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January 26, 2023

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

Attention: Hon. Minister Steve Clark, Minister of Municipal Affairs and Housing

Dear Hon. Minister Clark,

**RE: 1020 McNicoll Avenue, City of Toronto
City of Toronto Official Plan Amendment 591**

I represent Tendercare Nursing Homes Limited (“Tendercare”), the owner and operator of a long-term care and retirement home located at 1020 McNicoll Avenue in the City of Toronto (the “Site”).

Tendercare currently provides 254 long-term beds as well as 28 units and 56 beds in retirement homes (McNicoll Manor and Moll Berczy Haus). Unfortunately, the existing building does not meet the current standards for long-term care homes and is required by the Ministry of Long-term Care to meet current design standards by 2025.

To address the facility’s need for updated design and to meet the new standards, Tendercare developed a concept for the redevelopment of the Site. The City of Toronto (the “City”) indicated in January 2020 that the proposed redevelopment of the Site, including the upgrade of the long-term care home, would require a conversion to permit the redevelopment.

On December 16, 2020, a request for the conversion of the Site’s *General Employment* land use designation to *Mixed Use Areas* was submitted to the City. A Staff Report dated June 20, 2022 included a final assessment of the conversion request and recommended that the Site be redesignated from *General Employment Areas* to *Institutional Area* through a new Site and Area Specific Policy (“SASP”). In July 2022, City of Toronto Council adopted Official Plan Amendment 591 (“OPA 591”), which changed the Site’s land use designation and added SASP 791 to Chapter 7, Site and Area Specific Policies of the City’s Official Plan.

The SASP identified permitted uses and various conditions for the redevelopment of the Site, including a minimum required 2,100 square metres for one or more of the following non-residential uses:

- i) Medical support services;



- ii) Professional and medical offices;
- iii) Recreational facilities; and
- iv) Small-scale retail and service commercial.

Official Plan Amendment 591 was sent to the Ministry of Municipal Affairs and Housing (“MMAH”) and is currently awaiting approval as one part of the City’s municipal comprehensive review.

However, since the adoption of OPA 591, plans for the redevelopment of the Site have changed and now anticipate reducing the area to which the conversion would apply. The area proposed to be converted is limited to the southerly portion of the Site and is still proposed to accommodate a new long-term care building, however, the redevelopment concept is proposing that the northerly portion of the Site retain employment area permissions.

A Place to Grow: The Growth Plan for the Greater Golden Horseshoe, 2019 (the “Growth Plan”) applies to the Site and the requested conversion. The Site is located within *Provincially Significant Employment Zone #7* and the requested conversion responds to the policies set out in the Growth Plan concerning Provincially Significant Employment Zones, as the conversion will allow the existing long-term care home to be upgraded with additional beds added, and will result in minimal land use conflicts as the proposed use will be compatible with adjacent uses.

The conversion request would permit the comprehensive redevelopment of the Site that would support provincial and city objectives to provide long-term care beds that meet the current standards and would provide additional long-term care bed capacity. Furthermore, the conversion request would permit redevelopment that conforms with both provincial and city policies in respect of intensification and improving the Site with appropriate access, organization and open space. The conversion request will facilitate a desirable form of redevelopment that will ultimately generate additional employment opportunity as well as create an attractive public realm that is complementary to, and compatible with, the surrounding uses.

Attached is a Planning Justification Report prepared by Bousfields Inc., which further describes the conversion request and provides revised language of SASP 791 which will require revision prior to OPA 591 is approved.

My client would be pleased to meet with you to discuss the revised conversion request prior to a final decision being made.



LOOPSTRA NIXON LLP
BARRISTERS AND SOLICITORS

I trust this is satisfactory, however should you require anything further please don't hesitate to contact me.

Yours truly,
LOOPSTRA NIXON LLP

Per: 

Quinto M. Annibale

QMA/aew



BOUSFIELDS INC.

January 24, 2023

Project No. 19382

Hon. Steve Clark
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th floor
Toronto, Ontario M7A 2J3

Dear Minister Clark:

Re: *Request to Convert Employment Areas*
1020 McNicoll Avenue, Tendercare Nursing Homes Limited

We are the planning consultants to Tendercare Nursing Homes Limited (“Tendercare”), the owner of Tendercare Living Centre, municipally known as 1020 McNicoll Avenue (the “Site or the “Subject Site”). We are writing on behalf of the owner to request a modification to the employment conversion request that was adopted by the City of Toronto for the Subject Site. The following summarizes why the modifications are requested, includes a description of the original request and updates the planning justification regarding the employment conversion. We have also provided suggested modifications to the Site and Area Specific Policy that was adopted by City Council, including a modified schedule. These modifications, as discussed in more detail below, include reducing the area on the Site that the conversion would apply to and modifying policies in the Site and Area Specific Policies given that approximately half of the Site will be retained for employment uses.

