

February 5, 2024

Alejandra Perdomo  
Municipal Services Office - Central Ontario  
Ministry of Municipal Affairs & Housing  
Province of Ontario  
777 Bay Street, 16th floor  
Toronto, Ontario  
M7A 2J3

Dear Ms. Perdomo:

**RE: SUBMISSION ON OPA 653 – ERO #019-7731; MINISTRY #20-OP-238506**  
**340, 350, 360 & 364 EVANS AVENUE AND 12, 14 & 16 ARNOLD STREET, TORONTO**

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We are the lawyers for Tonlu Holdings Limited (“Tonlu”). Please accept these comments on behalf of Tonlu regarding City of Toronto Official Plan Amendment 653 (“OPA 653”) respecting the employment conversion of the property municipally addressed 340, 350, 360 and 364 Evans Avenue, and 12, 14 and 16 Arnold Street (hereinafter the “Subject Lands”).

We are respectfully requesting that you modify OPA 653 to change the designation of the Subject Lands on Map 15 of the City’s Official Plan from *Core Employment Areas* to *Mixed Use Areas* and add a Site and Area Specific Policy to Chapter 7 of the Official Plan in the form set out below which would apply to the Subject Lands.

## **The Proposal**

The proposal would allow for the revitalization of the area by allowing residential, hotel, community office, retail, and service commercial uses. The proposed development will assist in maintaining a diverse economic base and opportunities for employment in the immediate neighbourhood through the provision of new, modern efficient employment space including incubator and start up space. The inclusion of retail, service commercial, community and hotel space will further enhance the area by animating and supporting the new employment space on site, as well as that which exists in the area. The conversion would allow for substantial redevelopment to occur providing for transit supportive densities which will optimize existing and future infrastructure investments by the City and Province within proximity to the Subject Lands (i.e. the existing GO Station at Mimico-Judson, the future GO Station at Parklawn, the future subway extension to Sherway). By maintaining space for employment opportunities while introducing residential intensification in a compact built form in proximity to planned and existing transit infrastructure, the proposal represents a more efficient utilization of existing services and infrastructure.

To achieve transit supportive development density, in our opinion, it would be appropriate to convert the lands to Mixed Use Areas. This redesignation would allow for appropriate mixed use planning for the area to occur, including establishing transit supportive heights and densities, public realm elements (new roads, parks and pedestrian infrastructure), new residential opportunities in proximity to existing and planned employment centres and to reenergize the employment opportunities in this area through modern, efficient, and sustainable employment floor area (either stand alone or within a mixed use building). The introduction of residential uses onto the Subject Lands will provide for opportunities for housing in proximity to employment areas, including the provision of 5% affordable rental or 7% affordable ownership housing units. These new housing units will support the existing economic base of the South Etobicoke Employment Area accordingly. The proposed development is shown below.



**Demonstration Plan of a Possible Mixed Use Community on the Subject Lands**

## Planning Opinion

In support of this request, Mr. McKay, a Registered Professional Planner with MHBC, has prepared a summary of the proposal and his Planning Opinion on the modification (attached hereto). In summary, Mr. McKay concludes that the proposal and the modifications represent good planning and are in the public interest for the following reasons:

- The proposal is consistent with and conforms to Provincial Policy and structured around the optimization of existing municipal services, infrastructure and transit services.
- The proposal envisioned for the Subject Lands is one that will contribute to the overall existing mix of uses in this area of the City along the Gardiner Expressway which includes employment, residential and mixed use.
- The proposal would allow the construction of over 2,400 new residential dwelling units (including rental and ownership, with at least 180 affordable units being provided), with the non-residential components creating at least 1,000 jobs (an increase from the present 250 jobs).
- The Subject Lands represent a situation where a conversion is appropriate, given that the existing use of the Subject Lands represents an underutilization of the Subject Lands in comparison to the proposed mixed-use development which could occur.
- The proposed redevelopment will allow for the efficient use of the land and the optimization of infrastructure while maintaining employment through integration of retail, service commercial and office / incubator uses into an urban format. The intensification that is created by the conversion includes a substantial increase in the amount of employment gross floor area thus preserving and enhancing the employment opportunities on the Subject Lands.
- The proposed conversion of employment lands to a Mixed Use Areas designation meets the intent and purpose of the policies with respect to employment land conversions as outlined in the Growth Plan and the City of Toronto Official Plan and has been demonstrated as follows:
  - The proposal will support existing TTC bus routes along Kipling Avenue and Evans Avenue that are in proximity to the Subject Lands.
  - The conversion proposes to redevelop underutilized land to better accommodate the City's growing housing needs by providing 2,400 units in a mix of tenures, unit sizes and affordability including 5% affordable rental units, or 7% affordable ownership units (as per City of Toronto definitions of affordability)
  - The lands will include a substantial amount of new employment, including incubator space, which will create upwards of 1,000 jobs – significantly more than the current employment generated on-site today.
  - The proposed conversion is compatible with adjacent employment uses and will not affect the ability of surrounding facilities to comply with applicable Provincial and City of Toronto regulations.
  - The Subject Lands are fully serviced with water, wastewater and stormwater services which ensures the optimization and efficient use of existing municipal infrastructure for the proposed development.
  - Community facilities will be provided within the development, including; a 1.1 acre public park, and a community daycare facility.

In summary the requested modification will achieve three important planning objectives: (1) providing badly needed housing, including affordable and attainable housing; (2) providing significant employment opportunities and jobs; and (3) providing community facilities and local services on the Subject Lands.

