

February 9, 2024

Ministry of Municipal Affairs and Housing
College Park, 17th Floor
777 Bay Street
Toronto, Ontario
M5G 2E5

Attention: The Honourable Paul Calandra

Dear Minister Calandra:

**Re. Environmental Registry of Ontario – Ministry Reference Number 20-OP-238506
ERO Number 019-7731
Request for Comments Re. City of Toronto Official Plan Amendment 653**

SteelesTech Nominee Inc. (North American Development Group, Crestpoint Real Estate Investments & Hazelview Investments – “STC”) is the owner of the lands municipally known as 3125, 3355, 3365, 3381 and 3390 Steeles Avenue East and 4000 Victoria Park Avenue which collectively make up the Steeles Technology Campus (“the Campus”). The property is approximately 16.5 ha in area and is located on the south side of Steeles Avenue immediately east of Highway 404 and is bounded on the east by Victoria Park Avenue and on the south by the northerly lot line of employment uses located on the north side of Gordon Baker Drive (see **Figure 1**).

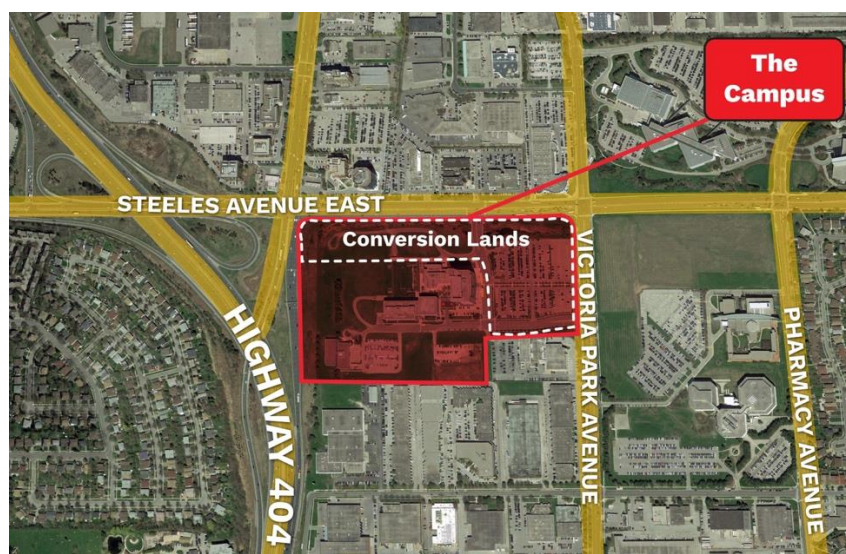


Figure 1 – Conversion Lands and Subject Site

The Campus is partly occupied by Class A office buildings that are currently home to several high-profile tenants, as well as purpose-built restaurants recently constructed to support the existing tenants. However, the majority of the lands remain undeveloped and have been vacant for decades. There have been no new office uses built in this submarket for the past 25 years, and the number of jobs in the broader employment area have been in decline. STC is committed to making an effort to retain and attract employment to this area and has invested heavily in the Campus to make it as amenity rich as possible, but the employment-only permission has served as a significant restraint in maximizing employment opportunities.

Approximately 3,300 people are currently employed on the Campus. STC is seeking to increase that number to more than 6,000 by converting under-utilized portions of the Campus to permit a mix of uses. This request is not about replacing current employment uses – but supporting existing and adding jobs. The request creates and protects thousands of jobs, does not remove lands that could be used by other compatible employment uses and adds vitality to an otherwise long-stagnant property.

The Campus is currently designated *General Employment Areas* in the City of Toronto Official Plan and is included within Site and Area Specific Policy No. 394 (“SASP 394”). In July 2021, STC submitted a request for the conversion of a portion of the Campus (6.8 ha) along Steeles Avenue East to the City to allow a *Regeneration Areas* designation, to permit a mix of uses to be woven into its fabric (“the Conversion Lands”, as also identified on **Figure 1**). The conversion request was made as part of the City’s Municipal Comprehensive Review (“MCR”) process.

The mixed-use master plan submitted with the conversion request included a vision for:

- approximately 1,370 new residential units, with opportunities for the provision of affordable, attainable and rental housing;
- approximately 49,210 sq. m of non-residential gross floor area, which could accommodate approximately 1,965 jobs (in addition to the 4,089 jobs that could be accommodated on the balance of the Campus);
- a new road network;
- two new public parks, totalling 1.8 ha;
- opportunities for the establishment of new POPS; and
- opportunities for the inclusion of supporting community uses.

Our submission provided substantial expert evidence that supports the importance of converting parts of the Campus to enhance the employee experience and help attract additional employers. Adding rental housing, new office space and some retail/commercial and community facilities to the underutilized lands within the Campus will help stabilize the current Class A office and transform the overall site into the kind of dynamic, mixed-use community sought by today’s businesses and employees, while also addressing a pressing City priority for rental housing on a shovel-ready property.

As you are aware, the City reviewed conversion requests filed through their MCR process in phases and have issued three Official Plan Amendment (“OPAs”) to implement their decisions on the requests, as applicable (OPA 591, OPA 644 and OPA 653). City Council adopted OPA 653, the subject of this letter, on July 19, 2023. OPA 653 does not include amendments specific to the Campus.

In previous correspondence to Council included as **Appendix B**, based on a letter dated June 2023 in response to OPA 644 (adopted by City Council on June 14, 2023), we outlined the significant development limitations on the Campus, as well as our concerns arising from the suggestion by the City to introduce inefficient land uses such as warehouse and fulfillment centres. Our submission to Council in this correspondence was that such uses would detract from the existing office uses and diminish the opportunity to intensify existing on-site employment. It is already difficult to maintain higher-density, higher-paying office employment in a partially-undeveloped Campus; it would be doubly difficult to do so where workers are surrounded by inaccessible, unanimated warehousing development. We have concurrently submitted a letter to the Environmental Registry of Ontario (“ERO”) directly commenting on OPA 644.


We shared similar concerns in a letter submitted to the ERO on January 31, 2023, requesting that OPA 591 (adopted by City Council on July 22, 2022) be amended to include the identified Conversion Lands. That correspondence is included as **Appendix A** to this letter, which also includes the architectural plans and planning report filed with the original conversion request. The Minister approved OPA 591 on December 12, 2023, with no amendments to address the City’s treatment of the Campus.

We implore the Ministry to make the decision to modify OPA 653 to include the redesignation of the Conversion Lands, in order for STC to introduce new, compatible employment to the Campus as well as allow for much-needed housing and community services.

We thank you in advance for considering our request. We would be very pleased to meet with you and any members of your staff to discuss this request to provide additional information and next steps.

Sincerely,

SteelesTech Nominee Inc.

Per: 

Steve Bishop
Vice President, Development Services
North American Development Group

Enclosures

- Appendix A: Submission letter to Ministry from SteelesTech Nominee Inc. ("Request for Comments Re. City of Toronto Official Plan Amendment 591"), dated January 31, 2023
 - Attachment 1: Architectural Plans and Renderings, prepared by Giannone Petricone Associates, dated July 27, 2021
 - Attachment 2: Planning Rationale, prepared by Bousfields Inc, dated July 2021
- Appendix B: Letter to City Council from North American Development Group, ("Submission on behalf of 3125-3389 Steeles Avenue East and 4000 Victoria Park Avenue") dated June 13, 2023

APPENDIX “A”



January 31, 2023

Ministry of Municipal Affairs and Housing
College Park, 17th Floor
777 Bay Street,
Toronto, Ontario
M5G 2ES

Attention: The Honourable Steven Clark

Dear Minister Clark:

Re: Environmental Registry of Ontario –
Ministry Reference Number: 20-OP-222176
ERO Number: 019-5868
Request for Comments Re: City of Toronto Official Plan Amendment 591

SteelesTech Nominee Inc. (North American Development Group, Crestpoint Real Estate Investments & Hazelview Investments – “STC”) is the owner of the lands municipally known as 3125, 3355, 3365, 3381 and 3390 Steeles Avenue East and 4000 Victoria Park Avenue which collectively make up the Steeles Technology Campus (“the Campus”). The property is approximately 16.5 ha in area and is located on the south side of Steeles Avenue immediately east of Highway 404 and is bounded on the east by Victoria Park Avenue and on the south by the northerly lot line of employment uses located on the north side of Gordon Baker Drive as shown below. Approximately 3,300 people are currently employed on the Campus and STC is seeking to increase that number to more than 6,000 by converting under-utilized portions of the site to mixed-use. This request is not about replacing current employment uses - but supporting existing and adding jobs.

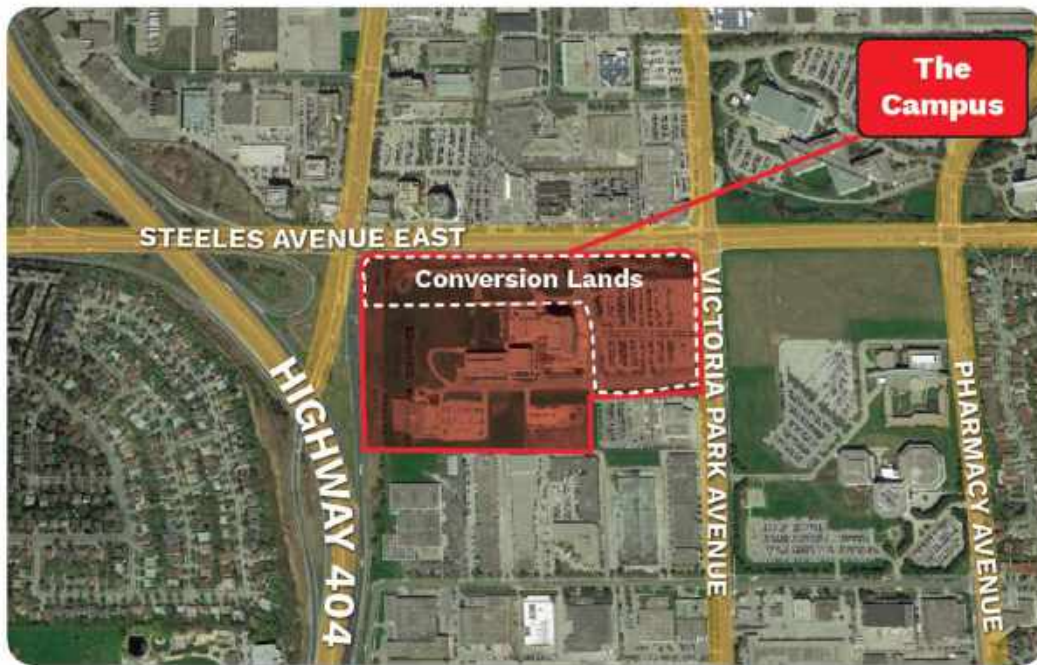


At the present time, the Campus is designated General Employment Area in the City of Toronto Official Plan and is included within Site and Special Area 394 (“SASP 394”).

STC is writing to request that OPA 591 be amended to include portions of the SteeleTech Campus to make it more attractive to existing and prospective employers and create the potential to add close to 2,000 or more jobs by converting vacant and under-utilized lands to a mix of complementary and supportive uses. This change would enable STC to transform the campus into a dynamic mixed-use community by adding close to 1,400 new residential units, two new office buildings, 2 parks and new retail/commercial uses in order to transform this isolated, car-dependent suburban campus into a significantly more attractive employment hub.

In justifying blanket protection for employment zones, City staff and consultant reports highlight the demand for “. . . multi-level industrial developments such as last mile fulfillment centres that are optimally situated to deliver goods to the urban market.” While the campus could easily accommodate such uses, in the absence of a successful conversion request, that option will likely be pursued to maximize the value of this under-utilized real estate. However, STC and the experts on its development team strongly maintain that fronting and surrounding the existing high tech office buildings with such uses will restrict their viability and expansion.

In July 2021, STC submitted a request for the conversion of a portion of the Campus (6.8 ha) to the City of Toronto allow a Regeneration Area designation to permit a mix of uses to be woven its fabric. The areas for which the conversion (“the Conversion Lands”) was requested are shown below.



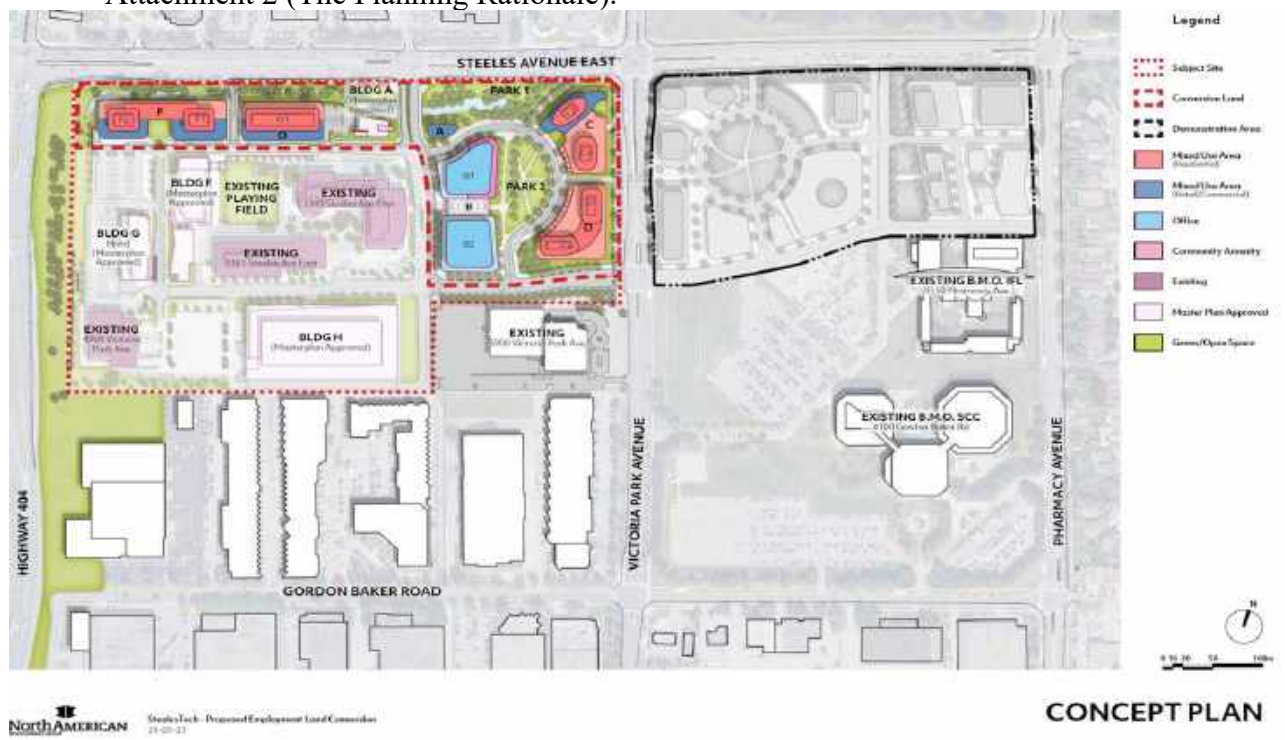
The original Master Plan for the Campus was approved over 25 years ago and was designed as a car-oriented suburban campus. Although recently amended, the Master Plan still provides for a series of office buildings in an open space setting with extensive surface parking lots, no street presence and an insufficient variety of uses and amenities to meet the needs of employees and create the sense of community they desire. To address more modern preferences, STC has made significant investments designed to retain and attract tenants to the existing buildings – adding a soccer field, fitness facility, basketball court, BBQ and patio areas, community gardens and high-end finishes to the interior of the buildings to reflect the high-tech nature of its tenants. STC has also added restaurants to previously vacant lands and are in the final stages of securing approval for a hotel on site. The existing tenants have expressed appreciation for these investments and their support for this conversion request.

Despite these efforts and expenditures, the overall format for the campus still fails to meet the needs of today's more discerning employers and employees. This situation is not a recent trend as the employment submarket in which the Campus is located has seen extremely limited office growth in the past 25 years – other than the three buildings on the site. This difficulty to attract employees reflects their preference to work close to home and near higher-order transit in mixed-use communities with restaurants, recreational facilities and opportunities for other experiences associated with urban living. Employers respond by choosing to locate in central mixed-use areas (Markham City Centre, Vaughan Metropolitan Centre and Downtown Toronto) where residential and office uses co-exist successfully. As a result, the Campus continues to struggle to attract and retain tenants and large swaths of the

In response to the overall challenges associated with this property, STC retained a first-class development team to create a new vision for a complete community on the Conversion Lands.

- Giannone Petricone Associates Incorporated (“GPAIA”) - Architects
- Bousfields Inc. – Land Use Planners
- Altus Group – Economic Analyses
- BA Group – Transportation Planning
- Fabian Papa & Partners – Municipal Servicing
- Gradient Wind Engineering – Land Use Compatibility

Attachment 1 (The GPAIA Architectural Plans and Renderings), and Attachment 2 (The Planning Rationale).



The Concept Plan provides for:

- Approximately 1, 370 residential units (122,952 sq. m of residential gross floor area (“GFA”);
- Opportunities for the provision of affordable, attainable and rental housing;
- 49,210 sq. m of non-residential GFA, which could accommodate approximately 1,965 jobs (in addition to the 4,089 that could be accommodated on the balance of the Campus);
- A new road network which serves the easter block (currently a large surface parking lot);
- Two new public parks totalling 1.8 ha;
- Opportunities for the establishment of new POPs; and,
- Opportunities for the inclusion of supporting community uses.

Importantly, the Concept Plan restricts the Regeneration Areas to the Steeles Avenue and Victoria Park frontages and the distribution of new office uses provides an appropriate transition to the employment uses to the south and east.

The proposed redevelopment of a portion of the Campus lands optimizes their use while achieving employment densities that are appropriate for the location and context of the Campus. This intensification will meet both Provincial and Municipal policy objectives. However, it would appear that the City has overlooked or rejected this conversion request in its adoption of OPA 591 simply on the grounds that it opposes the removal of employment lands – even if they have sat vacant for decades in the middle of a growing urban environment. STC does not agree with the City’s position and submit the following for your consideration.

1. The City needs to provide appropriate locations for employment uses and meet the provincial target of 285,000 new residential units by 2030. This conversion contributes directly to those objectives.
2. The Conversion Lands will not only provide 49,000 sq. m of non-residential space which will generate approximately 1,965 jobs, it will help retain the existing tenants who are facing challenges because of the isolated and “single use” nature of the Campus today. It will also spur significant interest for STC to erect another office building within the existing building envelope that so far has failed to generate sufficient interest to warrant its construction.
3. STC owners are experienced and successful real estate companies and NADG is a large and successful Canadian developer. For example, NADG has recently secured approval for the redevelopment of Agincourt Mall in east Toronto – an outdated community commercial centre with extensive surface parking lots that has faced retail challenges for some time. The new community to be developed will contain approximately 4400 new residential units, about 25,000 sq. m of retail uses, 9,000 sq. m of office uses as well as significant park lands, POPs and community spaces.

4. The approval of residential uses and its quick build out by an experienced developer represents an important overall step in demonstrating the Government's commitment to addressing the housing crisis. This is an opportunity to make a significant contribution to affordable, attainable and rental housing.
5. STC is proposing to build a complete community on the Conversion Lands and deliver approximately 1,965 new residential units on a redundant surface parking lot facing a major arterial road in a community with nearby support services and community facilities. The total population per ha ("pph") on the Conversion Lands is proposed to be about 350 pph.

STC respectfully requests that OPA 591 be amended to include the identified 6.8 ha Conversion Lands of the Steelestech Campus to make it more attractive to existing and prospective employers and create the potential to add close to 2,000 or more jobs by converting vacant and under-utilized lands to a mix of complementary and supportive uses.

