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July 16, 2021

**Via E-Mail ([kerri.voumvakis@toronto.ca](mailto:kerri.voumvakis@toronto.ca)) and Delivered**

Kerri Voumvakis  
Director, Strategic Initiatives, Policy & Analysis  
City of Toronto, City Planning Division  
22nd Floor, Metro Hall  
55 John Street  
Toronto, ON M5V 3C6

Dear Ms. Voumvakis:

**Re: Request for Employment Lands Conversion  
No. 1677 Wilson Avenue, (North York) City of Toronto**

We are the solicitors for 2656049 Ontario Inc., the owner of a 2.8 ha. site generally 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.



On behalf of our client, we are pleased to submit herewith materials and details in connection with a formal request as part of the City's ongoing municipal comprehensive review process and City of

Toronto Official Plan Policy 2.2.4.17. Specifically, we are requesting on behalf of our client that the City redesignate the Property from "General Employment Areas" to "Mixed Use Areas" to permit the redevelopment of this underutilized site into a more productive and contributing "Hub" for use and integration into the neighbourhood.

## **LOCATIONAL DETAILS**

The Property is approximately 6.99 acres in size and as shown on the attached air photo contains the former Toronto Plaza Hotel (now being run as a municipal shelter). The Property is dominated by a sprawling surface parking lot with frontages on municipal roads on three sides. 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 Areas 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 site, 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. To that end, our client has had formal discussions with City Planner Jeffrey Elkom, City Urban Designer Joanna Chludzinska, and City Engineer Serge Petit with the intention of submitting a mixed use "Hub" proposal in the near future.

## **EVALUATION OF THE CONVERSION REQUEST**

There are two general considerations by which a request is evaluated. The first is meeting the Provincial *Planning Act* requirements. With the Provincial "top down" planning hierarchy, the City has specific tests by which it must formally evaluate requests. The second is a consideration of the contextual relationship of the Property to the neighbourhood and uses within and abutting the subject Property. On a grander level, Employment Areas also must not only consider their role within the City and the region, but also within the Province.

## **PROPERTY STATUS**

In evaluating requests for employment conversions from a *Planning Act* perspective, we first note that the Property is not part of a Provincially Significant Employment Zone. While the Property is presently designated "General Employment Areas" and is classified within the City's Urban Structure

framework as an Employment Area (as identified on Map 2 to the Official Plan), its use is historically (and presently) not traditional "employment" type uses (such as manufacturing, warehousing), but as a hotel which is not even a permitted use within the Employment Area and "General Employment Areas" designation. Also relevant, the Property is on the edge of both the Employment Area and "General Employment Areas".

Furthermore, it is important to note that the property is being used currently for residential purposes, as much of the former hotel space is in fact now being used as a municipal shelter which is a residential use by definition.

## **CONTEXTUAL MUNICIPAL ROLE**

As described above, the Property is found within what can be characterized as an isolated "patch" of failing Employment Area lands. Located to the east of the Property are lands that are designated "Open Space" and uses include a place of worship (which is not permitted in the General Employment Use designation). To the north of the Property are lands designated "Mixed Use Areas" with "Neighbourhoods" further north. To the west of the Property is a failed restaurant and low intensity auto related uses.

With respect to the actual Property, as noted, its most recent uses are hotel (not permitted within the Employment Area lands) and municipal shelter, neither of which are employment uses.

The future use of the Property is envisioned as a lively mixed use site, which will include a new hotel (which our client has already met with the City on and is in the process of preparing their formal application), residential space, retail, office and community space. An outline of the potential for the property can be seen in the attached vision for the Property that has been prepared by RED Studios Architects. Building off this vision, the Property can become an exciting catalyst for regeneration of the failed employment lands into a strong mixed use area and hub for the larger community.

## **EXCLUSION REQUEST**

We understand that conversion requests will be assessed, both cumulatively and individually, by considering a number of conversion criteria. These criteria can be categorized into the following general themes:

I) Demonstrating a need for a conversion in order to meet the City's allocated population forecast;

It goes without saying that with increased immigration and the allocation of residential growth numbers by the Province to the City that an intensified form of residential development is desirable and required for the City to meet its obligations.

II) If the City will be able to meet their allocated employment forecast;

The requested conversion will not remove or discontinue a current functioning employment use. The Property and surrounding area are not functioning as Employment Area today, nor are they a candidate for the sort of "sheltered" employment uses like industrial, so there will be no decrease in defacto Employment Area lands. Just as importantly though the switch of this Property to a more appropriate designation will increase the likelihood of stable jobs through a "Mixed Use Areas" designation that will allow the development of the variety of employment spaces proposed by our client.

The requested exclusion of the Property from remaining within the "General Employment Use" designation will in no way prejudice the ability of the City or the broader region to respond to future needs for employment lands. The Property is insignificant in size and plays at best a very limited theoretical employment role today (in fact, the existing use is residential). As noted above, the conversion to a mixed use area will, in fact, lead to more employment opportunities on the Property than trying to constrain the area with single purpose employment uses.

III) Whether or not the conversion would adversely affect the employment area related to:

- Land use compatibility, size of employment area, ability to provide opportunities for similar or related employment; and

As demonstrated above, this part of the City has already evolved from being an Employment Area and the conversion of this Property will not destabilize what exists already. This is demonstrated even more graphically by the fact that the former use and the existing uses are already uses not permitted in the "General Employment Areas" designation. In fact, as it relates to land use compatibility, the proposed mixed use designation will be more compatible with the surrounding uses (both within the employment and residential areas) than the majority of the Employment Area uses current designated for the Property would be.

IV) Whether there is sufficient hard and soft infrastructure to accommodate the proposed use(s).

The lack of success of the former uses on the Property cannot be attributed to insufficient hard or soft infrastructure. In fact, from a local perspective the Property is well served by transit with comprehensive public transit infrastructure and local oriented road system. In terms of water and sewer any redevelopment options can be successfully serviced. Our client's servicing engineer has confirmed that the redevelopment options that are being considered would have less impact on servicing than many manufacturing uses which could be constructed on the Property if this area of the City was in fact desirable for that type of development.

## ENCLOSURES

Please find enclosed, a copy of this submission (letter and survey) on a USB key. With respect to the payment of \$20,000 to address the City's "Employment Areas Conversion Request User Fee", please direct your invoice to our client at:



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515 Consumers Road, Suite 701  
Toronto, ON M2J 4Z2

We would be happy to meet with the City to discuss this matter in further detail. We are also happy to provide such additional information as would reasonably assist the City in evaluating this matter. Please feel free to reach out to myself, or Robert Blunt, the land use planner assisting me with this matter at 416.777.7490.

Yours truly,

**BENNETT JONES LLP**



Andrew Jeanrie

Enclosures

cc: Client