



BOUSFIELDS INC.

January 24, 2024

Project No. 2110

Hon. Paul Calandra, MPP, Minister
Ministry of Municipal Affairs and Housing
Municipal Services Office – Central Ontario
777 Bay Street – 16th Floor
Toronto, ON M7A 2J3

Attn: Catherine MacKinnon

Dear Minister Calandra;

**Re: Request to Modify City of Toronto OPA 644 Prior to Ministerial Approval
ERO File Nos. 019-7441
1543-1551 The Queensway and 66, 70 & 76 Fordhouse Boulevard, City of
Toronto**

1.0 Introduction

Bousfields Inc. are planning consultants to 1545 The Queensway Inc. (owner of 1545 The Queensway), 2038980 Ontario Limited (owner of 1547 The Queensway and 70 Fordhouse Boulevard), 572989 Ontario Inc. (owner of 1543, 1549, 1551 The Queensway and 76 Fordhouse Boulevard) and 1370443 Ontario Limited (owner of 66 Fordhouse Boulevard) (the "subject site"). The subject site is located on the south side of The Queensway and north of Fordhouse Boulevard, approximately 21,550 square metres (2.15 hectares) in area.

As part of the City of Toronto's Municipal Comprehensive Review ("MCR"), the owners requested a conversion from *General Employment* and *Core Employment Areas* to *Mixed Use Areas*, under the City of Toronto Official Plan ("Official Plan"). On June 18, 2023, the City of Toronto adopted Official Plan Amendment ("OPA") 644, pursuant to sections 26 and 17 of the *Planning Act* by By-law 599-2023. The OPA 644 proposes new and updated policies and mapping related to employment, including 5 employment conversions. The amendment applies to Map 2 Urban Structure, Land Use Maps 13-23, and adds site and area specific policies to Chapter 7 of the City of Toronto Official Plan. On Map 2 of Council-adopted OPA 644, the subject site is redesignated *General Employment Areas* in its entirety.

We are writing to request that the Minister consider modifying OPA 644 to redesignate the subject site to Mixed Use Areas to permit the proposed redevelopment of an underutilized site with a mixed-use mixed income development. The proposal will facilitate the critical expansion community services provided by Haven on The Queensway – a charitable organization working to enhance the quality of life for those in need by providing food, clothing and other resources, deliver over 1,401 residential dwelling units including 208 affordable housing units to help meet Toronto's Housing Pledge to facilitate the construction of 285,000

new homes by 2031, a 2,155 square metre public park and 600 square metre Daycare facility to complete the community.

Accordingly, we are writing to request that the Ministry of Municipal Affairs and Housing modify OPA 644 as follows:

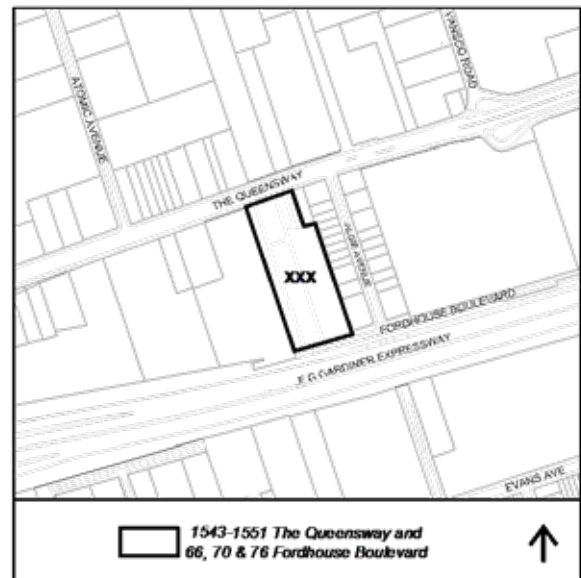
· **Review OPA 644 to add SASP XXXX as provided below:**

Chapter 7, Site and Area Specific Policies, is amended by adding Site and Area Specific Policy XXX for the lands known municipally in 2023 as *1543-1551 The Queensway and 66, 70 & 76 Fordhouse Boulevard* as follows:

'XXX. 1543-1551 The Queensway and 66-76 Fordhouse Boulevard

A mixed-use and mixed-income development is permitted provided that:

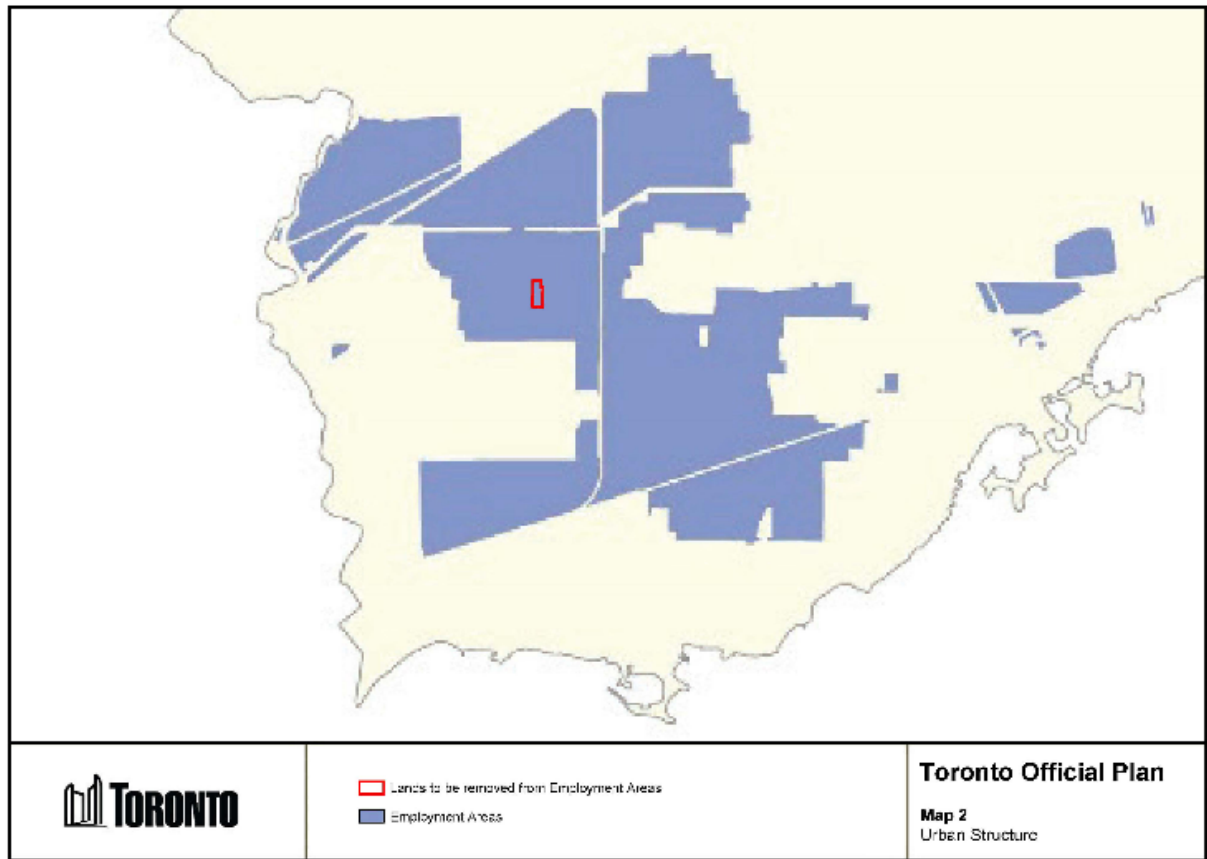
- a) A minimum of 3,600 square metres of gross floor area on the lands will be community services and facilities that:
 - i.) Will be comprised of uses such as a food bank, retail, office and educational services, and a daycare facility;
 - ii.) Will be constructed on the land prior to or concurrent with any residential gross floor area.

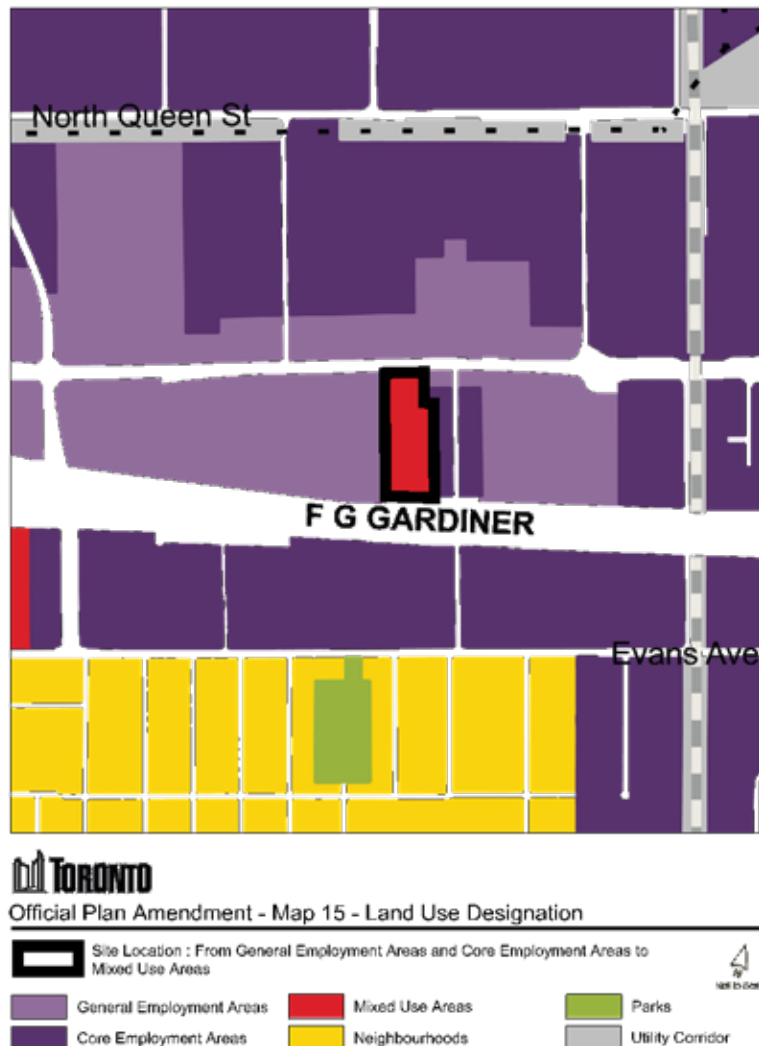


- b) New development containing residential units on the lands will secure a minimum amount of affordable housing as follows:

- i.) if a condominium development is proposed, a minimum of 7 per cent of the total new residential gross floor area shall be secured as affordable ownership housing or a minimum of 5 per cent of the total new residential gross floor area shall be secured as affordable rental housing;
- ii.) the affordable housing shall be secured at affordable rents or affordable ownership prices for a period of at least 99 years from the date of first residential occupancy of the unit;

- iii.) the unit mix of affordable housing shall reflect the market component of the development, as appropriate, to achieve a balanced mix of unit types and sizes and support the creation of affordable housing suitable for families; and
 - iv.) if a purpose-built rental development is proposed there is no requirement for affordable rental housing.
- c) The provision of affordable housing required by policy h) shall be secured through one or more agreements with the City.
 - d) If an Inclusionary Zoning By-law takes effect and becomes applicable to any development on the lands, then the Official Plan Inclusionary Zoning policies and by-law, as may be amended, will prevail and the affordable housing requirements in Policy b) will no longer apply, but only provided the applicable Inclusionary Zoning policy and by-law requirements meet or exceed the requirements of policy b) above.
 - e) Sensitive land uses, including new residential uses will be located, designed and buffered to mitigate impacts from, be compatible with, the ongoing operation and expansion of nearby employment uses, and any new employment uses within the surrounding *Core Employment Areas*.
 - f) As part of a complete Zoning By-law Amendment application, a Compatibility/Mitigation Study, Noise Impact Study and Vibration Study shall be submitted, peer reviewed and implemented, at the applicant's expense, to the City's satisfaction.
- **Revise “Appendix 1 - Map 2 Urban Structure, Employment Areas Modifications” to remove the subject site from this map.**
 - **Revise “Appendix 2 – Map 34 Official Plan Land Use Designations” to redesignate the subject site to *Mixed Use Areas*.**





For the reasons outlined in this letter, it is our opinion that the subject site is appropriate and desirable for redesignation to *Mixed Use Areas*. This redesignation would facilitate the redevelopment of lands that are currently vastly underutilized and would facilitate a higher density mixed-use and mixed income redevelopment along a Major Arterial Road and Surface Transit Priority Segment that will allow the expansion of Haven on The Queensway's community services to serve people and families impacted by poverty. Further, from an urban structure perspective, lands along The Queensway, east of Kipling Avenue and west of Highway 427 are designated *Mixed Use Areas* while the subject site is within a section of The Queensway that abruptly transitions from *Mixed Use Areas* to *Employment Areas*. Redesignating the subject site to *Mixed Use Areas* will revitalize The Queensway corridor that is largely vacant or underused, allow for the expansion of essential community services that are provided by Haven on The Queensway and complement the revitalization currently

occurring east and west along The Queensway, with no impact to the *Employment Areas* surrounding the subject site.

It is our opinion that the conversion of the subject site from *General Employment* and *Core Employment Areas* to *Mixed Use Areas* conforms to Policy 2.2.5.9 of A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the “Growth Plan”) as described in Section 5.0 of this letter.

2.0 Site and Surroundings

2.1 Subject Site

The subject site is approximately 21,550 square metres (2.15 hectares) in area, with frontages of approximately 76.2 metres along The Queensway and 94.2 metres along Fordhouse Boulevard and a depth of approximately 237.7 metres. The Subject site is currently occupied by seven 1-to 2-storey buildings that have a total building footprint of approximately 5,540 square metres. Currently, the building at 1551 The Queensway is being retrofitted to accommodate Haven on the Queensway’s Food Bank and the building at 66 Fordhouse Boulevard is actively used by Hello Fresh for food distribution. The remainder of the buildings on the site are used for service commercial tenants or vacant. It is estimated that the current uses on the subject site generate approximately 50 to 100 jobs.

2.2 Surrounding Context

The subject site is located in the Islington City-Centre West neighbourhood within the former City of Etobicoke, along a segment of The Queensway that extends west of Kipling Avenue to east of Highway 427. The Queensway is a major arterial road and has historically played a key role at the neighbourhood, City and regional scale, servicing as a main street of the neighbourhood linking it to the broader City, both geographically and economically.

In general, the lands along The Queensway, between Kipling Avenue and Highway 427, are predominantly developed with large-scale shopping centres and car dealerships. The subject site and sites along Algie Street, characterized by narrow/shallow lots and an eclectic mix of low density residential and service commercial uses and community services.

At the centre of this segment of The Queensway, Haven on The Queensway (1535 The Queensway) emerged in 2009 to enhance the quality of life for those in need by providing food, clothing and other resources to people and families impacted by poverty. Haven on the Queensway serves a catchment area that extends north to Etobicoke North (wards 1 and 2), includes Etobicoke Centre (Wards 3 and 4) and south to Etobicoke Lakeshore (Wards 5 and 6).

The Queensway is a 36 metre right of way, that approximately 530 metres east of the subject site, overpasses a CPR rail spur. Overall, this segment of The Queensway is generally described as automobile oriented, resulted in a poor pedestrian environment and constrained traffic movements.

Bousfields has worked extensively along the Gardiner Expressway and Highway 427 corridors on regenerating Employment Areas that are no longer fulfilling their employment potential despite the availability of municipal infrastructure, including transit, community services and facilities, healthcare and retail. This evolving context is reflected by recently approved mixed-use high-rise developments on the northwest and southwest corners of Kipling Avenue and The Queensway. These developments show a trend that the mixed-use character of The Queensway corridor is being extended further west from Kipling Avenue.

From a land use perspective, the lands located along this segment of The Queensway are designated *General Employment Areas*, while the lands located west of Highway 427 and at the intersection of The Queensway and Kipling Avenue are designated *Mixed Use Areas* and identified as *Avenues* on Official Plan Map 2 – Urban Structure (above). As such, there is currently a significant amount of mixed-use development activity occurring along The Queensway both east of Kipling Avenue and west of Highway 427.

2.3 Immediate Surroundings

Immediately north of the subject site are several car dealerships, residential dwellings and a large institutional use. Directly across the street from the site are three sites occupied by car dealerships (1542, 1544 and 1548 The Queensway). Immediately east of the dealerships is a large site occupied by the Church on the Queensway, which also contains an extensive surface parking lot (1536 The Queensway). To the west of the dealerships is a 2-storey motel (1554 The Queensway) and 1-storey eating establishment (1560 The Queensway), all of which contain their own parking areas and separated driveways from The Queensway. To the northwest are five 1-to 2-storey single detached dwellings which appear to be occupied by a mix of residential and commercial uses (1564, 1566, 1568, 1570 & 1572 The Queensway).

Further north is a mix of commercial and industrial uses located along Atomic Avenue and North Queen Street. Uses within this area include automotive repair, commercial laundry & linen services, truck rental services, waste management, packaging, warehousing & distribution, and manufacturing. With respect to these uses, the nearby property at 15 Atomic Avenue currently has an active environmental compliance approval to permit waste management related activities. In addition, the adjacent property at 24 Atomic Avenue has an active environmental compliance approval to permit air related externalities pertaining to a commercial laundry operation.

To the immediate east of the subject site is a 1-storey commercial building occupied by automotive repair shop (1541 The Queensway). Haven on the Queensway, a charitable community services provider is located at the southwest corner of The Queensway and Algie Avenue (1533 The Queensway). Along Algie Avenue there is a mix of automotive repair and residential uses contained with a variety of 1-to 2-storey commercial garage buildings and single detached dwellings. The current lot fabric and land use compatibility conditions along Algie Avenue are not desirable. The nearby property at 53 Algie Avenue has an active environmental compliance approval to permit air emissions pertaining to automotive painting.

East of Algie Avenue is a large IKEA furniture store (1475 The Queensway), which also contains a surface parking lot on the south side of the property. Further east is a 3-storey industrial building occupied by warehousing & distribution uses with an associated office. The CPR rail spur underpasses The Queensway.

Further east, between the CPR Rail spur and Kipling Avenue, are several uses comprised of commercial, manufacturing and car dealerships. At the northwestern corner of Kipling Avenue and The Queensway, at 1306-1310 The Queensway, is a recently approved mixed-use development with three buildings with heights up to 35-storeys. Additionally, at the southwestern corner of Kipling Avenue and The Queensway is another recently approved development, at 1325-1361 The Queensway, that proposes a mixed-use development with three buildings with heights of up to 46-storeys.

To the east of Kipling Avenue is a mix of residential and commercial uses, with an emerging context of mixed-use buildings with varying heights.

Immediately south of the subject site is Fordhouse Boulevard which terminates at the west boundary of the subject site. Further south is the Gardiner Expressway, followed by commercial and industrial uses along the north side of Evans Avenue. Uses within this area include packaging, distribution, and automotive & truck repair, among others. Immediately, to the south of Evans Avenue is a low-rise residential neighbourhood consisting primarily of single and semi-detached dwellings. Within this residential area, in proximity of the site, is the New Haven Learning Centre (301 Lanor Avenue) which is a school for those affected by autism spectrum disorder, in addition to several parks such as Douglas Park and Connorvale Park.

To the immediate west of the subject site is a three building retail commercial plaza and associated at-grade parking lot (1555-1563 The Queensway), in addition to two free standing eating establishments (1569 The Queensway). Adjacent to this property is a two-storey commercial building (1571 The Queensway) as well as a 2-storey car dealership and associated parking lot (1575 The Queensway).

Further west are three 1-to 2-storey buildings which contain a variety of commercial uses including retail, office, eating establishment, car dealership and wholesale-related uses (1581,

1585 & 1589 The Queensway), which are not included within the *Provincially Significant Employment Zone*. Adjacent to this property, are a series of 1-storey buildings primarily occupied by retail and service commercial operators (1599-1607 The Queensway).