The Subject Site is located on the north side of McNicoll Avenue, east of Victoria Park Avenue (see **Figure 1**, Location Aerial). The existing building does not meet the current standards for long-term care and needs to be compliant by 2025. To keep the current facilities operational while construction of the new building occurs, Tendercare needs to construct the new long-term care building on the vacant part of the Site. Through conversations with City staff, Tendercare was informed that this redevelopment would not be compliant with the use permission for the Site and that an employment land conversion through the City’s municipal comprehensive review would be necessary.



Figure 1 – Subject Site, Location Aerial

In December 2020, we wrote to City Planning Staff on behalf of our client to formally request that the Subject Site be redesignated from *General Employment Areas* to *Mixed Use Areas* in the City of Toronto Official Plan (the “Conversion Request” or the “Request”) to permit a long-term care home and other continuum of care uses on the Site. Despite the existing long-term care and retirement home on the Site, these uses are not permitted, meaning that the necessary redevelopment of the long-term care would not be possible with the in-force designation. The request applied to the entire property. This Request was supported by City Staff, who recommended the adoption of Official Plan Amendment 591 (“OPA 591”) in a Staff Report dated June 20, 2022. In July 2022, Council adopted OPA 591, which included the change to the Site’s land use designation to from *General Employment Areas Institutional Areas* and added Site and Area Specific Policy 791 (“SASP”) to Chapter 7, Site and Area Specific Policies, of the Official Plan. This SASP identified permitted uses, including long-term care and other continuum of care uses as well as various conditions for the redevelopment of the Subject Site. OPA 591 was subsequently sent to the Province for review and is currently awaiting approval as part of the City’s Municipal Comprehensive Review.

Since Council’s adoption of OPA 591, Tendercare has reconsidered the request to convert the entire property and instead has determined that only a portion of the Site would need to be converted to *Institutional Areas*. This revised approach is reflected in a new Conceptual Development Plan (“2022 Plan”) that has been developed for the

Site. Relative to the 2020 Plan, the 2022 Plan includes a smaller area at the south end of the Site to be converted from employment areas to non-employment areas (“Conversion Area”). The revised Conversion Area will accommodate only a new long-term care building and not the other uses included in the original request. As a result, approximately 14,690.1 square metres of the Site are now planned to retain the existing *General Employment* land use designation. This means that the additional non-residential uses that were proposed in the adopted SASP (Policies 791 a-c) would not need to be accommodated in the long-term care building because they can be accommodated on the lands retained for employment.

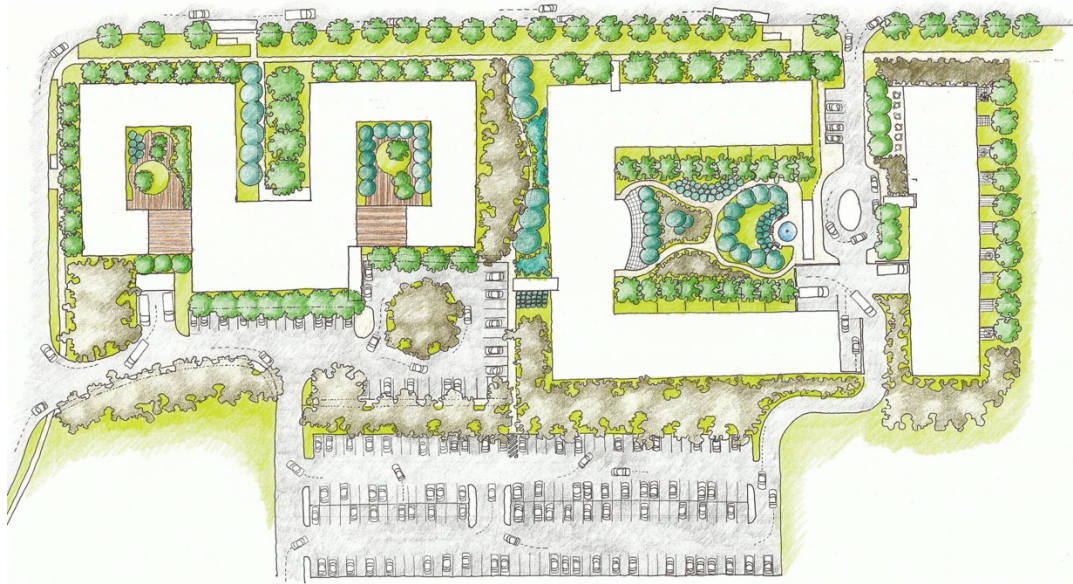


Figure 2: Conceptual Redevelopment Plan (2020 Plan)

To facilitate the realization of the 2022 Plan, SASP 791 will need to be revised. Required revisions include a new schedule showing the smaller area to be converted from *General Employment Areas* to *Institutional Areas* as well as the lands now requested to remain as *General Employment Areas* (see **Figure 3**). Changes are also required to the language of the SASP. A redline revision of the requested changes to the SASP is provided as an attachment to this letter (See **Attachment 1**). A draft amended schedule is provided as **Figure 4**.