We thank you in advance for considering our request. We would be very pleased to meet with you and any members of your staff to discuss this request to provide additional information and next steps.

Sincerely,

SteelesTech Nominee Inc.

Per:

A handwritten signature in black ink, appearing to read 'S. Bishop'.

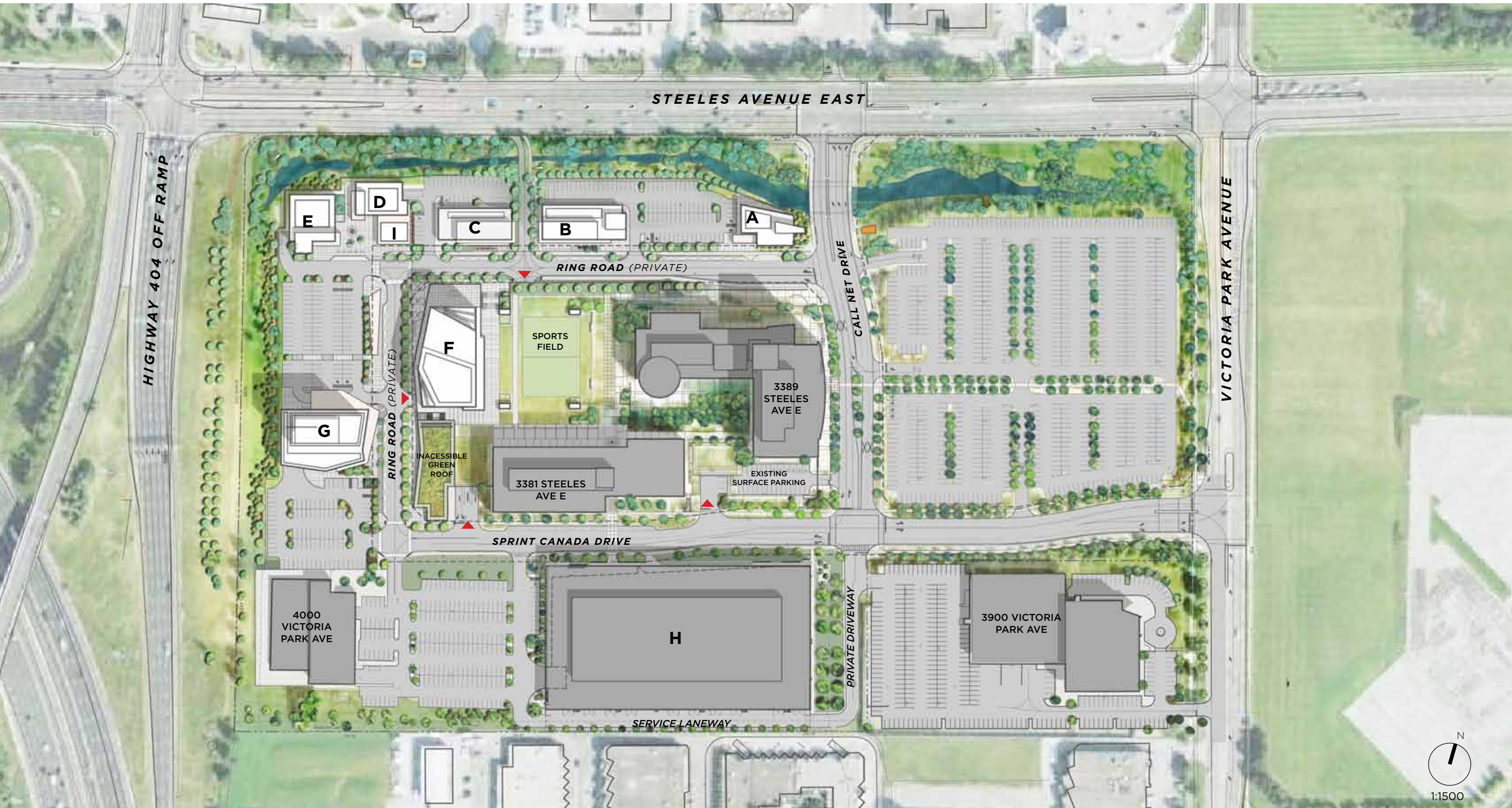
Steve Bishop
Vice President, Development Services
North American Development Group

SteelesTech

Proposed Employment Land Conversion

July 27th, 2021





Vision

The SteelesTech land conversion aims to create a smart development for the future. A vibrant, varied neighbourhood to live and work.

The SteelesTech campus will ultimately contain:



6,119 Jobs



1,380 Residential Units



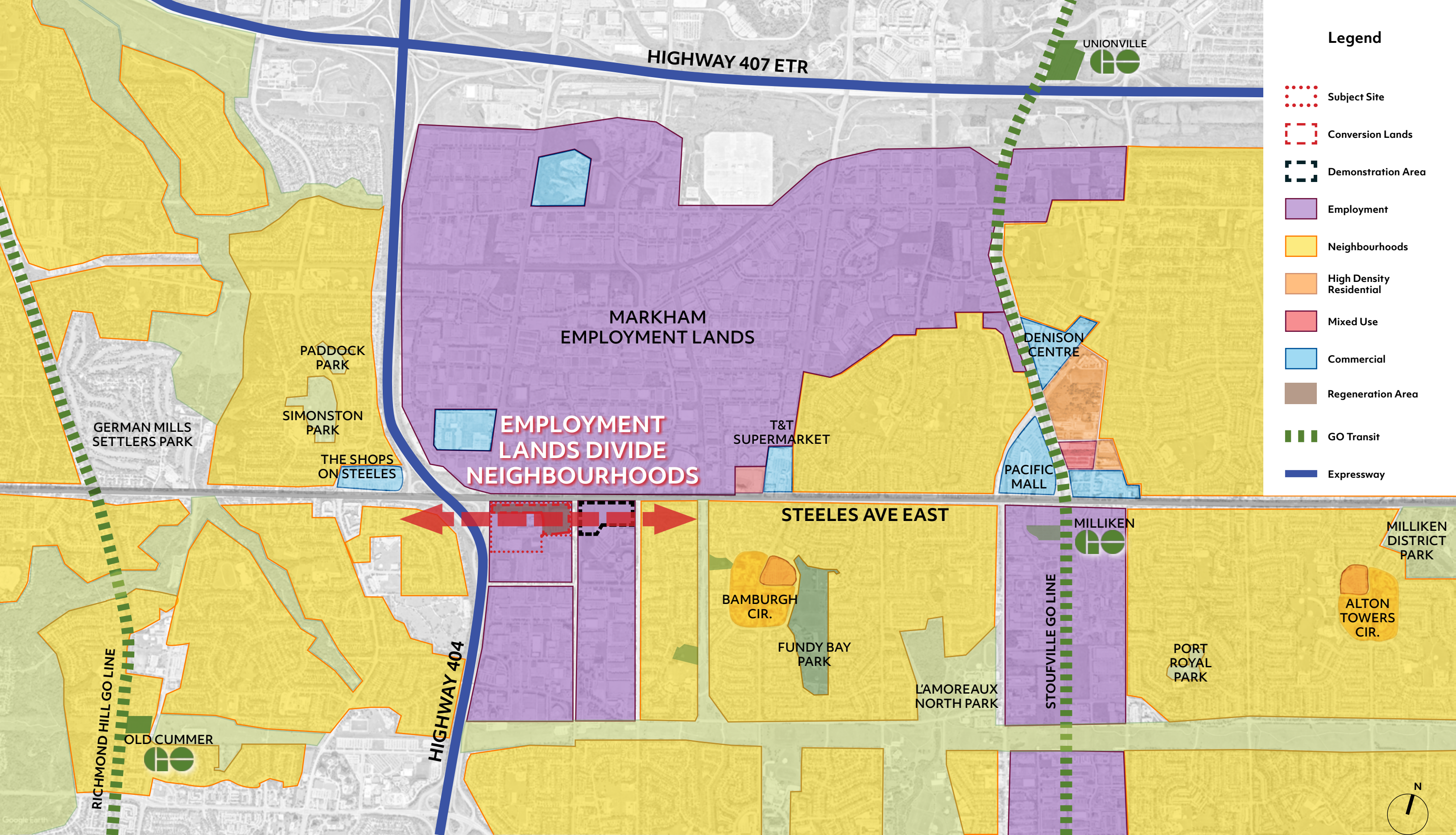
110,700 m² of Total Office GFA

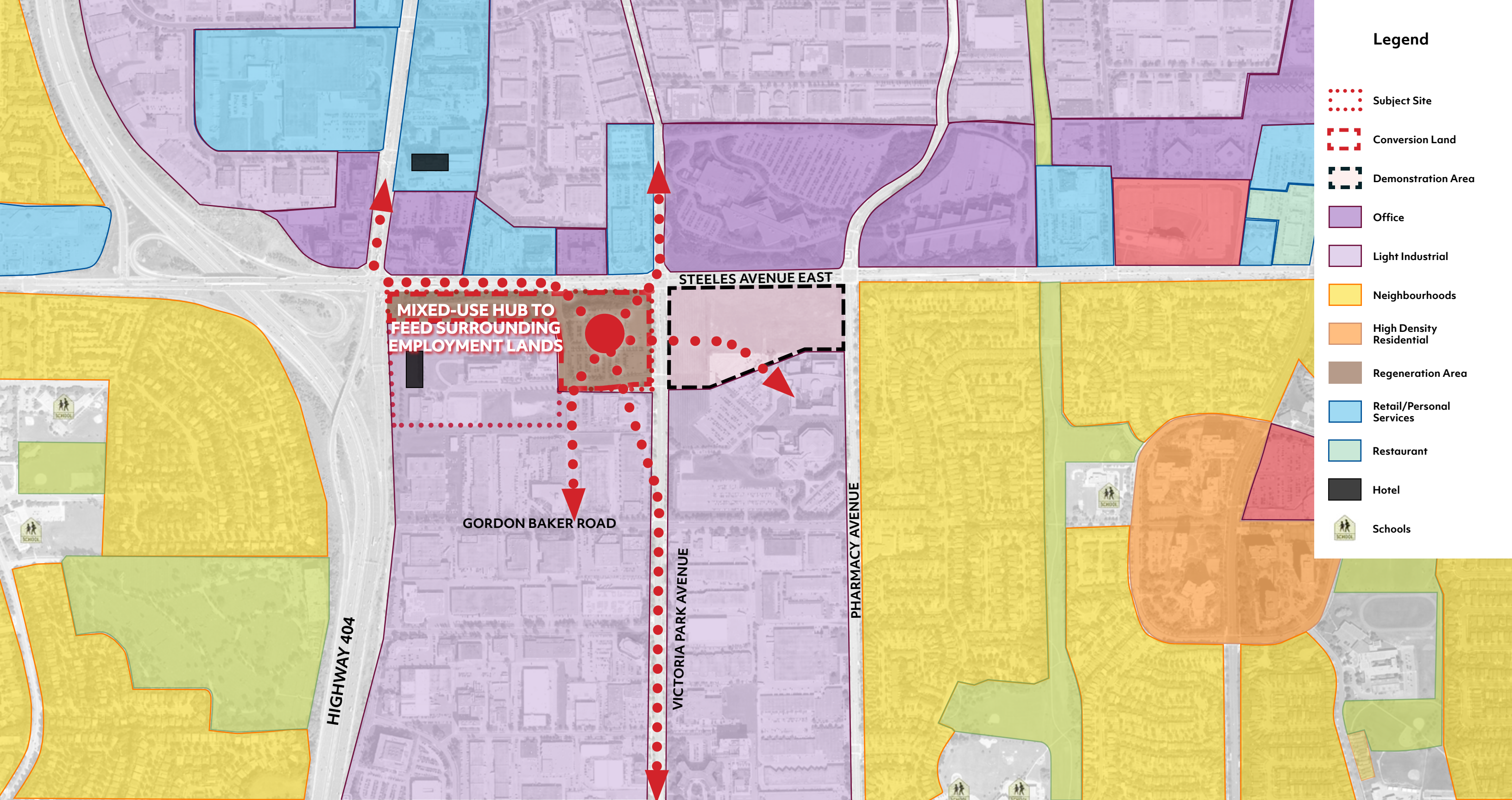


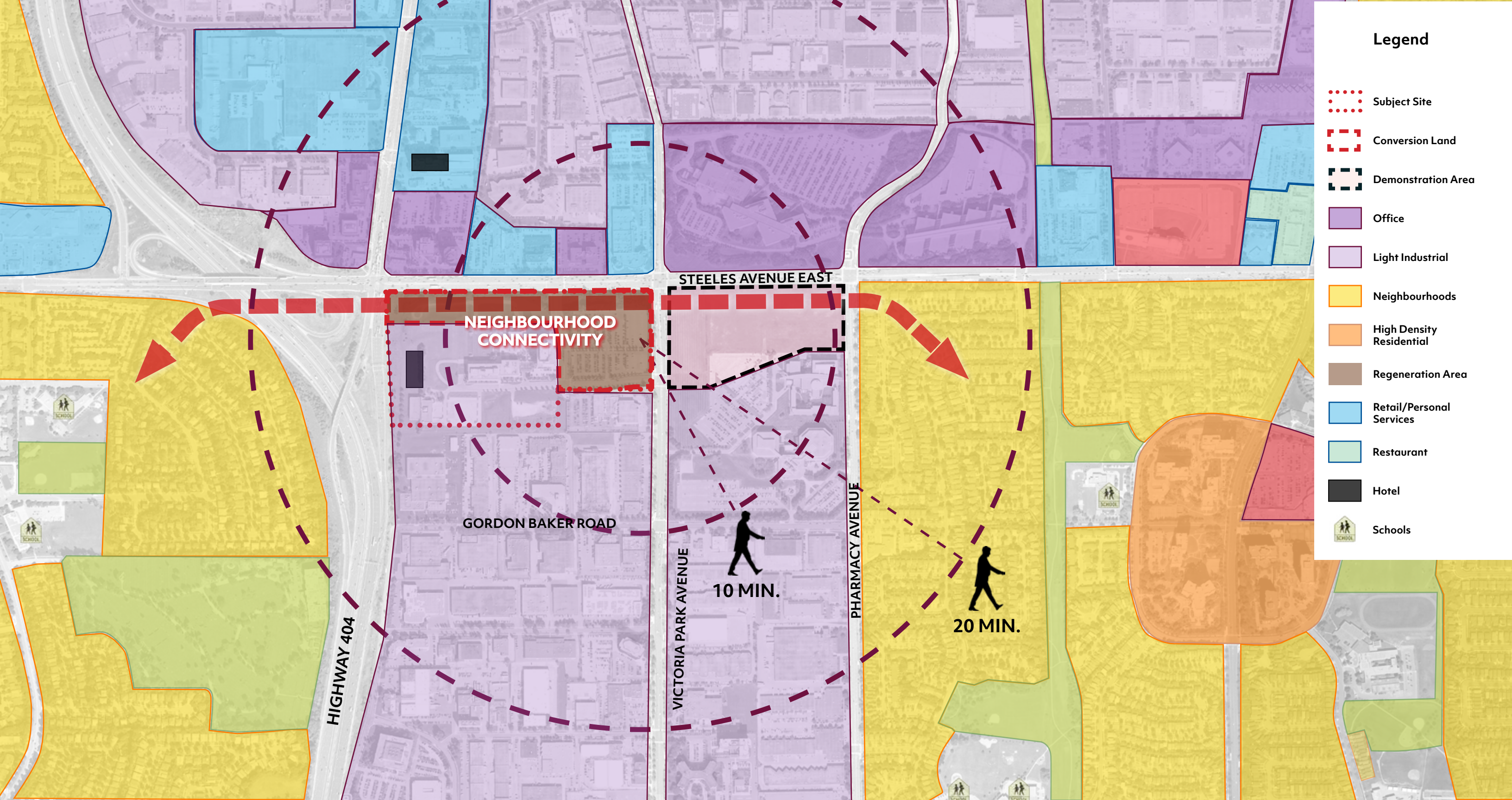
20,417 m² of Total Retail/Commercial GFA



1.81 ha of Parks

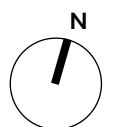






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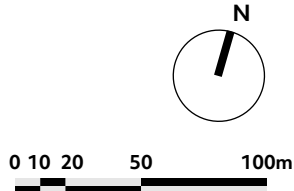
- Subject Site
- Conversion Land
- Demonstration Area
- Office
- Light Industrial
- Neighbourhoods
- High Density Residential
- Regeneration Area
- Retail/Personal Services
- Restaurant
- Hotel
- Schools

