

January 18, 2024

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

Dear Ms. Perdomo:

**RE: SUBMISSION ON OPA 644 – ERO #019-7441; MINISTRY #20-OP-232096
3675-3677 & 3685 KEELE STREET, TORONTO
OUR FILE: 07132DZ-6**

On behalf of Lissard Holdings Limited and 3685 Keele Street Ltd. under the direction of their agent, SmartCentres, please accept this submission regarding the review by the Province of the City of Toronto's Official Plan Amendment 644 ("OPA 644") respecting the employment conversion of 3675-3677 and 3685 Keele Street in Toronto (hereinafter the "Subject Lands") and shown below on **Figure 1**.

We are requesting designation of the lands from General Employment Area to Mixed Use Areas.



Figure 1 – Location of the Subject Lands

With respect to the surrounding lands, one notable indicator of the shift in the market is the planned closure of Downsview Airport, which is set to cease operation in 2023. The lands currently occupied by Downsview Airport make up a significant portion of the nearby Employment Lands that are located to the southeast of the Subject Lands. The planned closure of Downsview Airport will therefore result in a major shift in the surrounding land use context away from industrial or traditional employment uses, and towards a focus on walkable mixed use residential neighbourhoods supported by the existing high quality transit infrastructure. In addition, this shift has been recently augmented by City Council's approval of Site and Area Specific Policy 596 (SASP 596), which redesignates a majority of the Downsview Park lands as "Regeneration Area", and is a key first step from the City that will recognize and being to implement the future overall mixed use vision for Downsview Park (more specifically through the "id8 Downsview" planning process), as this approval of SASP 596 confirms the departure from these lands being utilized primarily for airport/industrial purposes.

The Subject Lands are municipally serviced with the majority of the property located within approximately 600 metres of the existing Downsview Park Station, which is serviced by TTC Subway Line 1 and the GO Transit Barrie Line. Accordingly, the Subject Lands are within an area which can be defined as a Major Transit Station Area ("MTSA") per the definition in the Growth Plan for the Greater Golden Horseshoe. In addition, the Subject Lands are adjacent to bus stops generally located at the intersection of Keele Street and St. Regis Crescent, which are serviced by TTC bus routes 41/941/341 that provide connections between Pioneer Village Station on TTC Line 1 and Keele Station on TTC Line 2. The bus stops adjacent to the Subject Lands are also serviced by TTC bus route 108a that provides connections between Pioneer Village and Sheppard West Stations on TTC Line 1.

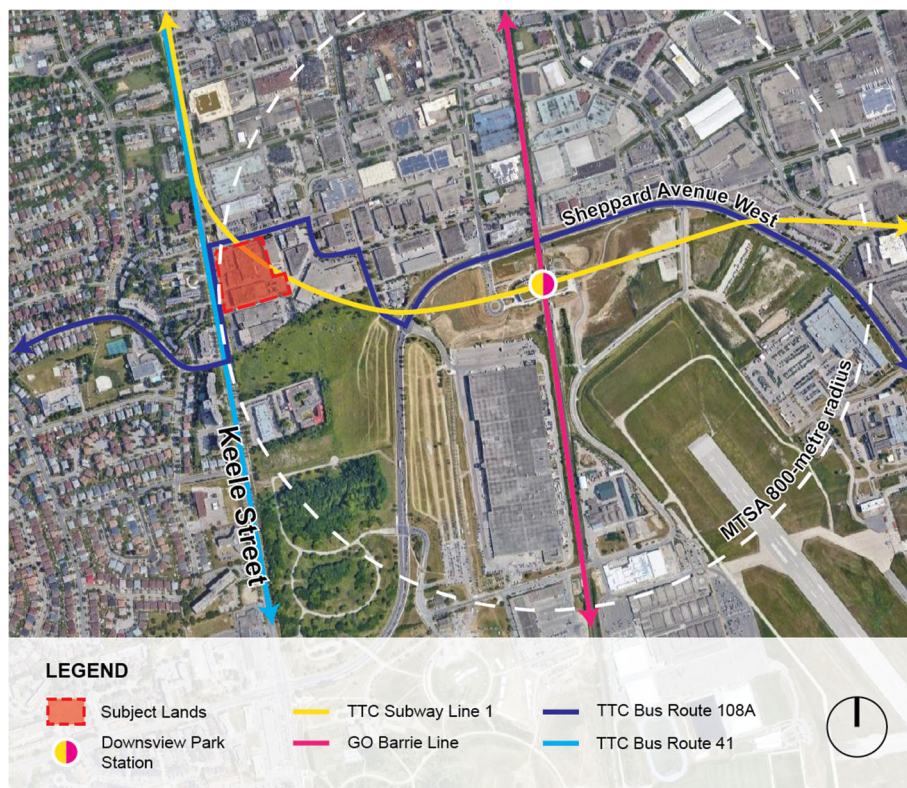


Figure 2 – Existing Transit Servicing the Subject Lands

The transit infrastructure servicing the Subject Lands are shown in **Figure 2** above. The proposal will optimize the use of existing municipal infrastructure (with no additional strains on this infrastructure, as there is sufficient capacity for the proposal being contemplated for the Subject Lands), and will also have access to nearby public service facilities, all in accordance with Provincial policy direction.

History of Request & The Proposal

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

The proposed vision for the Subject Lands is for the property to be redeveloped as a transit supportive, mixed use community. The conversion would allow this vision to occur. The vision would be achieved by providing a mixed use development that consists of low, mid and high-rise mixed use buildings, as well two commercial buildings at 4 storeys each being contemplated along the eastern portion of the Subject Lands.