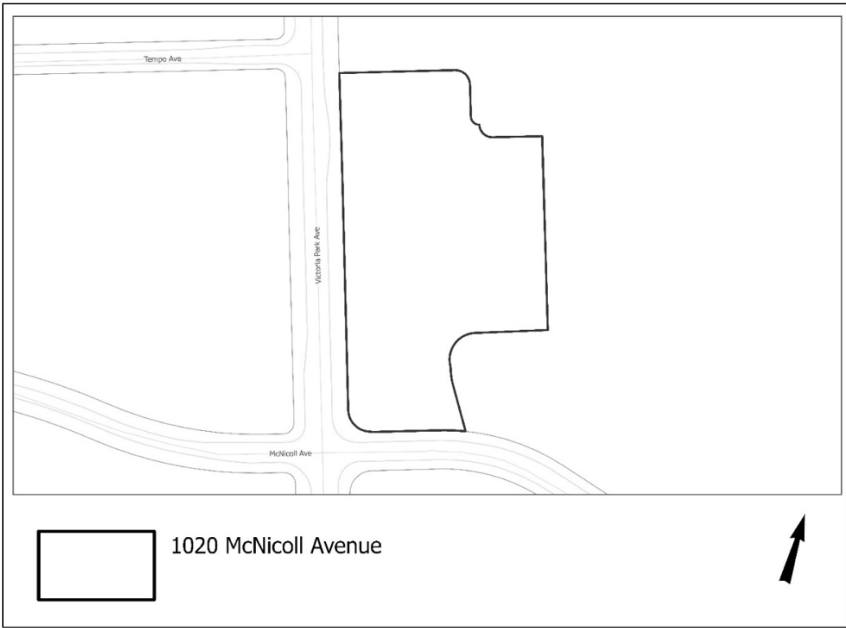


Figure 3 – City Adopted SASP Schedule

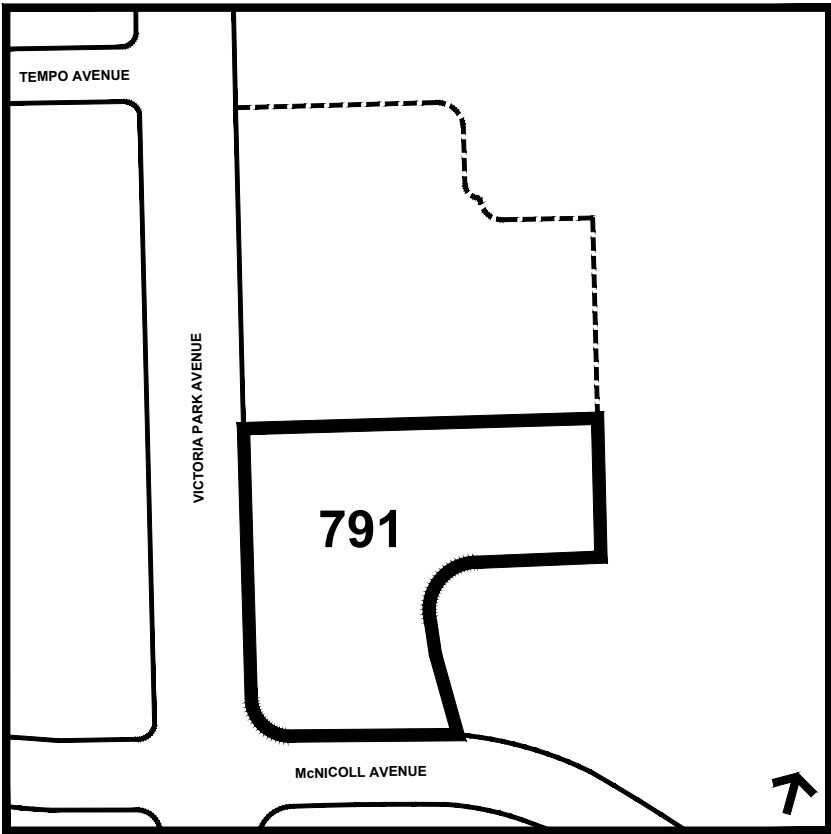


Figure 4 – Draft Revised SASP 791 Schedule

In support of this revised request, this letter provides our planning analysis and opinion. In addition to a summary of the process to date, this letter includes a description of the Subject Site and surrounding area, an overview of the original 2020 Plan and Conversion Request, the Council-approved Site and Area Specific Policy and the revised approach for redevelopment of the Site, which no longer requires the entire Site to be included in the conversion. This letter also summarizes the previous policy analysis conducted in support of the Conversion Request and concludes that this analysis continues to apply and is still valid. For a more detailed discussion of these policies, please refer to the 2020 rationale letter, dated December 16, 2020, which is included as an attachment to this letter. The reduction of the Conversion Area, as reflected in the 2022 Plan, does not change our opinion that the conversion satisfies the applicable policy criteria and is appropriate.

Description of Subject Site

The Subject Site is occupied by an existing 5-storey long-term care and retirement home that has operated on the Site since 1976. Currently, Tendercare provides 254 long-term care beds as well as 28 units and 56 beds in retirement homes (McNicol Manor and Moll Berczy Haus).

Table 1: Summary Site Statistics, Official Plan Designations & Zoning

Subject Site Area	30,000 square metres (3 hectares)
Site Frontage	Approximately 80 metres McNicol and approximately 250 metres Victoria Park
Existing Gross Floor Area	17,187 square metres gross floor area