There is an under-review development application for Site Plan Control on the 1599-1603 The Queensway properties. This application proposes to redevelop the existing retail commercial buildings with a 4-storey building containing an at grade automotive dealership with above grade parking.

To the northwest is a large, big-box retail commercial centre anchored by a Canadian Tire store and Lowe's store, separated by an extensive surface parking lot (1602-1608 The Queensway). Further west is an interchange for Highway 427.

2.4 Transportation Context

The subject site is serviced by several transit routes, including GO Transit, TTC subway and surface transit routes.

The site is in proximity to Kipling Subway Station, Kipling GO Station and Mimico GO Station, as well as major highways including the Queen Elizabeth Way, Gardiner Expressway and Highway 427.

Kipling Station is one of the major transit hubs in Etobicoke, providing access to several transit options include TTC subway Line 2, Kipling GO station on the Milton line, and Mississauga Transit with several MiWay routes. Kipling station is located at 10 minutes away with car or 15 minutes away with transit.

Mimico GO Station is located on the Lakeshore West line and provides a service frequency of every 15 minutes or better. Mimico GO station is located 10 minutes away from subject site with car or 25 minutes away with transit.

Additionally, the site has access to frequent transit service via TTC Bus Route 44 Kipling that runs north-south and provides connections to the above mentioned higher-order transit stations. The TTC Bus Route 80 Queensway and 123 Sherway also provides service adjacent to the subject site.

3.0 **Proposed Development**

The proposal represents an opportunity to redevelop an underutilized site with community infrastructure and housing to serve the surrounding community and City at-large.

The proposal is comprised of the following community benefits, which are described below:

1. 'Haven on The Queensway'

Haven on The Queensway ("Haven") is a charitable organization working to enhance the quality of life for those in need by providing food, clothing and other resources. Haven's community services have grown to serve an increasing demand from the community. Haven identified the need for a larger facility to expand the community services to accommodating an increasing demand for support. The new building will be specifically designed to allow Haven to offer their services in an efficient manner and expand their capacity to serve a growing demand for services.

The proposal consists of a new 11-storey mixed-use mid-rise building which will contain Haven's community services at ground, second and third levels. The Haven community services will occupy a total gross floor area of 3,379 square metres along with a loading bay access from Laneway Street "A".

2. Affordable Housing (Rental and Ownership Dwelling Units)

The proposal will provide a total of 203 affordable housing units in Buildings "A" and "C" combined. A range of unit sizes and types have been designed to meet the Affordable Housing Design Guidelines of the City of Toronto.

Affordable Rental Housing

Floors four to eleven of Building "A" will be dedicated to affordable rental housing units. Building A include 83 affordable rental units comprising 33 one-bedroom units, 33 two-bedroom units, 13 three-bedroom units and 4 four-bedroom units. Building "A" will have an indoor amenity area of 167 square metres (2.0 square metres per unit) and an outdoor amenity area of 754 square metres (6.3 square metres per unit) with a total of 362 square metres.

The owner welcomes the opportunity to partner with the City of Toronto to operate and deliver the affordable rental units.

Affordable Ownership Housing

In addition to Building "A" affordable rental housing, a portion of Building "C" will be provide affordable ownership housing. Building C will include 120 affordable ownership units comprising 48 one-bedroom units, 48 two-bedroom units, 18 three-bedroom units and 6 four-bedroom units. The units will be co-located with market housing units in Building "C".

The affordable ownership housing units will have an indoor amenity area of 544 square metres (4.5 square metres per unit) and an outdoor amenity area of 754 square metres (6.3 square metres per unit) with a total of 1,298 square metres. In addition, owners of the affordable units will have access all of the amenity area throughout the building.

3. Daycare

The proposal will provide a daycare to be located within the ground floor of Building “C”. The daycare use will have a gross floor area of 600 square metres.

4. Parkland

The proposal will provide a public park with an area of 2,155 square metres (10% of the total site area). The park will be located at the southeast corner of the site.

5. Market Housing

The proposal will include a total of 1,193 market housing units, in addition to the affordable rental and ownership housing units. The market housing units will be distributed in Buildings “B”, “C” and “D”, as per the below unit breakdown:

Building	Gross Floor Area	Unit Mix				Total
	Square Metres	Studio	1BR	2BR	3BR	
B	22,518	23	232	57	45	357
C	19,040	27	216	54	27	324
D	32,417	38	338	78	58	512
Total		88	786	189	130	1,193

Additional information about ‘Haven on The Queensway’

Building “A” will be designed to cater to Haven’s services. Below are the programs that Haven plans to expand or add to their existing services:

1. Current Programs proposed for expansion

a. First Care Program

First Care program focuses on meeting the material and nutritional needs of pregnant women and parents up to the age of two. As part of this program, Haven provides essential support such as food aid, clothing, diapers, formula, and moral assistance to ensure these families have access to the resources necessary for their well-being.

As part of the redevelopment, a dedicated space will be established within the new building for First Care. This area will include private rooms for counselling sessions, nutrition classes, and parenting workshops. It will also accommodate storage for larger quantities of essential items such as diapers, formula and clothing, ensuring that Haven can readily meet the needs of pregnant women and parents of newborns.

b. Food Bank

Haven's food bank serves approximately 1,000 clients weekly, distributing approximately 350,000 pounds of food annually. Haven has established partnerships with organizations such as Second Harvest, Daily Bread Food Bank, Hello Fresh and local businesses like Sobeys and Cobbs Bread to secure a steady supply of nutritious food for those in need.

This redevelopment, in the form of a larger facility for the food bank, will allow Haven to expand their Food Bank's storage capacity, enabling the organization to store a wider variety of fresh produce, non-perishable items, and frozen goods. Additionally, the redevelopment will provide Haven the opportunity to establish a spacious distribution area that provides a more comfortable and dignified shopping experience for their clients. With increased space as part of this redevelopment, Haven will also explore the possibility of incorporating community kitchen programs, where individuals can learn cooking skills and prepare meals together.

c. Haven's Closet Program

Haven's Closet is a program that offers seasonal clothing to individuals and families in need. Haven provides a wide selection of donated clothing, footwear, and accessories for adults and children, ensuring that everyone has access to appropriate clothing for different seasons.

This redevelopment will be designed to provide for the expansion of Haven's Closet program, which will give Haven the ability to dedicate separate sections within the building for sorting, organizing, and displaying donated clothing. This will enable Haven to offer a more extensive selection and improve the overall shopping experience for individuals and families accessing Haven's Closet. Additionally, the expanded facility will allow Haven to accommodate more donors and store a larger inventory of clothing and accessories.

d. Haven Helping Seniors Program

Haven Helping Seniors is a weekly program designed to support isolated or less fortunate seniors in the community. Haven provides the seniors with food, hygiene kits, phone calls for companionship, art kits for creative expression, social events to combat loneliness, and referrals to other services, among other services.

This redevelopment will provide the opportunity to build a larger facility to create a welcoming space for seniors within the community. In consultation with the Haven's team, certain areas in the building have been designed specifically for the elderly, to establish a designated area for social gatherings, group activities, and workshops. This space will also house offices for staff and volunteers, ensuring a centralized location for program coordination and providing seniors with a comfortable environment to seek assistance.

e. Hope with Wheels Program

Hope with Wheels is a mobile street outreach program that addresses the needs of people experiencing homelessness. Haven's team provides hot food, sleeping bags, and toiletries to those in vulnerable situations, ensuring their basic needs are met while offering a compassionate approach.

The design of this redevelopment incorporates an expanded facility that will enable Haven to store a higher volume of supplies for this program. The new building will include dedicated areas for sorting, packing, and loading the outreach vehicles, ensuring efficiency and organization. Furthermore, the expanded facility will also allow Haven to acquire additional outreach vehicles to serve more locations and individuals in need.

2. Proposed Programs and Facilities Upgrade

a. Community Drop-in Space

Haven proposes to offer a safe inclusive space to meet the needs of clients. The Community Drop-in Space will host various activities like community events, seminars and wellness workshops for their senior and first care program. This Community Drop-in Space will also provide services to clients such as beverages and food, as well as access to computers and printers. This space will also be used for youth-focused initiatives.

b. Educational Centre

This redevelopment will incorporate an educational centre in the new building that will offer a variety of educational opportunities such as access to skills development, educational study, computer literacy programs, ESL programs, tutoring and job search tools.

4.0 Policy and Regulatory Framework

4.1 Provincial Policy Statement 2020

The Provincial Policy Statement, 2020 (“PPS”) provides policy direction on matters of provincial interest related to land use planning and development. The subject site is also subject to A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019, as amended by Amendment No. 1 in 2020 (“the Growth Plan”), which sets out regional growth management policies for the Greater Golden Horseshoe area.

With respect to the PPS, one of the key policy directions expressed in the PPS is to build strong communities by promoting efficient development and land use patterns. To that end, Part V of the PPS contains several policies that promote intensification, redevelopment and compact built form, particularly in areas well served by public transit.

Among other matters, the 2020 PPS includes additional policies related to addressing a changing climate and supporting green infrastructure, enhancing land use compatibility policies for sensitive land uses, increasing minimum requirements for housing land supply and clarifying policies related to market-based housing by adding a reference to affordable housing (i.e. Policies 1.4.3 and 1.7.1 of the PPS).

Specifically, Policy 1.1.3.2 supports densities and a mix of land uses which efficiently use land, resources, infrastructure, and public service facilities and which are transit-supportive, where transit is planned, exists or may be developed. Policy 1.1.3.3 directs planning authorities to identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment, where this can be accommodated taking into account existing building stock or areas and the availability of suitable existing or planned infrastructure and public service facilities.

