urban fabric due to its proximity to existing infrastructure and services, as well as character of the surrounding neighbourhood, and will contribute to the City of Toronto's variety of employment opportunities, rental housing stock, and ownership housing stock. The Subject Site is well connected to

various forms of transit for pedestrians, cyclists and automobiles, and is within walking distance to transit stops.

The proposed development achieves the following:

- Incorporates intensification and redevelopment of an underutilized parcel of land with a compact form and density, resulting in the efficient use of land, infrastructure and services;
- Provides additional supply of private-sector purpose-built rental housing with a mix of unit sizes which support meeting the need of affordable housing for the City of Toronto;
- Provides additional employment opportunities for that Site by more than doubling the number of jobs with the additional commercial and tech industrial GFA;
- Introduces a more flexible land use designation to the western portion of the Site, which reduces barriers to investment and improves land use compatibility;
- Provides for 20m and 70m separation distances from the proposed residential area to ensure land use compatibility; and,
- Encourages the use of existing active transportation networks.

For all of the foregoing reasons and through our analysis it is our professional opinion that the proposed development is an appropriate and desirable development, represents good planning and warrants the support of staff and of Council.

Respectfully submitted,
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