Existing Uses	Long-term care and retirement home
Growth Plan	<i>Provincially Significant Employment Zone</i>
Official Plan (prior to conversion)	Employment Areas (Map 2 – Urban Structure); <i>General Employment Areas</i> (Map 17 – Land Use Plan); SASP 394
Right-of-Way Width	26 metres McNicol and 36 metres Victoria Park
Zoning (ZBL 569-2013)	n/a
Zoning (ZBL 1916)	Highway Commercial HC-355-581-913-991-1059

As summarized in **Table 1**, the Subject Site currently has an Official Plan land use designation of *General Employment Areas*. Because OPA 591 has not yet been approved by the Province, the conversion of the Site’s land use designation to *Institutional Areas* is not yet in full force and effect.

The Scarborough Employment Districts Zoning By-law Number 24982 applies to the Site. The Site is zoned Highway Commercial HC-355-581-913-991-1059, with

Exception 93. Exception 93 permits a restricted list of uses, which includes hospitals and accessory uses and hotel. We understand that the existing uses were originally permitted primarily as a “hospital” use with “hotel” uses on the 5th floor. The Subject Site is excluded from the City-wide By-law 569-2013.

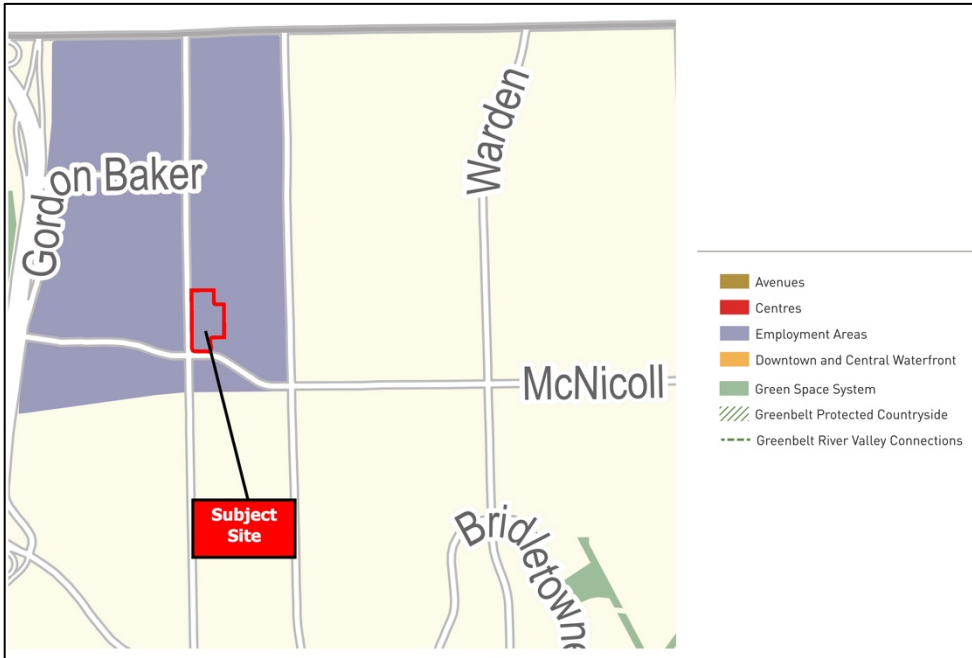


Figure 5 – City of Toronto Official Plan – Urban Structure (Map 2)



Figure 6 – City of Toronto Official Plan – Land Use Plan (Map 17)

Description of Surrounding Context

The Subject Site is located within the Steeles Neighbourhood in the City of Toronto. The neighbourhood area is bounded by Victoria Park Avenue to the west, Steeles Avenue East to the north, Kennedy Road to the east and a hydro corridor to the south. The neighbourhood area is divided into four north-south rectangular sections by Pharmacy Avenue, Warden Avenue and Birchmount Road.

