



February 9, 2024

Hon. Paul Calandra  
Minister of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, Ontario  
M7A 2J3

Attn: Alejandra Perdomo

Dear Minister Calandra,

**Re: Request to Modify City of Toronto OPA 644 Prior to Ministerial Approval  
ERO Number 019-5868  
33 Green Belt Drive**

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## **Introduction**

Bousfields Inc. are planning consultants for 33 Green Belt Drive Limited Partnership (the "Owner") with respect to their lands located on the south side of Green Belt Drive, north of Eglinton Avenue East and east of Don Mills Road, municipally known as 33 Green Belt Drive (the "Subject Site").

As part of the City of Toronto's Municipal Comprehensive Review ("MCR"), the owners requested a conversion from *General Employment Areas* to a combination of *Neighbourhoods* and *Apartment Neighbourhoods* under the City of Toronto Official Plan ("Official Plan").

On June 18, 2023, the City of Toronto adopted Official Plan Amendment 644 ("OPA 644"), pursuant to sections 26 and 17 of the *Planning Act* by By-law 599-2023. 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 has maintained its designation as *General Employment Areas* in its entirety.

We are writing to request that the Minister consider modifying OPA 644 to redesignate the Subject Site *General Employment* to *Neighbourhoods* and *Apartment Neighbourhoods* to allow for future residential development.

## **Background and Executive Summary**

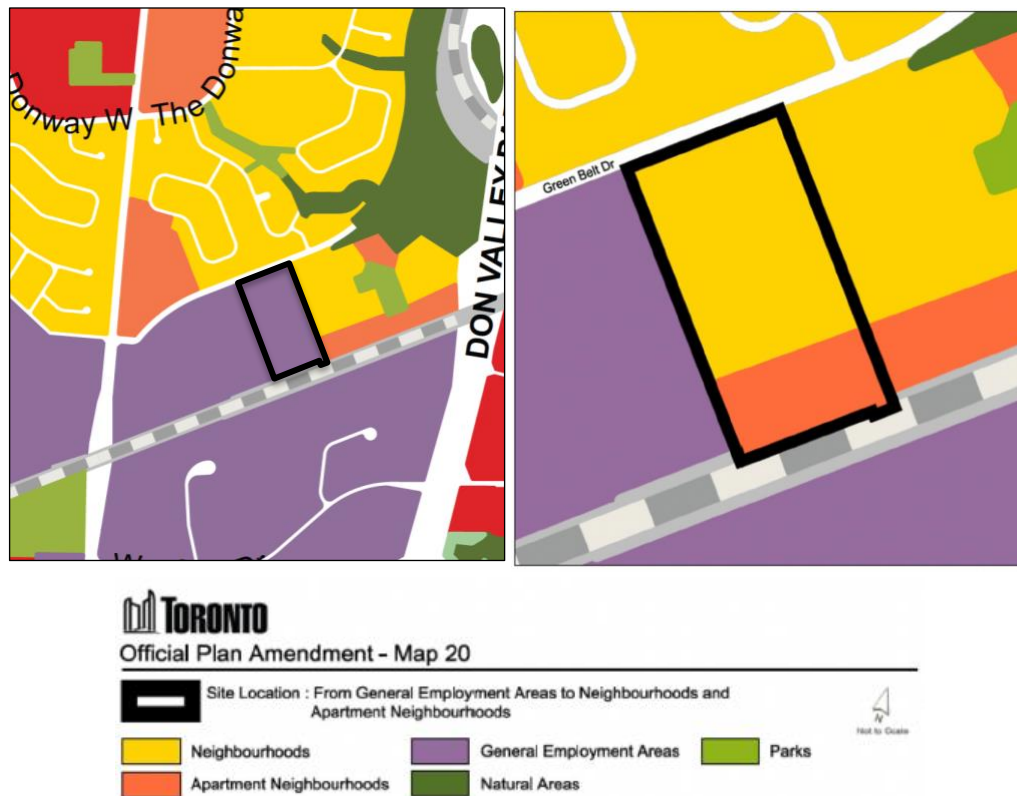
On behalf of 33 Green Belt Drive Limited Partnership, we submitted our original request to the former Minister of Municipal Affairs and Housing, Minister Clark, on May 4, 2023 under OPA 591 (refer to **Appendix A**). This letter provided a comprehensive and detailed review of the Subject Site, its surrounding context, current and emerging policy and regulatory frameworks as well as a planning justification to support a potential conversion. This executive summary provides a high-level overview of the conversion request.

The Subject Site is currently developed with a vacant one-storey non-residential building, comprised of approximately 142,323 square feet (13,006 square metres) of gross floor area consisting of approximately 64,535 square feet (5,995 square metres) of warehouse space and 77,786 square feet (7,226 square metres) of office space. The building was formerly occupied by Grand & Toy for warehousing and distribution purposes but has been vacant since 2017. A summary of site statistics and key policy documents is provided in **Table 1**.

***Table 1 – Site Statistics and General Policy Review***

<b>Site Area</b>	7.36 acres
<b>Site Frontage</b>	~ 122 metres
<b>Existing Building Area</b>	13,006 square metres (3.2 acres)
<b>Official Plan Designation</b>	Map 2, Urban Structure – <i>Employment Areas</i> Map 20, Land Use – <i>General Employment Areas</i>
<b>Zoning (569-2013)</b>	E 1.0 (x6) The Exception provides that the only uses permitted within 70 metres of any lot on the north side of Green Belt Drive zoned for residential uses are the uses permitted in an Employment Light industrial zone (EL).
<b>Zoning (7625)</b>	M2(65) – Industrial Zone Two The exception provides that the only uses permitted within 70 metres of any lot on the north side of Green Belt Drive in an R or RM zone shall be uses permitted in an M1 Zone.

In short, the conversion of the Subject Site would optimize an industrial building that has been vacant for 7 years with new residential housing and reflect a logical extension of existing *Neighbourhoods* and *Apartment Neighbourhoods* land use patterns to the north and east. The requested conversion from *General Employment* to a mix of *Neighbourhoods* and *Apartment Neighbourhoods* aligns with the current land use designations abutting the eastern property line (see **Figure 1**).



**Figure 1 – Official Plan Land Use Map 20: Current Land Use and Requested Conversion**

With regard for transit accessibility, the Subject Site is located within an approximate 1.1-kilometre walking distance of Science Centre Station on the under-construction Eglinton Crosstown LRT, a \$5.3 billion dollar transit investment by the Government of Ontario to provide additional connections across the City. Notably, Science Centre Station will be an interchange station with the planned Ontario Line offering a direct connection to Union Station, thereby providing transit users an alternative route to into downtown as opposed to Line 1 Yonge-University further west.

In addition, the site is located within a 310-metre walk (3-4 minutes) of the TTC's 25 Don Mills bus route with a stop located at the southeast corner of Don Mills Road and Green Belt Drive. The 25 Bus Route is part of the 10 Minute Network and operates 10 minutes or better, all day, every day providing serviced between Pape subway station on Line 2 Bloor-Danforth, Don Mills Station on Line 4 Sheppard and the Science Centre Station on the Eglinton Crosstown LRT.

In our opinion, the redesignation of the Subject Site to *Neighbourhoods* and *Apartment Neighbourhoods* will support the broader policy goals of the PPS and the Growth Plan which seek to balance the provision of high quality housing stock in a variety of types and tenures needed to achieve critical housing targets.

In considering the emphasis and importance placed on optimizing lands and making efficient use of public infrastructure, it is our opinion that the Subject Site presents an excellent opportunity to realize numerous planning objectives at both the municipal and provincial levels. As such we are requesting the minister amend OPA 644 as set out below.

- Revise “Appendix 1 - Map 2 Urban Structure, Employment Areas Modifications” to remove the Subject Site from this map.
- Revise “Appendix 2 – Map 20 Official Plan Land Use Designations” to redesignate the Subject Site to *Neighbourhoods* and *Apartment Neighbourhoods*.

### **Site and Surroundings**

#### **Subject Site**

The Subject Site is located on the south side of Green Belt Drive, approximately 310 metres east of Don Mills Road. As noted above, the site is currently developed with a one-storey office, warehousing and distribution building which ceased operations in 2017. Access to the site is provided via a driveway entrance along the east lot line serving a front yard surface parking lot and loading spaces along the east and south sides of the building.

The Subject Site is not located within a Provincially Significant Employment Zone in the 2019 Growth Plan, as amended.

#### **Surrounding Area**

To the immediate east of the Subject Site are comprised of a residential neighbourhood with two low-rise residential townhouse subdivisions. The lands are designated *Neighbourhoods* and *Apartment Neighbourhoods* on Map 20 of the Official Plan, and the southern portion of the lands that are designated *Apartment Neighbourhoods* have approvals for residential buildings that are 8- and 9-storeys in height. However, the buildings are not yet constructed. Further east, at the northeast corner of Jessie Drive and Dallimore Circle, is an 8-storey residential building (Savoy). Beyond these lands is the Moccasin Trail Park – a 15-hectare naturalized park, which can be accessed from Green Belt Drive.

To the immediate south is a Canadian Pacific Railway right-of-way with employment lands beyond.

To the immediate west, are lands designated *General Employment Areas*, comprised of a two-storey building at 19 Green Belt Drive (Janssen Pharmaceuticals), and the Morneau Sheppel Centre at 895 Don Mills Road which consists of two 9-storey buildings and an above-grade 4-storey parking garage.

To the northwest of the Subject Site, at the northeast corner of Green Belt Drive and Don Mills Road, is a 10-storey retirement home that is under construction (Don Mills Retirement Residence).

To the immediate north is residential neighbourhood consisting of low-rise townhouses and apartment buildings, designated *Neighbourhoods*. The properties at 40 Moccasin Trail And 50 Green Belt Drive were also the subject of Official Plan and Zoning By-law Amendment applications and have approvals for an “L”-shaped, eight-storey residential building with 194 dwelling units located at 50-60 Green Belt Drive, and a “U”-shaped, four-storey residential building with 100 rental dwelling units (including rental replacement units), located at 40 Moccasin Trail. The applications were approved by way of an LPAT settlement hearing in 2017 (PL151208). The Official Plan Amendment added a site-specific exception to the lands in order to permit the eight-storey apartment, and to secure rental dwelling units.

To the northwest of the Subject Site, at the northeast corner of Green Belt Drive and Don Mills Road is an *Apartment Neighbourhoods* comprised of 5-storey residential buildings and low-rise townhouses (i.e., the Green Belt Village townhouse/ apartment complex). As well, a 10-storey retirement residence with a total gross floor area of approximately 11,570 square metres, comprising 142 bed-sitting rooms, has been approved at 905 Don Mills Road.

## **Policy and Regulatory Framework**

### **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 1.3.2.5 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 not located within a Provincially Significant Employment Zone (PSEZ).

## **Growth Plan Considerations**

On May 16, 2019, a new Growth Plan (A Place to Grow: The Growth Plan for the Greater Golden Horseshoe) came into effect, 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 a number of 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 (“PSEZ”). These zones are 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. As noted above, the Subject Site is not located within a PSEZ.