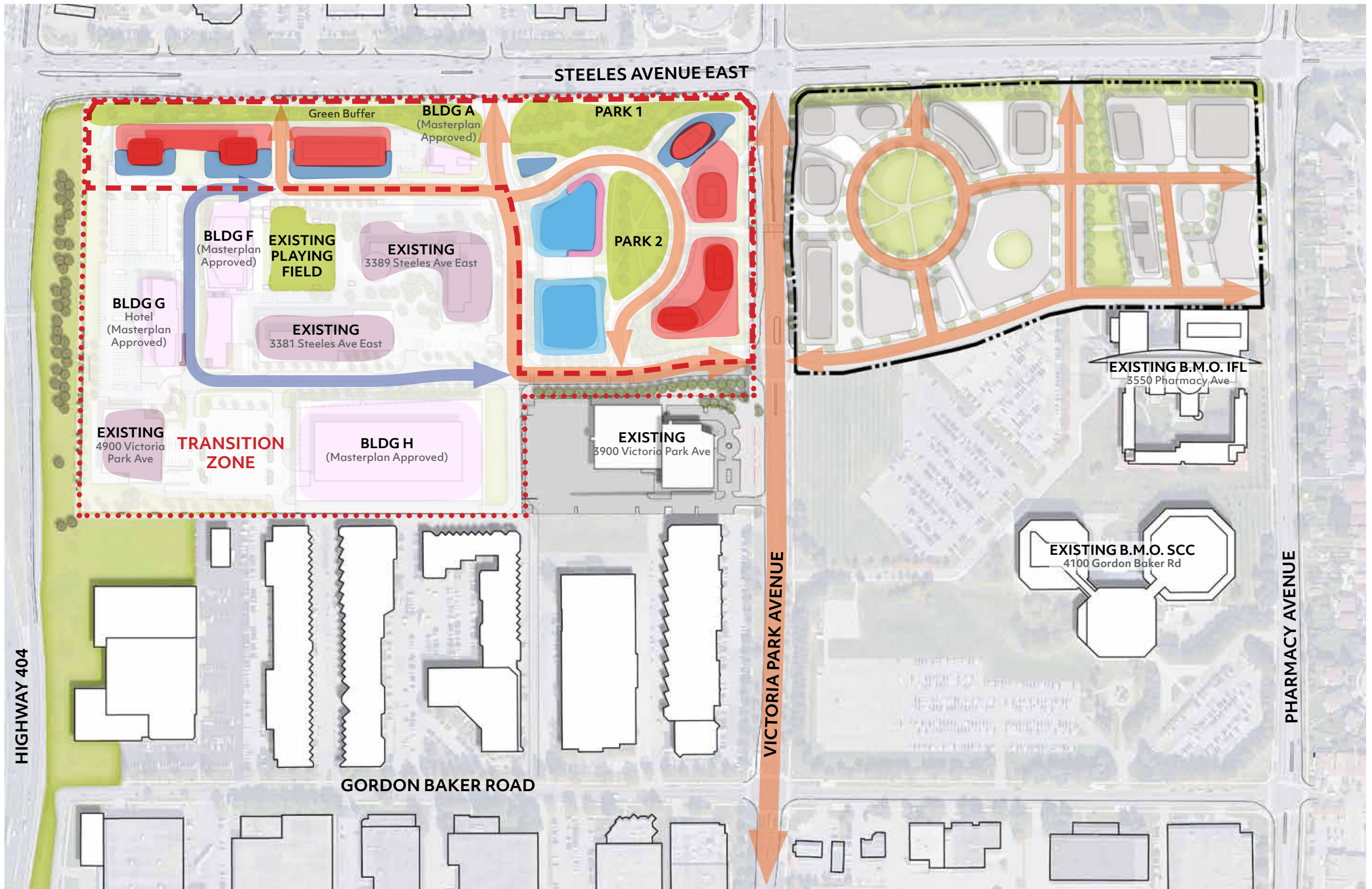




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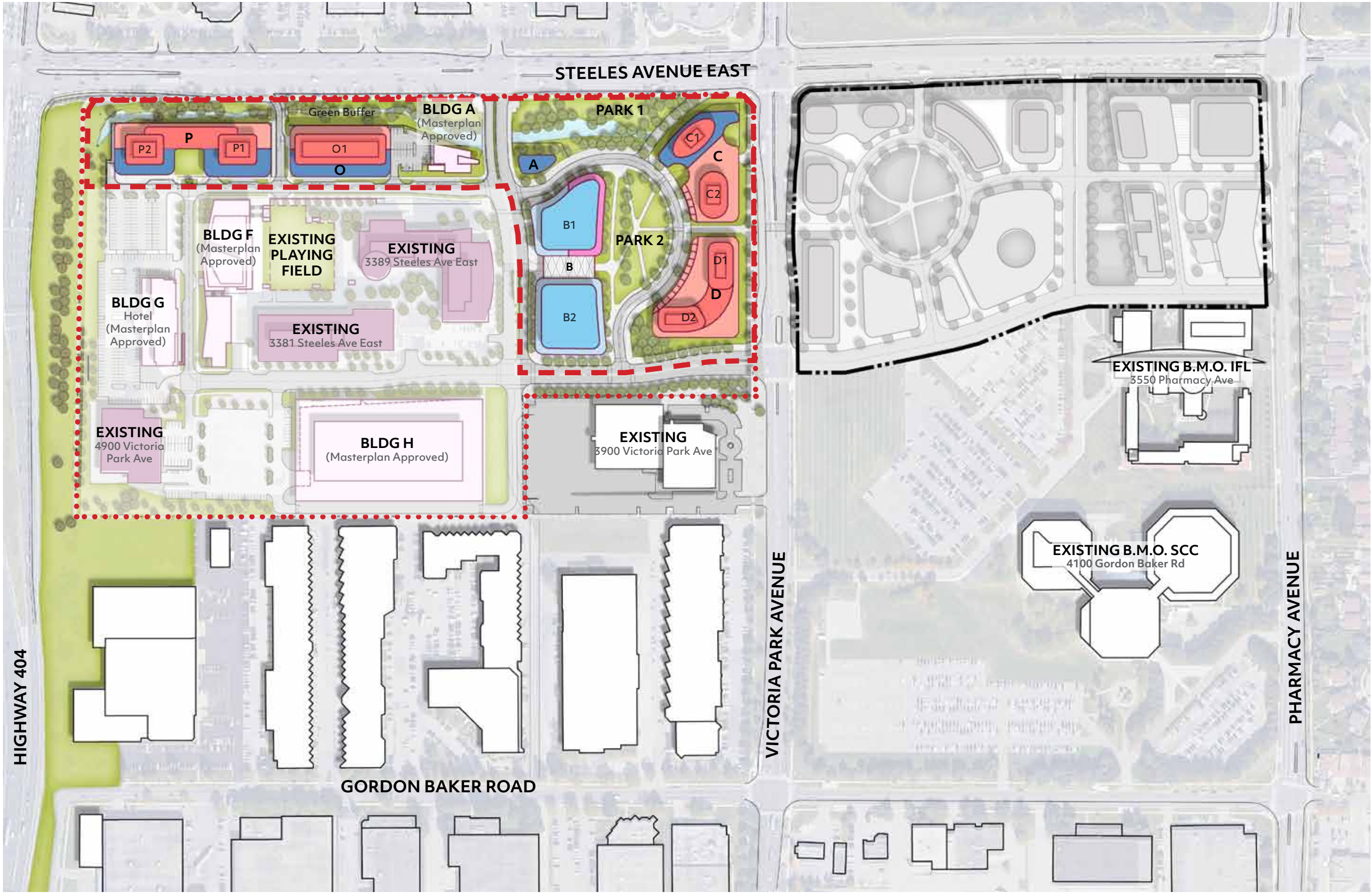
- Subject Site
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- Demonstration Area
- Office
- Light Industrial
- Neighbourhoods
- High Density Residential
- Regeneration Area
- Retail/Personal Services
- Restaurant
- Hotel
- Schools
- Connectivity
- Green/Open Space





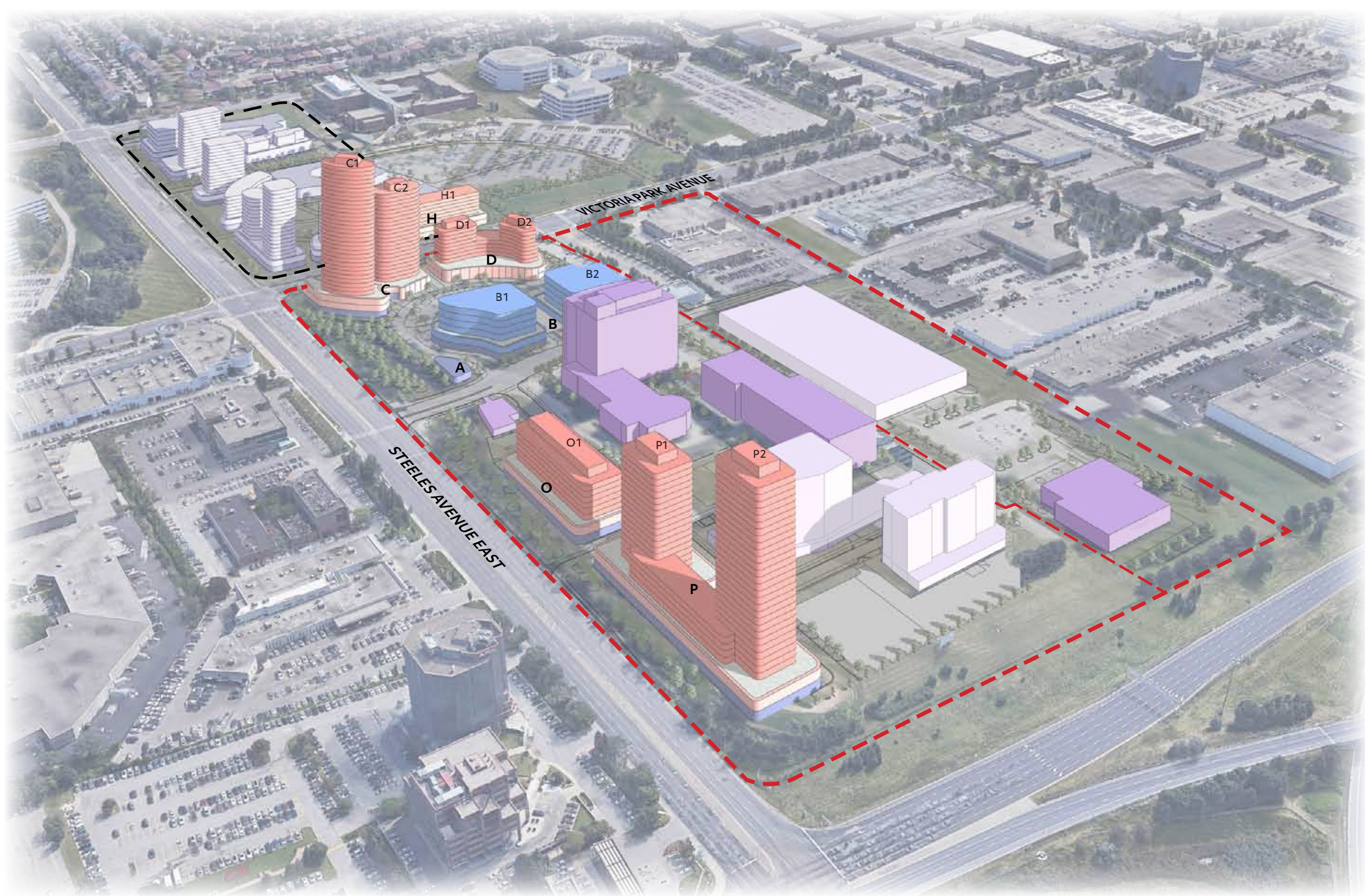
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- Subject Site
- Conversion Land
- Demonstration Area
- Mixed Use Area (Residential)
- Mixed Use Area (Retail/Commercial)
- Office
- Community Amenity
- Existing
- Master Plan Approved
- Green/Open Space
- Public Roads
- Private Roads



Legend

- Subject Site
- Conversion Land
- Demonstration Area
- Mixed Use Area (Residential)
- Mixed Use Area (Retail/Commercial)
- Office
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- Existing
- Master Plan Approved
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Legend

- Subject Site
- Conversion Land
- Demonstration Area
- Mixed Use Area (Residential)
- Mixed Use Area (Retail/Commercial)
- Office
- Community Amenity
- Existing
- Master Plan Approved
- Parks

1. Current Jobs Onsite		EXISTING BUILDINGS GFA							Floor Space per Worker (FSW)					Jobs
Building Name/Number	Height (storeys)	Restaurant	Retail	Office	Hotel	Data Storage	TOTAL GFA (sm)	TOTAL GFA (sf)	Restaurant	Retail	Office	Amenity	Hotel	
SUBJECT SITE (WEST OF VICTORIA PARK AVE)														
3389 Steeles Ave. E	12			36,557			36,557	393,496	40 sm/job	40 sm/job	20 sm/job	60 sm/job	40 sm/job	1,828
3381 Steeles Ave. E	5			18,811			18,811	202,480						941
4000 Victoria Park Ave.	2			5,085			5,085	54,734						254
Building A (Bank)	1			573			573	6,168						29
Building B	1	936					936	10,075						23
Building C	1	756					756	8,138						19
Building D	1	526					526	5,662						13
Building E	1	762					762	8,202						19
Building F	8		87	15,547			15,634	168,283						780
Building G (Hotel)	12	390	10		9,450		9,850	106,024						246
Building H (Data Storage)	2			872		20,644	21,516	231,596						319
Building I	1	177					177	1,905						4
TOTAL GFA BY USE (sm)							111,183	1,196,763						4,475

Legend

Residential

Retail Commercial

Office

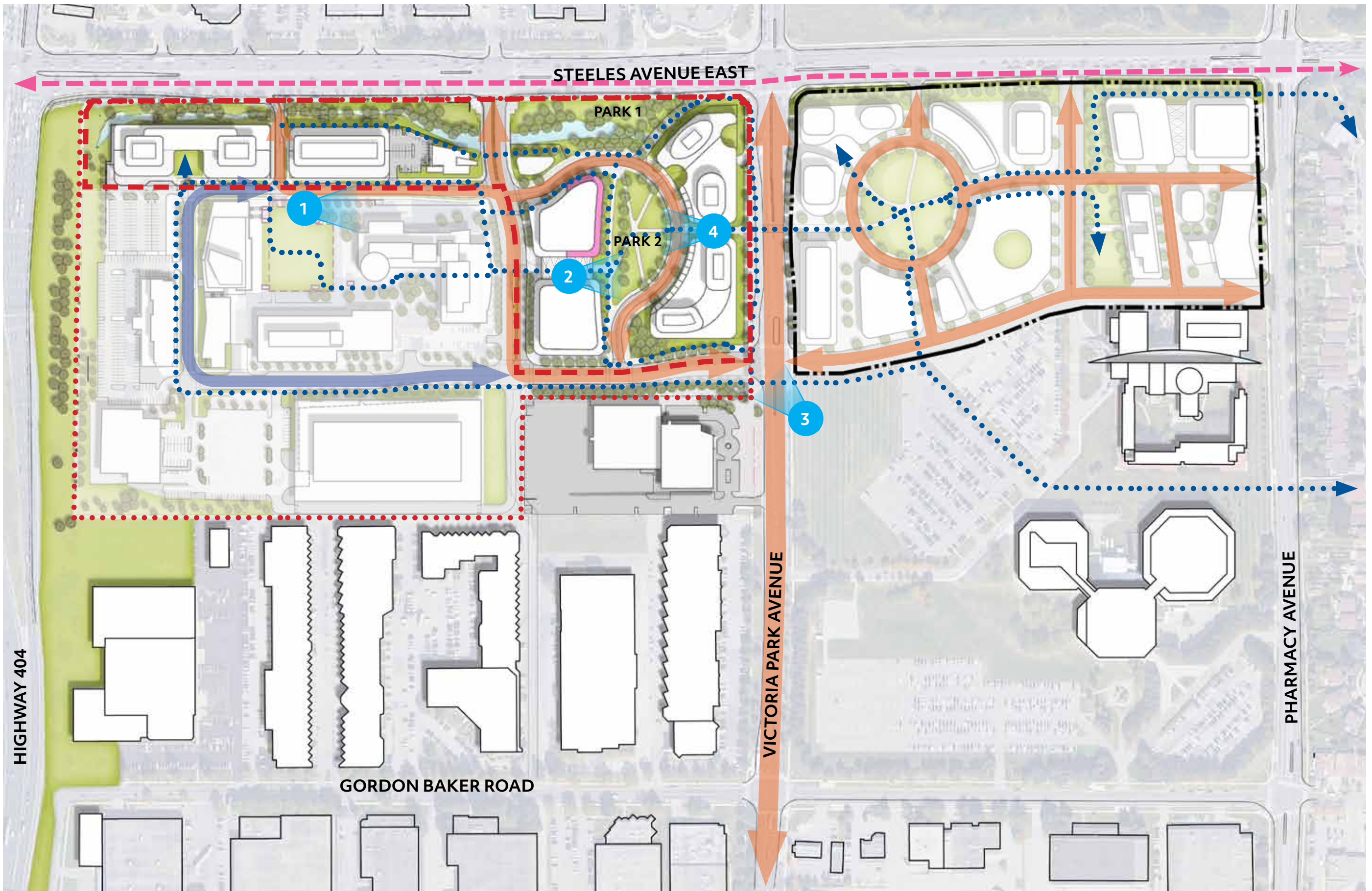
2B. Typical Existing Employment Lands Dev. Scenario						
	LAND AREA (sm)	FSI allowable	FSI achieved	TOTAL GFA (sm)	Floor Space per Worker	Jobs
Area of N.E. Portion of Steelestech Site	37,801	1.50	0.79	30,030	Industrial = 135 sm/job	222

Note: Assumed development at this parcel is a 2 storey industrial sales and services development to match existing employment developments to the south

2C. Employment Lands Dev. Scenario						
	LAND AREA (sm)	FSI allowable	FSI achieved	TOTAL GFA (sm)	Floor Space per Worker	Jobs
Area of N.E. Portion of Steelestech Site	37,801	1.50	0.60	22,550	Office = 20 sm/job	1,128

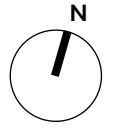
Note: Assumed development at this parcel is a 2 storey business office development

3. Proposed Mixed-use Conversion																
	PROPOSED BUILDINGS GFA										Floor Space per Worker (FSW)					Jobs
	Proposed Building	Height (storeys)	Floor plate area	Residential Units	Residential (sm)	Retail/Commercial (sm)	Community Amenity (sm)	Office (sm)	TOTAL GFA (sm)	TOTAL GFA (sf)	Restaurant 40 sm/job	Retail 40 sm/job	Office 20 sm/job	Amenity 60 sm/job	Hotel 40 sm/job	Persons (1.74 per Residential Unit)
SUBJECT SITE (WEST OF VICTORIA PARK AVE)	A	1	378			378			378	4,069		9	0	0		9
	B	2	6,533				4,900	8,166	13,066	140,641		0	408	81		489
	B1	6	2,067					8,268	8,268	88,996		0	413	0		413
	B2	6	2,323					9,292	9,292	100,018		0	464	0		464
	C	2	3,937		5,374	2,500			7,874	84,755		62	0	0		62
	C1	34	750	320	24,000				24,000	258,334		0	0	0		0
	C2	24	750	220	16,500				16,500	177,604		0	0	0		0
	D	2	4,237		5,974	2,500			8,474	91,213		62	0	0		62
	D Midrise	6	1,750	93	7,000				7,000	75,347			0	0		0
	D1	10	750	40	3,000				3,000	32,292			0	0		0
	D2	10	750	40	3,000				3,000	32,292			0	0		0
	O	2	3,307		1,500	1,807		3,307	6,614	71,192		45	165	0		210
	O1	8	1,794	144	10,764				10,764	115,863		0	0	0		0
	P	2	4,795		1,500	3,295		4,795	9,590	103,226		82	239	0		321
	P Midrise	6	2,460	131	9,840				9,840	105,917		0	0	0		0
	P1	20	750	140	13,500				13,500	145,313		0	0	0		0
	P2	30	750	240	21,000				21,000	226,042		0	0	0		0
Building F (Existing Masterplan Approved)		8				87		15,547	15,634	168,283		2	777	0		779
Building G (Hotel) (Existing Masterplan Approved)		12				9,850			9,850	106,024		246	0	0		246
Building H (Data Storage) (Existing Masterplan Approved)		2	10,758					872	21,516	231,596		0	43	0		43
3389 Steeles Ave. E		12						36,557	36,557	393,496		0	1,827	0		1,827
3381 Steeles Ave. E		5						18,811	18,811	202,480		0	940	0		940
4000 Victoria Park Ave.		2						5,085	5,085	54,734		0	254	0		254
	TOTAL GFA BY USE (sm)			1,368 Units	122,952	20,417	4,900	110,700	279,613	3,009,726	NEW TOTAL JOBS					6,119 Jobs
																2,380 Persons



Legend

- Subject Site
- Conversion Land
- Demonstration Area
- Community Amenity
- Green/Open Space
- Pedestrian Connectivity
- Bike Path
- Public Roads
- Private Roads
- Rendering Viewpoints



0 10 20 50 100m





















Planning Rationale

**3125-3389 Steeles
Avenue East &
4000 Victoria Park**
City of Toronto

Prepared For
STC Investments Nominee Inc.
("STC"), c/o North American
Development Group

July 2021



Job Number
13146-2

www.bousfields.ca

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Urban Design
Community Engagement

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Table of Contents

1 Introduction	1
1.1 The Conversion Request	3
1.2 The Basis for the Conversion Request	4
1.3 The Economic Background	4
1.4 The Proposed Concept Plan	5
2 Campus Lands and Surroundings	7
2.1 Campus Lands	8
2.2 The Conversion Lands	10
2.3 Area Context	10
2.4 The Policy and Development Framework	12
2.5 Transportation	12
3 Proposal	14
3.1 Vision for the Campus	15
4 Policy & Regulatory Context	21
4.1 Overview	22
4.2 Provincial Policy Statement (2020)	22
4.3 Growth Plan for the Greater Golden Horseshoe (2019)	22
4.4 City of Toronto Official Plan (2019 Consolidation)	23
4.5 Zoning By-law	31
5 Analysis	33
6 Conclusion	40



Looking Northwest Along Victoria Park Avenue



Looking East to Park 2



Looking East from Existing Steelestech Campus

A hand-drawn diagram on a light blue background. A hand holding a blue pen is pointing at a section of the diagram. The diagram features a series of vertical red and black lines, a horizontal line with a red arrow pointing right, and a vertical line with a red arrow pointing down. The text "40 mm" is written next to the vertical arrow, and "25 mm" is written next to the horizontal arrow. The word "Intro" is partially visible at the bottom right.