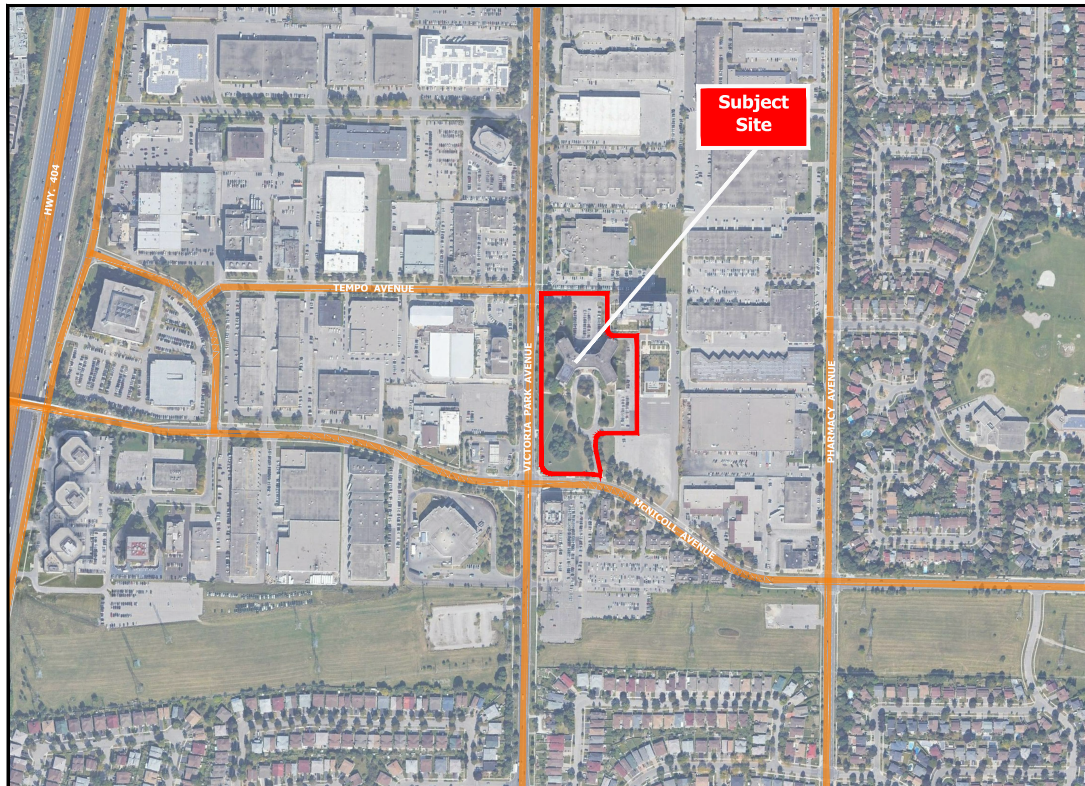


Figure 7 – Surrounding Context

The western section of the neighbourhood, which contains the Subject Site, transitions sharply on the west side of Pharmacy Avenue from residential uses to a low-rise business park. The area that surrounds the Subject Site is characterized by buildings with large footprints. The majority of these buildings support wholesaling of goods ranging from solar panels, furniture, and dental supplies, among others. There are also light manufacturing uses, restaurants and higher density office buildings located throughout the area. This business park extends west towards Highway 404 and continues north beyond Steeles Avenue East into a larger employment district in Markham.

The most eastern section of the Steeles Neighbourhood consists primarily of single-detached dwellings with community amenities such as schools and parks. Bamburgh Circle surrounds higher density apartment buildings of approximately 19 storeys as

well as a low-rise shopping plaza that services the community. The remainder of the built form consists of low-rise dwellings ranging from single-detached homes, row-houses and interspersed co-operative housing complexes.

To the immediate east of the Subject Site is a multi-phased development at 1030 McNicoll Avenue which includes an existing 12-storey seniors centre, an under construction 14-storey residential building and a future 1-storey community centre (1028 – 1038 McNicoll Avenue). A site plan application is currently under review for a 1-storey community centre on the eastern portion of the site.