Regarding the conversion of employment areas to non-employment uses, Policy 1.3.2.4 states that:

Planning authorities may permit conversion of lands within employment areas to non-employment uses through a comprehensive review, only 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 1.3.2.5 states that:

Notwithstanding policy 1.3.2.4, and until the official plan review or update in policy 1.3.2.4 is undertaken and completed, lands within existing employment areas may be converted to a designation that permits non-employment uses provided the area has not been identified as provincially significant through a provincial plan exercise or as

regionally significant by a regional economic development corporation working together with affected upper and single-tier municipalities and subject to the following:

- A) there is an identified need for the conversion and the land is not required for employment purposes over the long term;*
- B) the proposed uses would not adversely affect the overall viability of the employment area; and,*
- C) existing or planned infrastructure and public service facilities are available to accommodate the proposed uses.*

The subject site is located within a Provincially Significant Employment Area and therefore cannot be converted pursuant to Policy 1.3.2.5. However, as the City has commenced its official plan review, the conversion is being sought pursuant to policy 1.3.2.4. However, as noted above, Policy 5.2.1(2) of the 2019 Growth Plan states that:

A municipal comprehensive review that is undertaken in accordance with this Plan will be deemed to fulfill the requirements in the PPS to undertake a comprehensive review.

4.2 Growth Plan for the Greater Golden Horseshoe 2019

On May 16, 2019, A Place to Grow: The Growth Plan for the Greater Golden Horseshoe) came into effect (the “2019 Growth Plan”), replacing the Growth Plan for the Greater Golden Horseshoe, 2017. All decisions made on or after this date in respect of the exercise of any authority that affects a planning matter will conform with the 2019 Growth Plan, subject to any legislative or regulatory provisions providing otherwise. Subsequently, on August 28, 2020, the 2019 Growth Plan was amended by Growth Plan Amendment No. 1.

The Growth Plan policies emphasize the importance of integrating land use and infrastructure planning, and the need to optimize the use of the land supply and infrastructure. Key objectives in the Growth Plan support the development of complete communities and promote transit-supportive development adjacent to existing and planned higher order transit. This is further emphasized in Section 2.1 of the Plan:

“To support the achievement of complete communities that are healthier, safer, and more equitable, choices about where and how growth occurs in the GGH need to be made carefully. Better use of land and infrastructure can be made by directing growth to settlement areas and prioritizing intensification, with a focus on strategic growth areas, including urban growth centres and major transit station areas, as well as brownfield sites and greyfields. Concentrating new development in these areas provides a focus for investments in transit as well as other types of infrastructure and public service facilities to support forecasted growth, while also supporting a more diverse range and mix of housing options... It is important that we maximize the benefits of land use planning as

well as existing and future investments in infrastructure so that our communities are well-positioned to leverage economic change.”

There are several changes from the previously applicable Growth Plan that are relevant to the subject site. One significant change was the identification of 29 *Provincially Significant Employment Zones*. *Provincially Significant Employment Zones* are areas defined by the Minister in consultation with affected municipalities for the purpose of long-term planning for job creation and economic development. These zones can consist of employment areas or mixed-use areas with a significant number of jobs.

The subject site is located within a “strategic growth area” pursuant to the Growth Plan (i.e. a focus for accommodating intensification and higher-density mixed uses in a more compact built form). “Strategic growth areas” include urban growth centres, major transit station areas, and other major opportunities that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields. In this respect, the subject site is serviced by existing frequent transit service on The Queensway.

Policy 2.2.1(4) states that applying the policies of the Growth Plan will support the achievement of complete communities that, among other things, feature a diverse mix of land uses including residential and employment uses, and convenient access to local stores, services, and public service facilities; expand convenient access to a range of transportation options and public service facilities; and provide for a more compact built form.

Regarding the policies for the conversion of employment areas to non-employment uses, Policy 2.2.5.9 states that:

The conversion of lands within employment areas to non-employment uses may be permitted only through a municipal comprehensive review where it is demonstrated that:

- 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.*

Policy 2.2.5.10 states that:

Notwithstanding policy 2.2.5.9, until the next municipal comprehensive review, lands within existing employment areas may be converted to a designation that permits non-employment uses, provided the conversion would:

- a) *satisfy the requirements of policy 2.2.5.9 a), d) and e);*
- b) *maintain a significant number of jobs on those lands through the establishment of development criteria; and,*
- c) *not include any part of an employment area identified as a provincially significant employment zone unless the part of the employment area is located within a major transit station area as delineated in accordance with the policies in subsection 2.2.4.*

The subject site is located within a *Provincially Significant Employment Zone* (Zone 13 – Toronto, Peel), meaning that a conversion to permit residential uses can only occur through a municipal comprehensive review. As the City has initiated its municipal comprehensive review as of August 4, 2020, a conversion of employment areas to non-employment uses is being sought subject to the criteria referenced above.

The subject site responds well to the criteria set out in policy 2.2.5.9, which are generally consistent with the conversion criteria of OPA 231. In summary, there is a need for the conversion as the subject site is vastly underutilized and the proposed conversion would facilitate a higher density mixed use form of redevelopment along a Major Arterial and Surface Transit Priority segment. The increase in population and jobs will be facilitated by transportation and public realm improvements that will positively affect the viability of the broader employment area.

While the subject site is located within a *Provincially Significant Employment Zone*, the existing buildings on these lands do not contribute to the employment forecasts outlines within the 2019 Growth Plan. As such, the subject site is not currently considered a key location for employment in the City of Toronto. The proposed redevelopment of these lands, by redesignating them to *Mixed Use Areas*, will contribute to the employment forecasts outlined in the 2019 Growth Plan by providing 3,379 square metres of community services space for Haven.

This conversion will help ensure the continuity of the Mixed Use Areas along The Queensway while also protecting the employment areas to the north. We anticipate that there will be minimal land use conflicts if residential uses are added.

With respect to forecasted growth, Schedule 3 of the Growth Plan, as amended by Growth Plan Amendment No. 1, forecasts a population of 3,650,000 and 1,980,000 jobs for the City of Toronto by 2051. The 2016 Census data indicates that population growth in Toronto is continuing to fall short of the past and updated Growth Plan forecasts. The City's population growth from 2001 to the 2016 population of 2,822,902 (adjusted for net Census undercoverage) represents only 73.2% of the growth that would be necessary on an annualized basis to achieve the population forecast of 3,650,000 by 2051.

4.3 City of Toronto Official Plan

City of Toronto-initiated Official Plan Amendment 231 ("OPA 231") was part of the City's last MCR exercise, which included a review of all lands designated *Employment Areas* to permit non-employment uses. OPA 231 was adopted by Council on December 18, 2013 and resulted in the creation of two new employment lands designations, *Core Employment Areas* and *General Employment Areas*. OPA 231 is largely in effect as it relates to the subject site, except for the office replacement policies.

In accordance with Land Use Map 15 of the Official Plan, the subject site is designated *Core Employment Areas and General Employment Areas*. In accordance with Policy 4.6.3 of OPA 231, *General Employment Areas* are places for business and economic activities generally located on the peripheries of *Employment Areas* where, in addition to all the uses permitted in *Core Employment Areas* (i.e. manufacturing, warehousing, wholesaling and offices, among others), retail and service uses, and restaurants may also be permitted.

While the permissions of *General Employment Areas* are generally more flexible than those of the *Core Employment Areas*, residential uses are not permitted.

Policy 4.5.1 of the Toronto OP provides that *Mixed Use Areas* are made up of a broad range of commercial, residential and institutional uses, in single use or mixed use buildings, as well as parks and open spaces and utilities.

Furthermore, Policy 4.5.2 outlines the following development criteria in *Mixed Use Areas*:

- a) create a balance of high quality commercial, residential, institutional and open space uses that reduces automobile dependency and meets the needs of the local community;
- b) provide for new jobs and homes for Toronto's growing population on underutilized lands in the Downtown and Central Waterfront, Centres, Avenues and other lands

- designated Mixed Use Areas, creating and sustaining well-paid, stable, safe and fulfilling employment opportunities for all Torontonians;
- c) locate and mass new buildings to provide a transition between areas of different development intensity and scale, as necessary to achieve the objectives of this Plan, through means such as providing appropriate setbacks and/or a stepping down of heights, particularly towards lower scale Neighbourhoods;
 - d) locate and mass new buildings so as to adequately limit shadow impacts on adjacent Neighbourhoods, particularly during the spring and fall equinoxes;
 - e) locate and mass new buildings to frame the edges of streets and parks with good proportion and maintain sunlight and comfortable wind conditions for pedestrians on adjacent streets, parks and open spaces;
 - f) provide an attractive, comfortable and safe pedestrian environment;
 - g) have access to schools, parks, community centres, libraries and childcare;
 - h) take advantage of nearby transit services;
 - i) provide good site access and circulation and an adequate supply of parking for residents and visitors;
 - j) locate and screen service areas, ramps and garbage storage to minimize the impact on adjacent streets and residences;
 - k) provide indoor and outdoor recreation space for building residents in every significant multi-unit residential development;
 - l) provide opportunities for energy conservation, peak demand reduction, resilience to power disruptions and small local integrated energy solutions that incorporate renewables, district energy, combined heat and power or energy storage; and
 - m) provide opportunities for green infrastructure including tree planting, stormwater management systems and green roofs.

5.0 Planning Opinion

The Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe, the City of Toronto Official Plan all support intensification on sites well-served by municipal infrastructure, particularly sites along frequent transit service. In this respect, it is our opinion that the subject site should be redesignated “*Mixed Use Areas*” and developed at transit-supportive densities to support and optimize the investment in transit.

Based on policy 2.2.5.9 (a-e) of the Growth Plan, permitting residential uses on the subject site would represent the introduction of a use that is otherwise not permitted in an Employment Area and therefore it would be considered a conversion and require consideration as part of the municipal comprehensive review, as adopted by City Council through OPA 644.

Policy 2.2.5.9 provides that “the conversion of lands within employment areas to non-employment uses may be permitted only through a municipal comprehensive review where it is demonstrated that:

- 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.*

The subject site responds well to the conversion policies set out in the Growth Plan, which are generally consistent with the conversion policies of the Toronto Official Plan as amended by OPA 231. In summary, the “need” for conversion related to the opportunity to redevelop an underutilized site with a mixed-use mixed income development focused on area that has been established as a hub of community services provide by Haven on The Queensway – a charitable organization working to enhance the quality of life for those in need by providing food, clothing and other resources. The proposal will facilitate the critical expansion Haven’s community services, deliver approximately 1,401 residential dwelling units including 208 affordable housing units to help meet Toronto’s Housing Pledge to facilitate the construction of 285,000 new homes by 2031, a 2,155 square metre public park and 600 square metre Daycare facility to complete the community. In our opinion there is an immediate “need” to convert the subject site to facilitate the proposed mixed use mixed income development.