1

Introduction

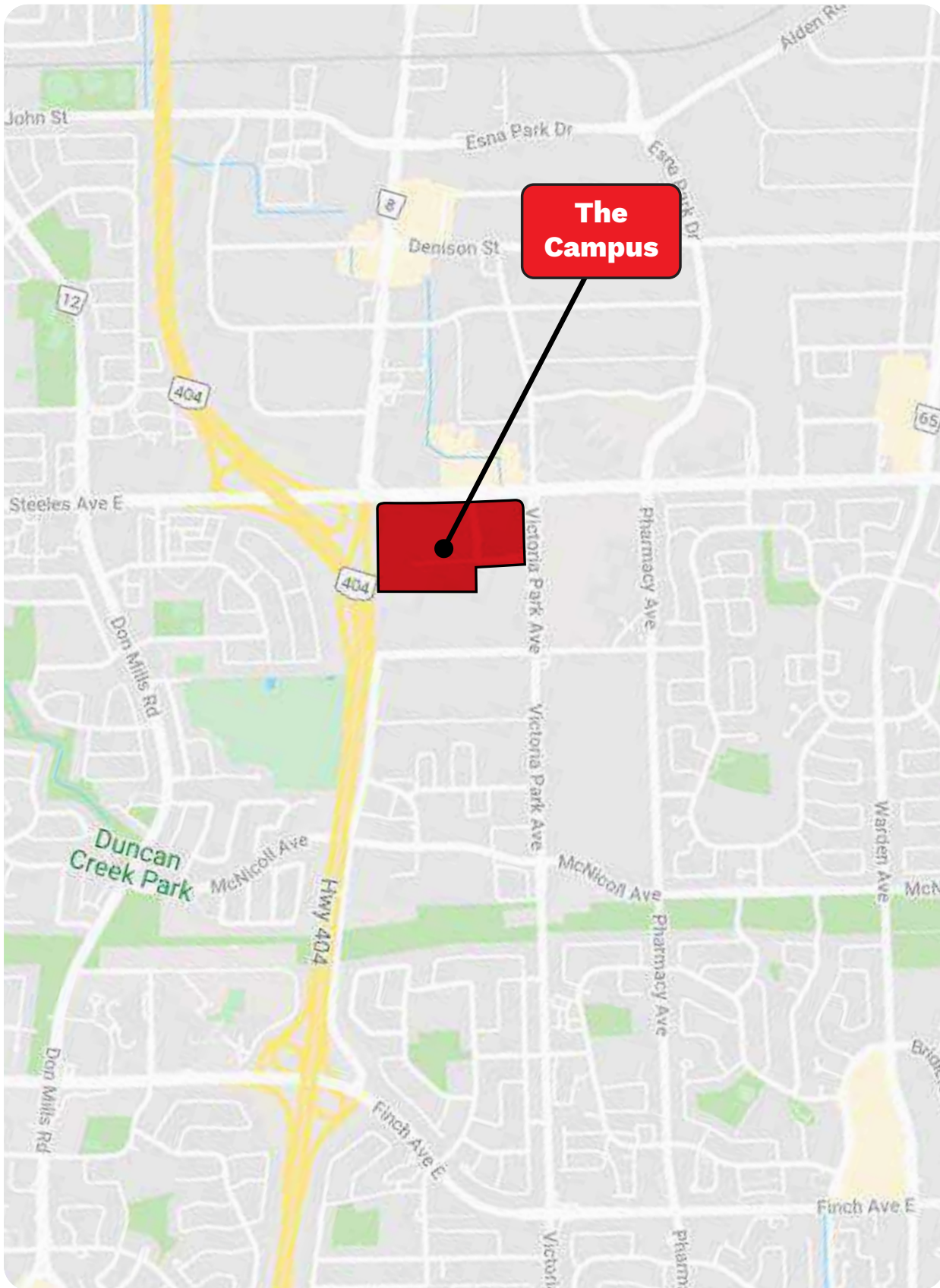


Figure 1 - Location Map

1.1 The Conversion Request

We are planning consultants to STC Investments Nominee Inc. ("STC"), c/o North American Development Group, the owner of the lands municipally known as 3125, 3355, 3365, 3381 and 3389 Steeles Avenue East and 4000 Victoria Park Avenue which collectively are referred to as the Steeles Technology Campus ("the Campus"). The Campus is located on the south side of Steeles Avenue and are bounded on the west by Highway 404, on the east by Victoria Park Avenue and on the south by the northerly lot line of employment uses located on the north side of Gordon Baker Drive (see **Figure 1 – Location Map**).

As part of the City of Toronto's ongoing Municipal Comprehensive Review ("MCR") process, we are writing on behalf of our client to request that a portion of the Campus, which measures approximately 68,223 square metres (6.8 hectares) in size or approximately 40% of the overall Campus, be considered for conversion from *General Employment Areas* (subject to SASP

394) to *Regeneration Area* (also subject to a SASP) under the City of Toronto Official Plan ("Official Plan") ("the Conversion Lands") (See **Figure 2 – Conversion Lands**).

This Planning Rationale is prepared in support of that request ("the Conversion Request"). The Conversion Request seeks to permit the introduction of non-employment uses along the Steeles Avenue frontage west of Call Net Drive, and on lands at the southwest corner of Steeles Avenue and Victoria Park Avenue which are further bounded by Call Net Drive on the west and Sprint Canada Drive on the south. Much thought has been given to the size, the location and the potential future uses of the Conversion Lands. From both a planning policy and an economic development perspective it is our opinion that the Conversion Request addresses the applicable policies in the 2020 Provincial Policy Statement, the 2019 Growth Plan (as amended) and the City of Toronto Official Plan, and should be approved.

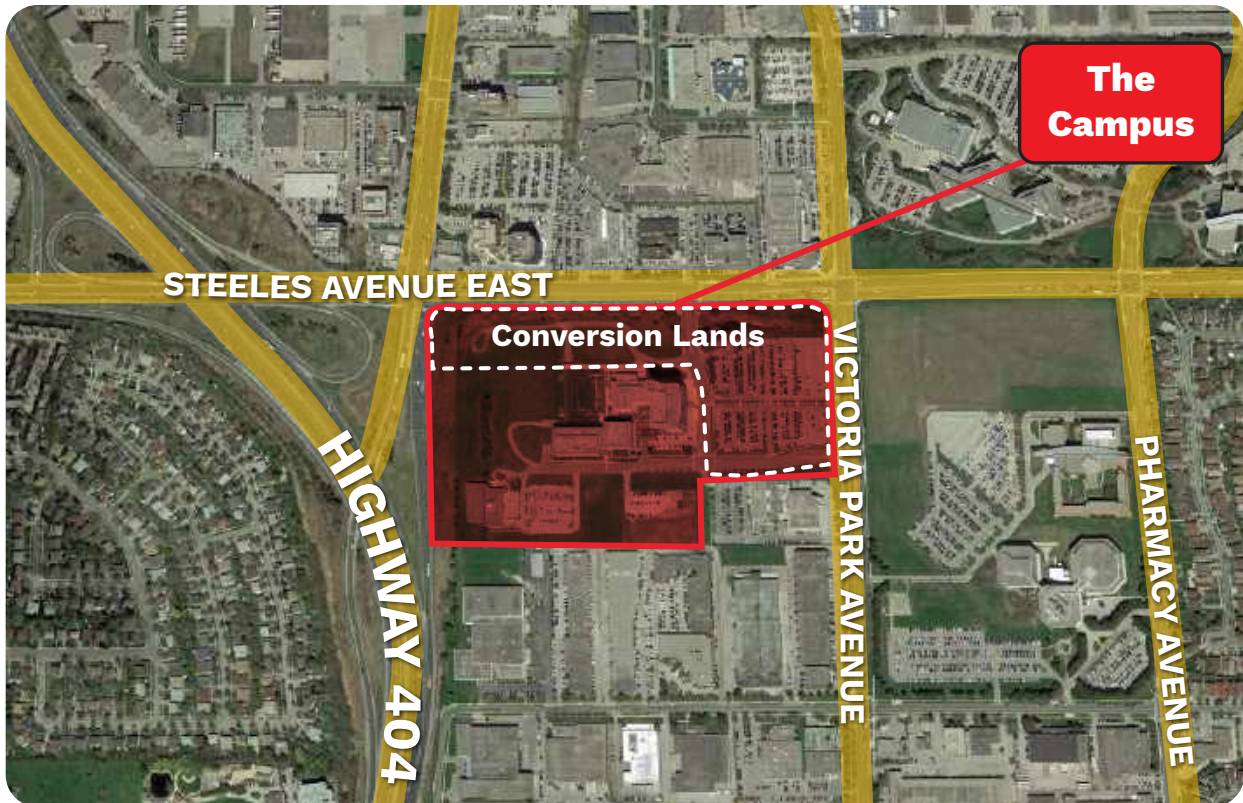


Figure 2 - Conversion Lands

1.2 The Basis for the Conversion Request

Today the Campus is being developed in accordance with a Master Site Plan Agreement that was entered into with the (former) City of North York in 1999. This Master Plan provided for the development of a series of office buildings located in a park-like setting, which were internally focused, did not relate to the exterior public street system, and were served by a private road system. This form of development reflected the economic and planning context of the time and, in many respects, mirrored the “tower in the park” high-rise residential development of the preceding decades. Neither forms reflect current City planning and urban design policies.

Initially, the Campus was a success. 3389 Steeles Avenue East (now Tangerine: 36,557 sq. m), 3381 Steeles Avenue East (HSBC and Symantec: 18,110 sq. m) and 4000 Victoria Park (originally Enercare and now a commercial educational facility: 5,085 sq. m) were all built at approximately the same time – about 20 years ago. Since then, there has been no new office construction and maintaining existing tenants (even pre-Covid) has been a challenge. Today, major office users (responding in part to the strong preferences of their employees) are seeking a very different setting. A car-oriented suburban office campus, with limited amenities is no longer seen as the place to locate. Downtown Toronto and Markham Centre which offer a mix of uses including residential, entertainment and restaurants as well as better transit are seen as much more attractive locations. Try though it might, STC has not been successful in attracting major non-residential users. In 2018 site plan approval for a data centre was given, but a user has yet to be secured. Then, in order to increase on-site amenities in 2019 site plan approval for a restaurant campus on Steeles Avenue which, despite Covid, is now occupied and STC is currently seeking the necessary variances to facilitate a hotel on lands adjacent to Highway 404. However, there are still very few new office tenants. In fact, the number of vacancies in similar office buildings on the north side of Steeles Avenue has created further challenges.

1.3 The Economic Background

Clearly, a more fundamental change to the Campus is required if existing tenants are to be retained, new tenants attracted and a new community established. This position is supported by a detailed Economic Study prepared by the Altus Group (“the Altus Report”), which concluded allowing residential uses will strengthen the attraction of the Campus for office uses and improve its marketability. The Altus Report has been submitted concurrently under a separate cover.

As outlined in the Altus Report, and in keeping with the above, the Campus and the surrounding area has seen little to no new office development, with only two office buildings constructed since 1995 (beyond those built on the Campus). There has been a net loss in occupied office space in the area and, combined with the effects to the office market due to Covid-19, the area is likely to continue to struggle to attract new office development. Altus provides that the buildings on the Campus have a significantly above-average vacancy rate of 15.8% of space in relatively new buildings.

However, Altus outlines that allowing for residential uses can create a value-add proposition for prospective tenants by providing opportunity for employees to live and work in the area, and contributes to a vibrancy by improving the diversity of land uses and amenities available. The introduction of residential uses will be compatible with the existing businesses and help overcome the lack of development activity the area has seen and high vacancy rates in the existing buildings.

Based on Altus’s findings, the presence of residential in other office-oriented employment areas throughout the GTA (including Consumers Road area, Vaughan Metropolitan Centre and Markham Centre) stimulate demand for office, rather than reducing it.

The Altus Report also reviews the population and employment targets set out in the Growth Plan for the Greater Golden Horseshoe ("the Growth Plan"). Based on the 2031 and 2041 employment projections set out in earlier versions of the Growth Plan, the City had exceeded employment targets significantly ahead of schedule. The 2019 Growth Plan, as amended in 2020, updated the employment forecasts and the planning horizon to the year 2051, allocating significant additional job growth to the City, or a total of 251,000 more jobs than the City had as of 2019, requiring nearly 7,850 net new jobs per year. While the annual growth is just under half the average annual growth seen from 2001-2019 (16,050 jobs per year), the vast majority of job growth in the City was seen in the Downtown and Central Waterfront. To achieve the 2051 targets, the City may require a shift in how jobs are planned for and a greater focus on employment growth outside the Downtown Central Waterfront and Urban Growth Centres. The City will need to find new and creative ways to catalyze employment within employment areas that have been recently underperforming, such as the employment area that comprises the Campus.

The introduction of compatible residential uses to office-oriented employment areas, such as the Highway 404/Steeles area, based on experiences seen in other comparable areas in the GTA (Vaughan Metropolitan Centre, Consumers Road area, Markham Centre) shows that incorporating residential uses can stimulate demand for office tenants and generate demand for office space that a single-use office-oriented employment area is less likely to produce.

1.4 The Proposed Concept Plan

What STC is proposing, therefore, is the introduction of a significant residential component, with a range of housing types, sizes and affordability, within a limited area (6.8 ha) at the periphery of the Campus. The new units will not only help the City meet its provincial population targets, they could also make a significant contribution to the variety of housing types available in the northeast area of the City,

and could provide much needed affordable housing. In terms of a live-work relationship, the residential component will help to attract employees who can live close to their offices and in many cases walk to work (and not have to rely on transit). However, STC recognized that the introduction of residential uses alone is not the answer. What is needed is a complete mixed-use community with parks, public streets, shopping and community services and importantly employment opportunities.

Therefore, STC asked Giannone Petricone Architects ("GPAIA") to prepare a conceptual plan illustrating what the key elements of this new community should include. The GPAIA plan ("the Concept Plan") provides an excellent example of a new, attractive and vibrant community on the Conversion Lands (see **Figure 3**).

The Concept Plan provides for the following uses on the Conversion Lands:

- Approximately 1,370 residential units (122,952 sq. m of residential gross floor area "GFA");
- 49,210 sq. m of non-residential GFA, which could accommodate approximately 1,965 jobs (in addition to the 4,089 jobs that could be accommodated on the balance of the Campus);
- An expanded public road network;
- Two new public parks totaling 1.8 ha;
- Opportunities for the establishment of new POPS; and
- Opportunities for the inclusion of supporting community uses.

The balance of the Campus will remain largely unchanged, with the lands maintained exclusively for employment uses. The existing office buildings will remain and new construction will include the planned data centre, hotel and a new office building with a minimum non-residential GFA of 9,000 sq. m (identified as Building F on **Figure 3**) as permitted through the Master Plan and SASP 394. In accordance with the provisions of SASP 394 (Area A), Building F must be constructed prior to any further non-office development on the Campus.

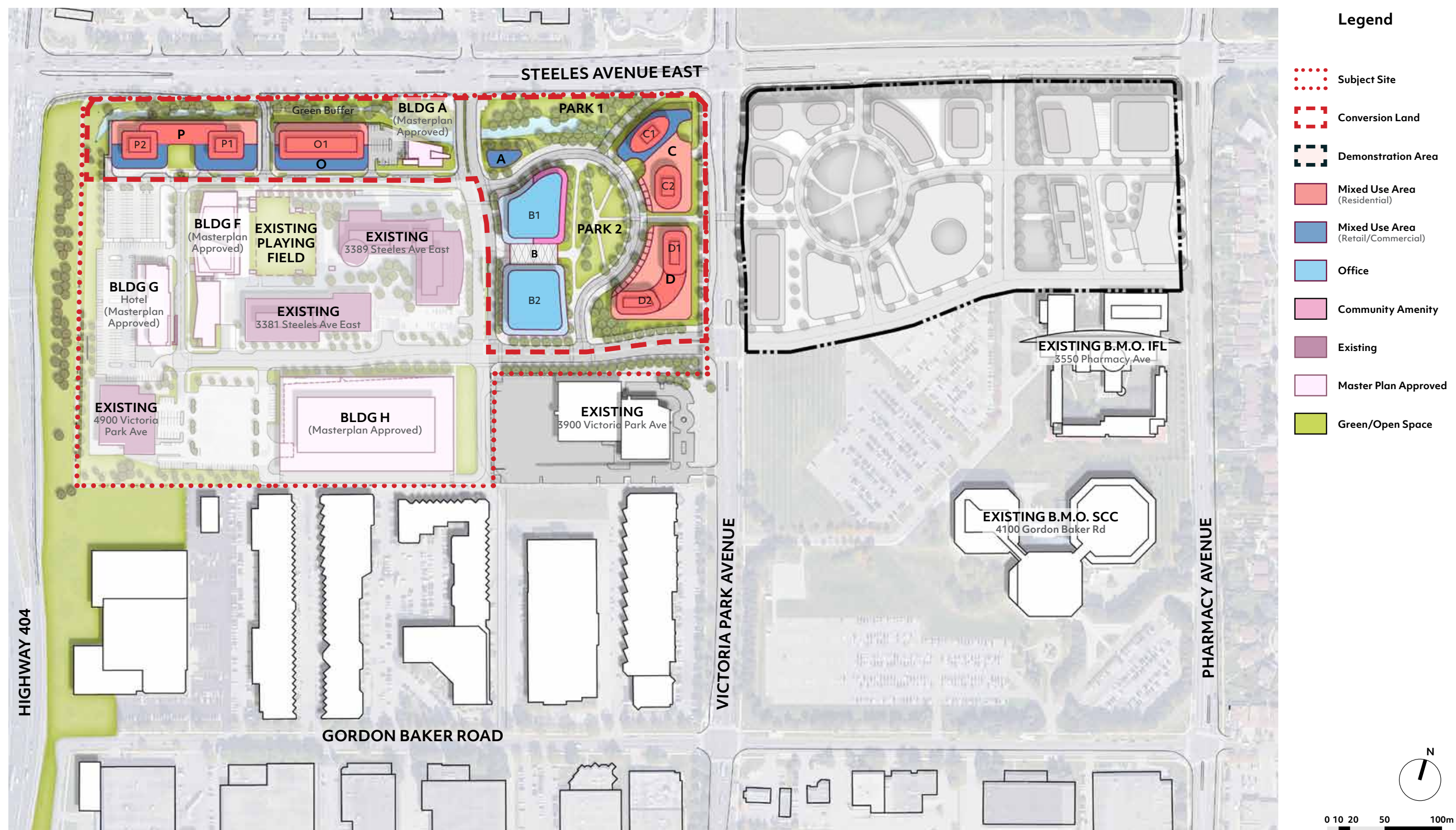


Figure 3 - Concept Plan



Campus Lands and Surroundings



2.1 Campus Lands

The Campus which is approximately 16.5 ha in size, is located on the south side of Steeles Avenue East, east of Highway 404 and west of Victoria Park Avenue (see **Figure 4** – Oblique Aerial). Generally rectangular in size, it has a frontage of approximately 501 m along Steeles Avenue East and 254 m along Victoria Park Avenue. The Conversion Lands occupy approximately 20 percent of the total area of the Campus.

There are the following existing buildings on the Campus Lands:

- 3355 Steeles Avenue East: 1-storey restaurant (926 sq. m of GFA);
- 3365 Steeles Avenue East: 1-storey restaurant (756 sq. m of GFA);
- 3381 Steeles Avenue East: 5-storey office building (18,811 sq. m of GFA);
- 3389 Steeles Avenue East: 12-storey office building (36,557 sq. m of GFA); and
- 4000 Victoria Park Avenue: 2-storey office building (5,085 sq. m of GFA).