Further east are three large industrial warehouse buildings that support light manufacturing and wholesaling uses including furniture, dental supplies and vehicle brakes (3420, 3400 and 3370 Pharmacy Avenue). East of these industrial uses the character transitions to low-rise residential dwellings that are oriented towards the interior of the neighbourhood (12 – 18 Chadbury Place). Residential uses continue to the east as described above.

To the north of the Subject Site is a 2-storey low-rise office building with associated surface parking occupied by Great Gulf Homes (3751 Victoria Park Avenue). Further north is an industrial warehouse building that supports a private education centre (William Academy Scarborough) and a solar panel distribution centre (Polaron Solartech Corp) (3761 Victoria Park Avenue). Three additional warehouse buildings are situated further north containing a range of uses that include a health and safety equipment wholesaler, a flooring wholesaler, an electronics store and an archery range (3771, 3781 and 3791 Victoria Park Avenue).

Further to the north of the Subject Site, at the northwest corner of Victoria Park Avenue and Tempo Avenue, is a low-rise commercial, retail and service plaza as well as a 3-storey office building occupied by HSBC (3600 – 3642 Victoria Park Avenue). North of HSBC is a 9-storey office building occupied by TD Insurance that supports a 1-storey above grade parking structure and a private surface parking lot to the west (3650 Victoria Park Avenue). The pattern of low-rise industrial buildings with various distribution, wholesaling and interspersed retail and service uses continues north of Sparks Avenue.

To the west of the Subject Site, at the southwest corner of Victoria Park Avenue and Tempo Avenue, is a 5-storey office building that contains underground parking (3550 Victoria Park Avenue). To the west of the office building is a recreation complex known as Canlan Ice Sports that supports two ice skating rinks integrated onto a 2-storey commercial-retail plaza that extends west along Tempo Avenue (3650 Tempo Avenue). Further to the west are additional low-rise industrial buildings and higher density office buildings adjacent to Highway 404.

South of the recreation complex is a Presbyterian Church that contains large areas of surface parking which are accessed from Victoria Park Avenue and McNicoll Avenue (650 McNicoll Avenue). At the northwest corner of Victoria Park Avenue and McNicoll Avenue is an Esso Gas station (3400 McNicoll Avenue). Adjacent to the gas station on Victoria Park Avenue is a bus stop that is serviced by TTC Route 24 that operates on the 10-minute network, offering service 7 days a week at 10 minute intervals or better. To the southwest of the Subject Site is the Victoria Park Transfer Station which facilitates recycling operations (3350 Victoria Park Avenue).

To the immediate south of the Subject Site is a bus stop on the north side of McNicoll Avenue that is serviced by TTC Bus Route 42 (Cummer). On the southeast corner of McNicoll Avenue and Victoria Park Avenue is a 5-storey mixed-use building that contains office uses as well as a commercial-retail plaza at grade (3585-3605 Victoria Park Avenue). The mixed-use building is accessed from both street frontages and provides surface parking at the east of the building. East of the mixed-use plaza is the Victoria Business Village that support multiple 2-storey residential buildings that have been converted to support a variety of uses and services (1015-1065 McNicoll Avenue). Uses range from community support services, a place of worship, private educational facilities, retail and personal services. Further south of the Victoria Business Village is a hydro corridor.

To the southeast of the Subject Site is 1-storey commercial-retail plaza that supports a range of businesses such as a furniture outlet, a party supply shop, a flooring wholesaler and a paper wholesaler (1050 McNicoll Avenue). Further to the southeast, fronting onto McNicoll Avenue, is a 1-storey Banquet Hall and restaurant that contains surface parking along the north portions of the property (3330 Pharmacy Avenue). To the north of the Banquet Hall is a 1-storey mattress and furniture outlet with associated surface parking fronting onto Pharmacy Avenue (3350 Pharmacy Avenue).

Proposed Redevelopment of the Subject Site

As discussed, the existing building on the Subject Site does not meet the current standards for long-term care (“LTC”) homes and is required by the Ministry of Long-term Care to meet current design standards by 2025. Further, both the Province of Ontario and the City of Toronto recognize the need for additional LTC beds to reduce existing waitlist times and to alleviate additional demand that is expected to increase over the coming years.

2020 Conceptual Redevelopment Plan

To address the facility’s deficiency and meet the new standards, Tendercare developed a concept for the redevelopment of the Site. This redevelopment plan (“2020 Plan,” see **Figure 2**) involved the construction of a facility that would replace the existing LTC building. This new facility would accommodate double the number of

LTC beds on the Subject Site. The 2020 Plan also proposed to use excess lands on the Site for additional development providing a continuum of care for retirement living, independent living and assisted living.