## City's Decision on the Proposed Conversion

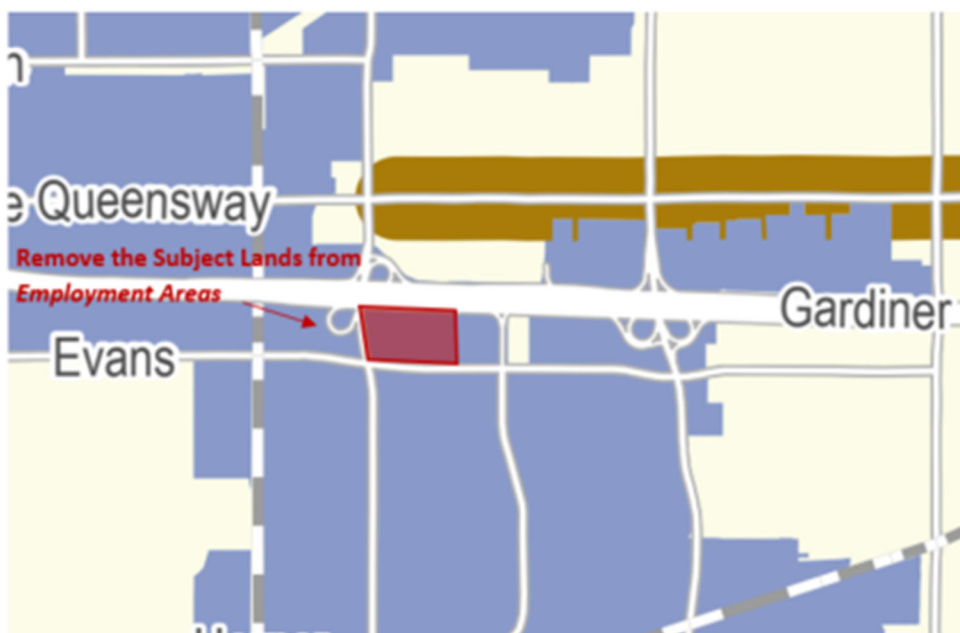
On September 6, 2023 City of Toronto Council adopted OPA 653. Despite the above substantial city building proposal by our client, Council did not support the conversion request through the OPA 653 adoption nor subsequent discussions by Council held on October 12<sup>th</sup>, 2023. Our client sees this as a significant failure by the City to recognize the redevelopment potential of the Subject Lands which would provide significant amounts of housing as well as employment opportunities in a rejuvenated and revitalized urban format.

*Given the deepening housing crisis and the substantial planning merit of the proposal, our client has decided to address the Minister in the context of his consideration of OPA 653 and seek the Minister's modification requested in this submission.*

## Request of the Minister

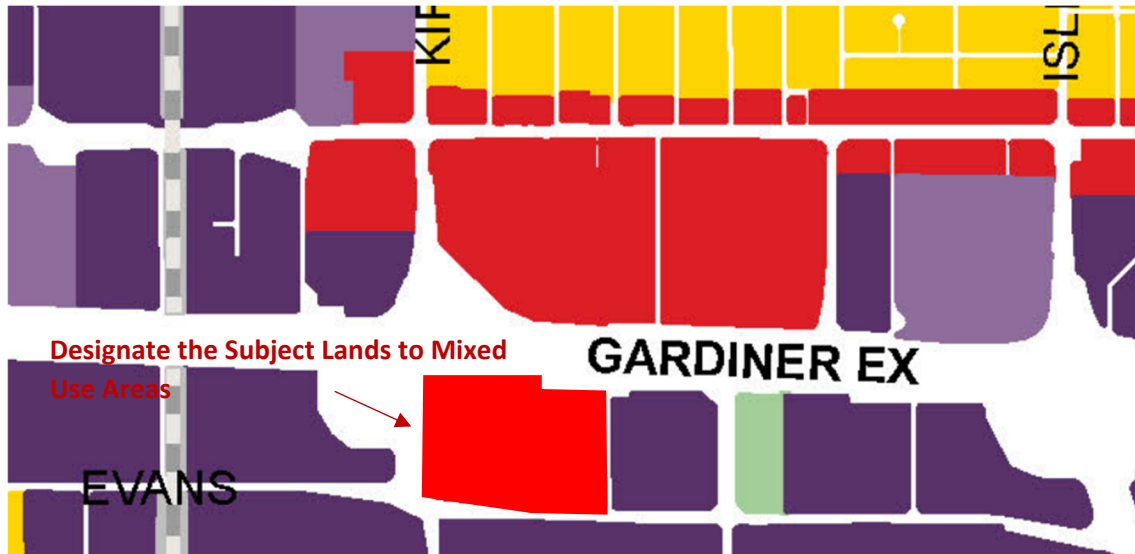
The Minister can utilize his powers under the Planning Act as the approval authority of OPA 653 to modify it in order to grant the conversion request for the Subject Lands. To this effect, the request would involve the following modifications:

1. We request **removal of the Subject Lands from Employment Areas on Map 2** of the Official Plan as shown below.



**Figure 1** – Removal of Subject Lands from *Employment Areas* as shown on excerpt from OPA 653, Appendix 1: Map 2

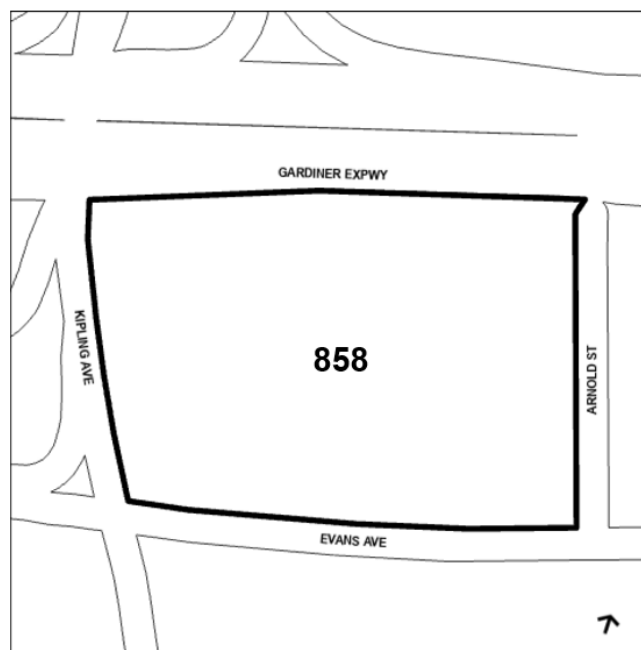
2. We request the Subject Lands be **designated *Mixed Use Areas* on Land Use Designation Map 15** (part of Tile Index Map 35 of Appendix 2 of OPA 653) as shown below.