In relation to the population forecast, mixed use mixed income intensification on the subject site will contribute to the achievement of population forecasts for the City as a whole as set out in the Growth Plan. While City-wide population forecasts should not be determinative, Schedule 3 of the Growth Plan, as amended by Growth Plan Amendment No. 1, forecasts a population of 3,650,000 for the City of Toronto by 2051. The 2016 Census data indicates that population growth in Toronto is falling short of the updated Growth Plan forecast. The City’s population growth from 2001 to the 2016 population of 2,822,902 (adjusted for net Census undercoverage) represents only 73.2% of the growth that would be necessary on an annualized basis to achieve the population forecast of 3,650,000 by 2051.

Further, on May 10, 2023, City Council adopted a housing pledge to meet or exceed 285,000 new homes by 2031. The Municipal Housing Pledge is the City’s call to action to accelerate timelines and get more housing built. The housing pledge of 285,000 homes by 2031 represents a 23 per cent increase in Toronto’s housing supply within 10 years. The target

requires the completion of 31,500 homes per year, which is approximately double the annual completions between 2017 to 2021.

More fundamentally, the current derelict and vacant buildings on the subject site do not optimize the use of land and infrastructure. We estimate there are currently between 50 and 100 jobs generated by the use of the subject site, which represents an employment density of approximately 23.3 to 46.5 jobs per hectare. According to the City's 2022 Employment Survey, *General Employment Areas* had an average employment density of 68.3 jobs per hectare. Therefore, the subject site is underperforming relative to the average density of *General Employment Areas* in the City. A mixed-use mixed income development would make more efficient use of the site and help to maximize the number of residents and jobs that can be accommodated, while providing critical space for Haven to expand community services to serve people and families impacted by poverty.

Further to the above, the “need” for conversion related to the opportunity to complete the urban structure along The Queensway ‘Avenue’. The requested conversion would help to facilitate mixed use development along a segment of The Queensway that supports the use of active and public transportation and completes the broader urban structure along The Queensway to the east of Kipling Avenue and west of Highway 427. Particularly, the conversion will complete the *Avenue* overlay and *Mixed Use Areas* designation of The Queensway to the east of Kipling Avenue and west of Highway 4027 (see **Figure 1**).



Figure 1 – Surrounding Land Use Context

Completing the *Avenue* along The Queensway will be critical to support future public and active transportation investments in the area, given the growth and development activity that is emerging within the Sherway Secondary Plan Area node to the west, and the intersection of Kipling Avenue and The Queensway to the east. The conversion would facilitate a mixed-use mixed income development with higher density of employment and residential uses, contributing to the reurbanization of The Queensway (a Major Arterial and Surface Transit Priority segment), while expanding Haven's community services to accommodate an increasing demand for support by those in need and produce approximately 208 affordable housing units to help meet Toronto's Housing Pledge to facilitate the construction of 285,000 new homes by 2031.

Policy 2.2.5.9 (b) of the Growth Plan provides that “*the lands are not required over the horizon of this Plan for the employment purposes for which they are designated;*”.

The proposed redesignation of the subject site to *Mixed Use Areas* will not diminish the City's ability to meet its employment forecasts as outlined in the Growth Plan. We anticipate the redevelopment of the site will create the opportunity for increased employment on the subject site through Haven's community services, which will occupy 3,379 square metres of non-residential gross floor area. The proposed development will generate more economic activity through the delivery of critical community services than the estimated 50 to 100 jobs that presently exist on the subject site.

Based on employment growth between 2001 and 2018, it appears that the City will achieve, and likely surpass, the employment forecast in the Growth Plan well before the 2051 horizon date. On a City-wide basis, the estimated number of jobs was 1,700,000 as of 2018 (the most recent available data)¹. On that basis, the growth in employment between 2001 and 2018 was 142% of what would be required on an annualized basis to achieve the 2051 Growth Plan target of 1,980,000. After a period of job loss during the pandemic, the City has emerged with employment gains that are regaining the job loss during the first year of the pandemic. The 2023 Toronto Employment Survey recorded employment growth as a rate of 3.4 per cent from 2022, which is the second highest year-over-year growth rate in the past twenty years. It is our opinion that the subject site is not required over the planning horizon of the Growth Plan for only employment purposes permitted by the *General Employment* and *Core Employment Areas* designations that currently apply under the Official Plan.

Further, as evidenced by the recent developments along this segment of The Queensway, the subject site's block and lot pattern will continue to support antiquated land uses with relatively limited employment opportunities. We note that recent developments along this segment of The Queensway consisted of a large 2-storey self-storage centre to the northeast (1460 The Queensway) in addition to several automotive dealerships such as Honda Queensway (630 Kipling Avenue) and Marino's Auto Group (620 Kipling Avenue) to the east

¹ Russell Mathew evidence on behalf of the City of Toronto at the OPA 231 LPAT hearing (July 29, 2019 witness statement, paragraph 48).

in addition to Audi Queensway (1635 The Queensway) and the 4-storey Mercedes Benz automotive dealership at 1599-1603 The Queensway to the west. In our opinion, this segment of The Queensway and in particular the subject site is not required for the employment uses permitted under the *General Employment Area* designation of the Toronto Official Plan.

Policy 2.2.5.9 (c) of the Growth Plan provides that the City “*will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan*”.

As noted above, it is likely that the City will surpass the employment forecast in the Growth Plan well before the 2051 horizon. It is also important to note that the existing uses of the subject site do not generate an employment density that meets the average across *General Employment Areas* in the City. Therefore, it is our opinion that the conversion of the subject site will not affect the City’s ability to meet the forecasted employment growth to the horizon of the Growth Plan. The proposed development facilitated by the conversion request would result in a net gain in employment on the subject site through the expansion of community services provided by Haven.

Policy 2.2.5.9 (d) provides that “*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*”.

Policy 2.2.5.9 (d) pertains to land use compatibility between the introduction of sensitive land uses and existing employment uses in the surrounding area. In this respect, an Air Quality and Land Use Compatibility Assessment, dated April 8, 2021, prepared by Gradient Wind Engineers & Scientists, concludes that should the proposed development of the subject site be granted approval for residential use, it is not expected to have any land compatibility issues or conflicts with the existing or future employment lands in the surrounding area. Further, the immediately adjacent properties do not appear to be of a type that would result in any undue impacts to the introduction of sensitive land uses to the subject site as there are existing residential uses within 40 metres of the subject site. We anticipate that land use compatibility between the introduction of sensitive land uses and existing employment uses in the surrounding area can be mitigated.

In consideration of mitigating land use conflicts, the subject site is not located adjacent to heavy industrial uses that would present land use compatibility conflicts with residential uses on the subject site. Any future development application would include the appropriate land use compatibility study, noise study, wind study and transportation study as applicable.

In this respect, it is our opinion that the proposed conversion would facilitate a compatible and complementary mix of uses on the site that would not result in any negative impacts on the existing employment uses in the area. We anticipate the redevelopment of the site will create the opportunity for critical community services provided by Haven, as could be secured through the *Mixed Use Areas* redesignation with a Site and Area Specific Policy, as proposed.

With respect to the achievement of the minimum intensification and density targets of the Growth Plan, the conversion area is approximately 21,550 square metres in size and located along The Queensway, which in our opinion is an appropriate size and location for higher density mixed use mixed income development. A range of employment uses, typically requiring large land parcels, are not anticipated to be suitable for lands along The Queensway. Rather, the subject site represents an appropriate candidate to accommodate a mixed-use mixed income redevelopment that will facilitate the expansion of community services provided by Haven enhancing the quality of life for those in need by providing food, clothing and other resources, deliver over 1,401 residential dwelling units including 208 affordable housing units to help meet Toronto's Housing Pledge to facilitate the construction of 285,000 new homes by 2031, a 2,155 square metres public park and 600 square metres daycare facility to complete the community.

It is our opinion that the introduction of sensitive land uses on the subject site will not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in the Growth Plan.

Policy 2.2.5.9 (e) provides that "there are existing or planned infrastructure and public service facilities to accommodate the proposed uses."

The subject site is located in an area well served by existing transportation, water and sewer infrastructure. The proposed conversion would facilitate improvements to the existing transportation network, including a new public road connecting Fordhouse Boulevard to The Queensway that would accommodate an increase in people and jobs on the subject site. Any future development application would include technical studies including a Transportation Study, Function Servicing Study, Stormwater Management Study, and Hydrogeological Study which will confirm that the existing and planned infrastructure can accommodate the proposed conversion.

With respect to community infrastructure, approximately 900 metres to the southwest of the site is Lanor Junior Middle School (450 Lanor Avenue). In addition, there is also the New Haven Learning Centre, a school for those affected by Autism Spectrum Disorder, located approximately 630 metres to the south.

There are also several parks located to the south of the site. Douglas Park, which contains a children's playground, is located approximately 390 metres to the south of the site. As well, the 5 hectare Connorvale Park is located approximately 850 metres southeast of the site. Connorvale Park contains two A-rated, baseball diamonds and a fieldhouse. The subject site is also located in proximity to Queensland Park, located to the northeast, in addition to the Alderwood Memorial Park located to the southwest.

In terms of public recreation centres and libraries, the Horner Avenue Seniors Centre is located 1.4 kilometres south of the site. There are no other public recreation centres or libraries within 2.0 kilometres of the site.

In addition to the existing schools and parks in the surrounding area, the proposed mixed use mixed income development of the subject site will include 3,379 square metres of community services gross floor area, 600 square metres of daycare facility gross floor area and a 2,155 square metres public park to serve future residents of the proposed development and the surrounding area.