In terms of the criteria for the conversion of employment areas to non-employment uses, Policy 2.2.5.9 of the Growth Plan 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.*

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 had been underutilized and vacant since 2017, a redevelopment would facilitate a mix of housing types in more compact forms that are in proximity to a Major Arterial Road (Don Mills) and a Surface Transit Priority segment. The resulting increase in population will support the significant transit infrastructure investments at the interchange station of the Eglinton Crosstown LRT and the Ontario Line. The conversion would result in a logical continuation of the existing land use designations that abut the Subject Site and optimize the lands with new housing.

On that basis, the growth in employment between 2001 and 2018 was 142% of what would be required on an annualized basis to achieve to 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.

In response to item (d) it is anticipated that there will be minimal land use conflicts between adjacent employment lands if residential uses are secured on site based on the appended Land Use Compatibility Study which was prepared by RWDI dated March 16, 2021 (refer to **Appendix B**). A more comprehensive review these tests is set out in this letter.



## **Emerging Provincial Policy Context**

### **Proposed 2023 Provincial Planning Statement**

The changes proposed in the proposed 2023 PPS represent fundamental changes in how growth planning is carried out in the province. With respect to Employment land conversions, the first thing to note is that the proposed 2023 PPS eliminates the concept of municipal comprehensive reviews of official plans.

Secondly, the proposed 2023 PPS provides that municipalities can consider, and landowners can apply for the removal of lands from employment areas. The tests to be met include that there is a need for the removal, and the land is not required for employment uses over the long term. However, as the Growth Plan is proposed to be repealed, there will be no land budgets and targets to be met, the application of these tests will rely on targets contained in official plans. We note that the *Planning Act* continues to limit the ability to appeal refusals or non-decisions of such applications, but as discussed in further detail below, proposed Bill 97 proposes to change the definition of areas of employment.

### **Proposed Bill 97**

The scope of what constitutes an “area of employment” would be narrowed if Schedule 6 of the proposed Bill 97 is passed. The present definition under subsection 1(1) of the *Planning Act* defines an area of employment as lands designated in an official plan for clusters of business and economic uses including (but not limited to) manufacturing uses, warehousing uses, office uses, associated retail uses and ancillary facilities.

Bill 97 proposes to exclude institutional uses and commercial uses, which include retail and office uses not associated with primary industrial uses, from the list of uses. The definition will be limited to areas where manufacturing, research and development related to manufacturing, warehousing and ancillary uses occur.

As illustrated, the emerging Provincial policy proposed to amend the process of converting employment lands in order to achieve its housing targets.

We note that Bill 97 has been approved and received Royal Assent on June 8, 2023. However, the new “Areas of Employment” definition amendment, although passed, has not yet been proclaimed in force and effect. Such proclamation is anticipated to take place in the near future. Nonetheless, the proposed changes indicate the direction that the current provincial government intends to pursue.

## **City of Toronto Housing Pledge and Housing Action Plan**

While this does not constitute as a policy update, we note that on October 25, 2022 the Province issued a bulletin on its ERO setting out Municipal Housing Targets identifying a target for the Province to build 1.5 million new homes by 2031. The 29 fastest growing municipalities have been assigned municipal housing targets and the target for Toronto is 285,000 dwelling units.

Furthermore, on May 10, 2023, Toronto City Council adopted a housing pledge to achieve or exceed the provincial housing target of 285,000 new Toronto homes by 2031. This housing target represents a 23 percent increase in Toronto's housing supply within 10 years. To meet this target, 31,050 new homes per year must be completed, which is approximately double the average number of units built annually between 2017 to 2021.

### **Planning Opinion**

The Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe, and the City of Toronto Official Plan all support intensification on sites well-served by municipal infrastructure and which seek to optimize underutilized lands. In this respect, it is our opinion that the Subject Site should be redesignated to *Neighbourhoods* and *Apartment Neighbourhoods* to support the significant investment in transit located approximately 1.1 kilometer south at the interchange station of the Eglinton Crosstown LRT and the future Ontario Line at Science Centre Station.

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.

In our opinion 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.

### **Policy 2.2.5.9 (a)**

Policy 2.2.5.9 (a) of the Growth Plan establishes that there be a "need" for the conversion. The "need" for conversion is related to the opportunity to redevelop an existing industrial building which has been vacant since 2017. Over the past 7 years, the current owners has made repeated efforts to lease the site for industrial uses which

has been unsuccessful. Should the Subject Site not be converted from *Employment Areas* to permit residential uses, the property is anticipated to continue to be underutilized. It is our opinion that the redevelopment of the site for a mix of residential building types will generate transit-supportive densities which will further support the emerging Science Centre transit node to the south.

With regard for population forecasts, residential 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. The 2021 Census population of 2,794,356 represents a 2.3% increase from 2016, and would translate into an estimated population of 2,887,786, applying the same under coverage rate as in 2016 (i.e. 70.2% of the growth required to meet the forecast).

In addition, 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. This data further emphasizes the need for housing starts which could be accommodated on the Subject Site.

**Policy 2.2.5.9 (b)**

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 *Neighbourhoods* and *Apartment Neighbourhoods* will not diminish the City's ability to meet its employment forecasts as outlined the Growth Plan. Notably, the current site location has proved challenging to attract new employment opportunities since its closure in 2017.

Moreover, 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<sup>1</sup>. On that basis, the growth in employment between 2001 and 2018 was 142% of what would be required on an annualized basis to achieve to 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 significant intensification that has been approved and is under construction in the Don Mills and Eglinton area, this former Employment Area as a whole is emerging as a transit-oriented mixed-use node. It is acknowledged that should certain employment lands be maintained within the Don Mills Eglinton Area south of the existing rail corridor, the Subject Site is situated in a fundamentally different immediate context. The Site is isolated from Employment Areas due to the rail corridor to the immediate south and is accessed from Green Belt Drive which is primarily a residential street.

Furthermore, since 1999, a trend of converting former industrial lands into residential uses has occurred on the properties to the immediate northeast of the Subject Site. Most recently in 2011 with City Staff supporting the construction of a 9-storey residential building abutting the rail corridor. It is our opinion that the continuation of this trend onto the Subject Site represents good planning and would further support nearby higher order transit stations and contribute towards ridership.

The proposed conversion would facilitate redevelopment that achieves the population growth and creates an attractive place to live that responds to the evolving context around Don Mills and Eglinton, as well as providing more transit riders to support the ECLRT and planned Ontario line which are conveniently accessible from the Subject Site.

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

**Policy 2.2.5.9 (c)**

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 no single conversion request would affect the City’s ability to achieve the Growth Plan’s employment forecast.

Furthermore, it is apparent that the Subject Site is not desirable location for long-term employment uses given its vacancy since 2017 and lack of ability to attract new employment users to this specific area. In addition, the presence of a low-rise community on its east property line further diminishes the viability of a new employment operation occurring. Therefore, we are of the opinion that this specific site is need not be maintained accommodate future employment growth.

**Policy 2.2.5.9 (d)**

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”. This policy largely pertains to land use compatibility between the introduction of sensitive land uses (residential) and existing employment uses in the surrounding area. A Compatibility/Mitigation Study (“compatibility study”) was completed by RWDI in March 2021, on behalf of the owner, to review the impacts from surrounding employment uses.

The study included a site visit to the area and a review of the City of Toronto zoning information, MECP ECA and EASR records, and ECCC NPRI data were conducted as part of this assessment. The land uses within 1000 m of the subject lands are predominantly residential, mixed use, and commercial/light industrial use. All of the identified facilities are well contained with little to no potential for impacts of fugitive dust or odours. Based on the preliminary review for the facilities it was determined that they are not expected to have a significant impact on the air quality at the subject lands. There is potential for noise impact from nearby roadways and the CP rail line it is recommended that a detailed noise and vibration assessment be conducted to assess the need for any mitigation.

**Policy 2.2.5.9 (e)**

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 Subject Site is located to the immediate north of Aga Khan Park & Museum MTSA, and within 1.1 kilometres of two higher-order transit lines including the under-construction Eglinton Crosstown LRT and the Planned Ontario Line.

The proposed conversion would facilitate the development of residential uses with a full range of housing in terms of form and tenure in an area that is well served by frequent transit service. In this regard, the Subject Site is within approximately 310 metres walking distance from frequent transit services along Don Mills Road to the east and has immediate access to Bus Route 403 which runs long Green Belt Drive before turning south on Don Mills toward Flemingdon Park.

As mentioned previously, the significant investments in higher order transit services at the Science Centre transit hub merits consideration for a proposed residential development to support further support this public infrastructure. In addition, there are a number of existing and approved community services and facilities in proximity to the Subject Site including the following:

- Moccasin Trail Park, Sunnybrook Park, ET Seaton Park, Wilket Creek Park, the Don Mills Trail;
- Don Mills Public Library;
- Don Mills Civitan Arena (proposed to be located on Celestica site, south of the Subject Site);
- TDSB and TCDSB schools including Greenland Public School, Don Mills Collegiate and Junior High School; and
- A new City-owned child-care facility and 2.5 hectares of parklands that were secured as part of the nearby Celestica site.

## **Conclusion**

In our opinion, the redesignation of the Subject Site to *Neighbourhoods* and *Apartment Neighbourhoods* will support the broader policy goals of the PPS and the Growth Plan. In this regard, the Subject Site represents a logical continuation of an existing land use pattern and trend of residential infill development. Moreover, a future development can accommodate a balance of high-quality housing stock in a variety of types and tenures to achieve critical housing targets outlined in the City of Toronto's 2023 Municipal Housing Pledge.

In considering the emphasis and importance placed on optimizing lands and making efficient use of public infrastructure, it is our opinion that the Subject Site presents an excellent opportunity to realize numerous planning objectives at both the municipal and provincial levels. For the aforementioned reasons, the Subject Site merits

conversion from *General Employment* to *Neighbourhoods* and *Apartment Neighbourhoods*.

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





**BOUSFIELDS INC.**

Project No. 19411

Hon. Steve Clark  
Minister of Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, Ontario  
M7A 2J3

Attn: Alejandra Perdomo

Dear Minister Clark,

**Re: 33 Green Belt Drive**  
**ERO Number 019-5868**  
**Ministry Reference Number 20-OP-222176**

***Toronto Official Plan Amendment 591***  
***Employment Conversion Request***

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We are planning consultants for 33 Green Belt Drive Limited Partnership (the "Owner") with respect to their lands located on the south side of Green Belt Drive, north of Eglinton Avenue East and east of Don Mills Road, municipally known as 33 Green Belt Drive (the "Subject Site").

We are writing to request that the Subject Site be converted from a *General Employment* designation in the Official Plan to a designation that permits residential uses, through the ongoing municipal comprehensive review process. Specifically, we would request the conversion of the southern portion of the Subject Site that abut the Canadian Pacific Railway to *Apartment Neighbourhoods*, and the northern portion of the Subject Site to *Neighbourhoods*.

In our opinion, the proposed conversion request presents an opportunity to increase the residential housing supply in the City and will optimize the use of land and infrastructure and provide for a compatible land use with adjacent residential and employment lands which abut the site.

The Subject Site is currently developed with a vacant one-storey non-residential building, comprised of approximately 142,323 square feet (13,006 square metres) of gross floor area consisting of approximately 64,535 square feet (5,995 square metres) of warehouse space and 77,786 square feet (7,226 square metres) of office space. The building was formerly occupied by Grand & Toy for warehousing and distribution purposes but has been vacant since 2017. The Owner purchased the site in 2017.