**Figure 2** – Designate Subject Lands from *Core Employment Areas* to *Mixed Use Areas* as shown on excerpt from Official Plan Land Use Designation Map 15 (Tile Map 34 of OPA 653, Appendix 2)

3. Add a **new Site and Area Specific Policy to OPA 653** as follows:

**858. 340-364 Evans Avenue and 12-16 Arnold Street**



- a) A minimum employment gross floor area of 17,500 square metres or 15 percent of the total gross floor area, whichever is greater will:
  - i. be comprised of uses permitted within *Core Employment Areas* and *General Employment Areas* and must be compatible with residential use as determined through a Compatibility/Mitigation Study; and
  - ii. be developed prior to, or concurrent with, any residential uses;
- b) A mixed-use and mixed-income development is permitted provided that any new development containing residential units on the lands will secure a minimum amount of affordable housing as follows:
  - i. if a condominium development is proposed, a minimum of 7 percent of the total new residential gross floor area shall be secured as affordable ownership housing or a minimum of 5 percent of the total new residential gross floor area shall be secured as affordable rental housing; and
  - ii. the affordable housing shall be secured at affordable rents or affordable ownership prices for a period of at least 99 years from the date of first residential occupancy of the unit; and
  - iii. the unit mix of the affordable housing shall reflect the market component of the development, as appropriate, to achieve a balanced mix of unit types and sizes and support the creation of affordable housing suitable for families; and
  - iv. if a purpose-built rental development is proposed, there is no minimum requirement for affordable rental housing.
- c) Where a complete application for a Zoning By-law Amendment has not been filed prior to October 1, 2025, the affordable rental housing required in Policy b) i) will increase by 1.5 percent per year. Affordable ownership housing requirements will be set at 1.4 times the affordable rental housing requirements.
- d) The provision of affordable housing required by Policy b) and Policy c) shall be secured through one or more agreements with the City.
- e) The use of holding provisions may be used to ensure the required affordable housing is secured. Conditions to be met prior to the removal of a holding ("H") provision on the lands shall include the following:
  - i. Entering into a Municipal Housing Project Facility Agreement or such other agreement(s) as may be satisfactory to the City Solicitor to secure the provision of affordable housing; and

- ii. The submission and acceptance of a Housing Issues Report, to the satisfaction of the Chief Planner and Executive Director, that identifies the unit mix, unit sizes, and how affordable housing requirements will be met.
- f) If an Inclusionary Zoning By-law takes effect and becomes applicable to any development on the lands, then the Official Plan Inclusionary Zoning policies and by law, as may be amended, will prevail and the affordable housing requirements in Policy b) and Policy c) will no longer apply, but only provided the applicable Inclusionary Zoning policy and by-law requirements meet or exceed the requirements of Policy b) and Policy c) above.
- g) As part of a complete Zoning By-law Amendment application for the lands, the following will be submitted:
- i. Compatibility/Mitigation Study peer reviewed and implemented, at the applicant's expense, to the City's satisfaction.
  - ii. A Land Use Plan that will:
    - A) inform building heights and densities across the lands; and
    - B) ensure appropriate land uses are located in proximity to lands designated as *Core* and *General Employment Areas*.
  - iii. A Community Services and Facilities Report to identify area services and facility needs and to inform the type(s), location(s) and amount(s) of facility space to be developed on the lands.
  - iv. A Servicing Plan that identifies water, sanitary and stormwater infrastructure for the lands and off-site improvements required to support new development;
- h) Sensitive land uses, including new residential uses will be located, designed and buffered to mitigate impacts from, be compatible with, and not impede the continuation of and the expansion of existing employment uses, and any new employment uses within the surrounding *Core Employment Areas*.

### **Support by Local Councillor**

Despite City Council not agreeing with the conversion, the local Councillor, Amber Morley was a strong supporter of the project, as evidenced by the attached support letter. In addition, a number of other Councillors were supportive including but not limited to: Brad Bradford, Jon Burnside, Mike Colle, Vince Crisanti, Frances Nunziata, and James Pasternak.

## Overall Conclusion

The proposed conversion of employment lands to a *Mixed Use Areas* designation meets the intent and purpose of the policies with respect to employment land conversions as outlined in the Growth Plan and the City of Toronto Official Plan and represents good planning.

The proposal would allow for a mixed use development to occur on the Subject Lands which will provide a substantial amount of housing and jobs as well as community facilities to service the development as well as the surrounding area.

The Subject Lands represent a situation where a conversion is appropriate, given that the existing use of the Subject Lands as low intensity, largely vacant, industrial uses and represents an underutilization of the Subject Lands in comparison to the proposed mid- and high-rise mixed use development. Furthermore, it does not result in the loss of lands providing employment, but rather provides for an increase in employment on the lands through a mixed use redevelopment.

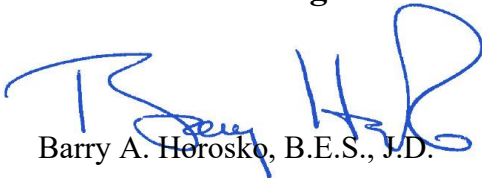
The proposal will revitalize and reinvigorate the Subject Lands, through redevelopment, into a vibrant, transit-oriented development as depicted above.

This proposal is consistent with and conforms to Provincial Policy and contributes to the optimization of existing municipal services, infrastructure and transit services through appropriate intensification.

If you have any questions regarding any of the above information, plans and reports, please contact the undersigned.

Yours truly,

**Horosko Planning Law**



Barry A. Horosko, B.E.S., J.D.

cc: Clients  
Project Team

Encl.