It is our opinion that the proposed mixed-use mixed income development is well served by existing infrastructure and public service facilities in the surrounding area and will contribute new infrastructure, community services and parks to accommodate a complete community.

From an urban structure perspective, The Queensway is designated *Avenues* from Grand Avenue at its eastern end to Kipling Avenue, and from Highway 427 to the West Mall at its western end. While the segment of The Queensway between Highway 427 and Kipling Avenue is not currently designated *Avenues*, it already serves the function of an *Avenue*, connecting with the *Avenues* designated portions of The Queensway to the east and west. This stretch of The Queensway is also designated a *Transit Priority Segment* and has existing frequent transit service that connects these *Avenues* segments together. In our opinion, the existing conditions along The Queensway, provide an opportunity to optimize the existing investment in public infrastructure, including servicing and transit.

The existing uses on the subject site are characterized with Haven's food bank and food related distribution, surrounded by vacant and underutilized buildings that generate significantly less employment than typical employment uses. In our opinion, redesignating the subject site to *Mixed Use Areas* offers an opportunity to utilize the existing infrastructure and propose land uses that will offer a net gain in employment in this area.

Furthermore, the subject site is vastly underutilized given the presence of low-rise retail and warehouse buildings with large surface parking lots. It is our opinion that the site location along a major arterial road with existing transit and servicing infrastructure provides the subject site an opportunity to plan for intensification in a contextually-sensitive manner that provides transit-supportive built form, expands community services and the City's housing supply including new affordable housing in a livable community.

The Queensway, west of Highway 427 and east of Kipling Avenue is designated *Mixed Use Areas*. The redesignation of the subject site will not adversely impact the *Employment Areas* on the north side of The Queensway and will rather permit land uses that are desirable on the south side of The Queensway and help optimize investments in transportation and infrastructure.

In our opinion, the redesignation of the subject site to *Mixed Use Areas* will support the broader policy goals of the PPS and the Growth Plan. In this regard, the proposed development meets several development criteria of the *Mixed Use Areas* designation and provides a significant community benefit by proposing to expand the 'Haven on The Queensway' headquarters, proposing affordable rental and affordable ownership housing, a day care centre and a public park. The proposed development will create a balance of high quality residential, community services and open space uses that meets the needs of the community. The development will locate and mass new buildings so as to frame the edges of streets and parks with good proportion and maintain sunlight and comfortable wind conditions for pedestrians on adjacent streets, parks and open spaces.

In considering the emphasis and importance placed on optimizing lands in proximity to frequent transit with greater intensification in order to achieve current Provincial policy objectives and to make more efficient use of this infrastructure, we believe that this site is a good candidate for employment lands conversion.

6.0 Conclusion

Based on the foregoing, it is our opinion that the site is a desirable and appropriate location for a conversion from *General Employment* and *Core Employment* to *Mixed Use Areas*. Accordingly, we request that the Ministry of Municipal Affairs and Housing modify OPA 644 as proposed in the attached draft Site and Area Specific Policy.

We trust the foregoing is satisfactory for your purposes. I would be pleased to discuss this request at your convenience. Please do not hesitate to contact me.

Yours very truly,
Bousfields Inc.



David Charezenko, MCIP, RPP
Principal

Attach. Draft SASP - 1543-1551 The Queensway and 66, 70 & 76 Fordhouse Boulevard
Air Quality and Land Use Compatibility Assessment, dated April 8, 2021, prepared by
Gradient Wind Engineers & Scientists

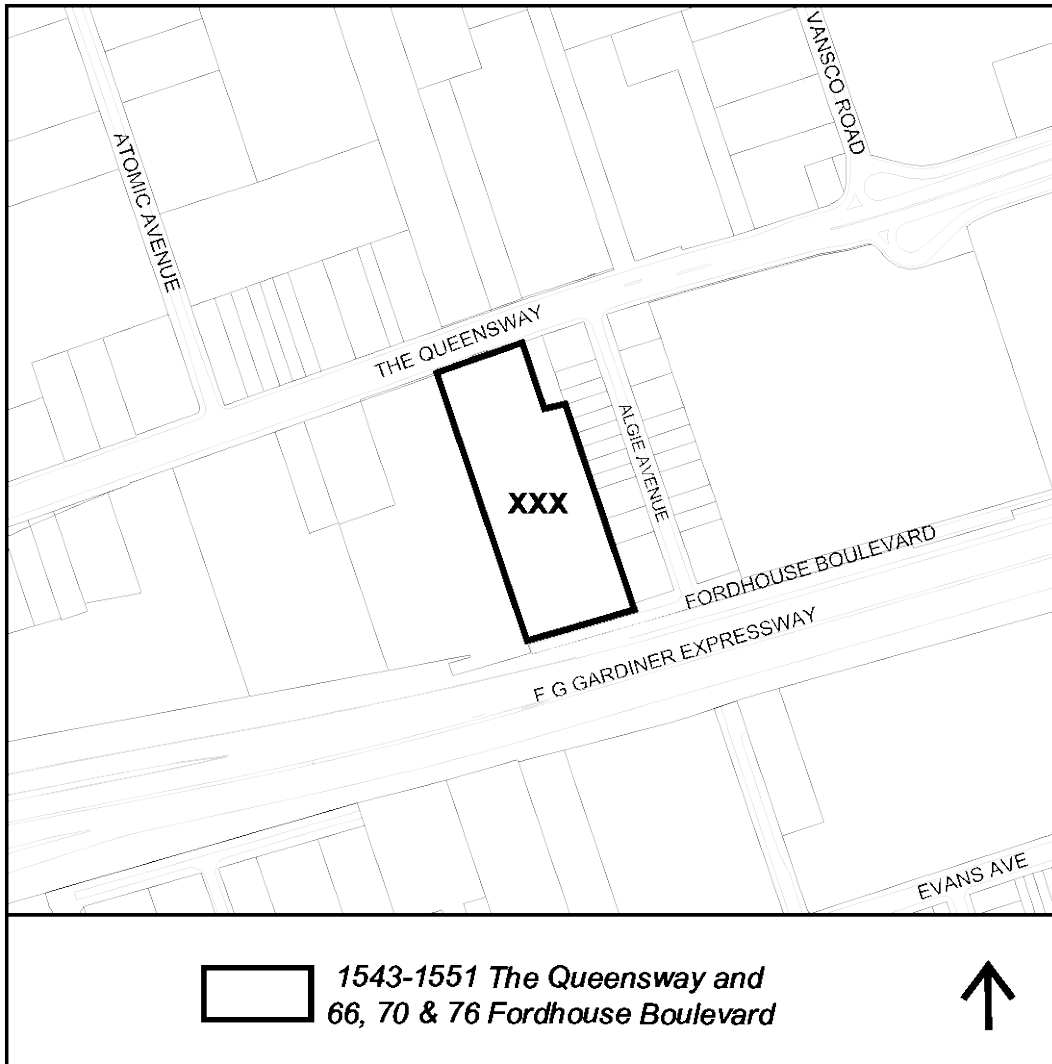
SASP

‘XXX. 1543-1551 The Queensway and 66-76 Fordhouse Boulevard

A mixed-use and mixed-income development is permitted provided that:

- a) A minimum of 3,600 square metres of gross floor area on the lands will be community services and facilities that:
 - i.) Will be comprised of a food bank, retail, office and educational services, and a daycare facility;
 - ii.) Will be constructed on the land prior to or concurrent with any residential gross floor area.
- b) New development containing residential units on the lands will secure a minimum amount of affordable housing as follows:
 - i.) if a condominium development is proposed, a minimum of 7 per cent of the total new residential gross floor area shall be secured as affordable ownership housing or a minimum of 5 per cent of the total new residential gross floor area shall be secured as affordable rental housing;
 - ii.) the affordable housing shall be secured at affordable rents or affordable ownership prices for a period of at least 99 years from the date of first residential occupancy of the unit;
 - iii.) the unit mix of affordable housing shall reflect the market component of the development, as appropriate, to achieve a balanced mix of unit types and sizes and support the creation of affordable housing suitable for families; and
 - iv.) if a purpose-built rental development is proposed there is no requirement for affordable rental housing.
- c) The provision of affordable housing required by policy b) shall be secured through one or more agreements with the City.
- d) If an Inclusionary Zoning By-law takes effect and becomes applicable to any development on the lands, then the Official Plan Inclusionary Zoning policies and by-law, as may be amended, will prevail and the affordable housing requirements in Policy b) will no longer apply, but only provided the applicable Inclusionary Zoning policy and by-law requirements meet or exceed the requirements of policy b) above.
- e) Sensitive land uses, including new residential uses will be located, designed and buffered to mitigate impacts from, be compatible with, the ongoing operation and expansion of nearby employment uses, and any new employment uses within the surrounding *Core Employment Areas*.
- f) As part of a complete Zoning By-law Amendment application, a Compatibility/Mitigation Study, Noise Impact Study and Vibration Study shall be

submitted, peer reviewed and implemented, at the applicant's expense, to the City's satisfaction.



Map 1

April 8, 2021

1370443 Ontario Limited

c/o RSM Canada
11 King St. W., Suite 700, Box 27
Toronto, ON M5H 4C7

Attn: Parmodh Angrish
parmodh.angrish@rsmcanada.com

Dear Mr. Angrish:

Re: Air Quality and Land Use Compatibility Assessment
1543-1551 The Queensway &
66, 70, & 76 Fordhouse Boulevard, Etobicoke
Gradient Wind File 21-060-Land Use Compatibility

1. INTRODUCTION AND TERMS OF REFERENCE

Gradient Wind Engineering Inc. (Gradient Wind) has been retained by 1370443 Ontario Limited to undertake a land use compatibility study for the proposed development located at 1543-1551 The Queensway and 66, 70, and 76 Fordhouse Boulevard in Etobicoke, Ontario. The complete scope of work within our mandate includes a preliminary review and a professional opinion in terms of expected air quality and noise impacts on the development, such as the impact of emissions from nearby commercial and industrial sources as applicable. The study is based on the Ontario Ministry of Environment, Conservation and Parks (MECP) Land Use Compatibility Guidelines (D-Series) and other relevant MECP guidelines, as well as digital maps received from the City of Toronto.