### Summary Site Statistics, Official Plan Designations and Zoning

<b>Site Area</b>	7.36 acres
<b>Site Frontage</b>	~ 122 metres
<b>Existing Building Area</b>	142,323 square feet (13,006 square metres)
<b>Official Plan Designation</b>	Map 2, Urban Structure – <i>Employment Areas</i> Map 20, Land Use – <i>General Employment Areas</i>
<b>Zoning (569-2013)</b>	E 1.0 (x6) The Exception provides that the only uses permitted within 70 metres of any lot on the north side of Green Belt Drive zoned for residential uses are the uses permitted in an Employment Light industrial zone (EL).
<b>Zoning (7625)</b>	M2(65) – Industrial Zone Two The exception provides that the only uses permitted within 70 metres of any lot on the north side of Green Belt Drive in an R or RM zone shall be uses permitted in an M1 Zone.

### Description of Subject Site

The Subject Site is located on the south side of Green Belt Drive, approximately 310 metres east of Don Mills Road. As noted above, the site is currently developed with a one-storey office, warehousing and distribution building which ceased operations in 2017. Access to the site is provided via a driveway entrance along the east lot line serving a front yard surface parking lot and loading spaces along the east and south sides of the building.

The Subject Site is not located within a Provincially Significant Employment Zone in the 2019 Growth Plan, as amended.

### Road Network and Transit

The Subject Site is approximately 1.1 kilometres (walking distance) north of Eglinton Avenue, which is one of the City's major streets. It is a two-way Major Arterial Road which spans the majority of the city, extending in an east-west direction from Kingston Road in Scarborough to Mississauga. It provides linkages to three subway lines, two significant highways and to a variety of diverse communities. The portion of Eglinton Avenue East, between Brentcliffe Road and Victoria Park Avenue, has a planned right-of-way width of 45 metres and over. It has three eastbound and three westbound lanes, including dedicated eastbound and westbound HOV lanes during peak hours.

As such, the Subject Site is also located within an approximate 1.1-kilometre walking distance of Science Centre Station on the under-construction Eglinton Crosstown LRT, which is a \$5.3 billion dollar transit investment by the Government of Ontario, to expand transit in the city. The Crosstown will span across much of the city (approximately 19 kilometers), from Kennedy Station to Mount Dennis (Weston Road), and will link to 54 local bus routes, three TTC interchange subway stations and GO Transit. The LRT is forecast to be operational by 2024. As it relates to the Science Centre Station, the station will be located underground, with multiple access points from the Don Mills / Eglinton Avenue intersection. In particular, the northeast corner of the intersection was deemed surplus and transferred to Build Toronto. It has since been cleared in preparation for the construction of a bus terminal which will connect to a secondary entrance to the Science Centre Station on the Eglinton Crosstown. The Science Centre Station is also the planned terminus station of the planned Ontario Line, which will provide links to the TTC Line 1 and 2, GO Transit, and to the Downtown.

In addition, the site is located within an approximate 310 metre walk (3-4 minutes) of the TTC's 25 Don Mills bus route with a stop located at the southeast corner of Don Mills Road and Green Belt Drive. The 25 Bus Route is part of the 10 Minute Network and operates 10 minutes or better, all day, every day providing serviced between Pape subway station on Line 2 Bloor-Danforth, Don Mills Station on Line 4 Sheppard and the Science Centre Station on the Eglinton Crosstown LRT.

In addition, Don Mills Road is identified as a Transit Corridor (Expansion Element) on Official Plan Map 4 – Higher Order Transit Corridors and a Transit Priority Segment (Expansion Element) on Official Plan Map 5 – Surface Transit Priority Network. The Don Mills LRT is identified as part of the 15-Year Plan in the Metrolinx Regional Transportation Plan (The Big Move).

Pursuant to the Growth Plan 2019, as amended, the Subject Site would be located within a “strategic growth area”, which is defined as those areas identified by municipalities or the Province to be the focus for accommodating intensification and higher-density mixed-uses in a more compact built form. These 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 addition, lands along major roads, arterials or other areas with existing or planned frequent transit service or higher order transit corridors may also be identified as strategic growth areas (our emphasis). Frequent transit is defined as public transit service that runs at least every 15 minutes in both directions throughout the day and into the evening every day of the week. In consideration of these applicable definitions, it is our opinion that Subject Site would be located within a strategic growth area in proximity to frequent transit service.

### Description of the Immediate Context

To the immediate east of the Subject Site are comprised of a residential neighbourhood with two low-rise residential townhouse subdivisions. The lands are designated *Neighbourhoods* and *Apartment Neighbourhoods* on Map 20 of the Official Plan, and the southern portion of the lands that are designated *Apartment Neighbourhoods* have approvals for residential buildings that are 8- and 9-storeys in height. However, the buildings are not yet constructed. Further east, at the northeast corner of Jessie Drive and Dallimore Circle, is an 8-storey residential building (Savoy). Beyond these lands is the Moccasin Trail Park – a 15-hectare naturalized park, which can be accessed from Green Belt Drive.

To the immediate south is a Canadian Pacific Railway right-of-way with employment lands beyond.

To the immediate west, are lands designated *General Employment Areas*, comprised of a two-storey building at 19 Green Belt Drive (Janssen Pharmaceuticals), and the Morneau Shepell Centre at 895 Don Mills Road which consists of two 9-storey buildings and an above-grade 4-storey parking garage.

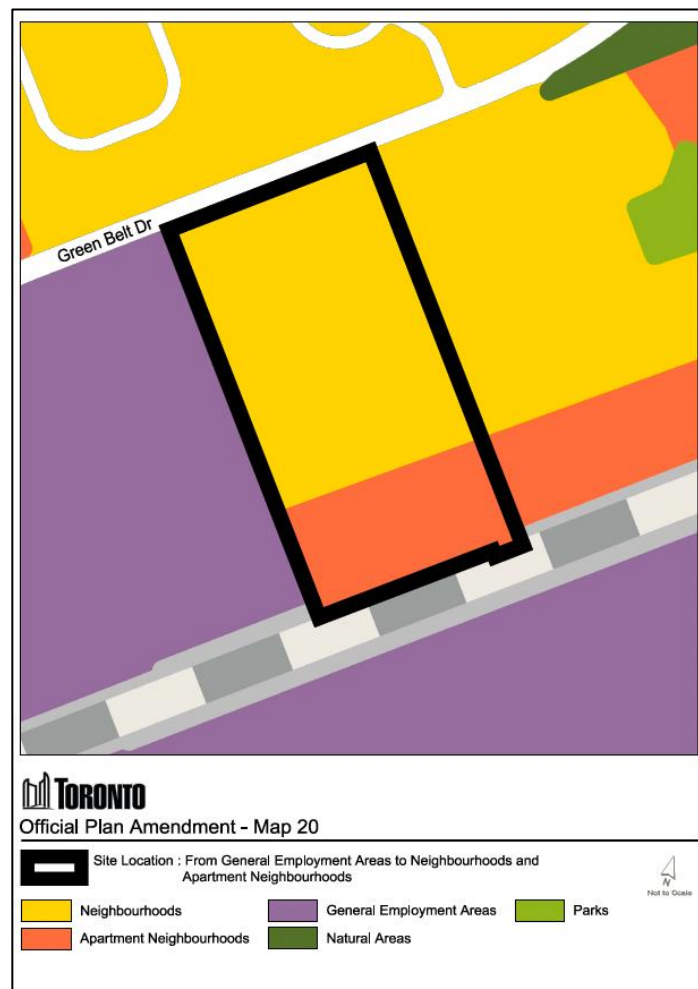
To the northwest of the subject site, at the northeast corner of Green Belt Drive and Don Mills Road, is a 10-storey retirement home that is under construction (Don Mills Retirement Residence).

To the immediate north is residential neighbourhood consisting of low-rise townhouses and apartment buildings, designated *Neighbourhoods*. The properties at 40 Moccasin Trail And 50 Green Belt Drive were also the subject of Official Plan and Zoning By-law Amendment applications and have approvals for an “L”-shaped, eight-storey residential building with 194 dwelling units located at 50-60 Green Belt Drive, and a “U”-shaped, four-storey residential building with 100 rental dwelling units (including rental replacement units), located at 40 Moccasin Trail. The applications were approved by way of an LPAT settlement hearing in 2017 (PL151208). The Official Plan Amendment added a site-specific exception to the lands in order to permit the eight-storey apartment, and to secure rental dwelling units.

To the northwest of the Subject Site, at the northeast corner of Green Belt Drive and Don Mills Road is an *Apartment Neighbourhoods* comprised of 5-storey residential buildings and low-rise townhouses (i.e., the Green Belt Village townhouse/ apartment complex). As well, a 10-storey retirement residence with a total gross floor area of approximately 11,570 square metres, comprising 142 bed-sitting rooms, has been approved at 905 Don Mills Road.

## Vision for the Subject Site

The Owner is seeking to convert the lands to permit a residential development that is compatible in scale with the existing residential areas that are to the immediate north and east of the Subject Site. The vision for the site is to permit higher-density residential uses that are permitted under the *Apartment Neighbourhoods* designation in the southern portion of the subject site, abutting the rail corridor, and transition to the low-rise residential uses that are to the north and east of the subject site by designating the lands in the northern portion of the Subject Site to *Neighbourhoods* (see **Figure 1** below).



**Figure 1 – Proposed Land Use Designations**

The residential vision for the Subject Site would be compatible with the existing surrounding uses as well as the Central Don Mills Secondary Plan Area. In this respect, it would be compatible with the existing and approved residential communities to the east and north, respectively. Moreover, a Compatibility/Mitigation Study dated March 16, 2021, was prepared by RWDI which concludes that original concept for the subject site, which was comprised of employment and residential uses, is not expected to cause any noise or air quality compatibility issues with respect to major industrial facilities. Furthermore, no future facilities are anticipated to cause adverse effects on the proposed development under the current zoning designation considering the currently permitted uses and the current character of the surrounding area.

Providing residential uses on the Subject Site would contribute to delivering a full range of housing in terms of form and tenure, in proximity to frequent transit service and in keeping with the objectives of the Central Don Mills Secondary Plan, which are described below. In addition, the Owner would also contemplate affordable housing and other public benefits for the Subject Site.

Finally, potential future residents of the Subject Site would have easy access to the City's Park, trail and open space system by virtue of its proximity to Moccasin Trail Park.

### **Provincial Policy Statement (2020)**

On February 28, 2020, the Province issued the Provincial Policy Statement (2020), which replaced the Provincial Policy Statement (PPS) (2014). The new PPS policies took effect on May 1, 2020, and, in accordance with Section 3 of the Planning Act, all decisions affecting land use planning matters made after this date are required to be consistent with the Provincial Policy Statement (2020).

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 2020 PPS).

We note that the 2020 PPS also includes additional language that encourages transit-supportive development. In particular, Policy 1.1.1 provides that healthy, liveable and safe communities will be sustained by promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs.

Regarding the conversion of employment areas to non-employment uses, 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.*

### **Growth Plan Policy Considerations**

On May 16, 2019, a new Growth Plan (A Place to Grow: The Growth Plan for the Greater Golden Horseshoe) came into effect, 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.

