

January 18, 2023

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 591 – ERO #019-5868; MINISTRY #20-OP-222176
SOUTHEAST CORNER OF HIGHWAY 401 AND WESTON ROAD, TORONTO
OUR FILE: 07132DZ-3**

On behalf of 401 Weston Centre Limited & Calloway REIT (Weston-401) Inc. ("SmartCentres"), please accept this submission regarding the review by the Province of the City of Toronto's Official Plan Amendment 591 ("OPA 591") respecting the employment conversion of the Crossroads Shopping Centre property located at the southeast corner of Highway 401 and Weston Road (hereinafter the "Subject Lands") and shown below on **Figure 1. We are requesting designation of the lands as Mixed Use Area.**



Figure 1 – Location of the Subject Lands

History of Request & The Proposal

On August 3, 2021, a request was made to the City of Toronto to redesignate the Subject Lands from General Employment Area to permit a mixed use development to occur. This request was supported by a Planning Justification, Traffic Impact Assessment and a Compatibility Study which can be found at the following link:

<https://www.dropbox.com/sh/0mqpap8w4hr84x4/AABgNer6ywnlLKnlqhwM7OOAa?dl=0>

The proposal for conversion would allow for the phased establishment of a mixed use redevelopment that would be complementary to and compatible with the existing and planned development surrounding the Crossroads Shopping Centre (which includes an approved conversion to the southeast, low rise residential to the east, and mixed use to the west of Weston Road). The redevelopment would replace the now failing Crossroads Shopping Centre, which has experienced significant decline in the last decade, with higher than 45% vacancy rates occurring despite the best efforts by SmartCentres to revitalize and rejuvenate the mall. This continued high vacancy rate is a chronic condition and has led to the decline of the centre.

The redevelopment of the Subject Lands would permit a mixed use redevelopment, as exemplified in the Demonstration Plan (shown below in **Figures 2, 3 and 4**), that would consist of a mixture of low, mid and high-rise buildings containing office, retail, service commercial large format retail (in an urban format), and residential uses. A mixture of open spaces, roads and amenities would be accommodated within a master planned community. Lastly, a mix of tenures (rental and ownership), residential unit sizes and attainable and affordable units (in accordance with City policies at the time of future development applications) would be accommodated. We estimate approximately 3,600 residential units being built and over 1,500 jobs being created through this redevelopment proposal.



Figure 2 – Demonstration Plan for a Possible Mixed Use Community



Figure 3 – Conceptual Rendering of the Demonstration Plan for a Possible Mixed Use Community



Figure 4 – Conceptual Rendering of the Demonstration Plan for a Possible Mixed Use Community

On July 22, 2022 City of Toronto Council adopted OPA 591. While OPA 591 modified the parent Official Plan and did deal with some conversion requests, it did not deal specifically with the request to convert Crossroads Shopping Centre.

Our client sees this as a significant failure by the City to recognize the redevelopment potential of the mall which would provide significant amounts of housing as well as employment opportunities in a rejuvenated and revitalized urban format. The decision by the City not to consider this employment conversion request has resulted in substantial delays in the reimagining of Crossroads Shopping Centre

and the delivery of much needed housing. It also continues the chronic failure of the mall, which could lead to urban blight.

Request of the Province

While our clients are appreciative of the efforts to date by City staff and the local Councillor on the conversion request, the delays resulting from this ongoing process are unnecessary. On behalf of our client, we are requesting that the Province utilize its powers as the approval authority to modify OPA 591 to grant the conversion request for Crossroads Shopping Centre. To this effect we request the following modifications:

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



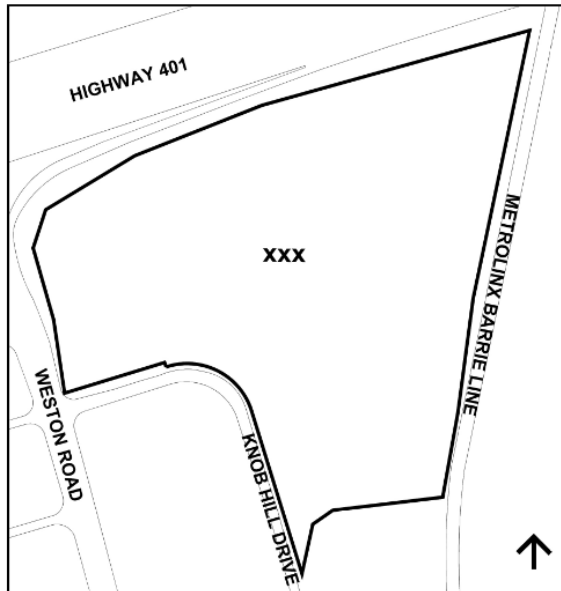
Figure 5 – Removal of Subject Lands From Employment Area as shown on excerpt from OPA 591, Appendix 1: Map 2

2. We request the Subject Lands be **designated Mixed Use Area on Land Use Designation Map 13** (part of Tile Index Maps 9 and 10 of Appendix 2 of OPA 591) as shown below.