The focus of this land use compatibility study is the subject site located on a nearly rectangular parcel of land bounded by The Queensway to the north, Algie Avenue to the east, Fordhouse Boulevard to the south, and commercial lands to the west. The site is currently occupied by low-rise commercial buildings.

The site is surrounded by low-rise commercial properties to the west and north, residential and commercial properties to the east, and The Queensway and Fordhouse Boulevard adjacent to the north and south property lines, respectively. The Gardiner Expressway and residential-use land is situated beyond

Fordhouse Boulevard to the south. The relevant pollution sources surrounding the site include existing nearby industrial and commercial facilities. Roadways and railways are not considered within the MECP D-Series guidelines. Based on our experience, emissions from road and railway will not have any significant impacts on the proposed development.

The sources of transportation noise impacting the site include The Queensway and Gardiner Expressway. During the Rezoning and/or Site Plan Control submission stage, a transportation noise analysis will be required to determine the appropriate noise mitigation measures to ensure indoor noise levels comply with MECP NPC-300 noise guidelines. The current land use compatibility assessment also provides commentary on the potential impact of existing nearby stationary sources on the subject site.

2. METHODOLOGY

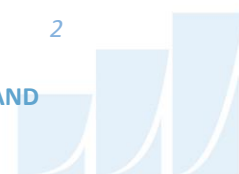
2.1 Identifying Critical Points of Impingement

The critical points of impingement for this study include fresh-air intakes, public sidewalks, walkways, building entrances, balconies, and terraces/green roofs devoted to common amenity space. Different receiver location types can have varying exposure times and sensitivities to pollutants. For instance, fresh-air intakes continuously provide air to the building's mechanical systems and can affect a large number of the building's occupants, making them the most sensitive. Main entrances operate intermittently, predominantly during daytime hours; therefore, the sensitivity of these locations is lower.

2.2 Identifying Emissions Sources

Following the definition of the critical points of impingement, a review of the study area was conducted to locate sources of airborne pollutants and odours. In general, emission sources that are considered as potentially influential to residential properties include nearby, existing commercial/industrial facilities.

Industrial processes are bound by the requirements of Section 9 of the Environmental Protection Act (EPA) R.S.O 1990 and Ontario Regulation (O. Reg.) 419/05 - Air Pollution and Local Air Quality. Section 9 of the Environmental Protection Act states that *"No person shall, except under and in accordance with an environmental compliance approval, use, operate, construct, alter, extend or replace any plant, structure, equipment, apparatus, mechanism or thing that may discharge or from which may be discharged a contaminant into any part of the natural environment other than water"*. Despite compliance to Section



9 of the EPA, a facility may be liable under Section 14 of the EPA if they permit the discharge of a contaminant, including odour, which causes an adverse effect. Under O. Reg 419/05 *“a person shall not discharge a contaminant or cause or permit the discharge of a contaminant into the natural environment, if the discharge causes or may cause an adverse effect”*.

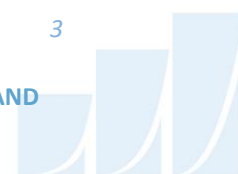
In order to obtain and maintain an Environmental Compliance Approval (ECA) (formerly referred to as a Certificate of Approval (CoA)), the emitting source must show compliance with O. Reg. 419/05. Compliance with O. Reg. 419/05 for air emissions is shown through an Emissions Summary and Dispersion Modelling (ESDM) report. An ESDM report quantifies all emissions from a facility and must demonstrate, through air dispersion modelling, that contaminant concentrations are below standards prescribed in O.Reg 419/05 at all points of impingement.

To minimize the potential for adverse impacts of industrial activities on sensitive land uses, the MECP has provided guidelines for adequate buffering of incompatible land uses under “Guideline D-6 Compatibility Between Industrial Facilities and Sensitive Land Uses”. The minimum separation distances are based on both the size of a facility and the scope of industrial activities within the facility, classified as Class I, II, or III, for light, medium and heavy industrial uses, respectively. Table 1 summarizes the recommended separation distance and potential area of influence for each class (see Figures 1 and 2). A sensitive development may be permitted within an industrial influence zone if appropriate air quality studies are undertaken and potential causes of adverse effects are mitigated.

TABLE 1: D-6 RECOMMENDED SEPARATION & INFLUENCE AREA

Class	Minimum Recommended Separation Distance (m)	Potential Influence Area (m)
I	20	70
II	70	300
III	300	1000

Based on a review of the surroundings via aerial imagery and a search of the MECP “Access Environment” database of registered ECA and EASR permit holders, our survey revealed the following industrial-use facilities within 1000 m of the study site. There are two Class I, five Class II, and one Class III industries within the areas of influence.



Class I Industries

53 Algie Avenue

The property at 53 Algie Avenue, known as DG Auto Electric Ltd., is an automotive repair shop. The site has an existing Environmental Compliance Approval (ECA#: 9026-8K6KL7) and is located approximately 65 meters from the nearest study site property line. Sources of emissions include a paint spray booth for solvent based coatings. The property is not within the minimum separation distance. Due to the setback distance from the study site and closer proximity to existing residential dwellings to the east, no significant sources of emissions, odours or noise are expected from the facility at the study site.

1541 The Queensway

The property at 1541 The Queensway, houses both Goodman Autowork and Tint Queensway. These industries specialize in automotive repairs and are located within 20 meters from the subject site property line. As these industries do not have an ECA, emissions from these sources are expected to be negligible and have an insignificant impact on the subject site. Additionally, the property is located at a similar setback distance from an existing residential property to the east.

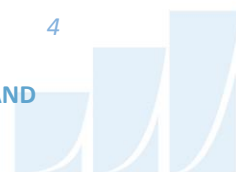
Class II Industries

24 Atomic Avenue

The property at 24 Atomic Avenue, known as Canadian Linen And Uniform Service Co., is a commercial laundry facility which rents, cleans, and maintains uniforms and sheets. The site has an existing Environmental Compliance Approval (ECA#: 4484-8U5QZE) and is located approximately 270 meters from the nearest study site property line. The processes performed at the site include receiving and sorting of soiled linen, uniforms and mats, as well as air stripping on the effluent discharge line to remove volatile organic compounds from the waste water. The property is not within the minimum separation distance. Due to the setback distance from the study site, no significant sources of emissions, odours or noise are expected from the facility.

496 Evans Avenue

The property at 496 Evans Avenue, known as MERSEN Canada DN Ltd., is a facility that manufactures carbon brushes for motors. The site has an existing Environmental Compliance Approval (ECA#: 4213-



9FLQ7B) and is located approximately 230 meters from the nearest study site property line. The processes performed at the site include cutting, sanding, gridding, buffing, metalizing, and soldering. Sources of emissions include a baghouse dust collector and curing oven. The property is not within the minimum separation distance. Due to the setback distance from the study site and closer proximity to existing residential dwellings to the south, no significant sources of emissions, odours or noise are expected from the facility at the study site.

10 Diesel Drive

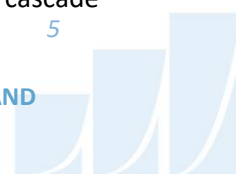
The property at 10 Diesel Drive, known as Wajax (formerly known as Harper Detroit Diesel Limited), is an industrial equipment manufacturer and service provider. The site has an existing Environmental Compliance Approval under Harper Detroit Diesel Limited (ECA#: 7127-7DHKNX) and is located approximately 110 meters from the nearest study site property line. However, operations at the time the ECA was conducted are expected to be comparable to current operations performed under Wajax. Sources of emissions include a paint spray booth for solvent based coatings, various natural gas fired combustion equipment, a standby generator, maintenance welding station, and a parts washing system. The property is not within the minimum separation distance. Due to the setback distance from the study site and closer proximity to existing residential dwellings to the south (Alderwood neighbourhood), no significant sources of emissions, odours or noise are expected from the facility at the study site.

14 Vansco Road

The property at 14 Vansco Road, known as PointOne Graphics Inc., is a custom printing facility. The site has an existing Environmental Compliance Approval (ECA#: 1181-9JEHK5) and is located approximately 300 meters from the nearest study site property line. The processes performed at the site include plate developing, press cleaning, and dust collection. Sources of emissions include coldset and heatset lithographic printing presses, and Integrated Dryer-Thermal Oxidizers serving the heatset printing presses. The property is not within the minimum separation distance. Due to the setback distance from the study site, no significant sources of emissions, odours or noise are expected from the facility at the study site.

450 Evans Avenue

The property at 450 Evans Avenue, known as Cascades Canada ULC, is a corrugated box manufacturing facility. The site has an existing Environmental Compliance Approval (ECA#: 7544-7PUK54). Sources of emissions include natural gas fired boilers, a baghouse dust collector, exhaust systems serving cascade



wax/corrugated machines, a bag filter system serving the starch storage silo, an exhaust system from a wastewater flocculation, oil separation and adsorption treatment system, and an exhaust system serving the liquid room area. The property's foundation is situated within 300 meters from the nearest study site property line, however the primary noise and emission producing sources are situated at the southeast corner of the facility approximately 420 meters from the study site. Due to the setback distance of the primary sources from the study site, and closer proximity to existing residential dwellings to the south of Evans Avenue (Alderwood neighbourhood), no significant sources of emissions, odours or noise are expected from the facility at the study site. The site is also favourably upwind of the facility, based on prevailing wind directions. Furthermore, noise from the facility is expected to be below ambient noise levels generated from roadway traffic along the Gardiner Expressway.

Class III Industries

74 North Queen Street

The property at 74 North Queen Street, known as Northcrete Concrete Supply Limited, is a ready-mix concrete batching plant. The site has an existing Environmental Compliance Approval (ECA#: 4613-AXKJU2). Sources of emissions include silos for the storage of cement and cement supplement material, baghouse dust collectors with filters and pulse jet cleaning mechanisms, a No. 2 fuel oil boiler, as well as fugitive emissions resulting from the delivery, storage, and transfer of materials associated with the concrete batching operations. The property's boundary is situated approximately 530 meters from the nearest study site property line, however the primary noise and emission producing sources are situated at the northwest corner of the facility approximately 800 meters from the study site. Due to the setback distance of the primary sources from the study site, no significant sources of emissions, odours or noise are expected from the facility at the study site.