The office buildings include take-out restaurant ancillary uses, and 4000 Victoria Park West contains a commercial school. The Campus is served by a system of private roads, built to public road standards (Call Net Drive and Sprint Canada Drive). There is one signalized intersection on Steeles Avenue East at Call Net Drive and one signalized intersection on Victoria Park Avenue at Sprint Canada Drive.

A Master Site Plan Agreement for the subject lands was entered into on April 12, 1999. The Site Plan Agreement provided for the development of the subject lands as an office park oriented around a campus courtyard (including a soccer field and basketball court), with associated surface parking lots and parking structures. There have been a number of amendments to the Master Site Plan Agreement, most recently in 2019 ("the Master Plan"). The 2019 amendment implemented the provisions of SASP 394, and provided for two new office buildings, five standalone restaurant/retail/service buildings and one hotel and a realigned private ring road (see **Figure 5** – Master Site Plan). The restaurant buildings are located along the Steeles Avenue frontage. The Master Plan provides for a total non-residential GFA of approximately 111,180 sq. m.



Figure 4 - Oblique Aerial showing Campus land and Conversion Lands (Note: Google 3D Image is outdated. Building B, Building C and the Ring Road are now completed.)

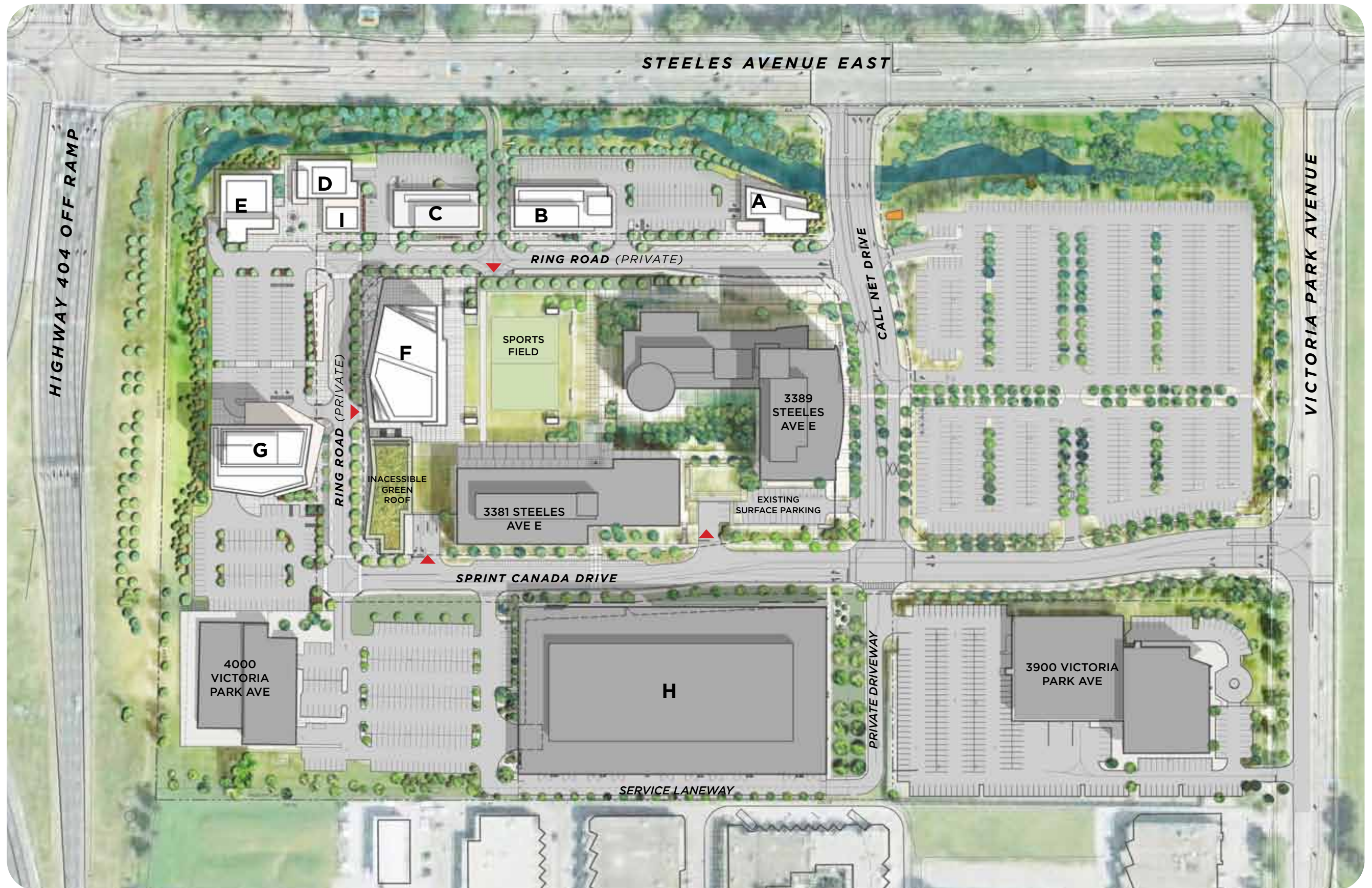


Figure 5 - Master Site Plan

2.2 The Conversion Lands

The Conversion Lands, located within the Campus, are subject to the same official plan policies and zoning regulations and Master Plan are located:

- a. along the south side of Steeles Avenue west of Call Net Drive and east of the 404/Steeles Avenue off ramp totalling 2.44ha, and
- b. at the southwest corner of Steeles Avenue and Victoria Park on a block bounded by Call Net Drive on the west and Sprint Canada Drive on the south, totalling 4.38ha.

The area to the west of Call Net Drive is occupied by two new single storey restaurant pads and associated parking. Additional restaurant uses are planned to the west, in the northwest corner of the property. A bank is proposed on the west side of Call Net Drive immediately east of the restaurants. These buildings are identified as Buildings A, B, C, D, E and I in the Master Plan. None of these uses depend on an *Employment Areas* designation. The area east of Call Net Drive and north of Sprint Canada Drive has no buildings and is used for surface parking.

2.3 Area Context

The Campus is located in the northeast area of the City of Toronto (former City of North York) and on the south side of Steeles Avenue East, which forms the boundary between the City of Toronto and the City of Markham (in York Region).

As outlined in the Altus Report, in terms of its employment context, the Campus is located within the Highway 404 and Steeles submarket, which covers the geographic area of Southern Markham and Northern Toronto. In the past 25 years, only five office buildings have been constructed in the submarket, three of which are on the Campus. The Altus Report identifies that the Steeles and Victoria Park *Employment Area* has one of the highest proportions of office employment in the City of Toronto, supporting a total of 12,600 jobs according to the 2015 Employment Survey, of which 73% was in the office sector.

To the immediate north of the Campus Lands, on the north side of Steeles Avenue in the City of Markham, are a variety of commercial uses including auto-oriented commercial uses, a hotel, retail stores, restaurants and office uses, along with associated surface parking lots. Existing uses on the north side of Steeles Avenue between Woodbine Avenue (which extends north from the Highway 404 on/off ramp) and Victoria Park Avenue include: an Esso gas station (7001 Woodbine Avenue); a 7-storey office building (3000 Steeles Avenue East); an 11-storey office building (3100 Steeles Avenue East); the Lexus car dealership (3120 Steeles Avenue East); the 2-storey J-Town Japanese Shopping Centre, including office space, restaurants and retail facilities (3160 Steeles Avenue East); a 3-storey office building (3190 Steeles Avenue East); and the Toyota car dealership (3300 Steeles Avenue East). North along Woodbine, there is a variety of non-residential uses including medical offices, restaurants, the 12-storey Courtyard Marriott Hotel at 7095 Woodbine Avenue and the Mayfair Tennis Club. The interior of the Markham Employment lands, east of Woodbine Avenue are characterized by more light-industrial business park and warehousing uses.

Northeast of the Campus on the northeast corner of Victoria Park Avenue and Steeles Avenue, extending east to Esna Park Boulevard is the former head office of IBM, now the Liberty Centre (3500 Steeles Avenue East) located on a 17 ha property. These offices include four triangular shaped office towers and one rectangular shaped computer/office tower which include approximately 550,000 sq. feet of leasable space all interconnected by a 700 foot long glass roof atrium covering 16,000 sq. ft. To the east of the Liberty Centre is the IBM head office at 3600 Steeles Avenue East a 5-7 storey office complex which has approximately 850,000 sq. ft of leasable area. The current tenants include IBM and TD Bank. There are approximately 150,000 sq. ft of space available for lease.

Immediately south of Sprint Drive (not within the Campus), on the west side of Victoria Park (3900 Victoria Park Avenue) is a high security facility operated by the Toronto Police Service. On the east side of Victoria Park is a large property owned by the Bank of Montreal ("BMO") which extends north to Steeles Avenue, east to Pharmacy Avenue and south to Gordon Baker Road. The BMO Institute for Learning ("BMO IFL"), a conference centre space and corporate learning facility (3550 Pharmacy Avenue) is centrally located on the property. The BMO IFL has 150 hotel rooms to provide overnight guest accommodation. The building is set back approximately 180 m from Steeles Avenue East, resulting in open green space along the south side of Steeles Avenue. A surface parking lot is located between the BMO IFL and Victoria Park Avenue. At the south end of the BMO property is the 4-storey BMO Data Centre (4100 Gordon Baker Road), which has extensive surface parking areas to the south and east.

East of Pharmacy Avenue, approximately 500 m east of the Campus Lands, is the Steeles Community. There is a north/south hydro corridor which extends from the Finch Hydro Recreation trail north to Steeles Avenue midway between Pharmacy Avenue and Warden Avenue. Bamburgh Park, and St Henry Catholic School are located on the east side of the corridor. West of Bamburgh Park is a cluster of high-rise residential buildings to the west and east of Warden Avenue, within Bamburgh Circle (25-275 Bamburgh Circle). There are 8 apartment buildings in this area, with heights up to 21 storeys.

To the immediate south of the Campus is a low-density business park/warehouse/industrial area. Between the Campus Lands and the south side of Gordon Baker Drive are single-storey buildings with a range of tenants, including wholesale operations, warehousing, commercial schools, dentist offices, a recreational studio, professional and dental offices and a place of worship. This industrial area extends south to the Finch Recreational Hydro Corridor.

To the immediate west of the Campus Lands is the Highway 404 on/off-ramp and Highway 404. Further west, on the south side of Steeles Avenue East, is the Hillcrest Village residential neighbourhood, which is predominantly occupied by single-detached dwelling units in addition to residential townhouse blocks. Townsend Road, which is the first residential street west of Highway 404, is approximately 800 m west of the Campus Lands. Arbour Glen Public School is approximately 1 km west of the Campus and Highland Memory Gardens is approximately 1.6 km (walking distance) to the southwest.

West of Highway 404 on the north side of Steeles Avenue East is a shopping plaza which includes a grocery store and community shopping facilities (2900 Steeles Avenue East). A high-density mixed-use project which will include retail, office and residential, with heights ranging between 18 and 34 storeys was approved by the then Ontario Municipal Board in 2011. More recently a consent has been approved (subject to site plan approval) to permit the first phase of the development to proceed.

2.4 The Policy and Development Framework

The Campus is currently designated *General Employment Areas* and is subject to Site and Area Specific Policy 394 ("SASP 394"). SASP 394 applies to all Business Parks along Highway 404 and permits a range of non-office uses provided that they are located on the lower floors of multi-storey buildings.

The specific provisions for the Campus (identified in SASP 394 as Area A) provide that development will occur in accordance with a Master Plan but introduces new standards for free-standing commercial uses. Up to 2,200 sq. m of GFA of recreational facilities, restaurants, retail stores and service uses which may be in standalone buildings; a hotel; a bank; and a minimum of 1,000 sq. m of additional office GFA are permitted as part of a first phase. Subsequent phases of development permit: a maximum of 1,100 sq. m of GFA of recreational facilities, restaurants, retail stores and service uses which may be in standalone buildings provided that above-grade building permits have been issued for a minimum of 1,000 sq. m of GFA for office uses (in the first phase); and a minimum of 9,000 sq. m of GFA of office uses.

2.5 Transportation Road Network

Call Net Drive is a private road and runs in a north-south direction, with a width of 30 m. It has a two-way, four-lane cross-section, with pedestrian sidewalks on both sides of the street.

Sprint Canada Drive is a private road and runs in an east-west direction, with a width of 27 m. It has a two-way, four-lane cross-section, with pedestrian sidewalks on both sides of the street.

Ring Road is an L-shaped private road which runs in an east-west and then north-south direction connecting Call Net Drive to Sprint Canada Drive, with varying widths. It has a two-way, two-lane cross-section, with pedestrian sidewalks on both sides of the street. There is on-street parking abutting the north and west lanes.

Steeles Avenue East is a major arterial public road and runs in an east-west direction, with an existing and planned right-of-way width of 36 m. It has a two-way, six-lane cross-section, which increases to seven with the centre turn lane at its intersection with Victoria Park Avenue. Pedestrian sidewalks and transit stops are located along both sides of the street. The road acts as the dividing line between the City of Toronto and the City of Markham.

Victoria Park Avenue is a major arterial public road and runs in a north-south direction, with an existing and planned right-of-way width of 36 m. It has a two-way, four-lane cross-section, with pedestrian sidewalks and transit stops located along both sides of the street.

Highway 404 is a freeway that runs in a north-south direction. This section of Highway 404 has a two-way, 10-lane cross-section, with one High Occupancy Vehicle (HOV) lane running in each direction. There is an off-ramp and an on-ramp located immediately to the west of the Campus, providing access to Steeles Avenue East.

Transit Network

The Campus is serviced by the following surface transit routes:

- **Bus Route 53 Steeles East** operates between Finch Station on the Yonge-University-Spadina Subway, and the area of Steeles Avenue East and Staines Road, generally in an east-west direction. Service between Finch Station and Markham Road is part of the 10 Minute Network, and operates 10 minutes or better, all day, every day. The closest eastbound bus stop is located on Steeles Avenue East at the southwest corner of Victoria Park Avenue. The closest westbound bus stop is on Steeles Avenue East at the northwest corner of Victoria Park Avenue and Steeles Avenue East.
- **Bus Route 24 Victoria Park** runs north-south between Victoria Park Station on Line 2 Bloor-Danforth and Don Mills Station on Line 4 Sheppard. The route services the area of Victoria Park Avenue and Steeles Avenue East. The 24A (Victoria Park Station-Steeles) branch is part of the 10 Minute Network, and operates 10 minutes or better, all day, every day. The closest southbound bus stop is located on Victoria Park Avenue just south of Steeles Avenue East on the east side. The closest northbound bus stop is located directly across the street, just south of Steeles Avenue East on the west side.
- **Bus Route 24 Woodbine** operates between Don Mills Subway Station on Line 4 in the City of Toronto and Honda Boulevard, in the City of Markham, generally in a north-south direction.



Proposal



3.1 Vision for the Campus

STC is asking the City to approve its conversion request which would allow non-employment uses along the Steeles Avenue East and Victoria Park frontages ("the Conversion Lands") in order to create a high-density neighbourhood comprised of a mix of offices, residential and retail uses, parks and a public street system. Their vision is to create a vibrant new neighbourhood that will provide opportunities to live, work and play within the Campus and which will attract employers and employees to benefit from a range of first-class amenities for those seeking a live/work environment. It is proposed that the vision would be realized by a *Regeneration Areas* designation and a revised Site and Area Specific Policy.

The GPAIA Concept Plan (see **Figure 3 – Concept Site Plan**) demonstrates how this could be achieved. Statistics associated with the Concept Plan are included in **Section 3.2** below.

The Campus - Lands to be Retained as General Employment Area

The Concept Plan maintains the *General Employment Areas* designation for that portion of the Campus which lies immediately to the south of the Conversion Lands. The existing office buildings will remain and new construction will include the planned data centre, hotel and office building (Building F) as permitted through the Master Plan. The Concept Plan, however, provides for the replacement of the low-rise retail uses that currently exist or are planned along Steeles Avenue East with higher-density mixed use buildings. Building A, the proposed bank to the east of the restaurants is to remain. The existing and planned buildings and their estimated employment is summarized in **Table 1** below.

This table demonstrates that based on the anticipated employment generation on the Campus (excluding the Conversion Lands) the overall density will be in the order of 1.1 times the lot area, and the total jobs per hectare ("jph") will be in the order of 420.

Table 1 - The Campus – Existing and Planned Development, Estimated Employment

Building	Height	Retail GFA sq. m	Office GFA sq. m	Other non-residential sq. m	Estimated Jobs
F	8	87	15,547	0	779
G	12	9,850	0	0	246
H	2	0	872	21,516 (data storage)	43
3389 Steeles	12	0	36,557	0	1,827
3381 Steeles	5	0	18,811	0	940
4000 Victoria Park	2	0	5,085	0	254
TOTAL		108,325 m			4,089 jobs

The Conversion Lands

It is proposed to introduce new mixed-use buildings along Steeles Avenue East and Victoria Park Avenue. The Conversion Lands will accommodate approximately 1,370 residential units and up to 49,210 sq. m of non-residential GFA as well as parks and community space. A density of 1.6 times the area of the lot is anticipated.

Along Steeles Avenue East west of Call Net Drive, the Concept Plan includes two new mixed-use buildings (Buildings P and O), both of which include two residential towers connected by a podium containing both retail and office uses. Tower P2 (the most westerly component) is proposed to have a height of 30 storeys and Tower P1 is proposed to have a height of 20 storeys, inclusive of a 2-storey podium. Between the driveway access to Steeles Avenue and Cal Net Drive, a 6-storey mid-rise, mixed-use building is proposed (Building O). These buildings will all be accessed from the private road located to the south, which will separate the Conversion Lands from the balance of the Campus.

Two new mixed-use buildings (Buildings C and D) are introduced along Victoria Park Avenue. Tower C1 (the most northerly element) is proposed to have a height of 34 storeys and Tower C2 is proposed to have a height of 24 storeys, inclusive of a 2-storey podium with retail at grade. Building D has a mid-rise form and is composed of two 10-storey elements (Buildings D1 and D2), inclusive of a 6-storey podium used for retail and residential purposes. Buildings D1 and D2 could be suitable for rental housing and could also include family units at grade, facing the park.

Buildings B1 and B2 are located at the northeast corner of Call Net Drive and Sprint Canada Drive and would be used exclusively for office and community amenity uses. These buildings are proposed to have a total height of 6-storeys and are linked by a 2-storey podium. The community amenity space is located between the buildings, faces the park and is directly accessible to it.

Building A, proposed as a single-storey retail use, is planned at the entrance to the Campus on the east side of Call Net Drive.

There are two new public parks totaling in the order of 1.8 ha. The existing stormwater facility on the east side of Call Net Drive will be enhanced through the introduction of a public park (Park 1). A second park (Park 2) is proposed in a central location east of Cal Net Drive and will be framed by Buildings B, C and D. A public street could be located mid-block, connecting Sprint Canada Drive and Call Net Drive and providing a public address for the residential buildings.

GPAIA has also included a larger Demonstration Area which extends further east of Victoria Park, and includes the northerly portion of the BMO IFL at 3550 Pharmacy Avenue. This is for conceptual purposes only, and does not reflect the plans of BMO, but rather it illustrates how the proposed uses along Steeles Avenue could be extended, as a mixed use corridor, linking the Conversion Lands to the Steeles Community to the east.

Table 2 summarizes the proposed the proposed non-residential GFA, residential units and the anticipated number of jobs and population generated by the Concept Plan for the Conversion Lands.