There are a number of 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 ("PSEZ"). These zones are 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. As noted above, the Subject Site is not located within a PSEZ.

In terms of the criteria for the conversion of employment areas to non-employment uses, Policy 2.2.5.9 of the Growth Plan 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.*

Following therefrom, 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.*

As the Subject Site is not located in a PSEZ, it could be converted outside of a municipal comprehensive review, and, since 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 at this time.

The proposed redesignation of the Subject Site responds well to the criteria set out in Policy 2.2.5.9, as follows:

- The proposed use of these lands for residential uses would provide for housing intensification in a strategic growth area that is served by frequent transit service. The current vacant use and previous use of the site for a low-rise industrial/warehouse operation does not optimize the use of land and infrastructure. A residential development would make more efficient use of the site and help to maximize the number of potential transit riders within the immediate vicinity of existing and planned higher-order transit stations. In

addition, it will mitigate any potential land use conflicts with adjacent existing and permitted residential uses.

- The location of the Subject Site adjacent to existing residential neighbourhoods makes the site inappropriate for manufacturing or high-traffic generating operations such as warehousing. In this regard, the Subject Site is bound to the north and east by *Neighbourhoods* and *Apartment Neighbourhoods* designated lands and uses.
- The proposed residential uses would not adversely affect the overall viability of the employment areas to the west of the Subject Site. In this regard, the lands to the west feature the Janssen Pharmaceuticals. Currently, there is little activity or traffic that originates from the site, and it appears that no manufacturing takes place on site. Moreover, there are already residential uses to the immediate north and east of the Subject Site that comfortably co-exist with the employment uses. Lastly, as previously noted, a Compatibility/Mitigation Study has been prepared which concludes that no issues of compatibility exist from the perspective of dust, emissions and noise.
- The proposed conversion would facilitate the development of residential uses with a full range of housing in terms of form and tenure in an area that is well served by frequent transit service. In this regard, the Subject Site is within approximately 310 metres walking distance from frequent transit services and within 1.1 kilometres of two higher-order transit lines including the under-construction Eglinton Crosstown LRT and the Planned Ontario Line.
- There are existing and planned infrastructure and public service facilities to accommodate the proposed uses. As noted above, the area has seen significant investment in transit infrastructure. Furthermore, there are a number of existing and approved community services and facilities in close proximity to the Subject Site including the following:
  - Moccasin Trail Park, Sunnybrook Park, ET Seaton Park, Wilket Creek Park, the Don Mills Trail;
  - Don Mills Public Library;
  - Don Mills Civitan Arena (proposed to be located on Celestica site, south of the Subject Site);
  - TDSB and TCDSB schools including Greenland Public School, Don Mills Collegiate and Junior High School; and
  - A new City-owned child-care facility and 2.5 hectares of parklands that were secured as part of the nearby Celestica site.

### **Central Don Mills Secondary Plan**

It is also noted that the Subject Site is directly adjacent to lands subject to the Central Don Mills Secondary Plan, which applies to lands generally bounded by Leslie Street to the west; Barber Greene Road, Green Belt Drive and the CP rail corridor to the south; and Moccasin Trail Park and the CP rail corridor to the south.

Section 5.2.1 of the City of Toronto Official Plan provides that Secondary Plans establish local development policies to guide growth and change in a defined area of the City. The Plans will not be prepared for stable areas of the City, where major physical change is not expected or desired. Following therefrom, it states that Secondary Plans are to guide the creation of new neighbourhoods and employment areas while ensuring adequate public infrastructure and environmental protection.

The goal of the Secondary Plan is to manage change in the community in a manner that retains and enhances the existing character of the area. In order to achieve this overarching goal, a number of objectives are identified including:

- preserving the scale, height and built form relationships originally provided for in the development concept for Don Mills;
- limit the amount of commercial development to a level that can be accommodated by the transportation infrastructure;
- maintain a full range of housing forms and tenure;
- encourage the provision of new affordable housing in appropriate locations in a form compatible with surrounding development;
- preserve and protect stable residential neighbourhoods; and
- reaffirm and extend into the future the basic elements of the concept of Don Mills.

The objectives also recognize the special relationship between Central Don Mills and the nearby *Employment Areas* by the inclusion of Site and Area Specific Policy 92 in Chapter 7 of the Official Plan.

Section 4.2.0 of the Secondary Plan states that a general density limit of 1.0 FSI applies to all lands designated *Mixed Use Areas*, *Neighbourhood 'A'*, *Apartment Neighbourhood 'A'* and *Apartment Neighbourhood 'B'* (i.e., lands generally located in the southwest quadrant of Don Mills Road and Lawrence Avenue East). The density limit was partly based on the Central Don Mills Transportation Study (IBI Group, May 1988) that was undertaken as part of the background to the Secondary Plan. This transportation study was prepared prior to the above-mentioned significant provincial investment in transit infrastructure in the city and is now outdated.

With respect to height, Section 4.3 typically limits a height of 8-storeys for lands designated *Mixed Use Areas*, *Neighbourhood 'A'*, *Apartment Neighbourhood 'A'* and *Apartment Neighbourhood 'B'*.

### **Emerging Provincial Policy Context**

On April 6, 2023, the Ontario government unveiled the latest of its policy and legislative proposals as part of its Housing Supply Action Plan. The proposals include the release for comment of a new Provincial Planning Statement which will replace the PPS and the Growth Plan. Moreover, some changes are also proposed to the *Planning Act*, with the introduction of Bill 97, the *Helping Homebuyers, Protecting Tenants Act, 2023*.

#### Proposed 2023 Provincial Planning Statement

The changes proposed in the proposed 2023 PPS represent fundamental changes in how growth planning is carried out in the province. With respect to Employment land conversions, the first thing to note is that the proposed 2023 PPS eliminates the concept of municipal comprehensive reviews of official plans.

Secondly, the proposed 2023 PPS provides that municipalities can consider, and landowners can apply for the removal of lands from employment areas. The tests to be met include that there is a need for the removal, and the land is not required for employment uses over the long term. However, as the Growth Plan is proposed to be repealed, there will be no land budgets and targets to be met, the application of these tests will rely on targets contained in official plans. We note that the *Planning Act* continues to limit the ability to appeal refusals or non-decisions of such applications, but as discussed in further detail below, proposed Bill 97 proposes to change the definition of areas of employment.

#### Proposed Bill 97

The scope of what constitutes an “area of employment” would be narrowed if Schedule 6 of the proposed Bill 97 is passed. The present definition under subsection 1(1) of the *Planning Act* defines an area of employment as lands designated in an official plan for clusters of business and economic uses including (but not limited to) manufacturing uses, warehousing uses, office uses, associated retail uses and ancillary facilities.

Bill 97 proposes to exclude institutional uses and commercial uses, which include retail and office uses not associated with primary industrial uses, from the list of uses. The definition will be limited to areas where manufacturing, research and development related to manufacturing, warehousing and ancillary uses occur.

As the Subject Site is currently vacant and is not used for manufacturing, research and development related to manufacturing, warehousing or ancillary uses, the Subject Site may no longer be identified as “employment” and no longer be subject to the employment areas policies, particularly those dealing with employment conversion set out in the newly proposed Provincial Planning Statement.

As illustrated, the emerging Provincial policy proposed to amend the process of converting employment lands in order to achieve its housing targets.

We note that the proposed changes have not yet been approved and are not currently in force. However, the proposed changes indicate the direction that the current provincial government intends to pursue.

### **Conclusion**

The Subject Site represents an opportunity to provide increased transit-supportive residential intensification. Based on the criteria set out in the PP (2020) Policy 1.3.2.4 and Growth Plan (2019) Policy 2.2.5.9, it is our opinion the Subject Site meets the criteria for a conversion to non-employment uses, in particular the redesignation of the Subject Site to *Apartment Neighbourhoods* and *Neighbourhoods*.

In summary, it is our opinion that the proposed conversion would be compatible with surrounding land uses, would not negatively affect the viability of any other employment uses in the vicinity, and would be consistent with the policy direction set out in the PPS and Growth Plan, as well as the emerging Provincial policy context.

If there are any questions with respect to this submission, please do not hesitate to contact me.

Yours truly,  
**Bousfields Inc.**



Tony Volpentesta, MCIP, RPP

# REPORT



## 33 GREEN BELT DRIVE

TORONTO, ONTARIO

### COMPATIBILITY/MITIGATION STUDY

RWDI # 2102054

March 16, 2021

#### SUBMITTED TO

**Vivian Zhou**

VP of Development

[Vivian.zhou@ott.ca](mailto:Vivian.zhou@ott.ca)

**OTT Community**

1123 Leslie Street

Toronto, ON, M3C 2K5

#### SUBMITTED BY

**Brandon Law**

Associate Principal/ Sr. Project Manager

[Brandon.Law@rwdi.com](mailto:Brandon.Law@rwdi.com)

T: 647.642.3316

**RWDI**

625 Queen Street West

Toronto, Ontario Canada M5V 2B7



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# 1 INTRODUCTION

RWDI was retained to undertake a compatibility/mitigation study in support of a request for conversion of employment lands for a proposed mixed-use development at 33 Green Belt Drive in North York, Toronto, Ontario (the “subject lands”). The location of the proposed development is shown on **Figure 1**.

The scope of this study was to identify any existing and potential land use compatibility issues and evaluate options to achieve appropriate design, buffering and/or separation distances between the proposed sensitive land uses and nearby employment areas and/or major facilities.

# 2 BACKGROUND

## City of Toronto Terms of Reference

The City of Toronto has Terms of Reference for a Compatibility/Mitigation Study [1], which indicates that the study is required to provide a description of the following items:

- potential land use compatibility impacts by type;
- environmental approvals information for industrial facilities whose influence area includes any portion of the applicant's property;
- complaint history information;
- Reasonable potential intensification, operational changes and expansion plans for existing major facilities;
- a detailed description of compatibility issues created by the proposed development.

The compatibility issues could include effects on the compliance of industries with environmental regulations and approvals, increased risk of complaints, operational constraints and constraints on expansion, modification or intensification of major industrial facilities, and extent of non-compliance with land use separation recommendations.

The report is also required to identify and evaluate options to achieve appropriate design, buffering and/or separation distance to mitigate potential adverse effects. Lastly, the report should recommend the method to secure recommended mitigation techniques.

## 2.1 Air Quality Management in Ontario

In Ontario, the primary air quality management approach is to have emitters control their emissions to a degree that results in acceptable air pollutant levels in the surrounding area. This approach is implemented through the Ontario Environment Protection Act, the Environmental Assessment Act, associated regulations (principally Regulation 419/05), and supporting guidelines. The legislation and guidelines establish an air permitting process with air contaminant concentration levels (standards) that cannot be exceeded and requirements for best management practices for certain types of emissions (odours and dust).



The province has several types of environmental permissions that deal with air emissions. Environmental Assessments are used primarily for government infrastructure projects, including those with potentially significant air emissions, such as roadways, highways, railroads and airports. Environmental Assessments may also be used for certain types of large industrial projects, such as mining projects, electricity generation projects, and forestry projects. Environmental Compliance Approvals (ECA's) are primarily for medium to large industries with significant emission potential. Environmental Activity and Sector Registry (EASR) is primarily for smaller industries with lesser potential for emissions. The province also has special approvals for renewable energy projects.