Original Conversion Request and City Site and Area Specific Policy

At a meeting on January 23, 2020, City Staff indicated that the proposed development, including the upgrade of the LTC, would require a conversion to permit the redevelopment. On December 16, 2020, a request for the conversion of the Site's *General Employment Areas* land use designation to *Mixed Use Areas* was submitted to the City. Supplementary information in support of the Conversion was submitted on July 5, 2021.

As part of the December 2020 conversion request, Bousfields prepared a rationale letter which described the plans for the redevelopment of the Site and reviewed the relevant development and policy context (the "rationale letter"). This rationale letter concluded that the intensification of the Subject Site satisfies the policy criteria to redesignate the Subject Site from *General Employment Areas* to *Mixed Use Areas* as set out in the 2020 Provincial Policy Statement, the 2019 Growth Plan, and the City of Toronto Official Plan.

A Staff Report dated June 20, 2022 included a final assessment of the Conversion request and recommended that the Site be redesignated from *General Employment Areas* to *Institutional Areas* through a new Site and Area Specific Policy. In July 2022, Council adopted Official Plan Amendment 591, which changed the Site's land use designation and added SASP 791 to Chapter 7, Site and Area Specific Policies, of the Official Plan. This SASP identified permitted uses and various conditions for the redevelopment of the Subject Site. These uses and conditions were determined based on the 2020 Plan. The conditions in SASP 791 included a minimum required 2,100 square metres for one of more of these non-residential uses:

- i) medical support services;
- ii) professional and medical offices;
- iii) recreational facilities; and
- iv) small-scale retail and service commercial.

This non-residential GFA was to be constructed prior to or concurrent with any residential GFA in a retirement home. In this regard, it is our understanding that the intent of including the requirement for the non-residential uses was to retain employment on the Site. Other conditions were required to address compatibility and mitigation related to surrounding employment uses.

Official Plan Amendment 591 was sent to the Province for review and is currently awaiting approval as one part of the City's municipal comprehensive review.

2022 Conceptual Development Plan

The plans for the redevelopment of the Site have changed and now anticipate reducing the area to which the Conversion would apply (the “2022 Plan”). In the 2022 Plan, the area to be converted from employment uses is limited to the southerly portion of the lands. As in the 2020 Plan, the southerly portion is still proposed to accommodate a new long-term care building. However, unlike the 2020 Plan, the 2022 Plan includes the retention of employment area permissions on the northly portion which is no longer proposed to be used for a continuum of care supporting retirement living, independent living and assisted living.

The following sections of this letter summarize the policy analysis provided in the 2020 rationale letter and conclude that the revised conversion illustrated in the 2022 Plan continues to be consistent with the planning and urban design framework established in the Provincial Policy Statement, conforms with the Growth Plan for the Greater Golden Horseshoe and the City of Toronto Official Plan and represents good planning.

Growth Plan Policy Considerations

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

Growth Plan policies applicable to the requested conversion, include the 29 *Provincially Significant Employment Zones* which are identified in the Growth Plan. The Subject Site is located within a *Provincially Significant Employment Zone* (“PSEZ”) (PSEZ #7 (404 407 Markham, Richmond Hill and Toronto)). The Growth Plan also provides policies that regulate the conversion of employment areas to non-employment uses.

The 2020 rationale letter concluded that the requested conversion responds well to the policies set out in the Growth Plan as it will allow the existing long-term care home to be upgraded and new beds added, it will result in minimal land use conflicts and the proposed uses would be compatible with adjacent uses, including the life-lease properties to the east.

The findings and analysis set out in our December 2020 rationale letter continue to be relevant and accurate. The proposed reduction of the area to be converted does not change our conclusion, which is that the proposed conversion is desirable and conforms with the policies of the Growth Plan.

Provincial Policy Statement (PPS), 2020 Considerations

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

As reviewed in the 2020 rationale letter, various policies from the 2020 PPS are relevant to the requested conversion, including Policy 1.3.2.4, which states that the conversion employment areas to non-employment uses may be permitted through a comprehensive review. Further, as required in Policy 1.3.2.5, the conversion of *Provincially Significant Employment Zone* (such as the Subject Site) should be considered through the *municipal comprehensive review*. The 2020 conversion request was sought as part of the City of Toronto Municipal Comprehensive Review.

Official Plan Amendment 231

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

Through the OPA 231 process, the Subject Site was redesignated from *Employment Areas* to *General Employment Areas* on Land Use Map 17 of the Official Plan (see **Figure 6**, Land Use Plan). In accordance with Policy 4.6.3 of OPA 231, *General Employment Areas* are places for business and economic activities generally located on the peripheries of *Employment Areas* where, in addition to all the uses permitted in *Core Employment Areas* (i.e. manufacturing, warehousing, wholesaling and offices, among others), retail and service uses, and restaurants may also be permitted.