Table 2 - Conversion Lands, Estimated Population and Employment

Building	Height (storeys)	Residential Units	Retail GFA (sq. m)	Office GFA (sq. m)	Other Non-Res GFA (sq. m)	Estimated Jobs	Estimated Population
<i>Proposed Buildings</i>							
A	1	0	378	0	0	9	0
B	B1 – 6 B2 – 6	0	0	19,365	4,900 (community)	1,366	313
C	C1 – 34 C2 – 24	540	2,500	0	0	62	1,149
D	D1 – 10 D2 – 10	173	2,500	0	0	62	800
O	8	144	1,807	3,307	0	210	661
P	P1 – 20 P2 – 30	511	3,295	4,795	0	321	905
TOTAL		1,368 units		49,208 sq. m		2,030 jobs	2,380 persons

This Table demonstrates that based on the anticipated employment and units generated on the

Conversion Lands the total jph will be in the order of 300 (almost double the number on the balance of the Campus) and the total population per hectare ("pph") will be in the order of 350. The gross density would be in the order of 2.5 times the area of the Conversion Lands.

When the Conversion Lands and the balance

of the Campus are considered together, the combined jph for the whole Campus would be in the order of 370, as illustrated on **Table 3** below. The overall density would be in the order of 1.7 times the area of the Campus.

Table 3 - Combined Campus Employment Lands Plus**Conversion Lands, Estimated Population and Employment**

Campus Employment Lands	Residential Units	Retail, Office and Other Non-Residential Uses (sq. m)	Estimated Jobs	Estimated Population
	0	108,325	4,089	0
<i>Conversion Lands</i>				
	1,368	49,208	2,030	2,380
TOTAL	1,368 units	157,533 sq. m	6,119 jobs	2,280 persons

It is proposed that the Conversion Lands be designated *Regeneration Area* and that SASP 394 be amended to provide site specific provisions with respect to the additional requirements with respect to servicing, the road network, the provision of affordable housing, the provision of community facilities and built form. The balance of the Campus Lands will maintain the *General Employment Areas* designation (see **Figure 6** proposed land use).

The Concept Plan will require amendments to the Official Plan and the applicable Zoning By-law and draft plan approval as well as site plan approval (which would include an amendment to the existing Master Plan). These applications would be filed after a review of the requested conversion was deemed appropriate through the MCR process.

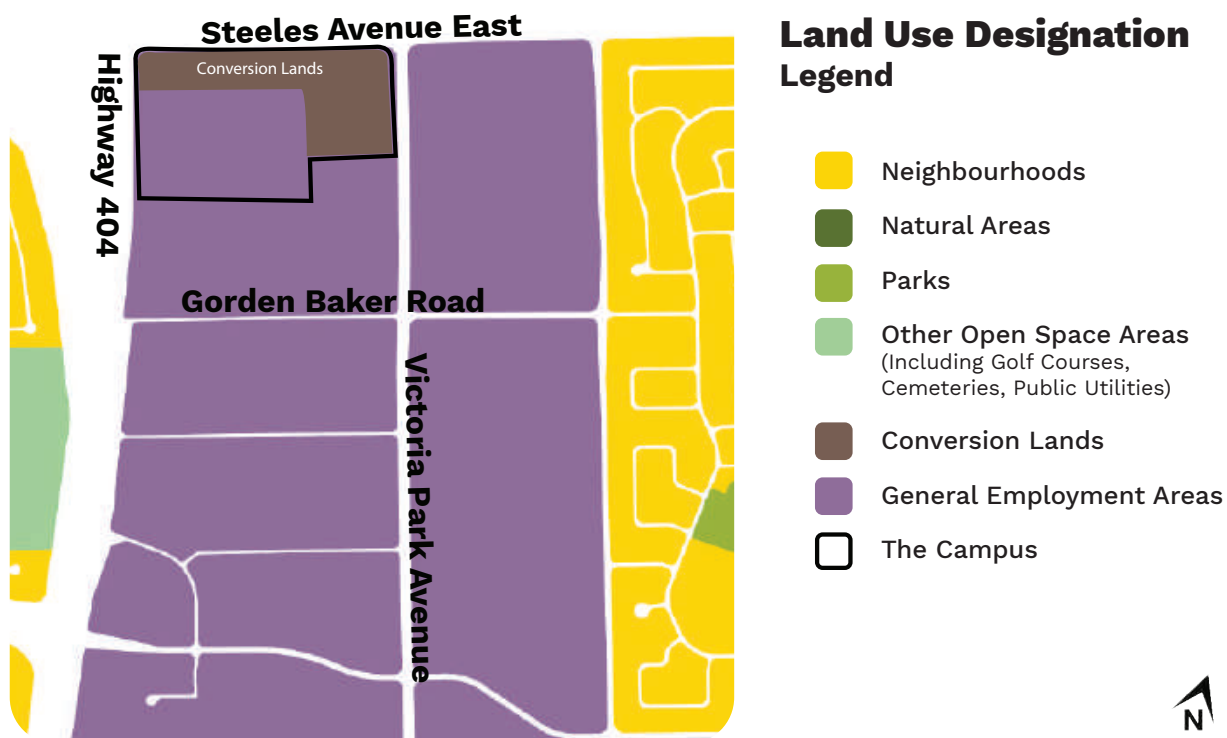


Figure 6 - Propose Land Use



Looking Northeast



Looking West to Park 2



Policy & Regulatory Context

4.1 Overview

As set out below, the proposed Conversion Request is consistent with the Provincial Policy Statement, 2020 ("2020 PPS"), including the policies in Section 1.3 with regards to Employment, and conforms with A Place to Grow: The Growth Plan for the Greater Golden Horseshoe 2019, as amended ("2019 Growth Plan") and the City of Toronto Official Plan ("Official Plan"), including the policies set out in Section 2.2.5.

In our opinion, the proposed Conversion Request meets the five tests set out in Section 2.2.5(9) of the 2019 Growth Plan and the considerations set out in Policy 2.2.4(17) of the Official Plan.

4.2 Provincial Policy Statement (2020)

Section 1.3 of the 2020 PPS relates specifically to *employment areas*, which are defined as "those areas designated in an official plan for clusters of business and economic activities including, but not limited to, manufacturing, warehousing, offices and associated retail and ancillary facilities."

Policy 1.3.2.1 provides that planning authorities shall plan for, protect and preserve *employment areas* for current and future uses and ensure that the necessary infrastructure is provided to support current and projected needs. Policy 1.3.2.2 provides that at the time of the official plan review or update, planning authorities should assess *employment areas* identified in local official plans to ensure that this designation is appropriate to the planned function of the *employment area*. Policy 1.3.2.3 provides that employment areas planned for industrial or manufacturing uses should include an appropriate transition to non-employment uses.

Policy 1.3.2.4 addresses the conversion of employment lands, providing that: "Planning authorities may permit conversion of lands within *employment areas* to non-employment uses through a comprehensive review, only where it has been demonstrated that the land is not required for employment purposes over the long term and that there is a need for the conversion."

Policy 1.3.2.5 provides that existing employment areas may be converted to a designation that permit non-employment uses provided the area has not been identified as provincially or regionally significant. However, as the Campus has been identified as a Provincially Significant Employment Zone, a conversion can only be considered through a municipal comprehensive review.

As the City is currently undertaking an MCR, it is an appropriate time to consider a portion of the Campus

4.3 Growth Plan for the Greater Golden Horseshoe (2019)

The Growth Plan provides a framework for implementing the Province's vision for managing growth across the region to the year 2051 and supports the achievement of complete communities. The Guiding Principles, which are important for the successful realization of the Growth Plan are set out in Section 1.2.1. The Growth Plan outlines a number of specific policies with respect to the development of employment areas, the provision of jobs and the conversion of employment lands.

In accordance with Policy 2.2.1, the population and employment forecasts contained in Schedule 3 of the Growth Plan will be used for planning and managing growth within the region. Schedule 3 of the Growth Plan, as amended by Growth Plan Amendment 1, forecasts a population of 3,650,000 and 1,980,000 jobs for the City of Toronto by 2051

With respect to Employment Lands, Policy 2.2.5(1) of the Plan states that economic development and competitiveness will be promoted by:

- Making more efficient use of existing employment areas and vacant and underutilized employment lands and increasing employment densities;
- Ensuring the availability of sufficient land, in appropriate locations, for a variety of employment to accommodate forecasted employed growth to the horizon of this Plan;

- Planning to better connect areas with high employment densities to transit; and
- Integrating and aligning land use planning and economic development goals and strategies to retain and attract investment and employment.

Policy 2.2.5(3) directs retail and office uses to locations that support active transportation and having existing or planned transit. In addition, Policy 2.2.5(4) provides that in planning for employment, surface parking will be minimized, and the development of active transportation networks and transit-supportive built form will be facilitated.

Policy 2.2.5(7) sets out the requirements which municipalities must follow in planning for employment areas within settlement areas these include providing an appropriate interface between employment areas and adjacent non-employment areas to maintain land use compatibility.

Policy 2.2.5(9) of the Plan outlines the conversion criteria for lands within an employment area and 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 conversion;
- b. The lands are not required over the horizon of this Plan for the employment purpose 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.

It is the opinion of Altus that there is a demonstrated need for the conversion of the Campus Lands as they are not required for, or suitable for, traditional employment uses (e.g. manufacturing or warehousing) in the future given their location in a Business Park. Altus provides that the conversion will not adversely affect the overall viability of the adjacent employment areas. Most importantly, the conversion will increase the potential of the area to attract office development

4.4 City of Toronto Official Plan (2019 Consolidation)

The Official Plan for the amalgamated City of Toronto ("the City P") was adopted on November 26, 2002 and was approved by the Ontario Municipal Board on July 6, 2006. Numerous amendments to the City OP have subsequently been approved, including amendments arising out of the Official Plan Review initiated in 2011. The most recent consolidation of the City OP is dated February 2019.

Growth Management Policies

Chapter 2 (Shaping the City) outlines the growth management strategy. It recognizes that:

"Toronto's future is one of growth, of rebuilding, of reurbanizing and of regenerating the City within an existing urban structure that is not easy to change. Population growth is needed to support economic growth and social development within the City and to contribute to a better future for the Greater Toronto Area (GTA). A healthier Toronto will grow from a successful strategy to attract more residents and more jobs to the City."

To that end, Policy 2.1(3) provides that Toronto is forecast to accommodate 3.19 million residents and 1.66 million jobs by the year 2031. The marginal note regarding Toronto's growth prospects makes it clear that the 3.19 million population figure is neither a target nor a maximum; it is a minimum:

"The Greater Toronto Area ... is forecast to grow by 2.7 million residents and 1.8 million jobs by the year 2031. The forecast allocates to Toronto 20 percent of the increase in population (537,000 additional residents) and 30 percent of the employment growth (544,000 additional jobs) ... This Plan takes the current GTA forecast as a minimum expectation, especially in terms of population growth. The policy framework prepares the City to realize this growth, or even more, depending on the success of this Plan in creating dynamic transit oriented mixed use centres and corridors." (Our emphasis.)

The growth management policies of the Official Plan direct growth to identified areas on Map 2 (Urban Structure), which include *Centres*, *Avenues*, *Employment Areas* and the *Downtown and Central Waterfront*, where transit services and other infrastructure are available (Section 2.2.2). The Campus Lands are identified as part of the *Employment Areas* on Map 2 (see **Figure 7**, Official Plan Map 2 – Urban Structure). The *Employment Areas* that the Campus Lands form part of extends from Highway 404 in the west, to Steeles Avenue East in the north, the Pharmacy Avenue in the east and to the Hydro Corridor in the south, south of McNicholl,

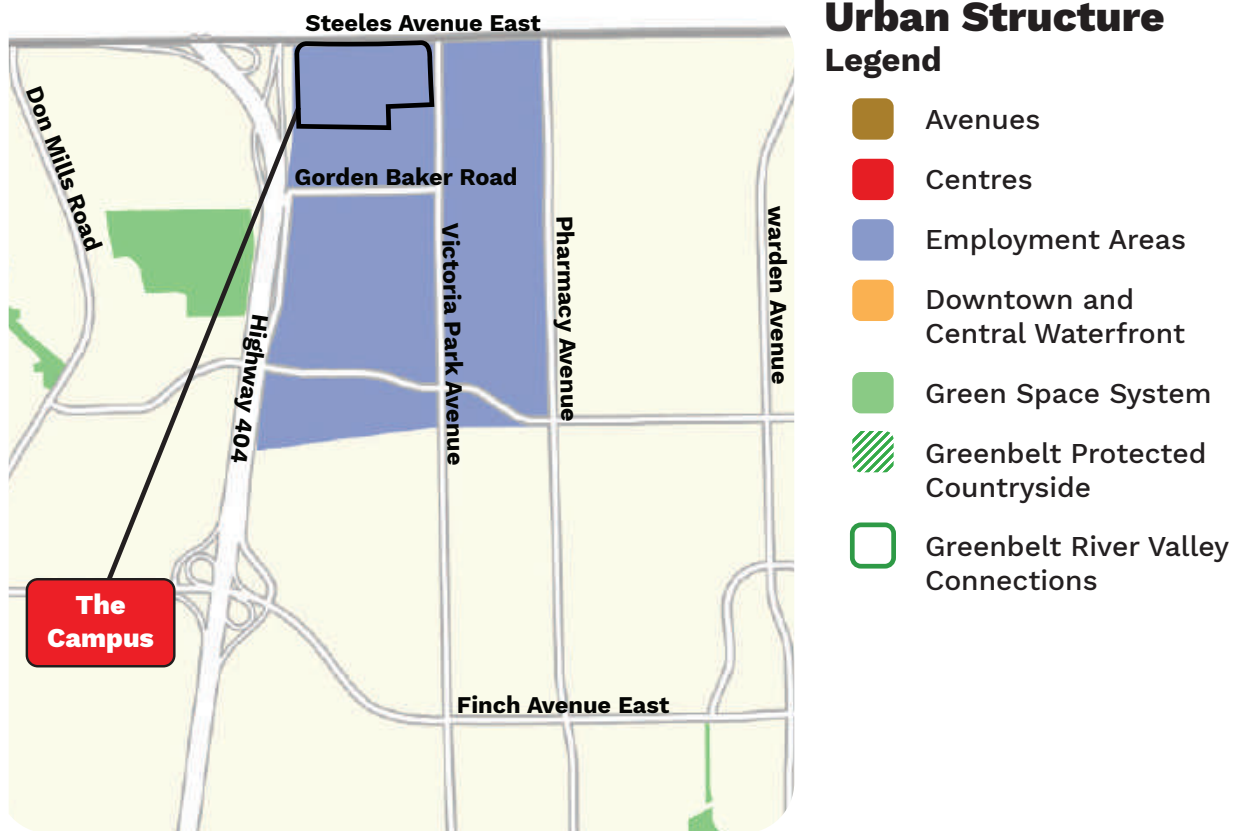


Figure 7 - Toronto Official Plan - Map 2, Urban Structure

In Chapter 2 (Shaping the City), one of the key policy directions is "Integrating Land Use and Transportation" (Section 2.2). The Official Plan states that:

"... future growth within Toronto will be steered to areas which are well served by transit, the existing road network and which have a number of properties with redevelopment potential. Generally, the growth areas are locations where good transit access can be provided along bus and streetcar routes and at rapid transit stations. Areas that can best accommodate this growth are shown on Map 2: Downtown, including the Central Waterfront, the Centres, the Avenues and the Employment Areas...The Mixed use Avenues will emphasize residential growth, while the Employment Areas will focus on job intensification".

Policy 2.2(2) provides that "growth will be directed to the Centres, Avenues, Employment Areas and the Downtown and Central Waterfront area as shown on Map 2", and sets out a number of objectives can be met by this strategy, including:

- using municipal land, infrastructure and services efficiently;
- concentrating jobs and people in areas well served by surface transit and rapid transit stations;
- promoting mixed use development to increase opportunities for living close to work and to encourage walking and cycling for local trips;
- offering opportunities for people of all means to be affordably housed;
- facilitating social interaction, public safety and cultural and economic activity;
- improving air quality and energy efficiency and reducing greenhouse gas emissions; and
- protecting neighbourhoods and green spaces from the effects of nearby development.

The introductory text in Section 2.4 "Bringing the City Together: A Progressive Agenda of Transportation Change", notes that:

"The transportation policies, maps and schedules of the Plan make provision for the protection and development of the City's road, rapid transit and inter-regional rail networks. The Plan provides complementary policies to make more efficient use of this infrastructure and to increase opportunities for walking, cycling, and transit use and support the goal of reducing car dependency throughout the City... Reducing car dependency means being creative and flexible about how we manage urban growth. We have to plan in 'next generation' terms to make walking, cycling, and transit increasingly attractive alternatives to using the car and to move towards a more sustainable transportation system."

In this regard, Steeles is identified as a transit corridor expansion element on Map 4, higher Order Transit Corridors (see Figure 8, Higher Order Transit Corridors) and both Steeles Avenue East and Victoria Park Avenue are identified on Map 5 as Enhanced Surface Transit Network (Figure 9, Enhanced Surface Transit Network) of the Official Plan.



Higher Order Transit Corridors Legend

Existing

- TTC Subway and LRT Lines
- GO Rail Lines

Expansion Elements

- Transit Corridors
- Transit Corridor Alignment To Be Determined
- Rail Station



Figure 8 - Toronto Official Plan – Map 4, Higher Order Transit Corridors



Enhanced Surface Transit Network Legend

Existing

- TTC Subway and LRT Lines
- GO Rail Lines

Expansion Elements

- Transit Priority Segments



Figure 9 - Toronto Official Plan – Map 5, Enhanced Surface Transit Network

Employment Areas Policies

Policy 2.2.4(2) which is under partial appeal at the LPAT, provide that *Employment Areas* will be used exclusively for business and economic activities in order to:

- a. retain sufficient availability of lands, for both current and future needs, for industrial functions such as manufacturing and warehousing which are permitted only within Employment Areas and Regeneration Areas;
- b. protect and preserve Employment Areas for current and future business and economic activities;
- c. provide for and contribute to a broad range of stable full-time employment opportunities;
- d. provide opportunities for new office buildings, particularly in business parks along the Don Valley corridor and/or within walking distance to higher order transit;
- e. provide a stable and productive operating environment for existing and new businesses by preventing the establishment of sensitive land uses in Employment Areas;
- f. maintain and grow the City's business tax base;
- g. promote and maintain food security for the City's residents;
- h. maintain the market attractiveness of the Employment Areas for employment uses;
- i. provide prominent, accessible and visible locations and a wide choice of appropriate sites for potential new businesses;
- j. continue to contribute to Toronto's diverse economic base and support export-oriented wealth creating employment;
- k. contribute to a balance between jobs and housing to reduce the need for long-distance commuting and encourage travel by transit, walking and cycling; and
- l. provide work opportunities for residents of nearby neighbourhoods.

Policy 2.2.4(3) provides that a more intensive use of lands in *Employment Areas* for business and economic activities will be encouraged to make better use of a limited supply of lands available for these activities, and Policy 2.2.4(4) provides that *Employment Areas* will be enhanced to ensure they are attractive and function well.

Policy 2.2.4(5) provides that sensitive land uses, including residential uses, where permitted or proposed outside of an adjacent to or near to *Employment Areas* or within the influence of major facilities, should be planned to ensure they are appropriately designed, buffered and/or separated as appropriate from *Employment Areas* and/or major facilities. Policies 2.2.4(6)-(10) set out requirements to demonstrate land use compatibility between the sensitive land uses and the *Employment Areas*.

Policy 2.2.4(11) provides that *Employment Areas* in the vicinity of existing major transportation infrastructure, including highway interchanges, are to be preserved for employment uses that may rely upon the major transportation infrastructure for the movement of goods.

Policy 2.2.4(12) provides that measures will be introduced and standards applied on roads within *Employment Areas* that give priority to the movement of trucks and transit vehicles.

The conversion and removal policies for *Employment Areas* are set out in Sections 2.2.4(14) – 2.2.4(18). Attachment 3 of the City of Toronto's Growth Plan Conformity and MCR Work Plan (dated May 19, 2020), which sets out the Official Plan policies approved by the LPAT in May 2020.