Regulation 419/05 prohibits adverse air quality effects and sets standards for concentrations of air pollutants that all emitters must achieve at all points of impingement on or beyond their property boundary. The standards apply regardless of the type of land use that exists in the surrounding area. The principal exemption from these standards is motor vehicles and transportation corridors. These emission sources are addressed in a different manner, through federal tailpipe regulations.

Land use planning is a secondary tool that can be used to help address types of emissions that may cause an adverse effect but may not be regulated through the permitting process or are regulated in a manner that depends on surrounding land use characteristics and, therefore, is affected by land use planning. The following are the key types of emissions that may fall into this category:

- **Contaminants with odour-based standards.** The odour-based standards apply only at sensitive land uses. Therefore, land use planning can play a role in ensuring and maintaining compliance.
- **Types of odour for which no standard has been set.** Mixtures of gaseous contaminants may cause an undesirable odour even when the individual contaminants comply with their concentration standards.
- **Dust emissions from truck and equipment travel, and stockpiles.** The Province does not necessarily require these types of emissions to be included in a compliance assessment but does require mitigation in the form of best practices for dust control. In some cases, best practices may be insufficient to avoid adverse effects at adjacent sensitive land uses.
- **Facilities with tall stacks and nearby elevated receptors (e.g., multi-storey residential).** Industrial emission sources must be designed to meet air quality standards at ground-level and at any existing elevated points of reception, but the design cannot foresee future land use changes that will permit new elevated receptors at higher heights or closer to the facility than the existing elevated receptors. This can be an issue for facilities that rely on stack height as a means of complying with the standards.
- **Emissions from major transportation corridors.** Transportation sources are not subject to provincial air quality standards in the same manner as industrial emitters. An environmental assessment for a transportation corridor will typically demonstrate that the emissions produce acceptable levels of air pollutants at nearby sensitive land uses, based on air quality criteria and the locations of sensitive uses at the time of the assessment. However, subsequent changes in air quality criteria and/or encroachment by new sensitive uses can result in unacceptable air quality conditions in the new sensitive use areas.

When conducting an air quality study for land use planning purposes, the starting point is to identify industries with significant potential for emissions that fall into one or more of the above categories. This assessment methodology is discussed further in Section 3.

Background on the applicable guidelines and regulations is presented in the following section.

## 2.2 Noise and Vibration Guidelines

The Ontario Ministry of the Environment, Conservation and Parks (MECP) Environmental Noise Guideline NPC-300 [2] contains sound level criteria for stationary sources (e.g. industry) as well as for environmental sound from transportation sources (e.g., road and rail). The noise provisions in the City of Toronto Municipal Code (Ch. 591) [3] also provides sound level criteria for stationary sources and refers to the applicable noise pollutions control guideline (currently NPC-300).

### 2.2.1 Stationary Sources

Stationary sources could be grouped into two groups: Those that have a permit with the MECP through an Environmental Compliance Approval (ECA) or Environmental Activity and Sector Registry (EASR); and those that are exempt from ECA or EASR permit requirements.

In the case where a stationary source has a permit with the MECP (ECA or EASR), and would be put in a position where it is no longer in compliance with the applicable sound level criteria due to the encroachment of the proposed new development, source specific mitigation and/or formal classification of the proposed development lands as a “Class 4 Area” (refer to C.4.4.2 “Class 4 Area” in NPC-300) would be required. In this case, coordination and agreements between the stationary source owner, proposed new development owner and potentially the land-use planning authority and MECP would be needed.

In the case where a stationary source is exempt from ECA or EASR permit requirements with the MECP, the noise provisions of the City’s Municipal Code [3] and guidance from NPC-300 [2] would be applicable. In this case, mitigation of sound levels due to stationary sources would be from a due diligence perspective to avoid nuisance complaints from future occupants of the proposed new development. Mitigation could be in the form of mitigation at the source (with agreement from the stationary source owner) and/or mitigation at the receptor through site and building element design (building orientation, acoustical barriers, façade sound insulation design).

### 2.2.2 Transportation Sources

Transportation noise that exceeds NPC-300 limits at proposed noise sensitive developments require upgraded building components (including barriers for outdoor living areas) and air-conditioning and ventilation systems to ensure adequate indoor noise levels. NPC-300 was not used in this land use compatibility assessment. However, NPC-300 is referenced here because it would be applicable in a detailed assessment.

### 2.2.3 Vibration Impact

Potential vibration impacts are to be assessed in cases where proposed sensitive developments are to be constructed either adjacent to or in close proximity to subway, streetcar or traditional freight/commuter rail lines. Railway Associations of Canada [4] guidelines recommend onsite vibration monitoring for proposed development located within 75 m of a railway right of way. The Toronto Transit Commission (TTC) [5] would require a vibration study for proposed developments within 15 m of the centreline of the nearest track.

Vibration from nearby stationary sources is assessed based on guidance from MECP NPC-207. Examples of the types of equipment that could cause offsite vibration impacts include stamping presses, shaker tables, and large rotating machinery. The subject lands are surrounding by small scale industries that are predominately food-related storage and distribution sites. These industries would not operate equipment that could generate offsite vibration impacts. An assessment of stationary source vibration impacts is therefore not required.

## 2.3 Land Use Planning Compatibility Guidelines

As already mentioned, land use planning plays a secondary role in managing air quality and noise effects in Ontario. For example, this can be achieved by creating a land use buffer between industry and a sensitive land use, such as residences, schools, seniors' facilities, daycares, hospitals, churches and campgrounds. The MECP guideline D-6: Compatibility between Industrial Facilities [6] is typically referenced to assist planners in establishing adequate buffers.

The D-series guidelines, and specifically Guideline D-6, are intended to minimize encroachment of sensitive land uses on industrial facilities and vice versa. They address potential incompatibilities due to emissions such as noise, odour and dust. Guideline D-6 states that studies for noise, dust and odour should be provided by the proponent to the approving authority. It also provides a classification scheme for industries, based their potential for emissions that could cause adverse effects. For each class of industry, the guideline provides an estimate of potential influence area and states that this influence area shall be used in the absence of the recommended technical studies. Guideline D-6 also recommends a minimum separation distance between each class of industry and sensitive land uses (see **Table 1**). Section 4.10 of D-6 identifies exceptional circumstances with respect to redevelopment, infill and mixed-use areas. In these cases, the guideline suggests that separation distances at, or less than, the recommended minimum separation distance may be acceptable if a justifying impact assessment is provided.

**Table 1:** Summary of Guideline D-6

Industry Class	Definition	Potential Influence Area
I	Small scale, self-contained, daytime only, infrequent heavy vehicle movements, no outside storage.	70 m
II	Medium scale, outdoor storage of wastes or materials, shift operations and frequent heavy equipment movement during the daytime.	300 m
III	Large scale, outdoor storage of raw and finished products, large production volume, continuous movement of products and employees during daily shift operations.	1000 m

Guideline D-6 provides criteria for classifying industrial land uses, based on their outputs, scale of operations, processes, schedule and intensity of operations. **Table 2** provides the classification criteria and examples.

**Table 2:** Guideline D-6 Industrial Categorization Criteria

Criteria	Class I	Class II	Class III
Outputs	<ul style="list-style-type: none"> <li>• Sound not audible off property</li> <li>• Infrequent dust and/ or odour emissions and not intense</li> <li>• No ground-borne vibration</li> </ul>	<ul style="list-style-type: none"> <li>• Sound occasionally audible off property</li> <li>• Frequent dust and/ or odour emissions and occasionally intense</li> <li>• Possible ground-borne vibration</li> </ul>	<ul style="list-style-type: none"> <li>• Sound frequently audible off property</li> <li>• Persistent and intense dust and/ or odour emissions</li> <li>• Frequent ground-borne vibration</li> </ul>
Scale	<ul style="list-style-type: none"> <li>• No outside storage</li> <li>• Small scale plant or scale is irrelevant in relation to all other criteria</li> </ul>	<ul style="list-style-type: none"> <li>• Outside storage permitted</li> <li>• Medium level of production</li> </ul>	<ul style="list-style-type: none"> <li>• Outside storage of raw and finished products</li> <li>• Large production levels</li> </ul>
Process	<ul style="list-style-type: none"> <li>• Self-contained plant or building which produces / stores a packaged product</li> <li>• Low probability of fugitive emissions</li> </ul>	<ul style="list-style-type: none"> <li>• Open process</li> <li>• Periodic outputs of minor annoyance</li> <li>• Low probability of fugitive emissions</li> </ul>	<ul style="list-style-type: none"> <li>• Open process</li> <li>• Frequent outputs of major annoyances</li> <li>• High probability of fugitive emissions</li> </ul>
Operation / Intensity	<ul style="list-style-type: none"> <li>• Daytime operations only</li> <li>• Infrequent movement of products and/or heavy trucks</li> </ul>	<ul style="list-style-type: none"> <li>• Shift operations permitted</li> <li>• Frequent movements of products and/or heavy trucks with majority of movements during daytime hours</li> </ul>	<ul style="list-style-type: none"> <li>• Continuous movement of products and employees</li> <li>• Daily shift operations permitted</li> </ul>

### 3 METHODOLOGY

The compatibility assessment for the proposed development began with an initial screening of industrial uses and other potentially significant emission sources in the surrounding area. This involves the use of experience and professional judgement, with the classification system and potential influence areas of Guideline D-6 serving as a useful guide. Based on D-6, the screening of industries focussed on the area within 1000 m of the proposed development. The following tasks were undertaken:

- Site visit to identify types and nature of existing land uses in the area;
- Contact the applicable MECP District Office to determine if there are any air quality or noise concerns within the area;
- Review of Guideline D-6 from the Ministry of the Environment, Conservation and Parks (MECP);
- Review of MECP's Environmental Compliance Approval (ECA) and Environmental Sector and Activity Registry (EASR) permits for existing industries within 1000 m of the subject lands;
- Review of Environment and Climate Change Canada's (ECCC) National Pollutant Release Inventory (NPRI) data for any potentially significant industries within 1000 m of the subject lands;
- Review of meteorological data; and,

- Interpretation of the above information based on our experience with air quality, dust, odour, noise and vibration effects.

The results of these tasks are summarized in the following sections.

### 3.1 Site Visit

A site visit to the study area was conducted by RWDI on January 14, 2021. The site visit involved a driving tour of the surrounding areas, with specific focus on non-residential areas within a 1 km radius of the proposed development site. In addition, aerial photography, ECA documents, EASR registrations, and National Pollutant Release Inventory entries were reviewed in preparation for the site visit, to identify facilities of interest. See **Appendix A** for a listing of all facilities with current MECP approvals and registrations within 1 km of the proposed development.

The area within 1 km radius of the subject site has residential, commercial, open space and industrial land uses. The majority of the land use in this study area is residential, mixed use, and commercial/light industrial use.

Over twenty (20) facilities within 1 km of the proposed development were identified through the MECP ECA and EASR document search. Table A-1 in **Appendix A** lists these industries and they are also presented on **Figure 2**. No facilities were identified to have tall stacks that could impact elevated receptors at the proposed development.

In addition, RWDI contacted the local MECP district office regarding concerns and complaints related to air quality or noise and were advised that the MECP is unable to provide this information directly; such inquiries have to be directed via the Ministry's Freedom of Information (FOI) office.