# Amber Morley

## CITY COUNCILLOR, ETOBICOKE-LAKESHORE

100 Queen St W, Suite C48  
Toronto, ON M5H 2N2

Ministry of Municipal Affairs and Housing  
College Park 17th Floor  
777 Bay St, Toronto, ON M7A 2J3

January 31, 2024

**Re: Site No. 103 340-364 Evans Ave & 12-16 Arnold St – Toronto MCR**

Hon. Paul Calandra,

The City of Toronto has been struggling to provide inclusive, complete communities which include an affordable housing component. At the same time, the City has identified as a priority the need to protect appropriate sites for Employment Uses. This is a constant struggle that emerges as we consider sites for conversion.

This subject site is at the northeast corner of Kipling and Evans Avenues. The owners of the property applied to convert the lands from Employment to Mixed Use. There were many merits to this site and I supported conversion at City Council but because of the Employment priority, the request ultimately failed. The proposal included the following elements:

- replacing 180,000 square feet of existing employment space on site
- creating 2,000 units housing in an area well served by public transit
- providing affordable housing (5% affordable rental, or 7% affordable ownership)
- providing a community daycare facility to support working parents
- providing a new local public park

The site is on the edge of an Employment Area, abutting the Queensway Avenue area which is experiencing high growth but little new employment opportunities. The proposed mixed use development at this site is unique in its context and its commitment to enhance employment opportunities. This 11 acre site currently supports approximately 80 jobs, with redevelopment it will support many more than that in flex office and studio style spaces including construction training centers and incubator spaces.

I remain committed to the development of complete communities and affordable development in my ward. I remain steadfast in my support of the proposed development at this site and its merits.

Sincerely,



**Councillor Amber Morley**  
Ward 3, Etobicoke-Lakeshore



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@CllrAmberMorley



PLANNING  
URBAN DESIGN  
& LANDSCAPE  
ARCHITECTURE

January 31, 2024

Barry A. Horosko, B.E.S., J.D.  
Horosko Planning Law  
M028 - 1460 The Queensway  
Etobicoke, Ontario  
M8Z 1S4

Dear Mr. Horosko:

**RE: SUBMISSION ON OPA 653 – ERO #019-7731; MINISTRY #20-OP-238506  
340, 350, 360 & 364 EVANS AVENUE AND 12, 14 & 16 ARNOLD STREET, TORONTO  
OUR FILE: 13111'B'**

Further to your request, the following represents a summary of the proposal by our client, Tonlu Holdings Limited ("Tonlu") and the essence of their request of the Province relative to the City of Toronto's Official Plan Amendment 653 ("OPA 653") respecting the employment conversion of the property municipally addressed 340, 350, 360 and 364 Evans Avenue, and 12, 14 and 16 Arnold Street (hereinafter the "Subject Lands") and shown below on **Figure 1**.



**Figure 1** – Location of the Subject Lands (shown in red)

## History of Request & The Proposal

On August 1, 2021, our clients submitted an employment conversion request for the Subject Lands as part of the City's municipal comprehensive review. The request was supported by planning, traffic, economic, compatibility and urban design rationale reports and plans (submitted in August 2021 and augmented by further submissions to the City in May 2022). These materials are attached to this submission.

The Subject Lands are approximately 4.8 ha (11.9 acres) and are currently occupied by a uniform supply store, a furniture store, an automobile detailing shop, air compressor repair service shop, a car rental company and a building materials store. The existing gross floor area on the Subject Lands is approximately 16,700 sq. m. (180,000 sq. ft).

Adjacent uses include the following:

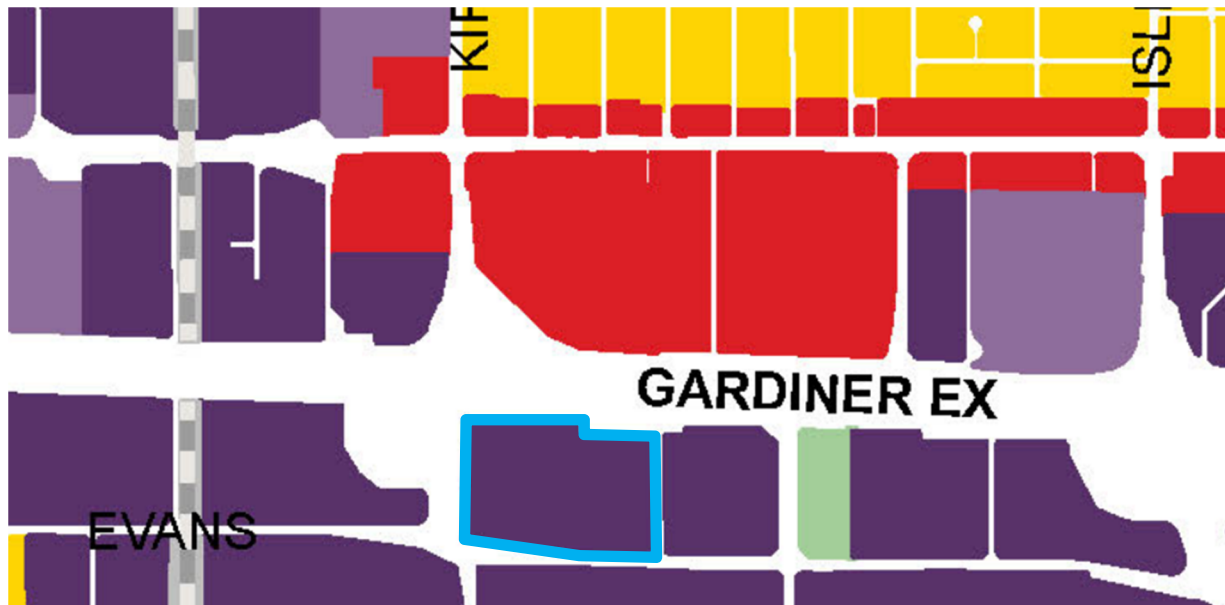
<b>NORTH</b>	The Gardner Expressway and a commercial plaza (a bank, a grocery store, used car dealership and Service Ontario);
<b>EAST</b>	Commercial uses (a boat dealer, a mover, a model train shop), Industrial uses (a truck repair shop and a self-storage facility) and institutional use (a cemetery);
<b>SOUTH</b>	Commercial uses (a bank, a gas station, a print shop, an eyewear shop, a gym, a community dinner theatre) and industrial uses a distribution centre);
<b>WEST</b>	Gardiner Expressway Interchange, commercial use (a coffee shop and a car dealership), industrial uses (a landscaper, TTC Queensway Garage).