Policy 2.2.2(14) provides that the redesignation of land from an *Employment Area* designation to any other designation, by way of an Official Plan Amendment, or the introduction of a use that is otherwise not permitted in an *Employment Area* is a conversion of land within an *Employment Area* and is also a removal of land from an *Employment Area* and may only be permitted by way of a Municipal Comprehensive Review. The introduction of a use that may be permitted in a *General Employment Area* into a *Core Employment Area* or the redesignation of a *Core Employment Area* into a *General Employment Area* designation is a conversion and may only be permitted by way of a Municipal Comprehensive Review.

Policy 2.2.4(15) provides that the conversion of land within an *Employment Area* is only permitted through a City initiated Municipal Comprehensive Review that comprehensively applies the policies and schedules of the Provincial Growth Plan.

Policy 2.2.4(16) provides that Applications to convert lands within an *Employment Area* will only be considered at the time of a municipal review of employment policies and designations under Section 26 of the Planning Act and a concurrent Municipal Comprehensive Review under the Growth Plan for the Greater Golden Horseshoe. Applications to convert lands within an *Employment Area* received between such City-initiated Official Plan Reviews will not be considered unless Council directs that a Municipal Comprehensive Review be initiated.

Policy 2.2.4(17) provides that during a Municipal Comprehensive Review, the City will assess requests to convert lands within Employment Areas, pursuant to the Provincial Growth Plan Policy 2.2.6.5, both cumulatively and individually, by considering the following matters:

- a. there is a demonstrated need for the conversion(s) to:
 - i. meet population forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe; or
 - ii. mitigate existing and/or potential land use conflicts
- b. the lands are not required over the long-term for employment purposes;
- c. The City will meet the employment forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe;
- d. the conversion(s) will not adversely affect the overall viability of an *Employment Area* and maintenance of a stable operating environment for business and economic activities with regard to the:
 - i. compatibility of any proposed land use with lands designated *Employment Areas* and major facilities, as demonstrated through the submission of a Compatibility/Mitigation Study in accordance with Policies 2.2.4.5, 2.2.4.7 and 2.2.4.8 and Schedule 3 for any proposed land use, with such policies read as applying to lands in *Employment Areas*;
 - ii. prevention or mitigation of adverse effects from noise, vibration, and emissions including dust and odour;
 - iii. prevention or mitigation of negative impacts and minimization of the risk of complaints;
 - iv. ability to ensure compliance with environmental. Approvals, registrations, legislation, regulations and guidelines;
 - v. ability to provide appropriate buffering and/or separation of employment uses from sensitive land uses, including residential;
 - vi. ability to minimize risk to public health and safety;
 - vii. reduction or elimination of visibility of, and accessibility to, employment lands or uses;
 - viii. impact upon the capacity and functioning of the transportation network and the movement of goods for existing and future employment uses;
 - ix. removal of large and/or key locations for employment uses;
 - x. ability to provide opportunities for the clustering of similar or related employment uses;
 - xi. provision of a variety of land parcel sizes within the *Employment Area* to accommodate a range of permitted employment uses;
- e. the existing or planned sewage, water, energy and transportation infrastructure can accommodate the proposed conversion(s);
- f. in the instance of conversions for residential purposes, sufficient parks, libraries, recreation centres and schools exist or are planned within walking distance for new residents;
- g. Employment lands are strategically preserved near important infrastructure such as highways and highway interchanges, rail corridors, ports and airports to facilitate movement of goods;
- h. The proposal(s) to convert lands in an *Employment Area* will help to maintain a diverse economic base accommodating and attracting a variety of employment uses and a broad range of employment opportunities in Toronto; and
- i. cross-jurisdictional issues have been considered.

Policy 2.2.4(18) provides that when assessing proposal(s) to convert lands within *Employment Areas*, the City will:

- a. notify all major facilities whose influence area(s) includes any portion of the lands proposed to be converted; and
- b. notify all facilities that store, distribute or handle propane whose required separation distances by law and/or regulation may include any portion of the land to be converted.

Land Use Policies

The Campus Lands are designated *General Employment Areas* on Map 19, Land Use Plan of the Official Plan (see **Figure 10 – Land Use Plan**). Policies that apply to *Employment Areas* are included in Section 4.6 of the Official Plan.

General Employment Areas are places for business and economic activities generally located on the peripheries of *Employment Areas*. All uses permitted in *Core Employment Areas* are permitted in *General Employment Areas* (although it is noted that SASP 394 prohibits heavy industrial uses), in addition to restaurants and all types of retail (subject to LPAT appeal) and service uses. The permitted uses in the

General Employment Areas designation include a variety of uses including, but not limited, offices, parks, and small-scale restaurants. Policy 4.6(6) provides that development within *Employment Areas* will contribute to the creation of competitive, attractive, highly functional *Employment Areas*.

As outlined, the Conversion Request suggests that the Conversion Lands be redesignated to *Regeneration Areas*. *Regeneration Areas* open up unique areas of the City to a wide array of uses to help attract investment, re-use buildings, encourage new construction and bring life to the streets. In *Regeneration Areas*, commercial, residential, live/work, institutional and light industrial uses can be mixed within the same block or even the same building.

Policies that apply to the *Regeneration Areas* designation are included in Section 4.7 of the Official Plan. Not all such Areas will have the same mix of uses or development policies. *Regeneration Areas* will need “tailor-made” strategies and frameworks for development, generally provided through a Secondary Plan. Development criteria for development in *Mixed Use Areas* is set out in Policy 4.7(2).

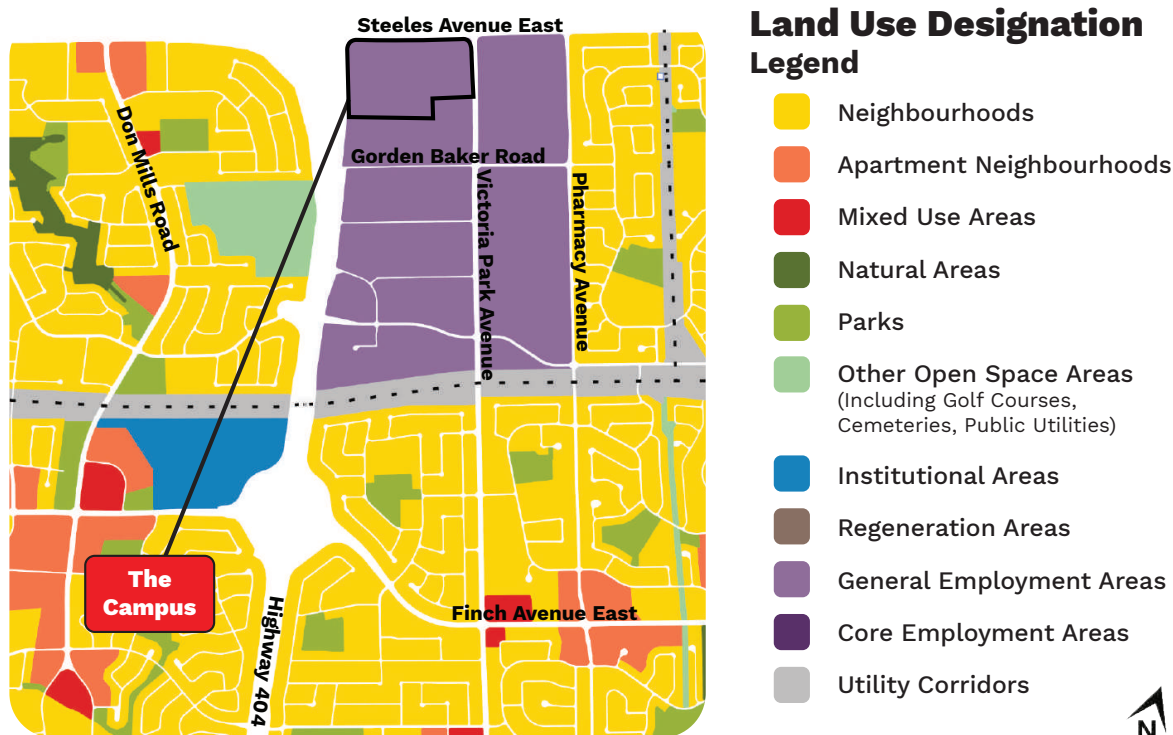


Figure 10 – Toronto Official Plan – Map 19, Land Use

Built Form Policies

The Official Plan recognizes the importance of good urban design, not just as an aesthetic overlay, but also as an essential ingredient of City-building. It demands high quality architecture, landscape architecture and urban design both within the public realm and within the privately developed built form. The Official Plan recognizes that, as intensification occurs in the *Downtown* and elsewhere throughout the City, there is an extraordinary opportunity to build the next generation of buildings and to create an image of Toronto that matches its status as one of the great cities in North America.

In putting forward policies to guide built form, the Official Plan notes that developments must be conceived not only in terms of the individual building site and program, but also in terms of how that building, and site fit within the context of the neighbourhood and the City. Policy 3.1.2(1) provides that new development will be located and organized to fit with its existing and/or planned context.

Policy 3.1.2(4) provides that new development will be massed to define the edges of streets, parks and open spaces at good proportion. Taller buildings will be located to ensure adequate access to sky view for the proposed and future use of these areas. The design of tall buildings should consist of a base to define and support the street edge at an appropriate scale, a shaft that is appropriately sized and oriented in relation to the base building and adjacent buildings, and a top that contributes to the character of the skyline and integrates rooftop mechanical systems. Tall building proposals should address key urban design considerations, including: meeting the built form principles of the Plan; demonstrating how the proposed building and site design will contribute to and reinforce the overall city structure; demonstrating how the proposed building and site design relate to the existing and/or planned context; taking into account the relationship of the Campus Lands to topography and other tall buildings; and providing high quality, comfortable and usable publicly accessible open space areas. (Policy 3.1.3(2)).

Housing Policies

The Official Plan's housing policies included in Section 3.2.1 support a full range of housing in terms of form, tenure and affordability, across to meet the current and future needs of residents. New housing supply will be encouraged through intensification and infill that is consistent with the Official Plan.

As the Conversion Lands are 6.8 ha, the provisions of Section 3.2.1.9 would apply. STC recognizes that the provision of affordable housing is a top priority for the City, and that the Conversion Lands offer a real opportunity to provide affordable housing in the northeast area of the City. Accordingly STC proposes that the site-specific SASP includes specific direction with respect to the provision of affordable housing, in recognition of the current housing needs in the City.

Implementation Policies

Policy 5.6(1) provides that the Official Plan should be read as a whole to understand its comprehensive and integrative intent as a policy framework for priority setting and decision making. The goal of the City's Official Plan is to appropriately balance and reconcile a range of diverse objectives affecting land use planning in the City.

Site and Area Specific Policy No. 394

SASP 394 applies to business parks along the Don Valley Parkway Corridor. The SASP prohibits new major retail developments with 6,000 sq. m or more of retail floor area and only permits restaurants, workplace daycares, recreation and entertainment facilities, and small and medium scale retail stores and services when these uses are located on lower level floors of multi-storey buildings that include *Core Employment Area* uses, particularly office uses.

The subject lands are classified as Area "A" within SASP 394, which provides the following:

1. A Master Site Plan will create safe and comfortable public and private realms and include matters such as:
 - a. a network of private and public streets;
 - b. flexibly-sized development blocks;
 - c. appropriately-sized private and/or public open spaces;
 - d. pedestrian and cycling facilities; and
 - e. convenient interconnections amongst the foregoing.
2. Heavy manufacturing uses are not permitted.
3. Hotels are permitted.
4. Following approval of a Master Site Plan, development will be phased as follows:
 - i. The first phase of development will include:
 - o a maximum of 2,200 sq. m of gross floor area comprised of recreational facilities, restaurants, retail stores and service uses that are permitted to be developed in stand-alone buildings notwithstanding b) above;
 - o a bank with a maximum gross floor area of 600 sq. m;
 - o a hotel with a minimum gross floor area of 7,000 sq. m; and
 - o a minimum of 1,000 sq. m of gross floor area for office uses.
 - ii. Subsequent phases of development will include:
 - o a maximum of 1,100 sq. m of gross floor area comprised of recreational facilities, restaurants, retail stores and service uses that are permitted to be developed in stand-alone buildings notwithstanding b) above, provided that above-grade building permits have been issued for a minimum of 1,000 sq. m of gross floor area for office uses as required in 1. above; and
 - o a minimum of 9,000 sq. m of gross floor area of office uses.

4.5 Zoning By-law

The in-force zoning by-law applying to the Campus Lands is Former City of North York Zoning By-law 7625, as amended ("By-law 7625"). This By-law includes a large area of the Campus within the Business Park Zone (MO) but zones the eastern portion, bordering Victoria Park Avenue MO(3) (see **Figure 11 – Zoning Map**). The Campus Lands are not included within the new City-wide Zoning By-law 569-2013.

Permitted uses within the MO Zone include adult education school, artist studio, car rental agency, college, commercial gallery, commercial school, communications and broadcasting, community centre, day nursery, financial institution, fitness centre, gasoline station, health science research lab, hotel, industrial sales and service, laundry, manufacturing, museum, office uses, outdoor café, park, personal service shop, place of worship, public library, research lab, restaurant, retail store, service shop, service station, showroom, theatre, and university uses). The MO zone does not permit any residential uses.

The MO(3) zone provides that notwithstanding the uses permitted in an MO zone, no commercial uses, except business offices, professional offices, restaurants and financial institutes are permitted to front on the west side of Victoria Park Avenue for a depth of 60 m, and no automotive uses are permitted within this depth

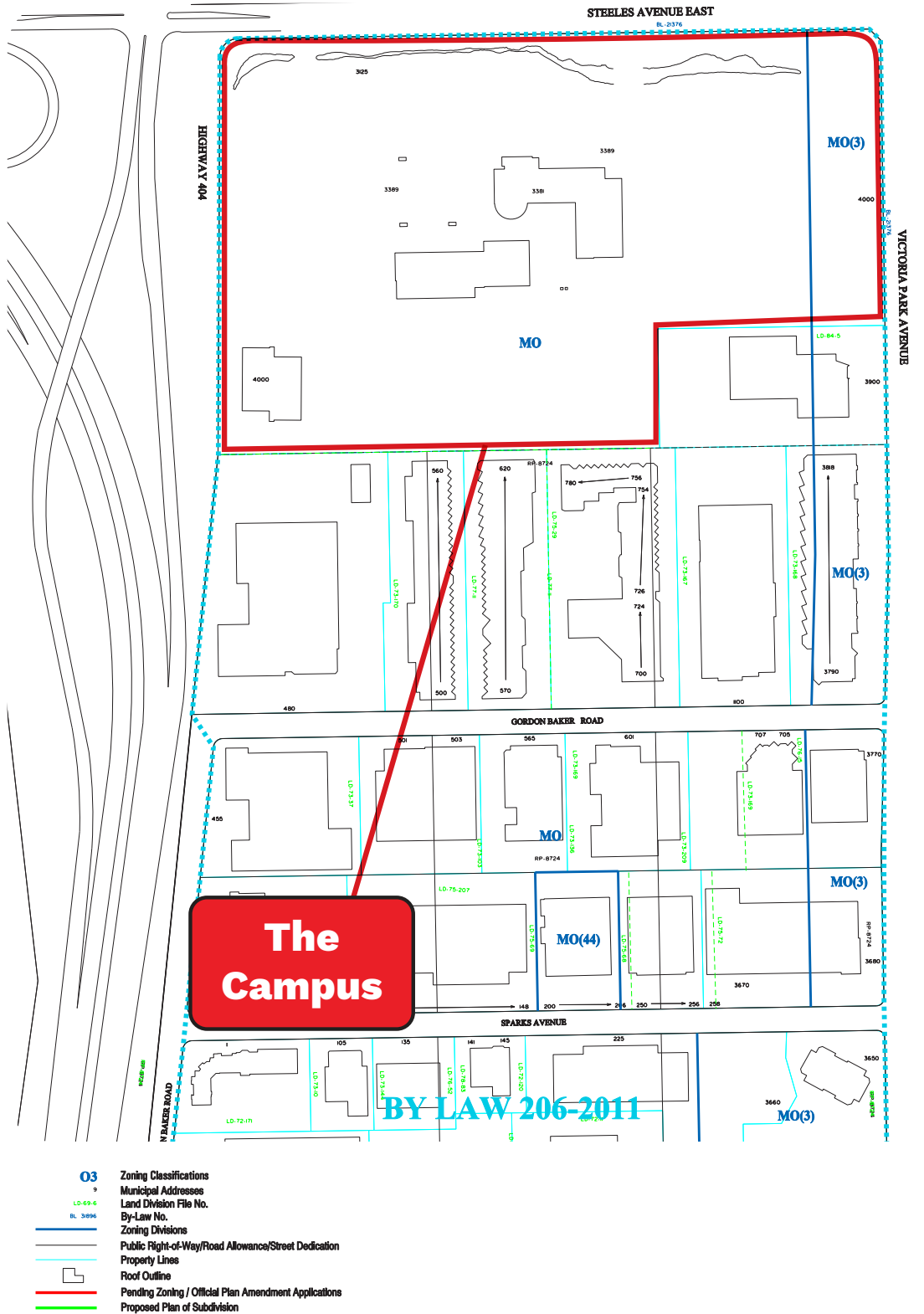


Figure 11 - By-law 7625 Zoning Map



Analysis

In our opinion, the Conversion Request, which seeks to convert the Conversion Lands from *General Employment Areas* to *Regeneration Areas* is appropriate and should be permitted by the City-wide MCR. This section of the Report provides an analysis of the Conversion Request within the context of the Official Plan policies related to the removal of lands from *Employment Areas* (Policy 2.2.4(14) to 2.2.4(18)).

Based on policies 2.2.4(14), 2.2.4(15) and 2.2.4(16), removing the Conversion Lands from an *Employment Area*, will provide the opportunity to include residential uses. We have considered all the conversion criteria included in Policy 2.2.4(17), both cumulatively and individually, to assess the impacts of the Concept Plan compared to the existing Master Plan.

a. There is a demonstrated need for the conversion(s) to:

1. Meet the population forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe; or

The Concept Plan, which has been prepared in support of the Conversion Request, provides for a total of approximately 1,370 units, resulting in approximately 2,380 people (and an additional 2,030 jobs).

Schedule 3 of the Growth Plan, as amended by Growth Plan Amendment 1, forecasts a population of 3,650,000 persons in the City of Toronto by 2051. As outlined in the Altus Report, the estimated population in the City in 2019 was 2,965,713 persons. This translates to an average annual growth of 21,300 persons per year since 2001. The rapid pace of growth experienced since 2001 needs to generally be matched in order to meet the 2051 forecasts. The City will need to add approximately 684,300 persons over the next 30 years (or, an average of 21,300 persons per year). Accordingly, the City needs to continue to encourage residential growth in order to meet their minimum targets.

In accordance with Policy 2.2.4(17)(a)(1), introducing more lands for residential uses will assist in meeting the residential population forecasts allocated to the City in the Growth Plan.

2. To mitigate existing and/or potential land use conflicts;

There are no existing land use conflicts within the Campus or between the Campus and adjacent land uses. The Campus is subject to Official Plan policies which support business park uses, which are reflected in the Master Plan and which are planned or existing. Accordingly, this consideration does not form part of a determinative rationale for the Conversion Request.

b. The lands are required over the long-term for employment purposes;

The Concept Plan proposes no change to the balance of the Campus: it is based on the assumption that with the development of the mixed-use component along Steeles and Victoria Park (the Conversion Lands), and the jobs proposed as part of the Master Plan (the office, hotel and data centre uses) will be provided and the existing jobs retained. The Conversion Request ensures that the Campus will continue to function as a successful office park.

c. The City will meet the employment forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe;

As outlined in the Altus Report, allowing for a greater mix of uses on the Conversion Lands will help support the existing employment uses on the Campus and also encourage greater economic activity. The Concept Plan establishes a vibrant environment that creates opportunities for employees to live close to their place of work and enjoy all the benefits of a mixed-use community. Based on Altus's findings, the presence of residential in other office-oriented employment areas throughout the GTA stimulated demand for office, rather than reducing it.