### 3.2 Meteorology Review

RWDI reviewed wind data from the Toronto Pearson International Airport, the closest meteorological station with a substantial and recent data set used to estimate wind conditions at the site.

A summary of the directional distribution of winds over a period from 2000 to 2020 is shown in **Figure 3**. The wind directions in the figure refer to the direction from which the wind blows, while the annual frequency of a given wind direction is shown as a distance radially from the centre. The most frequent winds originate from the west and north with winds from the east and south least frequent (less than 8% of the time).

### 3.3 Compatibility Review

The MECP Guideline D-6 was used as a tool to classify the identified industries and assess their potential influence on the proposed development. The results of the classification and potential influence on the proposed development is discussed below.

#### 3.3.1 Class I

There are twenty-two (22) facilities within the 1000 m area surrounding the proposed development that have been classified as Class I. A summary of all Class I facilities is provided in **Appendix A** and their location is shown on **Figure 2**.

There are two facilities identified as Class I within 70 m of the proposed development. These facilities are summarized in **Table 3** below.



**Table 3: Class I Industries within 70 m of the Development**

Name	Address	Type of Operation	ECA or EASR Registration #	Distance to Subject Property (Parcel to Parcel)
Janssen Inc.	19 Green Belt Drive	Pharmaceutical company with rooftop equipment identified	No existing MECP ECA or EASR Registration	<20 m
Level 3 Communications Canada Co.	8 Garamond Court	Company is in telecommunication sector; Information indicates this site has ceased operations	2352-4M8R52 (Copy of ECA could not be accessed)	35 m

#### 3.3.1.1 Noise Impact

The potential for noise impacts on the proposed development were assessed for the facilities identified in **Table 3**.

Janssen Inc. does not have an ECA or EASR registration that could be found however aerial photos of the facility show several pieces of cooling equipment located at the facility as well as loading docks and truck routes with the potential to impact the proposed development. Operations at the site could have an impact with respect to noise on the proposed development.

Level 3 Communications was identified through RWDI's MECP ECA search, however a copy of the ECA could not be accessed or viewed. There was no evidence of truck traffic at this site however, rooftop cooling equipment was observed. It is indicated that this site is permanently closed and thus will have no noise impact on the proposed development in its current state. It is possible in the future that the site could have an impact on the proposed development if in operation. This property should be reviewed as part of the detailed study.

Both of these facilities have the potential to create noise impacts at the proposed development.

#### 3.3.1.2 Air Quality Impact

The impact of these facilities on air quality at the proposed development was assessed based on the type of facility, observed potential for fugitive emissions and odour, and the presence of tall stacks at the facility. Both Class I facilities identified within the 70 m influence area have no evidence of significant industrial operations or truck volumes that would result in a significant impact on air quality at the proposed development. Both facilities do not have any evidence of outdoor operations, fugitive dust or odour sources. Janssen Inc. does not appear to have manufacturing operations at its 19 Green Belt Drive location as no ECA or EASR registration has been issued for this site and a search of available NPRI data indicated that the facility is not reported to the NPRI.

Level 3 Communications was identified through RWDI's MECP ECA search, however a copy of the ECA could not be accessed or viewed. In addition, a general information search has indicated that the site, which was a data centre, is permanently closed. There was no evidence of heavy traffic, or outputs, at this site; however, rooftop equipment was observed. No exhaust stacks were observed at this site.

Taking these factors into account, the impact of these facilities on air quality at the proposed development is expected to be insignificant.

**Table 4: Air Quality Summary**

Name	Outdoor Operations	Evidence of Fugitive Dust Sources	Evidence of Odour Sources	Tall stacks
Janssen Inc.	No	No	No	No
Level 3 Communications Canada Co.	No	No	No	No

### 3.3.2 Class II

One facility within the 1000 m radius of the proposed development was identified as Class II. A summary of the Class II facility is provided in **Appendix A** and its location is shown on **Figure 2**. Wescam Inc., is located at 17 Prince Andrew Place and has been classified as Class II. However, this facility is located approximately 600 m from the subject lands which is well beyond its potential influence area of 300 m and is therefore not expected to have an impact on the subject lands.

### 3.3.3 Class III

No facilities within the 1000 m radius of the proposed development were identified as Class III.

## 3.3.4 Transportation Corridors

### 3.3.4.1 Noise and Vibration Impact

The proposed development is bounded by Green Belt Drive to the north and the Canadian Pacific (CP) rail corridor to the south. Don Mills Road to the west and the Don Valley Parkway to the east do not border the site directly however are close enough that they have the potential to be a significant source of noise. Elevated sound levels on the proposed development due to road and rail traffic is expected. The southern portion of the site is bordered by the rail corridor where there is also potential for vibration impacts. Although the rail corridor is owned by CP, both freight and Metrolinx trains operate on it and both would have to be considered for noise and vibration impacts.

Eglinton Avenue East, and the future Eglinton Crosstown LRT, are located approximately 640 m to the south but are not expected to impact the development.

The development site is located beyond the NEF-25 contours for Downsview, Billy Bishop and Buttonville airports and therefore a detailed assessment of aircraft noise is not required.

It is recommended that the following be included in a detailed assessment of the potential transportation noise impacts:

- Assess the road and rail traffic sound levels from Green Belt Drive, Don Mills Road and the Don Valley Parkway and the CP rail corridor at all noise sensitive building façades for the proposed development and any designated outdoor living areas;
- Assess the vibration levels from the CP rail corridor at the proposed development;
- If elevated noise levels are predicted, assess mitigation or design options that can ensure that indoor and outdoor guideline limits are met for road and rail traffic noise. Such measures may include:
  - Relocation of outdoor living areas or shielding them using noise barriers;

- Modification of the building design to shield sensitive areas, such as the location of windows and balconies, or the inclusion of vertical wall elements that provide barrier screening;
  - Noise insulation design of façade, glazing and exterior door assemblies.
- If elevated vibration levels are predicted, assess mitigation or design options that can ensure guideline limits are met for vibration. Such measures may include:
  - Building isolation for the column footings;
  - Vertical resilient layer, or trench isolation layer wrapped around the foundation and/or footings of the building.

Due to the proximity of transportation corridors to the proposed development, it is recommended that a detailed study be completed to assess the potential noise and vibration impacts.

#### 3.3.4.2 Air Quality Impact

As discussed in the previous section, the proposed development is located adjacent to the CP rail corridor. Emissions from diesel fuelled locomotives can have an impact on sensitive receptors located in close proximity to frequently travelled corridors. Therefore, it is recommended that a detailed assessment of potential air emissions from the rail corridor be assessed for the proposed development on the subject lands. It is recommended that the assessment determine the impact of the air emissions at locations of sensitive use, such as residential and outdoor amenity areas, within the proposed development on the subject lands.

If elevated concentrations of air pollutants are predicted, it is recommended that mitigation or design options be assessed that will ensure that adverse effects at sensitive uses will not occur. Such mitigation measures may include building ventilation considerations such as filtration requirements for air intakes and HVAC systems, modifications to building design such as balcony locations, and/or minimum setback distances for the location of sensitive uses from the transportation sources.

## 4 CURRENT ZONING

As part of the compatibility study, the permitted land uses outlined in the local bylaw were considered to assess the potential for incompatibility with future industries. The current zoning surrounding the site is shown in **Figure 4**. The subject lands are in an area identified for General Employment use within the Official Plan for the City of Toronto with the site currently zoned for Employment Industrial (E ) and subject to the restrictions of Section 60.20 and exemption 6 of Chapter 900.20 under City of Toronto By-law 569-2013. The site is adjacent to properties currently zoned for residential as well as Employment Industrial and general employment uses subject to Former North York By-law 7625. Permitted uses within the Employment Industrial zone include a variety of uses such as light to medium manufacturing, custom workshops, industrial sales and service uses, laboratories, offices, printing establishments, service shops, software development and processing, and warehousing and wholesaling. Of the permitted uses, manufacturing operations, custom workshops, industrial sales and service uses, laboratories, offices, printing establishments, service shops, software development and processing, warehousing and wholesaling use are likely to carry out activities that could adversely affect the proposed development. These are all low risk facilities similar to the existing businesses surrounding the subject lands. Other uses are not likely to be

permitted given the existing character of the area and the nature of the current uses and businesses, including existing residential use immediately to the north and east of the subject lands.

The parcel immediately west is zoned the same as the subject lands subject to the same permitted uses and restrictions. The permitted uses are considered low-risk facilities, and their impacts at the subject property are not expected to change in the future considering the existing residential uses located immediately to the north. Therefore, no current or future facilities are anticipated to cause adverse effects on the proposed development under the current zoning designations.

## 5 CONCLUSIONS

RWDI completed an initial screening stage of a compatibility/mitigation study for the subject lands located at 33 Green Belt Drive in North York, Toronto, Ontario. A site visit to the area and a review of the City of Toronto zoning information, MECP ECA and EASR records, and ECCC NPRI data were conducted as part of this assessment. The land uses within 1000 m of the subject lands are predominantly residential, mixed use, and commercial/light industrial use.

There are over twenty (20) industrial facilities identified within the 1000 m study area. All but one of these facilities were classified as Class I. One Class II facility was identified well beyond its potential influence area of 300 m. No Class III facilities were identified in the study area. All of the identified facilities are well contained with little to no potential for impacts of fugitive dust or odours. Based on the preliminary review for the facilities it was determined that they are not expected to have a significant impact on the air quality at the subject lands however there is the potential for impact from noise.

Only two Class I facilities are identified within the D-6 Class I Influence area of 70m from the site. One of the sites appears to be permanently closed while the other does not have any evidence of any existing ECAs or EASRs or reporting to NPRI thereby suggesting that no industrial activities are occurring at this site. The facilities identified within 70 m of the proposed development were identified to not have a significant impact on the subject lands with respect to air quality as one facility appears to no longer be operational and the Janssen facility located next to the subject lands does not appear to have any manufacturing operations as there is no current ECA or EASR registration for the site. Due to these items identified for these two facilities, no further air quality assessment is deemed required.

With respect to noise, there is potential for these facilities to impact the proposed development. The Janssen facility shows evidence of some truck traffic at the site as well as cooling equipment which may result in elevated noise levels at the proposed development site. The Level 3 Communications facility may have different future uses which could also impact the noise level at the proposed development site. Due to these potential noise impacts, both facilities should be reviewed as part of the detailed study in order to identify the potential need for any mitigation.

Based on this initial screening, it was determined there is no need to further investigate complaint histories as required by the City's Terms of Reference (it was identified that to obtain this information would require a lengthy request under the Freedom of Information Act). Since no major industrial facilities were found whose potential influence area would encroach on the property of the proposed development, no investigation of potential



intensification, operational changes and expansion plans for major facilities was undertaken. The proposed development is not expected to create any noise or air quality compatibility issues with respect to major industrial facilities, so no detailed description of any such issues have been provided. In addition, no future facilities are anticipated to cause adverse effects on the proposed development under the current zoning designation considering the currently permitted uses and the current character of the surrounding area.

The subject lands are adjacent to the CP rail line and in the vicinity of the Don Valley Parkway. It is recommended that a detailed air quality assessment be completed to assess the potential impacts from the rail corridor at the proposed sensitive use locations within the proposed development. There is potential for noise impact from nearby roadways and the CP rail line it is recommended that a detailed noise and vibration assessment be conducted to assess the need for any mitigation.