The Subject Lands are also located within a Provincially Significant Employment Zone ("PSEZ") which can include **"... mixed-use areas that contain a significant number of jobs..."** based on the definition of PSEZ in the Growth Plan.

The Subject Lands are municipally serviced. TTC bus routes Evans 15 (regular service), Kipling 44 (ten minute service) and Kipling 944 (Express), with the latter two having direct service to the Kipling Subway / GO Station are in proximity to the Subject Lands.

**Figure 2** below depicts the existing land use map from the City of Toronto Official Plan showing the location of the subject site in the context of other Mixed Use Designations in the area. There is a clear pattern of approved *Mixed Use Areas* between Kipling Avenue and Islington Avenue on the north side of the QEW in this area.

Further, there is a cluster at the intersection of Kipling Avenue and The Queensway. The request would continue this pattern of *Mixed Use Areas* to the south side of QEW to mirror those uses on the north side of the QEW. This change in designation reinforces Kipling Avenue for a mix of uses which generates both housing and jobs in this area of South Etobicoke.



**Figure 2** – Excerpt from Official Plan Map 15 (Land Use) with Subject Lands (outlined in blue)

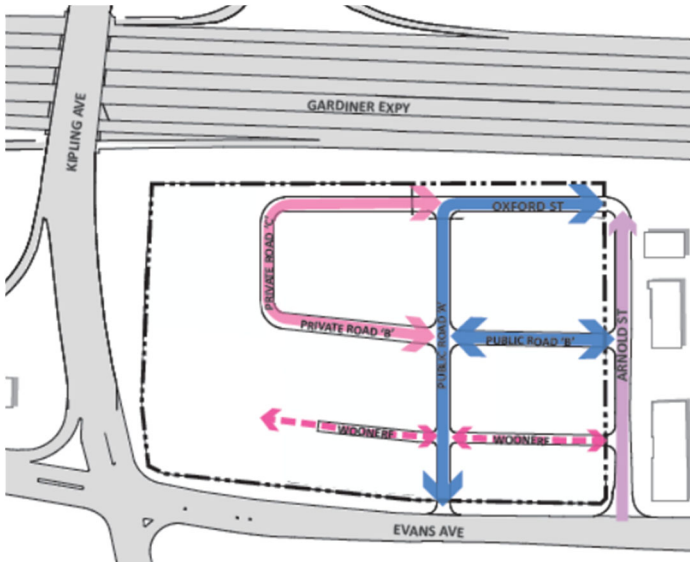
In our opinion, the area north of Evans Avenue is an employment area which needs revitalization. Once the home of significant employment, due to global economic trends over the past twenty years has degraded. The *Core Employment Areas* from The East Mall to Islington Avenue north of Evans Avenue exhibits land use characteristics as a fringe employment area with numerous retail uses throughout the area mixed with modest employment land employment uses. Used car lots have been established in numerous locations and common. Retail operations, with or without zoning compliance are also common place. There is only one substantial employment land employment use on the north side of Evans Avenue being the TTC Queensway Garage. The new developments in the surrounding Employment area are primarily warehousing uses and self-storage, which represent a net loss of jobs on those lands. The area to the south of and immediately adjacent to Evans Avenue includes similar characteristics with significant employment land employment uses located further south, away from the Evans Avenue frontage. The *Core Employment Areas* south of the Evans Avenue frontage are well established and appear to be healthy.

While some existing employment remains on the Subject Lands, it is not functioning as it was originally planned. The area contains 40 to 50 year old industrial space which is not suitable to current end user needs vis-à-vis efficiency, floor to ceiling heights, building quality, etc. The overall density of the area is well below 1.0 FSI and therefore is not optimizing infrastructure or represent an efficient use of land as called for by Provincial Policy.

