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February 9, 2024

Via Email (louis.bitonti@ontario.ca)

Louis Bitonti
Municipal Services Ontario-Central Ontario
13th Floor, 777 Bay Street
Toronto, Ontario M5G 2E5

Dear Mr. Bitonti:

RE: City of Toronto Official Plan Amendment No. 653 ("OPA 653")
1677 Wilson Avenue, Toronto
2656049 Ontario Inc.
ERO Number: 019-7731
Ministry Reference Number: 20-OP-238506

We are the solicitors for 2656049 Ontario Inc., the owner of a site located north of Highway 401 and northeast of the Highway 400 on ramp (from Highway 401) and municipally known as No. 1677 Wilson Avenue (the "**Property**"). The Property houses the Toronto Plaza Hotel and is depicted below in red for easy reference.

Figure 1. The Property



The purpose of this letter is twofold. The first is to highlight the suitability of this Property for mixed-use (including much needed residential uses) which unfortunately was not addressed through its failure to be included in City of Toronto OPA 653. The second purpose is to formally request a meeting with Provincial staff to provide further details of what could be achieved with our client's "shovel ready" mixed-use redevelopment in the City of Toronto.

With the Province's support of the redesignation, our client can provide Bill 97 desired housing and jobs. The requested redesignation recognizes that "hotel space and extensive surface parking" does not need protection from conversion. While the City of Toronto fails to recognize this, we note that this very fact is being addressed as the Province is proposing through its 2023/2024 "Review of proposed policies adapted from *A Place to Grow* and *Provincial Planning Statement*".

City of Toronto OPA 653

On September 6, 2023, the City of Toronto adopted OPA 653 pursuant to sections 17 and 26 of the *Planning Act*. This amendment is now before the Minister of Municipal Affairs and Housing for a decision under the *Planning Act*.

OPA 653 proposes new and updated policies and mapping related to employment land conversions. **However, the City's "process to comprehensively consider" employment land conversions failed to consider and/or approve an appropriate redesignation from "General Employment" for the Property.** We will explain below why this was an oversight.

Also relevant to our client's request is that OPA 653 does not appropriately consider the Province's intentions respecting truly protecting "areas of employment" that require protection (industrial, warehouse, etc.) and allowing more lands to become flexible land uses to meet the needs of the community. The City of Toronto has confirmed that they did not review OPA 653 in light of this progressive planning to align with the Province's intentions respecting providing shovel ready residential proposals.

As noted above, the purpose of this letter is to specifically request that our client's Property be redesignated to permit mixed-use and residential uses.

Conversion Request

As you are aware, on April 6, 2023, the Province introduced new policy and legislative changes as part of its ongoing effort to address both housing supply and affordability. The Province introduced two key components:

- 1) Bill 97 – An Act to amend various statutes with respect to housing and development; and
- 2) the proposed Provincial Planning Statement 2023.

This new definition for "areas of employment" is a logical recognition that industrial and other specialized economic lands have **different requirements and needs than old hotels!** Industrial lands do need protection. The Province has recognized that maintaining areas that are being used by hotels and shelter space (across the street from low rise residential) are different than industry and do not need "protection" as exists today – in fact, the most successful areas for non-residential uses in the City of Toronto (the Downtown) are not employment lands, but rather mixed-use lands. This request relates directly to this fact.

The proposed Provincial Planning Statement 2023 includes a new definition of Employment Areas to match the *Planning Act* definition change proposed in Bill 97. The new definition for Employment Areas



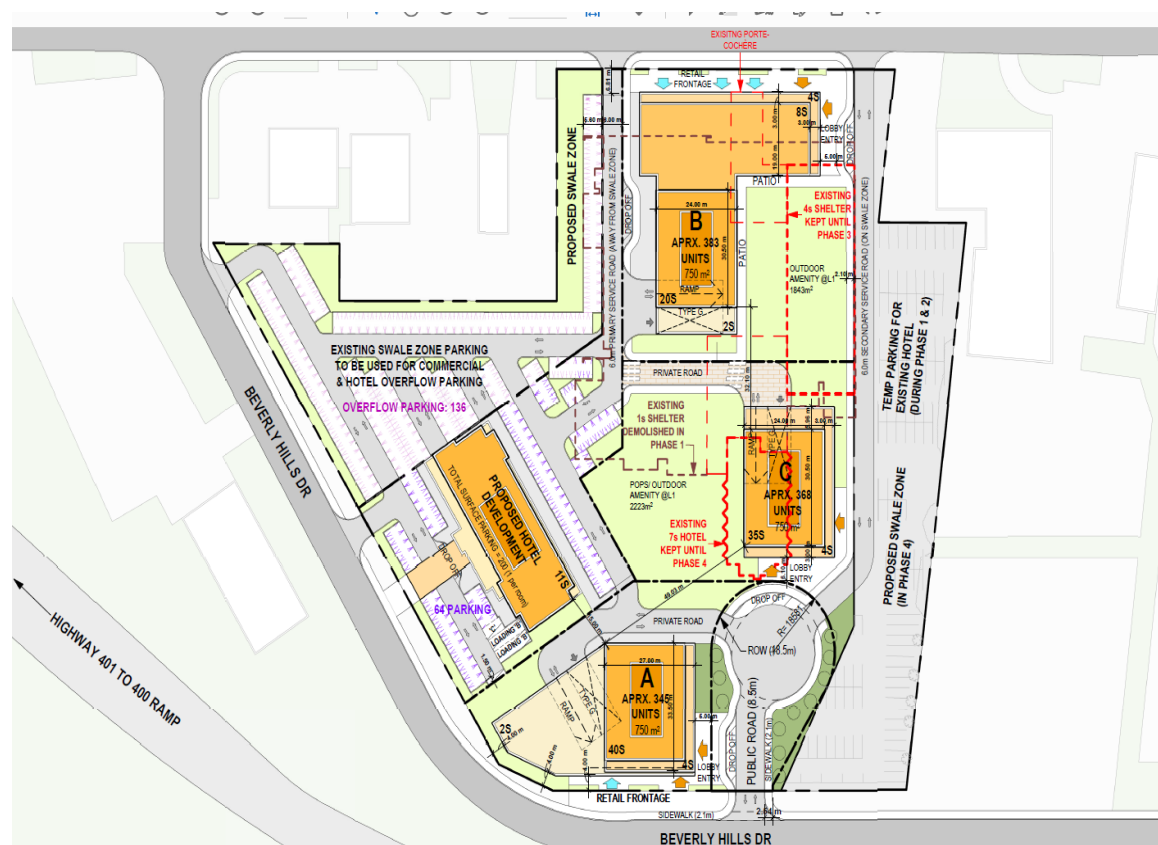
scopes the protected land uses. As such, the evolution of unnecessary hotel space to become part of complete communities is now being encouraged. This is dramatically different to how the City is considering conversions from these employment areas. **Therefore, on behalf of our client we are requesting the Minister to redesignate the Property to provide housing and jobs in line with a "Mixed Use" designation.**