2.2.1 Obsolete Industries

111 Brockhouse Road

The property located at 111 Brockhouse Road, currently operating as Supreme Sweets Inc., was previously owned by a commercial bakery industry under the name of Euro Breads Inc. The only existing ECA #0762-8CBQKA is associated with the previous owner and is therefore considered obsolete.

1460 The Queensway

The property located at 1460 The Queensway, was recently converted to a Dymon Self Storage facility. The existing ECA: #7021-4TFTR5 is for the previous owner Mylex Limited. Therefore the existing ECA associated with the property is considered obsolete and is no longer applicable.

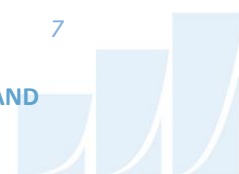
1631 The Queensway

The property located at 1631 The Queensway, is scheduled for two retail buildings as well as a fitness center, which are currently under construction. The existing ECA: # 4395-9KCK3T is for the previous owner Plastic Moulders Limited. Therefore the existing ECA associated with the property is considered obsolete and is no longer applicable.

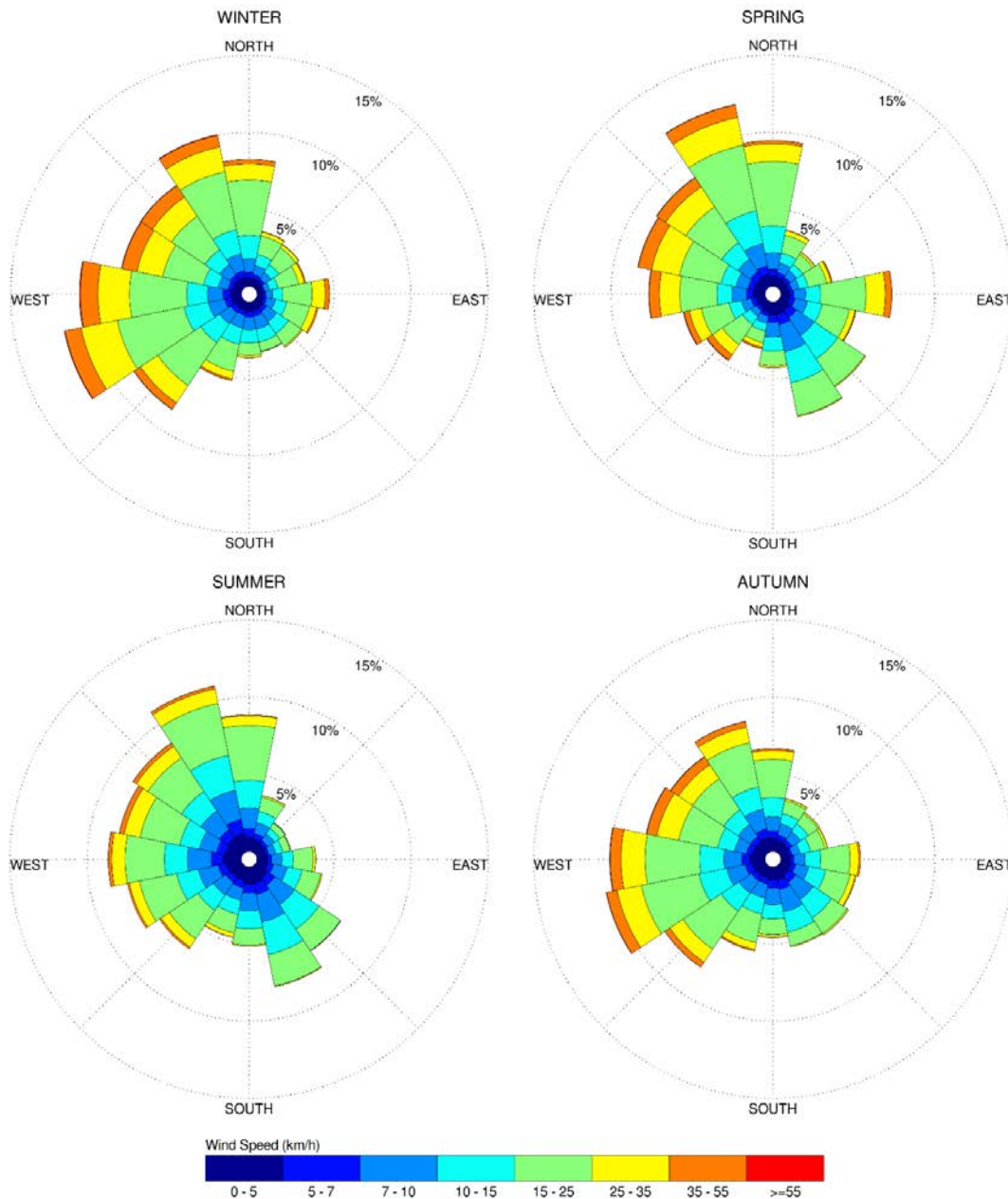
2.3 Meteorological Data Analysis

A statistical model for winds in Toronto was developed from approximately 40-years of hourly meteorological wind data recorded at Lester B. Pearson International Airport and obtained from Environment and Climate Change Canada. Wind speed and direction data were analyzed for each month of the year in order to determine the statistically prominent wind directions and corresponding speeds, and to characterize similarities between monthly weather patterns. Based on this portion of the analysis, the four seasons are represented by grouping data from consecutive months based on similarity of weather patterns, and not according to the traditional calendar method.

The statistical model of the Toronto area wind climate, which indicates the directional character of local winds on a seasonal basis, is illustrated on the following page. The plots illustrate seasonal distribution of measured wind speeds and directions in kilometers per hour (km/h). Probabilities of occurrence of different wind speeds are represented as stacked polar bars in sixteen azimuth divisions. The radial direction represents the percentage of time for various wind speed ranges per wind direction during the measurement period. The common wind speeds and directions can be identified by the longer length of the bars. For Toronto, the most common winds concerning pedestrian comfort occur from the southwest clockwise to the north, as well as those from the east. The directional preference and relative magnitude of the wind speed varies somewhat from season to season, with the summer months displaying the calmest winds relative to the remaining seasonal periods. Westerly winds are favourable for the study site, which will force emissions from the Class III industries to the east, away from critical points of impingement on the study site.



SEASONAL DISTRIBUTION OF WIND LESTER B. PEARSON INTERNATIONAL AIRPORT, TORONTO, ONTARIO



Notes:

1. Radial distances indicate percentage of time of wind events.
2. Wind speeds are mean hourly in km/h, measured at 10 m above the ground.



2.4 Potential Stationary Noise Impacts – Existing Buildings

Furthermore, Gradient Wind investigated the potential stationary noise impacts from nearby industrial/commercial properties surrounding the study site. As previously mentioned, the site is surrounded by low-rise commercial properties to the west and north, residential and commercial properties to the east, and The Queensway and Fordhouse Boulevard adjacent to the north and south property lines, respectively.

The properties to the west, 1555 The Queensway, 1557 The Queensway, and 1561 The Queensway, are considered to be the properties with the largest number of exposed mechanical equipment nearest to the subject site. Based on satellite imagery, the buildings are serviced by standard HVAC equipment for the building type. As the mechanical equipment is positioned on a roof deck with a high parapet, stationary noise impacts from this property are considered to be minimal. Furthermore, stationary noise impacts of the subject site onto the surroundings will be determined at a future stage to ensure noise levels at nearby areas meet the NPC-300 criteria. Similarly, off-site noise impacts are not expected to be a concern given the presence of nearby existing low-rise noise sensitive properties. Where necessary, noise impacts can generally be minimized by judicious selection and placement of the proposed equipment.

3. RESULTS AND CONCLUSIONS

In recent years, the neighbourhood of the proposed study site has not experienced much change from a development perspective. The neighbourhood is comprised of both residential and commercial properties. With that notion, should the proposed development at 1543-1551 The Queensway and 66, 70, and 76 Fordhouse Boulevard be granted approval for residential use, it is not expected to have any land compatibility issues or conflicts with the existing or future employment lands.

In keeping with standard building construction and good engineering practice, as well as City of Toronto and MECP guidelines, the following comments and recommendations are provided to be incorporated into the design of the building to ensure indoor air quality and noise levels are maintained to acceptable standards for the proposed development:

- (i) Based on the findings of this report, Gradient Wind concludes that the residential sensitive land use is feasible.
- (ii) The development meets the minimum setback distance from established industries operating with a valid ECA.
- (iii) The development can incorporate upgraded building components, ventilation requirements, and warning clauses to address noise from The Queensway and Gardiner Expressway.
- (iv) In line with standard building practices, design, install, operate, and maintain air filtration at the fresh air intakes of the mechanical systems serving all habitable areas, including the addition of air conditioning. The areas that would not require filtered air would be parking garages and utility spaces. Minimum Efficiency Reporting Value (MERV) 8 certification filters should be used for this development in all occupied spaces. Details of the air filtration system will be designed by the mechanical engineers during the detailed design phase.

This concludes our land use compatibility study and report. If you have any questions or wish to discuss our findings, please advise us. In the interim, we thank you for the opportunity to be of service.

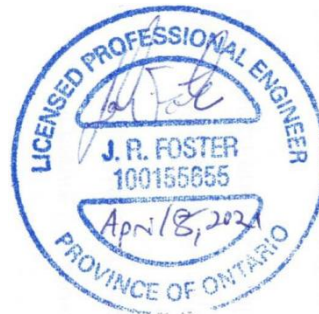
Sincerely,

Gradient Wind Engineering Inc.



Giuseppe Garro, MAsc.
Junior Environmental Scientist

Gradient Wind File 21-060 - Land Use Compatibility



Joshua Foster, P.Eng.
Principal