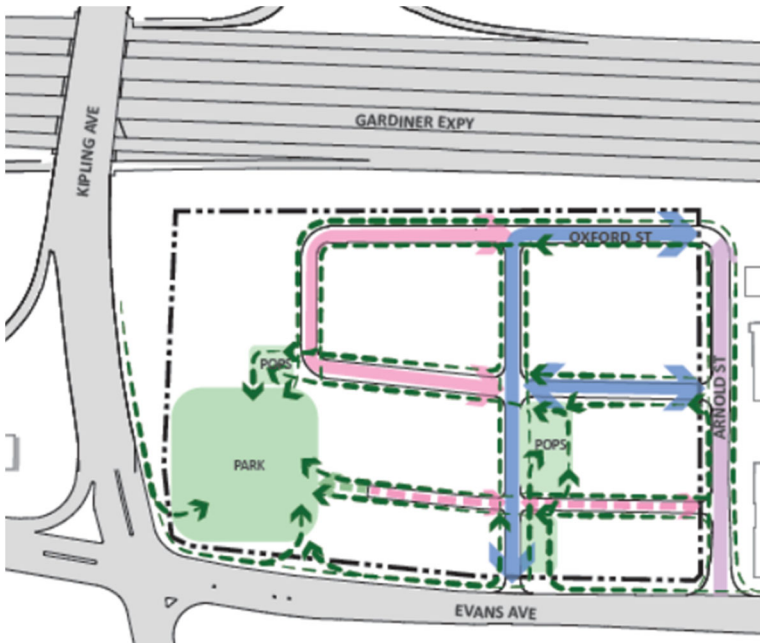
## Proposed Conversion

The proposal would allow for the revitalization of the area by allowing residential, hotel, community office, retail, and service commercial uses. The proposed development will assist in maintaining a diverse economic base and opportunities for employment in the immediate neighbourhood through the provision of new, modern efficient employment space including incubator and start up space. The inclusion of retail, service commercial, community and hotel space will further enhance the area by animating and supporting the new employment space on site, as well as that which exists in the area. The conversion would allow for substantial redevelopment to occur providing for transit supportive densities which will optimize existing and future infrastructure investments by the City and Province within proximity to the Subject Lands (i.e. the existing GO Station at Mimico-Judson, the future GO Station at Parklawn, the future subway extension to Sherway). By maintaining space for employment opportunities while introducing residential intensification in a compact built form in proximity to planned and existing transit infrastructure, the proposal represents a more efficient utilization of existing services and infrastructure.

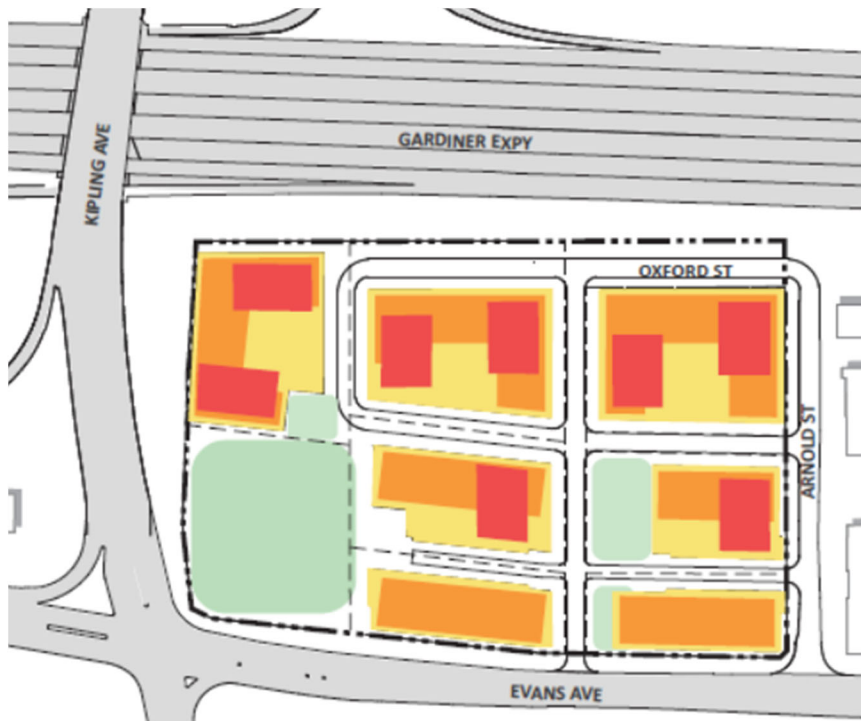
To achieve transit supportive development density, in our opinion, it would be appropriate to convert the lands to *Mixed Use Areas*. This redesignation would allow for appropriate mixed use planning for the area to occur, including establishing transit supportive heights and densities, public realm elements (new roads, parks and pedestrian infrastructure), new residential opportunities in proximity to existing and planned employment centres and to reenergize the employment opportunities in this area through modern, efficient, and sustainable employment floor area (either stand alone or within a mixed use building). The introduction of residential uses onto the Subject Lands will provide for opportunities for housing in proximity to employment areas, including the provision of 5% affordable rental or 7% affordable ownership housing units. These new housing units will support the existing economic base of the South Etobicoke Employment Area accordingly. The proposal is depicted in **Figures 3 to 8** below.



**Figure 3** – Introduction of Public & Private Roads (including woonerfs to subdivide the lands into discrete blocks)



**Figure 4** – Adding place making elements (public park and POPs) and creating pedestrian / cycling connections



**Figure 5** – Thoughtfully placement of low, mid and high rise built form to frame the place making elements and streets



**Figure 6** – Incorporating a variety of uses to animate and activate the at grade condition



**Figure 7** – Demonstration Plan of a Possible Mixed Use Community on the Subject Lands



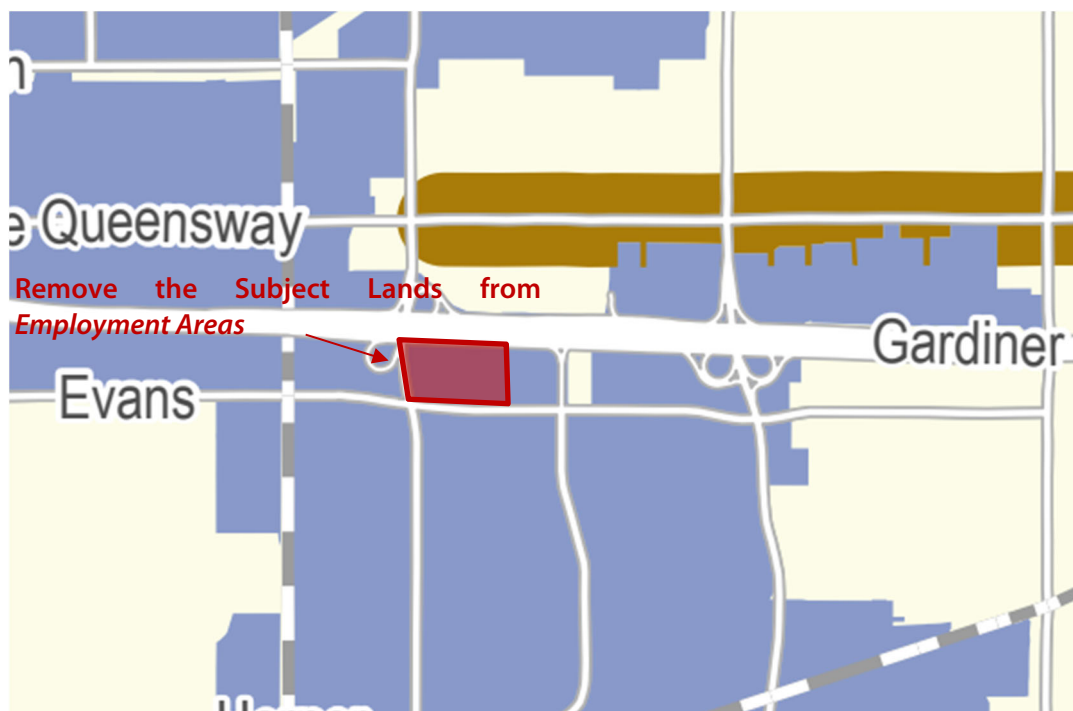
**Figure 8** – Rendering of a Possible Mixed Use Community on the Subject Lands (looking towards the central square)