As previously stated, there have been no new office buildings constructed in the Campus for 20 years. Based on the economic analysis provided, development of office uses in tandem with residential uses will create synergies resulting in more financially feasible development. The improved economics will help support the overall net gain of non-residential GFA on the

Conversion Lands which, overall will result in a net gain overall of job opportunities. Without the introduction of a mix of uses, it is less likely that the jobs anticipated by the Master Plan will be realized.

The Concept Plan anticipates an employment increase of approximately 30% over the Master Plan (by including approximately 2,000 new jobs on the Conversion Lands and meeting an overall target of over 6,000 jobs. This will contribute to forecasted employment forecast of 1,980,000 jobs in the City of Toronto by 2051, as set out in Schedule 3 of the Growth Plan, as amended by Growth Plan Amendment 1.

The Altus Report also provides that the estimated number of jobs in the City in 2019 was 1,569,800, which equates to an average annual employment growth of 6,830 jobs per year since 2021. The City need to continue to grow employment opportunities, but at a slower pace, to meet the applicable forecasts. Based on the 2031 and 2041 employment projections in earlier iterations of the Growth Plan, the City was ahead of pace in job growth. The 2019 Growth Plan (as amended in 2020) updated the employment forecasts to the year 2051, which allocated additional job growth. Based on these targets, the City will need to add approximately 13,200 jobs annually between 2020 and 2051.

In accordance with Policy 2.2.4(17)(c), the Concept Plan maintains and increases non-residential uses, and accordingly the Campus will continue to contribute to the City's employment targets. By introducing a mix of uses, it is more likely that the existing levels of employment can be maintained and new employment uses added.

d. The conversion(s) will adversely affect the overall viability of an Employment Area and maintenance of a stable operating environment for business and economic activities with regard to the:

1. compatibility of any proposed land use with lands designated Employment Areas and major facilities, as demonstrated through the submission of a Compatibility/Mitigation Study in accordance with Policies 2.2.4.5, 2.2.4.7 and 2.2.4.8 and Schedule 3 for any proposed land use, with such policies read as applying to lands within Employment Areas;

2. prevention or mitigation of adverse effects from noise, vibration, and emissions, including dust and odour;
3. prevention or mitigation of negative impacts and minimization of the risk of complaints;
4. ability to ensure compliance with environmental approvals, registrations, legislation, regulations and guidelines;
5. ability to provide appropriate buffering and/or separation of employment uses from sensitive land uses, including residential;
6. ability to minimize risk to public health and safety;

The introduction of residential uses will not affect the overall viability of the abutting *General Employment Areas* in the City of Toronto. The adjacent uses in the Campus include offices and a hotel, which are uses which could equally well be accommodated within a *Mixed Use Areas* or a *Regeneration Areas* designation.

SASP 394 limits the types of uses permitted within this Business Park, prohibits all heavy industrial uses but specifically permits hotels, identified as a sensitive land use. It also makes provision for the enhancement of parks and open spaces, bicycle and pedestrian routes and connections through the area. The approved Industrial-Office Business Park Zoning (MO Zone) also does not permit heavier employment uses such as manufacturing and processing facilities. Instead, permitted uses include college and universities, commercial schools, community centres, day nurseries, hotels, offices, outdoor cafes, place of worship, public library, restaurant and theatres. These land uses, and the applicable OP policies, support the provision of safe environments and an attractive public realm for employees, students and patrons. The introduction of residential uses will not result in any additional risks to public health and safety.

In terms of adjacent uses to the north, in the City of Markham, where a variety of commercial uses are found, as described in Section 2.0 of this Report, there are already sensitive land uses on the north side of Steeles Avenue East, opposite to the Conversion Lands. Other sensitive uses in the vicinity include the BMO IFL (3550 Pharmacy Avenue) and the Marriott Hotel (7095 Woodbine Avenue), both within 300 m of the Conversion Lands and both of which provide overnight accommodation (as would Building G, the planned hotel on the Campus Lands).

With regards to the lands to the south of the Campus (and over 150 m south of the Conversion Lands) the warehousing, distribution, retail, office and wholesale uses do not appear to have any environmental certificates of approval. The uses on the south side of Gordon Baker Drive are located over 300 m from the Conversion Lands.

A Land Use Compatibility Assessment has been prepared by Gradient Wind (dated July 15, 2021), submitted concurrently under a separate cover, to provide a preliminary review of expected air quality and noise impacts on the development. The investigation concludes that the proposed residential land use is feasible from a compatibility perspective. Key findings of the report include:

- The report reviews the presence of properties classified as Class I, II or III based on the D-Series guidelines prepared by the Ministry of Environment, Conservation and Parks ("MECP"). There is only one Class I property within the potential influence area with a registered Environmental Compliance Approval (480 Gordon Baker Road), and the residential uses would exceed the minimum 20 m setback required from this property. There are no Class II or Class III properties within the potential influence area.
- Off-site noise impacts are not expected to be a concern for the property, and that on-site noise levels can be mitigated at future stages in the development approval process.
- From an air quality perspective, technological improvements and more stringent emission standards will likely result in lower emissions and improved air quality for the site over time.

Steeles Avenue East is distinct from the balance of the employment lands, in both Toronto and Markham, and the introduction of an additional mix of uses would not destabilize the existing business and economic uses further north or south of the major arterial.

7. reduction or elimination of visibility of, and accessibility to, employment lands or uses;

The Conversion Lands are located on the northern periphery of the *Employment Area* identified on Map 2, Urban Structure in the City OP. There will be no change in the visibility of the existing and planned uses from Highway 404, and the existing office buildings continue to be visible from Victoria Park Avenue, and from Steeles Avenue and Cal Net Drive (where single storey buildings will frame the entrance). The creation of an enhanced public realm and pedestrian network, as outlined in the Concept Plan will provide better pedestrian and bicycle linkages between the uses on the Campus. No changes are proposed with regards to access to the Campus from Steeles Avenue East or Victoria Park Avenue which could have impact on the balance of the lands designated *General Employment Areas*.

8. impact upon the capacity and functioning of the transportation network and the movement of goods for existing and future employment uses;

The Campus has been identified primarily as an office park, and its undeveloped lands are not anticipated to include manufacturing and warehousing and thus require facilities for the movement of goods. As outlined in the response to Policy 2.2.4(17)(e) below, the Concept Plan will not have a significant impact on the transportation networks in the area. The major roads (Victoria Park and Steeles Avenue) will continue to provide regional connections. The internal road system does not connect south to Gordon Baker and thus there will be no traffic impact in the immediate area, as outlined by BA Group in their Transportation Considerations memorandum. Therefore, it is not anticipated that any movement of goods to the balance of the *General Employment Area* would be impacted. As part of any future official plan amendment, a complete traffic study would be required to confirm the functioning of the transportation network and the movement of goods for existing and future employment uses.

9. removal of large and/or key locations for employment uses;

The Campus will continue to be used for employment uses, only the area abutting Steeles Avenue and Victoria Park would be available for non-employment uses. Accordingly this key location within the Highway 404 and Steeles submarket, with excellent access from Highway 404, will be maintained for its Business Park planned function. Lands further south in the *Employment Area* also remain available for their existing and planned function.

10. ability to provide opportunities for the clustering of similar or related employment uses; and

The requested conversion, as illustrated by the Concept Plan is intended to attract a variety of non-residential and residential uses – and result in a clustering of similar or related office employment uses. It is hoped that this conversion will create an outstanding opportunity to strengthen this employment area, clustering with the existing office uses within the City of Markham while providing for more jobs within the Toronto side of this highly visible location along Highway 404.

11. provision of a variety of land parcel sizes within the Employment Area to accommodate a range of permitted employment uses;

As the Campus Lands are on the edge of an *Employment Area*, the proposed introduction of new uses would not result in the fragmentation of a large parcel that would otherwise be available for larger-scale employment uses. The existing office buildings in the middle of the Campus Lands already limit the opportunities for large-scale employment use. This development pattern results in the balance of the Campus Lands being most appropriately available to accommodate uses such as office or retail, in addition to other uses permitted by the MO Zone including hotels, banks and restaurants.

e. The existing or planned sewage, water, energy and transportation infrastructure can accommodate the proposed conversion(s);

A Transportation Considerations memorandum has been prepared by BA Group, submitted concurrently under a separate cover, to outline the transportation considerations associated with the Conversion Request. The analysis compares the trip generation estimates between the Concept Plan and the Master Plan, which is summarized as follows:

OPTION	AM PEAK HOUR			PM PEAK HOUR		
	<i>In</i>	<i>Out</i>	<i>2-way</i>	<i>In</i>	<i>Out</i>	<i>2-way</i>
Master Plan (Scenario 1)	1465	285	1855	520	1315	1920
Concept Plan (Scenario 2)	1450	510	1960	830	1620	2450

Accordingly, BA Group's analysis indicates that the two options would generate similar amounts of peak hour traffic, and that their impact on the public road network would be minimal. Further, the Concept Plan would have relatively balanced inbound and outbound flow, which allows trips being made in the off-peak direction to use generally under-utilized road capacity given that with a mix of uses more trips are made during off-peak hours.

A Functional Services memorandum has been prepared by Fabian Papa & Partners, submitted concurrently under a separate cover, to review the municipal services availability for the Concept Plan which would result from the Conversion Request. Based on the proposed statistics, the analysis concludes that:

- The existing municipal water infrastructure is expected to be capable of accommodating the proposed development resulting from the land conversion;
- The existing internal sewer system on the Campus Lands, including its connections to the existing municipal infrastructure system, can accommodate the development as proposed;
- No upgrades to the receiving sewer system are anticipated, based on the high-level assessment of the existing sanitary sewer infrastructure;
- It is expected that all development relevant to the proposed land conversion will discharge flows to the stormwater management pond which, in turn, drains in a controlled manner to the receiving storm sewer; and
- The downstream sanitary sewer system can accommodate the foundation discharge.

In conclusion, Fabian Papa & Partners identify that the Concept Plan is feasible from a municipal servicing perspective and that: the existing municipal water infrastructure adjacent to the Campus Lands are expected to be capable of accommodating the proposed domestic and fire water demands for the development; the existing municipal sanitary sewer system can accommodate the additional wastewater from the proposed development and no upgrades or mitigation measures are anticipated; and the existing private stormwater management facility on the Campus Lands will provide the required attenuation for runoff from the proposed development.

Based on the foregoing, the Conversion Request conforms with Policy 2.2.4(17)(e) as the existing sewage, water and transportation infrastructure can accommodate the proposed conversion of land uses. A greater analysis related to the transportation and servicing considerations would be provided as part of a future development application to confirm capacity.

f. In the instance of conversions for residential purposes, sufficient parks, libraries, recreation centres and schools exist or are planned within walking distance for new residents;

A review has been undertaken by Bousfields Inc. to provide a brief inventory of the existing community services and facilities within the City of Toronto, in the area bound by Steeles Avenue East to the north, Birchmount Road to the east, Finch Avenue to the south and Highway 404 to the west ("the Study Area"). In summary:

- There are 9 TDSB elementary schools and 2 TDSB secondary schools within the Study Area;
- There are four TDCSB elementary schools, but no TDCSB secondary schools within the Study Area;
- There are 14 childcare facilities, providing a total of 781 childcare spaces;
- There are two public libraries within the Study Area;
- There are no community centres within the Study Area, but the L'Amoreaux Community Recreation Centre and the Pleasantview Community Centre are in proximity to the east and south, respectively;
- There are five human service organizations and one hospital within the Study Area; and
- There are 11 parks and over 27 hectares of green space within the Study Area, in addition to the Hydro Corridor.

Additional services are provided on the west side of Highway 404. Furthermore, in addition to the new on-site parkland contemplated as part of the Concept Plan, 4,900 sq. m of new community space will be introduced to the Conversion Lands. The programming for this space would be determined through a future development application and in conversation with the local Councillor and area residents.

Based on the foregoing, there are sufficient parks, libraries, recreation and schools within walking distance of the Conversion Lands for new residents. A more detailed review with respect to service capacity would be undertaken as part of a formal development application. The need for community infrastructure could be evaluated on the basis of a phased development of the Conversion Lands.

Page 6 of the concurrently filed package by Giannone Petricone Associates depicts proximity to schools and parks in the area.

g. Employment lands are strategically preserved near important transportation infrastructure such as highways and highway interchanges, rail corridors, ports and airports to facilitate the movement of goods;

This strategically placed office park location along Highway 404 will be maintained, meeting the intent of Policy 2.2.4(17)(g). The Campus will continue to be a key, accessible location within the Steeles and 404 office submarket.

h. The proposal(s) to convert lands in an Employment Area will help to maintain a diverse economic base accommodating and attracting a variety of employment uses and a broad range of employment opportunities in Toronto; and

The Concept Plan would maintain and increase the economic-generating uses on the Campus through the creation of a broader range of employment opportunities. In addition to generating office, retail and community-sector job opportunities, the Concept Plan would generate significantly more property tax revenues than the Master Plan would have otherwise, as outlined in the Altus Report, the residential uses are needed to help attract employment uses to the area.

i. Cross-jurisdictional issues have been considered.

As outlined above, the impact of the Conversion Request on the lands to the immediate north of the Campus Lands within the City of Markham has been considered. The Concept Plan would be compatible with the existing office, commercial and hotel uses on the north side of Steeles Avenue East. The introduction of residential uses on the Conversion Lands will add vibrancy and amenities to this important arterial road, which should contribute to the overall desirability of the Highway 404 and Steeles office submarket (including for the lands within the City of Markham) and likely stimulate office demand.



Conclusion

In summary, it is our opinion that the Concept Plan, and related Conversion Request, would result in a form of development which would be compatible with surrounding land uses, would not negatively affect the viability of any other employment use in the vicinity, and would be consistent with the policy direction set out in the PPS and Growth Plan. The Conversion Request has appropriate regard for all considerations for a conversion set out in Policy 2.2.4(17), both individually and cumulatively.

The existing Campus is experiencing serious challenges. Maintaining existing tenants and attracting new tenants has been and continues to be a formidable task. The introduction of a critical mass of residential uses is seen as an important and catalytic initiative. These residential uses will not only provide opportunities to create a better live/work relationship thus supporting the existing and new offices but will also generate more demand for retail, restaurant and service uses, as well as parks and open spaces – they will allow STC to create a new neighbourhood. Based on the economic analysis provided by Altus, the mix of uses proposed will allow the opportunity to enhance the market feasibility of constructing offices in the Highway 404 and Steeles submarket and will also contribute to both the job and residential population targets set out for the City by the Growth Plan.

The Concept Plan maintains the existing permissions for 60% of the Campus while providing for new office space, new residential housing and supporting retail, restaurant, community service and recreational uses, including new public parks, on the Conversion Lands which can accommodate 1,380 units, 2,380 residents and 2,000 jobs (resulting in approximately 6,000 jobs on the Campus Lands overall).

For the reasons set out in this Report, in our opinion this Conversion should be approved through the City's MCR process.



APPENDIX “B”

Via E-mail: councilmeeting@toronto.ca

June 13, 2023

Toronto City Council
100 Queen St. West
Toronto, ON M5H 2N2

Attention: Sylwia Przewdziecki, Council Administrator

Dear Deputy Mayor McKelvie and Members of Council:

Re: Our Plan Toronto: Recommendations on Forty-Five Employment Area Conversion Requests – Final Report - Agenda Item PH4.5
Submission on behalf of 3125-3389 Steeles Avenue East and 4000 Victoria Park Avenue

We are writing on behalf of our joint venture company STC Investments, the owners of the 16.5 ha (41 acre) property at the southwest corner of Steeles Avenue East and Victoria Park known as the Steelestech Campus, to outline our objections to the City Staff response to our request to convert only a portion of the campus lands to 'Regeneration Area'. In our view, the City's assessment is incomplete and fails to recognize the challenges and opportunities associated with our efforts to support and intensify a sprawling campus that currently employs 3300 office workers.

The Steelestech Campus is partly occupied by Class 'A' office buildings that are currently home to several high-profile tenants. The buildings themselves are set back considerably from the arterial roads that front the property and, except for some purpose-built restaurants we have recently added as part of our ongoing program to support existing tenants, the majority of the lands in question remain undeveloped. The northeast quadrant of the site which represents the majority of the requested Regeneration Area is occupied by a massive surface parking lot that dominates the 524m eastern frontage along Victoria Park Avenue and a portion of Steeles Avenue. These lands have remained largely vacant for decades - a



testament to an aggressive zoning policy that has essentially frozen these lands from adding any viable or compatible uses.

Our submission provided substantial expert evidence that supports the importance of converting parts of the SteelesTech campus to enhance the employee experience and help attract additional employers. By adding rental housing, new office space and some retail/commercial and community facilities to these under-utilized lands, will help stabilize the current Class A office and transform the overall site into the kind of dynamic mixed-use community sought by today's businesses and employees, while also addressing a pressing City priority for rental housing on a shovel-ready property.

In response to our request, the staff report provides an incomplete appraisal of the economic activity in the 'Victoria Park/Steeles Office Focussed Area' by concluding that substantial building permit activity in the area 'demonstrates



increased growth and investment in an area that employs 11,700 people.' This overly positive assessment fails to account for our largely vacant lands, the fact that no office buildings have been built in this sub-market in the past 25 years and more glaringly, it fails to mention the fact that the area is bleeding jobs. According to the City's own 2022 Employment Survey the 'Victoria Park/Steeles Office Focussed Area' had 14,140 jobs in 2017 but only 11,700 in 2022 – a 17% decline in just six years. The Survey also points out that of the City's 23 Employment Areas, this one has experienced the most dramatic decline. When the status quo is clearly not working, it is not worth blithely protecting.

Instead, the City staff report suggests that land intensive uses such as warehouses and fulfillment centres are in high demand and points out that a primary reason for retaining the Employment designation on this entire property is its proximity to Hwy 404 because it provides good access for trucks and vans. In our view, locating other (non-office) employment zone-permitted uses on the lands in front of the Class 'A' office buildings as implied in the staff report would detract from the existing office uses and diminish the opportunity to intensify employment while addressing the City's housing priority.

We recognize the effort required to retain and attract employment to this submarket area and have invested heavily in the Steelestech Campus to make it as amenity rich as possible to suit the values of today's employees – to the extent that government policies will allow us. The office precinct has a soccer field, basketball court, communal gardens, BBQ patios a fitness centre and more – amenities designed to help compete with office markets downtown, along the Avenues and more poignantly in downtown Markham. We recently added some restaurants so people don't have to leave the campus and go

elsewhere and are in the process of adding a hotel to the west side of the property beside Highway 404. We are prepared to intensify employment by investing in a better future for this campus but can't do so under constraints that fail to recognize what the campus is and could be.

We understand the rationale behind the City's aggressive quest to retain employment within its boundaries and appreciate that each of the 150 submissions claims exceptionalism. In our case, that claim is superior and accurate – our application creates and protects thousands of jobs, doesn't remove lands that could be used by other compatible employment uses and adds vitality to an otherwise long stagnant property.

We implore City Council to reject staff's recommendation to further preclude the potential of this overall property by continuing to subject it to a policy that more accurately protects industrial, manufacturing and goods movement objectives that are not relevant in this instance.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Bishop", written in a cursive style.

Steve Bishop
Vice President, Development Services
North American Development Group