1677 Wilson Avenue and Its Potential

The 2.8 ha Property is dominated by a sprawling surface parking lot with frontages on municipal roads on three sides and Wilson Avenue to the north and Hollywood Boulevard to the south and west. Directly to the north of the Property are low rise multi-family buildings with retail to the east. Directly to the east and abutting the Property is the West Toronto Church of God (not permitted in the "General Employment Area" designation) and outdoor storage. Abutting to the west is a closed Country Style Donut store with auto related service uses further to the east. A mosque is located to the south-west (also not permitted in the "General Employment Area" designation) and a funeral home with surface parking to the south.

The neighbourhood is definitely not thriving as an Employment Area as that term is defined by the City's own Official Plan and, importantly, shows no ability to be so in the future. Neither the Property, nor the area, are appropriate for reverting to an industrial or other pure employment style use. The area is ripe for conversion to a modern mixed-use style of development, which can house more jobs than are currently in the area, while also delivering much in demand community uses and housing to the benefit of the direct neighbours and residences to the north and the City as a whole. Maintaining the existing designation will only serve to stifle improvements from taking place. It is the goal of our client to spark this revitalization.

Figure 2. Rendering of Comprehensive Redevelopment of the Property



The phased redevelopment of the Property is for a mixed-use master plan development that generally consists of three (3) high-rise residential and/or mixed use buildings ranging in heights from 20-40 stories and an 11 storey hotel. Currently, approximately 1,100 apartment dwelling units, 200 hotel rooms and ground floor retail along Wilson Avenue and Beverly Hills Drive is proposed.

The Property is developed with a 7-storey building that historically has operated as a hotel and conference centre. Since 2016 the building has been utilized by the Toronto Shelter and Support Services Division as a temporary shelter for individuals and families facing homelessness. A large portion of the Property consists of an asphalt surface parking. The Property is located within the Black Creek Regional floodplain, which is regulated by the Toronto and Region Conservation Authority (“TRCA”). Our client and its consultants have been working with TRCA to design an appropriate response to potential flood conditions. As our client’s planning consultant (Richard Domes of Gagnon Walker Domes Ltd.) states:

“Based on our preliminary review of the Flood Analysis prepared by Valdor Engineering Inc. and the preliminary Site Plan prepared by Z01 Architects, redevelopment of the subject site for mixed use high density development, including residential uses appears to be feasible from a technical perspective. As noted above, the proposed grading strategy results in flood free areas (under the 350 year flood condition) on portions of the subject site where new development is proposed; pursuant to the criteria established between Valdor Engineering Inc. and the TRCA, the Provincial Policy Statement and Official Plan policy. Safe ingress and egress has also been contemplated under this storm event in the development and grading design.”

We note neither the Property, nor the immediate area, are appropriate for reverting to an industrial style use. The Property is ripe for conversion to become a modern complete community.

The highest and best use of the Property would be better served as mixed-use development. Converting the Property to a mixed-use development will allow the site to maximize its potential and the use of the extensive municipal infrastructure in the area, in sharp contrast to the existing state of the Property (and the area). A vibrant mixed-use district will, in turn, further support the intensification of the employment uses in the area – employment, retail and institutional uses thrive in vibrant complete communities.

It is best stated by our client’s planning consultant Richard Domes:

“It is our opinion that there is a demonstrated need for the Conversion Request. The Province of Ontario, including the City of Toronto and other Greater Golden Horseshoe municipalities are currently experiencing a housing crisis. Simply, there is not enough housing to meet the needs of Ontario’s existing and growing population. More housing is required within established Built-up Areas through intensification of vacant and/or underutilized lands. The subject site, while currently developed, is underutilized in its current form. The redevelopment of the subject site for mixed use development, featuring high density residential would optimize the use of land and infrastructure. Sunray Group’s proposed mixed use master plan presents a significant opportunity to address housing

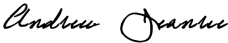
needs in the City and Jane-Wilson community. The substantial addition of approximately 1,100 dwelling units on the subject site, which contemplates a range of unit sizes in both condominium and rental tenures, will contribute to meeting the critical demand for the City's wide range of existing and forecasted housing needs."

Please be advised that our client welcomes further discussion and a meeting with Provincial (and City) staff. We thank you for the opportunity to comment on this important matter.

Yours truly,

BENNETT JONES LLP

Per:

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Andrew Jeanrie

c.c.: Client

Richard Domes, Gagnon Domes Walker Ltd.