A mix of housing tenure, unit sizes and affordability will be provided, including potential for retirement residence / continuum of care facilities. A privately owned publicly accessible space ("POPS") is proposed to be located central to all buildings and will offer a pedestrian trail connection to the park space being proposed in the subdivision development to the south. A road connecting Keele and St. Regis is also proposed as part of the development being contemplated for the Subject Lands which will increase connectivity in the immediate area, including a possible redevelopment of the lands to the immediate south and connection to the William Baker development lands.

The retail / service commercial uses that exist today would be reincorporated into the mixed use community at-grade along Keele Street and St. Regis Crescent. Further, two 4 storey commercial buildings are proposed which will increase the employment floor space on the Subject Lands as well as providing transition (with the public road) to the employment areas to the east. Approximately 9,300 sq m (100,000 sq ft) of new floor space would replace the existing 7,800 sq m (84,000 sq ft) commercial plaza, resulting in an approximate increase in the accommodation of employees from 210 to 370 employees.

With the over 64 age cohort expected to increase by 1.9 million persons over the next 25 years to over 22% of the population, there is a likewise increasing need for seniors housing¹. A potential retirement residence / continuum of care facility would help meet the need for seniors housing, which is increasingly become apparent in the City and the Province. A potential retirement residence facility would help fulfill Provincial Policy mandates accordingly and would generate a further increase the employment by approximately 75 to 100 jobs.

¹ Province of Ontario, [2020-2046 Population Projections](#) [Ontario population projections](#) | [Ontario.ca](#)

The owners have prepared a Demonstration Plan and Conceptual Massing (subject to further refinement) for a mixed use community which could evolve for the Subject Lands (**Figures 3 and 4**).



Figure 3 – Demonstration Plan for a Possible Mixed Use Community



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

Overall, the approval of a conversion would facilitate the transformation of the Subject Lands from a low rise, low density commercial plaza to a complete mixed-use community at transit supportive densities in the range of up to 4.0 FSI as exemplified by the Demonstration Plan.

Decision From Council

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

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

Request of the Province

The delays resulting from this ongoing process are unnecessary. On behalf of our client, we are requesting that the Province utilize its powers as the approval authority to modify OPA 644 to grant the conversion request for 3675-3677 and 3685 Keele Street. To this effect we request the following modifications:

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 Area as shown on Map 2 of the Official Plan

2. We request the Subject Lands be **designated Mixed Use Areas on Land Use Designation Map 16** (part of Tile Index Map 4 of Appendix 2 of OPA 644) as shown below.



Figure 6 – Designate Subject Lands from General Employment Area to Mixed Use Areas as shown on excerpt from Official Plan Land Use Designation Map 16 (Tile Map 4 of OPA 644, Appendix 2)

Overall Conclusion

The proposal envisioned for the Subject Lands as achieved through the conversion is one that will contribute to the mixed use vision and existing and emerging regeneration context in the York-University Heights area in the City. The proposed conversion is consistent with and conforms to Provincial Policy and structured around the optimization of existing municipal services, infrastructure and transit services.

The Subject Lands represent a situation where a conversion is appropriate, given that the existing use of the Subject Lands represents an underutilization of the Subject Lands in comparison to the proposed mid- and high-rise mixed use development, and also considering the marginal impact of the removal of the 2.0 ha Subject Lands would have on the City's supply of employment lands. Through a redevelopment as exemplified by the Demonstration Plan, an increase from approximately 210 to at least 370 employees would occur.

It is also important to identify that the current use of the Subject Lands is not for traditional employment uses, but rather for an existing retail / commercial plaza. ***We note that this request is in alignment with the proposed revisions to the Provincial Policy Statement / Growth Plan where retail areas will no longer be considered "areas of employment" and therefore not "conversions" thereto.*** The proposed redevelopment will allow for the

efficient use of the land and the optimization of infrastructure while maintaining an equivalent or greater amount of the existing retail-commercial planned function through integration of these uses into an urban format. It would also allow for increased connectivity through this area through the provision of public and private roads.

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

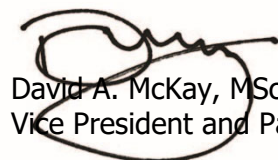
- The proposed conversion would allow a redevelopment at a density up to 4.0 FSI in proximity to the existing subway and GO train lines serviced at Downsview Park Station, the existing bus transit infrastructure, and the potential future transit expansion along Sheppard Avenue West as identified in the City OP.
- The proposed transit-oriented development permitted by the conversion will provide for a mix of tenures, unit sizes and affordability (in accordance with City policies at the time of future development applications in proximity to existing higher-order transit options. In addition, the possible inclusion of a retirement residence / continuum of care facility would help meet the growing need for seniors housing.
- The proposed conversion for the Subject Lands is compatible with existing surrounding employment uses as determined through the RWDI Compatibility / Mitigation Report.
- The proposed conversion of the Subject Lands is not expected to have a significant vehicle traffic impact relative to the employment uses already permitted as determined by the Urban Transportation Considerations Report by BA Group.
- The proposed conversion will not affect the ability of surrounding facilities to comply with applicable Provincial and City of Toronto regulations, as identified in the Compatibility & Mitigation Study conducted by RWDI. Appropriate mitigation measures related to noise and air quality impacts arising from transportation facilities will be implemented where required.
- 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 proposal.

Please feel free to contact 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 and Partner

*cc: Client
Project Team*