## 6 REFERENCES

1. City of Toronto, Application Support Material: Terms of Reference, Compatibility/Mitigation Study ([Link](#), accessed 2020-12-18).
2. Ministry of the Environment, Parks and Climate Change (MECP), Ontario Ministry of the Environment (MOE), August 2013, Publication NPC-300, *Environmental Noise Guideline Stationary and Transportation Sources – Approval and Planning*.
3. City of Toronto, Municipal Code Chapter 591, Noise ([Link](#), accessed 2020-12-18).
4. The Railway Association of Canada (RAC), Guidelines for New Development in Proximity to Railway Operations.
5. MOEE/TTC Draft Protocol for Noise and Vibration Assessment for the Proposed Yonge-Spadina Subway Loop (MOEE/TTC, 1993)
6. Ministry of the Environment, Parks and Climate Change (MECP), previously Ontario Ministry of the Environment (MOE), July 1995, Guideline D-6, *Compatibility Between Industrial Facilities and Sensitive Land Uses*.

# FIGURES





## Site Location and Property Boundary

Map Projection: NAD 1983 UTM Zone 17N  
33 Green Belt Drive - North York, ON

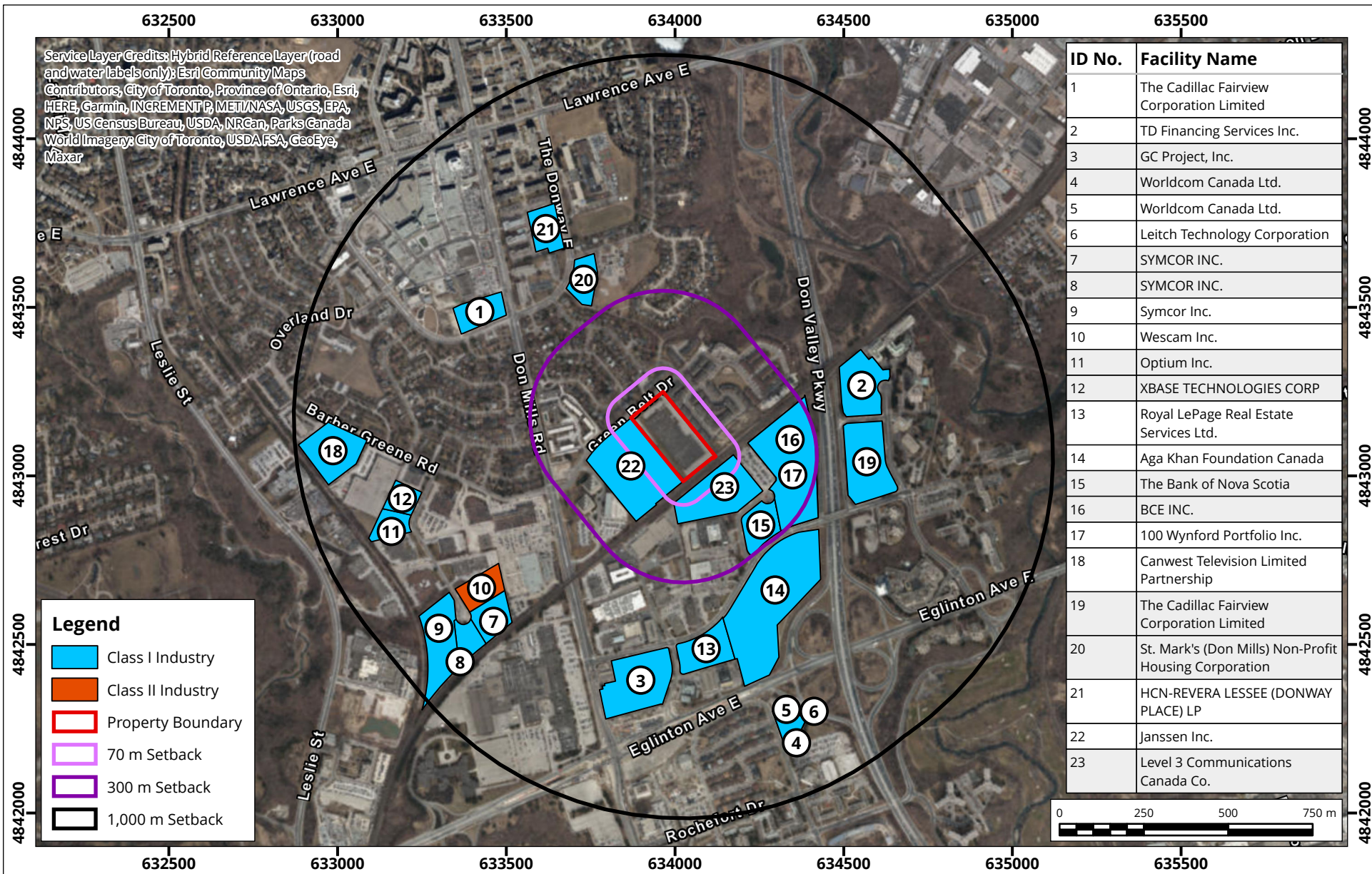


Project #: 2102054

Drawn by: DJH	Figure: 1
Approx. Scale: 1:2,500	
Date Revised: Feb 22, 2021	







## Proposed Development and Surrounding Industries

Map Projection: NAD 1983 UTM Zone 17N  
33 Green Belt Drive - North York, ON



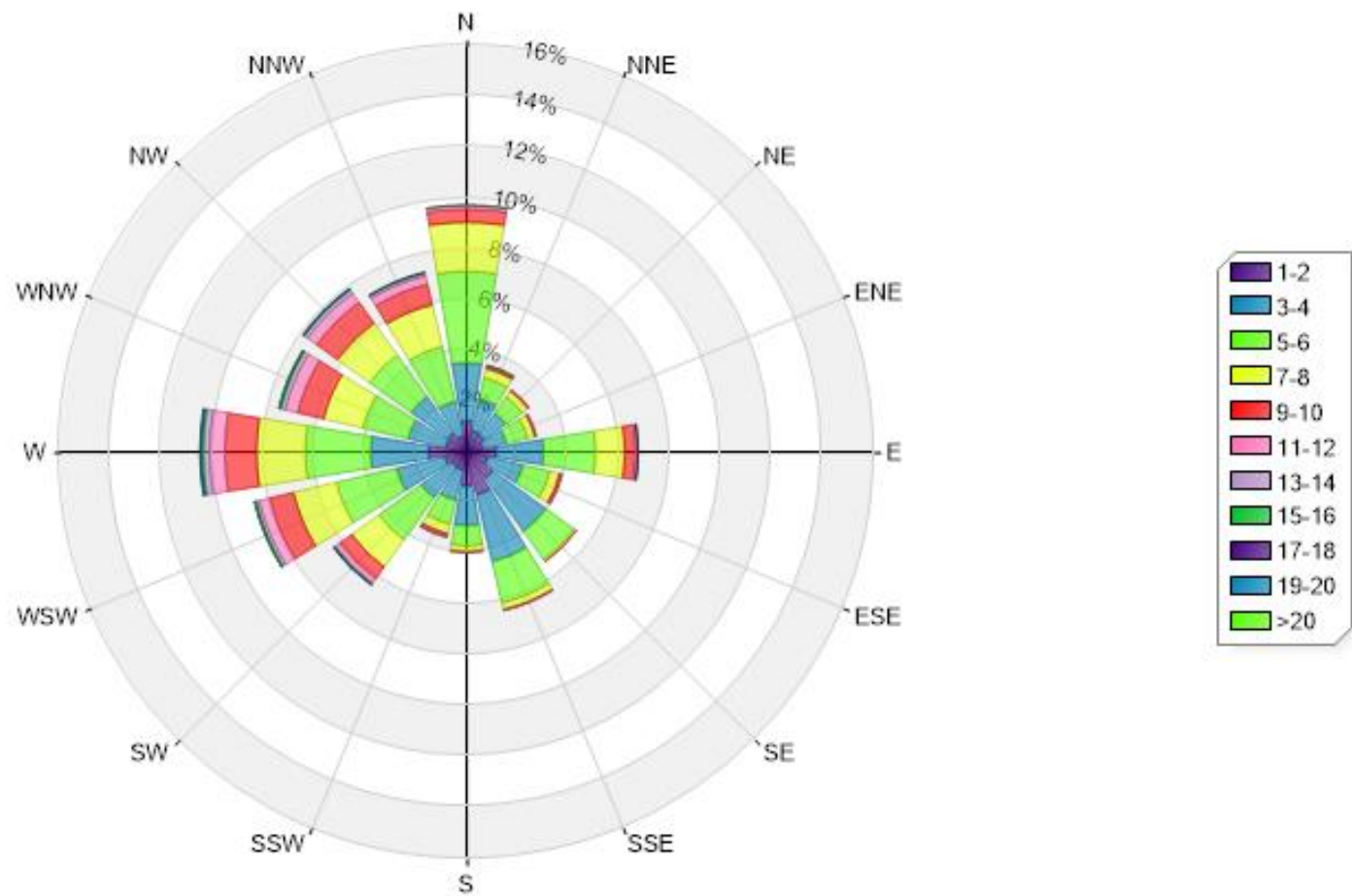
Project #: 2102054

Drawn by: DJH	Figure: 2
Approx. Scale: 1:16,000	
Date Revised: Feb 23, 2021	





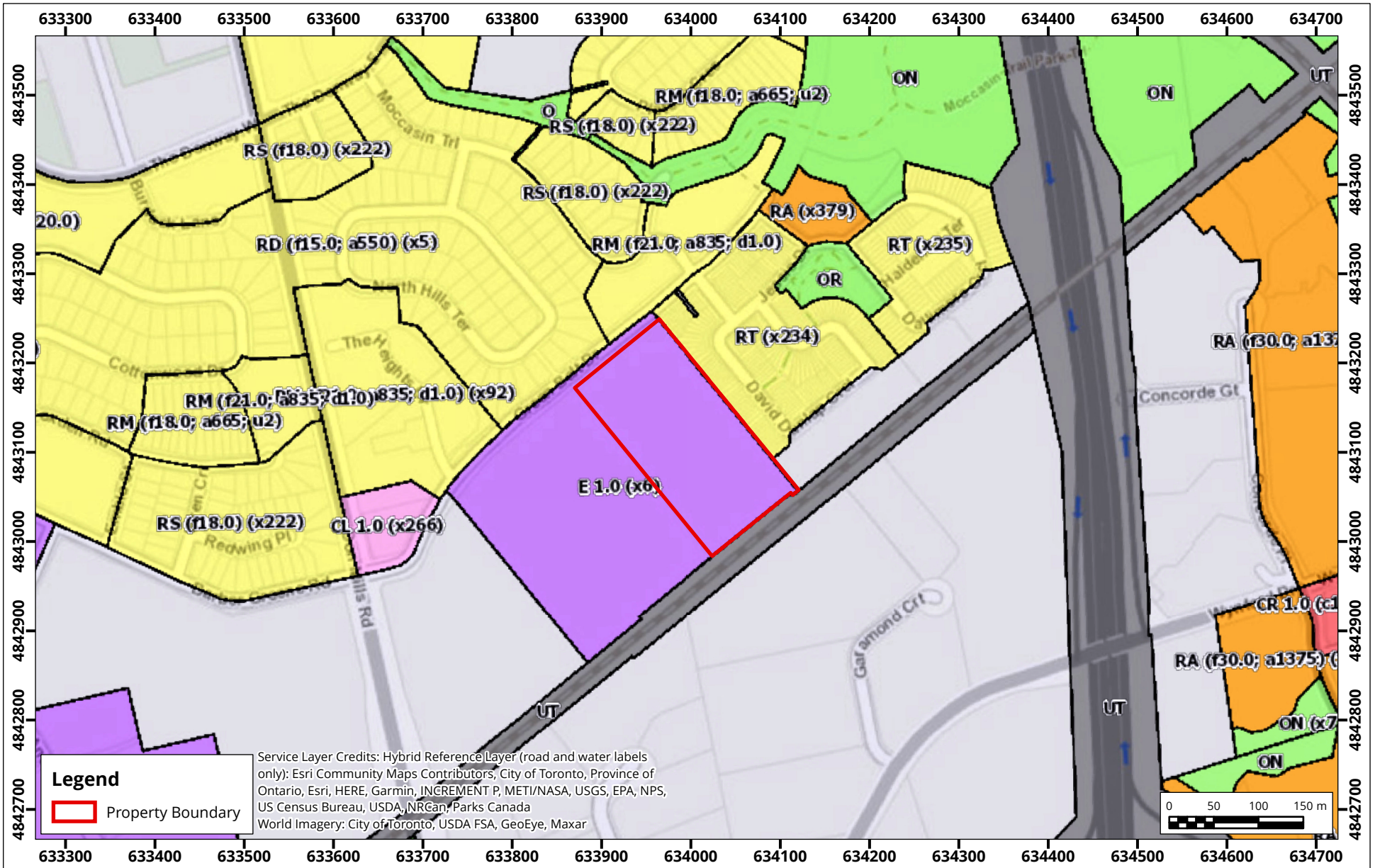
**Directional Distribution (%) of Winds in m/s (Blowing From)  
Toronto Pearson International Airport, (2000-2020)**



**Directional Distribution of Winds Blowing From Toronto Pearson  
International Airport (2000-2020)**

Figure: 3





## Site Location and Surrounding Zoning

Map Projection: NAD 1983 UTM Zone 17N  
33 Green Belt Drive - North York, ON



Drawn by: DJH	Figure: 4
Approx. Scale: 1:6,000	
Date Revised: Feb 24, 2021	

Project #: 2102054



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# APPENDIX A

**33 Green Belt Drive Landuse Compatibility Assessment**  
**33 Green Belt Drive, Toronto, ON.**

RWDI# 2102054

**Table A-1: List of Industrial Sites Around the Proposed Development**

Map Icon Number	BUSINESS NAME	ADDRESS	TYPE OF FACILITY/EQUIPMENT	APPROVAL / REGISTRATION NUMBER
1	The Cadillac Fairview Corporation Limited	49 The Donway West, Toronto, M5H 3R4	HVACs, boilers and 2 cooling towers	2289-67RK8Y
2	TD Financing Services Inc.	12 Concorde Pl 3rd, 4th & 6th Floors, Toronto, M4M 2M3	ECA for emergency power	8899-8AMNQ9
3	GC Project, Inc., as general partner for and on behalf of GC Project L.P.	825 Don Mills Road, Toronto, M5H 2S8	Approval is for a natural gas fired peak shaving generator. ECA has emission limits for the unit in Schedule A and noise limits.	4636-B32HS3
4	Worldcom Canada Ltd.	150 Ferrand Drive, Toronto, MSC 3E4	ECA for emergency power	8238-55XN5V
5	Worldcom Canada Ltd.	150 Ferrand Drive, Toronto, MSC 3E4	ECA for emergency power	4486-4WBRZ7
6	Leitch Technology Corporation	150 Ferrand Drive, Toronto, M3B 1V7	ECA for emergency power	5417-4WRQXF
7	SYMCOR INC.	1 PRINCE ANDREW PL, NORTH YORK, M3C 2H2	EASR-Standby Power System	R-002-5272678697
8	SYMCOR INC.	4 PRINCE ANDREW PL, NORTH YORK, M3C 2H4	EASR-Standby Power System	R-002-5272966092
9	Symcor Inc.	8 Prince Andrew Pl, Toronto, L4Z 4E7	Approvals for diesel generators for emergency power.	7324-9V4J2B
10	Wescam Inc. (now associated with L3Harris)	17 Prince Andrew Pl, Toronto, L7P 5B9	Limited operational flexibility approval for lense assembly and optics component manufacturing. Activities include polishing and grinding and diamond turning.	0955-A5FPUY
11	Optium Inc.	58 Prince Andrew Place, Toronto, M3C 3A2	Approval for a printing machine with a single exhaust. Ink usage is low 0.17L/hr.	3494-589L2Z
12	XBASE TECHNOLOGIES CORP	60 Prince Andrew PLACE, Toronto, M3C 2H4	EASR-Standby Power System	R-002-3578835993
13	Royal LePage Real Estate Services Ltd.	39 Wynford Drive, Toronto, M3C 3K5	Approval for standby diesel generator.	9846-5DWUWQ
14	Aga Khan Foundation Canada	59 Wynford Dr, Toronto, M3C 1K1	Approval for gas fired heating and diesel standby generator.	7428-8CETEE
15	The Bank of Nova Scotia	90 Wynford Dr, Toronto, M5J 1E5	Approval for gas fired heating and diesel standby generator and a cooling tower.	4728-AABJ2V
16	BCE INC.	100 WYNFORD DR, NORTH YORK, M3C 4B4	Bell Canada site communications site. EASR indicates presence of a non emergency generator.	R-010-1112178227
17	100 Wynford Portfolio Inc.	100 Wynford Dr c/o H&R Property Management Ltd., Toronto, M3C 1K4	Approval for standby diesels. Facility appears to be a Bell Canada site.	6085-998K56
18	Canwest Television Limited Partnership	81 Barber Greene Rd, Toronto, M3C 2A2	Television studio/broadcaster. ECA is for Heating equipment and standby diesel generator.	9560-7RENNK
19	The Cadillac Fairview Corporation Limited	1 & 3 Concorde Place	Approval for natural gas fired boilers , water heater, cooling tower, and 2 standby emergency diesel gen sets	4015-67WMF6
20	St. Mark's (Don Mills) Non-Profit Housing Corporation	7 The Donway E North York, Toronto, M3C 3P8	Non-Profit housing corporation. Approval for a emergency natural gas generator.	4379-757J7H
21	HCN-REVERA LESSEE (DONWAY PLACE) LP	8 THE DONWAY E, NORTH YORK, M3C 3R7	Retirement living - standby power.	R-002-1671592376
22	Janssen Inc.	19 Green Belt Drive	Janssen is a pharmaceutical company, division of Johnson and Johnson. The facility does not have a current MECP ECA or EASR registration.	N/A