While the permissions of *General Employment Areas* are generally more flexible than those of the *Core Employment Areas*, residential uses, long-term care and retirement homes and hospitals are not permitted. As a result, the conversion of the lands to be used for the new LTC facility is required.

Growth Plan Conformity and Municipal Comprehensive Review - Work Plan

On June 29, 2020, City of Toronto Council adopted staff recommendations outlined in the *Growth Plan Conformity and Municipal Comprehensive Review – Work Plan Report*, dated May 19, 2020. The staff report outlines City Planning’s recommended approach to aligning the Official Plan with the 2019 Growth Plan.

The report outlines recommendations concerning an employment lands strategy which will be undertaken to satisfy the 2019 Growth Plan requirements to complete the conformity exercise and municipal comprehensive review. In Attachment 3, the report lists the relevant conversion and removal policies to be applied to *Employment Areas*, in addition to those set out in the 2019 Growth Plan.

The December 2020 rationale letter provided an analysis of the conversion request against Policies 2.2.4.14 through 2.2.4.18 of the Official Plan, as outlined in Attachment 3 of the May 19, 2020 staff report. This analysis concluded that a conversion to permit the comprehensive redevelopment of the Subject Site would support provincial and city objectives to provide LTC beds that meet the current standards and to provide additional LTC bed capacity. The redevelopment of the Subject Site was also found to conform to provincial and city policies with respect to intensification and improving the Subject Site with respect to access, organization and open space. Further, the proposed uses are consistent with the adjacent uses at 1030 McNicoll, a property developed with Life Lease units.

The 2022 revised concept plan contemplates retaining employment uses on the northern portion of the Subject Site. The retained employment uses will maintain the existing land use condition on the Site and will not generate new compatibility issues. Any future employment uses on the Subject Site that may have environmental compliance obligations would be required to consider the existing/redeveloped LTC facility and adjacent life lease properties with respect to environmental compliance. Further, any future development application for the Subject Site would need to include compatibility studies to identify any impacts and mitigation measures required to be compatible with employment uses in the area. As part of the 2020 Conversion Request, Tendercare submitted an Air Quality and Land Use Compatibility Assessment, conducted by Gradient Wind and dated June 24, 2021. This Assessment concluded that no “land compatibility issues or conflicts with the existing or future employment lands” were anticipated. This assessment still applies to the 2022 Plan and its conclusions that support of the requested conversion are still valid.

The amended conversion continues to support provincial and city objectives and facilitate a desirable form of redevelopment that will generate additional employment, create an attractive public realm that is complementary to, and compatible with, the *Neighbourhood* designated areas to the east and south as well as the surrounding employment uses.

Conclusion

In our opinion, the Subject Site represents an excellent opportunity to provide needed long-term care beds that meet the current standards. The removal of continuum of care uses from the Conceptual Redevelopment plan does not change our conclusion that the requested conversion is desirable and satisfies the policy criteria to redesignate the Subject Site from employment uses to non-employment uses. Our analysis continues to demonstrate that the amended conversion is consistent with the 2020 PPS and conforms to the 2019 Growth Plan and the City of Toronto Official Plan and represents good planning.

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

Yours truly,
Bousfields Inc.



Emma West, RPP, MCIP
Partner



Lisa Ward Mather RPP, MCIP
Associate

Appendix A – Redline revised SASP 791

'791. 1020 McNicoll Avenue

- a) Primary permitted uses are limited to seniors accommodation facilities, including:
 - i) Nursing home and/or long term care facility as defined in *the Long-Term Care Homes Act, 2007*, as amended, replaced or superseded; ~~and~~
 - ii) ~~Retirement home as defined in the *Retirement Homes Act, 2010*, as amended, replaced or superseded.~~
- b) ~~The A minimum of 2,100 square metres of the total~~ gross floor area on the lands ~~will~~ may include one or more of the following non-residential ancillary uses;
 - i) medical support services;
 - ii) professional and medical offices;
 - iii) recreational facilities; and
 - iv) small-scale retail and service commercial.
- ~~e) The minimum non-residential gross floor area required will be constructed on the lands prior to or concurrent with any residential gross floor area included in a retirement home.~~
- d) Sensitive land uses, including the primary permitted uses will be located, designed and buffered to mitigate impacts from, be compatible with, and not impede the continuation of and the expansion of nearby employment uses, and any new employment uses within the surrounding *General Employment Areas*.
- e) As part of a complete Zoning By-law Amendment for the lands to introduce sensitive land uses, including residential uses, a Compatibility/Mitigation Study shall be submitted, peer reviewed and implemented, at the owner's expense, to the City's satisfaction.'