On September 6, 2023 City of Toronto Council adopted OPA 653. Despite the above substantial city building proposal by our client, Council did not support the conversion request through the OPA 653 adoption nor subsequent discussions by Council held on October 12<sup>th</sup>, 2023.

## Request of the Minister

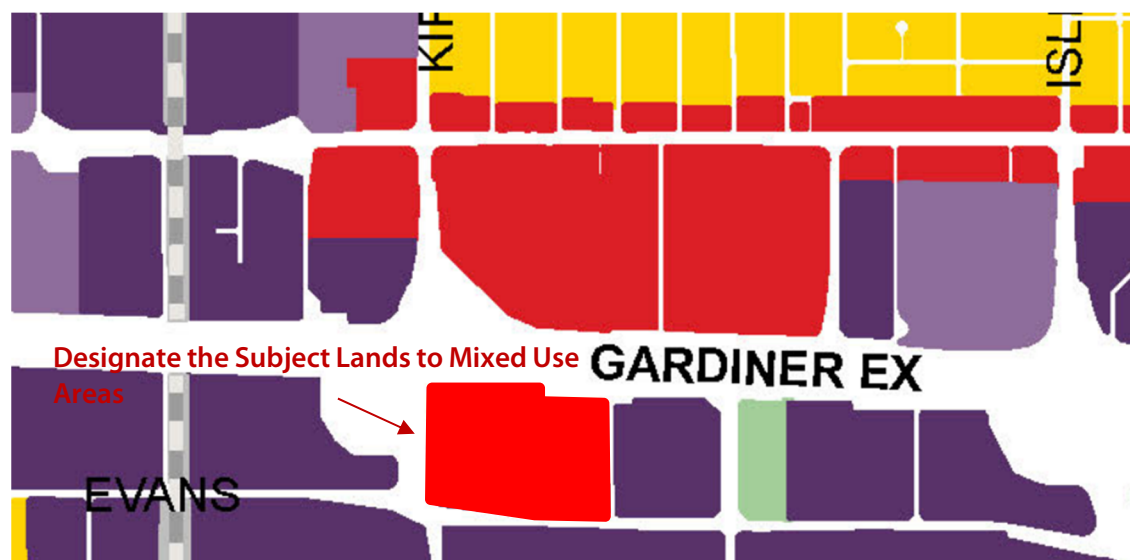
The Minister can utilize his powers under the Planning Act as the approval authority of OPA 653 to modify it in order to grant the conversion request for the Subject Lands. To this effect, the request would involve the following modifications:

1. We request **removal of the Subject Lands from Employment Areas on Map 2** of the Official Plan as shown below.



**Figure 9** – Removal of Subject Lands from *Employment Areas* as shown on excerpt from OPA 653, Appendix 1: Map 2

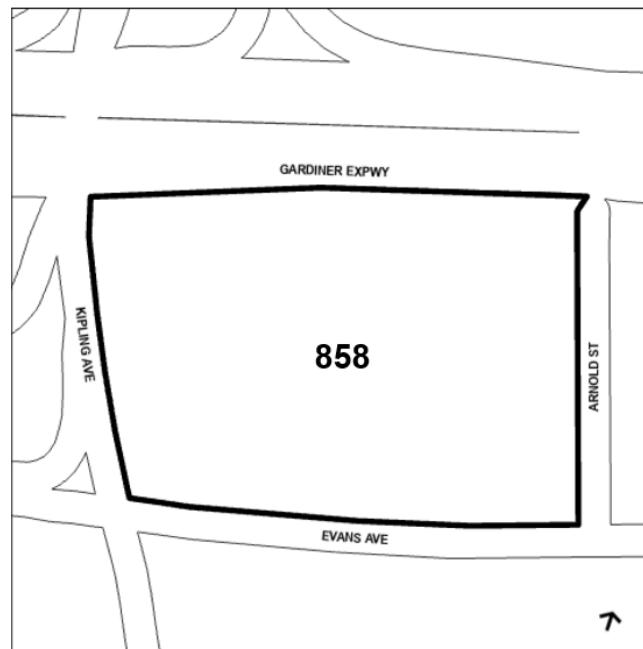
2. We request the Subject Lands be **designated *Mixed Use Areas* on Land Use Designation Map 15** (part of Tile Index Map 35 of Appendix 2 of OPA 653) as shown below.