23	Level 3 Communications Canada Co.	8 Garamond Court, Toronto, B3J 2X2	Access Enviroment search indicates a current ECA for this facility however a copy was unable to be retrieved.	2352-4M8R52

**33 Green Belt Drive Landuse Compatibility Assessment**  
**33 Green Belt Drive, Toronto, ON.**

RWDI# 2102054

**Table A-2: List of Industrial Sites Around the Proposed Development**

Map Icon Number	BUSINESS NAME	Comment on Operations	Tall Stacks Present	Approximate Distance to Site (m)	D-6 Classification
1	The Cadillac Fairview Corporation Limited	This is a site being developed for mixed use - including high rise residential condo units. Emissions from the heating and cooling system are not expected to have a significant impact on air quality.	No	500 m	Class I
2	TD Financing Services Inc.	Not expected to have significant impact on air quality and noise. Air emissions must comply with MECP benchmarks at property line and beyond.	No	470 m	Class I
3	GC Project, Inc., as general partner for and on behalf of GC Project L.P.	Generator is inside an enclosure and shielded by the retail building. The generator is approximately 146 m from the project parcel. It is not expected to have significant impact on air quality and noise.	No	530 m	Class I
4	Worldcom Canada Ltd.	Not an industrial site. Site is well contained with little to no potential for fugitive dust or odours. Not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond. Facility is located closer to existing residential than to the subject lands.	No	>750 m	Class I
5	Worldcom Canada Ltd.	Not an industrial site. Site is well contained with little to no potential for fugitive dust or odours. Not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond. Facility is located closer to existing residential than to the subject lands.	No	>750 m	Class I
6	Leitch Technology Corporation	Not an industrial site. Site is well contained with little to no potential for fugitive dust or odours. Not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond. Noise emission must comply with NPC-300 at existing residences across the street.	No	>750 m	Class I
7	SYMCOR INC.	Commercial property emergency power system is not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	No	650 m	Class I
8	SYMCOR INC.	Commercial property emergency power system not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	No	760 m	Class I
9	Symcor Inc.	Commercial property emergency power system is not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	No	600 m	Class I
10	Wescam Inc. (now associated with L3Harris)	Well contained industrial site with low lying stacks. No evidence of outdoor storage or sources that can contribute to fugitive dust or odour. Air emissions must comply with MECP benchmarks at property line and beyond. Facility is located closer to existing residential than to the subject lands. Not expected to have significant impact on air quality or noise.	No	600 m	Class II
11	Optium Inc.	Well contained industrial site with low lying stacks. No evidence of outdoor storage or sources that can contribute to fugitive dust or odour. Air emissions must comply with MECP benchmarks at property line and beyond. Facility is located closer to existing residential than to the subject lands. Not expected to have significant impact on air quality or noise.	No	>700 m	Class I
12	XBASE TECHNOLOGIES CORP	Commercial/Residential property heating system not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	No	>700 m	Class I
13	Royal LePage Real Estate Services Ltd.	Commercial/Residential property heating system not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	No	500 m	Class I
14	Aga Khan Foundation Canada	Institutional property heating system not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	No	300 m	Class I
15	The Bank of Nova Scotia	Commercial/Residential property heating system not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	No	200 m	Class I
16	BCE INC.	Commercial/Residential property heating system not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	No	200 m	Class I
17	100 Wynford Portfolio Inc.	Commercial/Residential property heating system not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	No	200 m	Class I
18	Canwest Television Limited Partnership	Broadcasting site property heating system and emergency generator not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	No	>800m	Class 1
19	The Cadillac Fairview Corporation Limited	Residential property heating/cooling system and emergency power not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	no	>500 m	Class I
20	St. Mark's (Don Mills) Non-Profit Housing Corporation	Residential property emergency power system not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	no	370 m	Class I
21	HCN-REVERA LESSEE (DONWAY PLACE) LP	Residential property emergency power system not expected to have significant impact on air quality or noise. Air emissions must comply with MECP benchmarks at property line and beyond.	no	540 m	Class I
22	Janssen Inc.	The facility is medium in size and appears to have roof top equipment. There are no large stacks present and no evidence of heavy truck movements or bays. There is no outdoor storage or operations present.	No	<20 m	Class I
23	Level 3 Communications Canada Co.	Information indicates that Level 3 is permanently closed. It is identified as a telecommunications operation.	No	35 m	Class I