**Figure 10** – Designate Subject Lands from *Core Employment Areas* to *Mixed Use Areas* as shown on excerpt from Official Plan Land Use Designation Map 15 (Tile Map 34 of OPA 653, Appendix 2)

3. Add a **new Site and Area Specific Policy to OPA 653** as follows:

**858. 340-364 Evans Avenue and 12-16 Arnold Street**



- a) A minimum employment gross floor area of 17,500 square metres or 15 percent of the total gross floor area, whichever is greater will:
  - i. be comprised of uses permitted within *Core Employment Areas* and *General Employment Areas* and must be compatible with residential use as determined through a Compatibility/Mitigation Study; and
  - ii. be developed prior to, or concurrent with, any residential uses;
- b) A mixed-use and mixed-income development is permitted provided that any new development containing residential units on the lands will secure a minimum amount of affordable housing as follows:
  - i. if a condominium development is proposed, a minimum of 7 percent of the total new residential gross floor area shall be secured as affordable ownership housing or a minimum of 5 percent of the total new residential gross floor area shall be secured as affordable rental housing; and
  - ii. the affordable housing shall be secured at affordable rents or affordable ownership prices for a period of at least 99 years from the date of first residential occupancy of the unit; and
  - iii. the unit mix of the affordable housing shall reflect the market component of the development, as appropriate, to achieve a balanced mix of unit types and sizes and support the creation of affordable housing suitable for families; and

- iv. if a purpose-built rental development is proposed, there is no minimum requirement for affordable rental housing.
- c) Where a complete application for a Zoning By-law Amendment has not been filed prior to October 1, 2025, the affordable rental housing required in Policy b) i) will increase by 1.5 percent per year. Affordable ownership housing requirements will be set at 1.4 times the affordable rental housing requirements.
- d) The provision of affordable housing required by Policy b) and Policy c) shall be secured through one or more agreements with the City.
- e) The use of holding provisions may be used to ensure the required affordable housing is secured. Conditions to be met prior to the removal of a holding ("H") provision on the lands shall include the following:
  - i. Entering into a Municipal Housing Project Facility Agreement or such other agreement(s) as may be satisfactory to the City Solicitor to secure the provision of affordable housing; and
  - ii. The submission and acceptance of a Housing Issues Report, to the satisfaction of the Chief Planner and Executive Director, that identifies the unit mix, unit sizes, and how affordable housing requirements will be met.
- f) If an Inclusionary Zoning By-law takes effect and becomes applicable to any development on the lands, then the Official Plan Inclusionary Zoning policies and by law, as may be amended, will prevail and the affordable housing requirements in Policy b) and Policy c) will no longer apply, but only provided the applicable Inclusionary Zoning policy and by-law requirements meet or exceed the requirements of Policy b) and Policy c) above.
- g) As part of a complete Zoning By-law Amendment application for the lands, the following will be submitted:
  - i. Compatibility/Mitigation Study peer reviewed and implemented, at the applicant's expense, to the City's satisfaction.
  - ii. A Land Use Plan that will:
    - A) inform building heights and densities across the lands; and
    - B) ensure appropriate land uses are located in proximity to lands designated as *Core* and *General Employment Areas*.
  - iii. A Community Services and Facilities Report to identify area services and facility needs and to inform the type(s), location(s) and amount(s) of facility space to be developed on the lands.
  - iv. A Servicing Plan that identifies water, sanitary and stormwater infrastructure for the lands and off-site improvements required to support new development;

- h) Sensitive land uses, including new residential uses will be located, designed and buffered to mitigate impacts from, be compatible with, and not impede the continuation of and the expansion of existing employment uses, and any new employment uses within the surrounding *Core Employment Areas*.

Approval by the Minister of this modification, at this time, would provide certainty to the ability of the lands to be redeveloped for mixed use purposes and ensure the timely delivery of new housing units (2,400 units) to help address the housing crisis, including a substantial amount of affordable units (180 units).

## Overall Conclusion

This proposal is consistent with and conforms to Provincial Policy and structured around the optimization of existing municipal services, infrastructure and transit services. The proposal envisioned for the Subject Lands is one that will contribute to the overall existing mix of uses in this area of the City along the Gardiner Expressway which includes employment, residential and mixed use. The proposal would allow the construction of over 2,400 new residential dwelling units (including rental and ownership, with at least 180 affordable units being provided), with the non-residential components creating at least 1,000 jobs (an increase from the present 250 jobs).

The Subject Lands represent a situation where a conversion is appropriate, given that the existing use of the Subject Lands represents an underutilization of the Subject Lands in comparison to the proposed mixed-use development which could occur.

It is also important to identify that the proposed redevelopment will allow for the efficient use of the land and the optimization of infrastructure while maintaining employment through integration of retail, service commercial and office / incubator uses into an urban format. As shown in the updated Demonstration Plan enclosed with this letter, the intensification that is created by the conversion includes a substantial increase in the amount of employment gross floor area thus preserving and enhancing the employment opportunities on the Subject Lands.

The proposed conversion of employment lands to a *Mixed Use Areas* designation meets the intent and purpose of the policies with respect to employment land conversions as outlined in the Growth Plan and the City of Toronto Official Plan and has been demonstrated as follows:

- The proposal will support existing TTC bus routes along Kipling Avenue and Evans Avenue that are in proximity to the Subject Lands.
- The conversion proposes to redevelop underutilized land to better accommodate the City's growing housing needs by providing 2,400 units in a mix of tenures, unit sizes and affordability including 5% affordable rental units, or 7% affordable ownership units (as per City of Toronto definitions of affordability)
- The lands will include a substantial amount of new employment, including incubator space, which will create upwards of 1,000 jobs – significantly more than the current employment generated on-site today.
- The proposed conversion is compatible with adjacent employment uses and will not affect the ability of surrounding facilities to comply with applicable Provincial and City of Toronto regulations.
- The Subject Lands are fully serviced with water, wastewater and stormwater services which ensures the optimization and efficient use of existing municipal infrastructure for the proposed development.

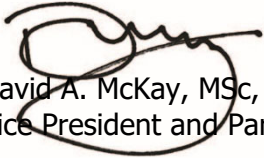
- Community facilities will be provided within the development, including; a 1.1 acre public park, and a community daycare facility

Please feel free to contact us if you have any questions or wish to discuss in further detail.

Thank you.

Yours Truly,

**MHBC**

A handwritten signature in black ink, appearing to read 'David A. McKay', is written over a circular stamp or seal.

David A. McKay, MSc, MLAI, MCIP, RPP  
Vice President and Partner

cc: *Clients*  
*Project Team*

*Encl.*