Figure 6 – Designate Subject Lands from General Employment Area to Mixed Use Area as shown on excerpt from Official Plan Land Use Designation Map 13 (Tile Map 9 and 10 of OPA 591, Appendix 2)

3. Add a **new Site and Area Specific Policy to OPA 591** as follows:



XXX. South of Highway 401, east of Weston Road, West of the Metrolinx Barrie Line, and north of Oak Street (excluding 8 Oak Street)

1. All uses permitted under the Mixed Use Area designation, including existing and interim uses, with the exception of residential uses and live-work uses, are permitted on the lands prior to the completion of studies in support of a Zoning By-law Amendment to allow residential and live-work uses in accordance with the Policy 4 below.
2. A minimum of 20,000 square metres of non-residential gross floor area will be provided at full build out of all the lands inclusive of retail and service commercial uses (including major retail, within a mixed use, multi-storey building format), office, hotel, community and institutional uses.
3. Non-residential uses will be constructed in each phase, prior to, or concurrent with residential development to provide an appropriate mix of employment and residential growth in all phases of development provided that:
 - a. a significant number of jobs are established on these specific sites;
 - b. it is demonstrated that existing or planned infrastructure and public service facilities will accommodate the proposed uses.
4. As part of a Zoning By-law Amendment to permit residential and live-work uses, the following studies shall be required:
 - a. A Land Use Plan that informs the maximum building heights and densities across the site to be included within the Zoning By-law Amendment;

- b. A Phasing Strategy and Implementation Plan to ensure the orderly development of a mix of uses on the site and which may include the use of holding provisions to provide for the orderly sequencing of development in phases, including the provision of infrastructure and services;
- c. A Physical Structure Plan that integrates the site with the surrounding community, which applies the City's "Complete Streets" principles and establishes a network of public streets, development blocks, pedestrian and cycling facilities and connections, and parks and open spaces that contributes to a safe, comfortable and connected public realm;
- d. A Public Streets Plan that accommodates new development and ensures connectivity to the adjacent road network;
- e. A Parks and Open Space Plan that identifies locations of new public parks and other open spaces and that includes a full unencumbered parkland dedication on the lands;
- f. Urban Design Guidelines that set out the framework for the appropriate built form;
- g. A Compatibility/Mitigation Strategy that takes into consideration impacts from surrounding land uses and facilities and identifies mitigation measures for each phase;
- h. A Housing Plan that identifies for each phase of residential development both the percentage of units that will be two and three bedrooms in size as well as a mix of affordable housing;
- i. A Community Services and Facilities Strategy that identifies community space and facilities needs, including the provision of new schools, daycares, libraries, community recreation centres, and other services, and sets out priorities to support growth and which may include potential locations and recommended phasing as well as opportunities for co-location. The specific community space and facilities identified through the needs study will be secured through appropriate agreement(s) between the City and owner that will be registered on title;
- j. An Infrastructure Master Plan that identifies water, sanitary, stormwater and hydro infrastructure requirements and development strategy;
- k. A Green Infrastructure Strategy that includes consideration of stormwater management systems and trees; and
- l. An Energy Strategy to address energy conservation including peak demand reduction, resilience to power disruptions and small local integrated energy

solutions that incorporate renewable, district energy, combined heat and power or energy storage to address the City's targets of carbon reduction.

Overall Conclusion

The proposed conversion would allow the Subject Lands to be revitalized and renewed from its current failing state through the establishment of a planning and design framework to allow mixed use development to occur. 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 would allow the construction of 3,600 new residential dwelling units (including rental and ownership, with attainable and affordable units being provided), with the non-residential components housing at least 1,500 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 mid- and high-rise mixed use development which could occur as shown in the Demonstration Plan and also considering the marginal impact of the removal of the 10.1 hectares Subject Lands would have on the City's supply of employment lands given they are not used for employment land employment uses, but rather for an existing retail / commercial plaza. The proposed conversion and the redevelopment it will permit will allow for the efficient use of the land and the optimization of infrastructure while maintaining the existing retail-commercial planned function through integration of these uses into an urban format.

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:

1. The proposed conversion will revitalize and reinvigorate the current failing shopping centre, through a redevelopment into a vibrant, transit oriented development of up to 3.0 FSI as depicted in the Demonstration Plan.
2. The proposed conversion would allow a planning and design framework to be established which would introduce public realm elements, including a public park, community space and public roads as well as private design elements which create an animated and activated community.
3. The proposed conversion would allow the provision of a mix of housing tenure, unit size and affordability along with a retention of the retail / service commercial function of the Subject Lands with an equivalent or greater amount of commercial and office space. An estimated 1,500 to 2,000 employees will be accommodated as shown in the Demonstration Plan.
4. The proposed conversion for the Subject Lands is compatible with existing surrounding employment uses as determined through the RWDI Land Use Compatibility / Mitigation Report.
5. The surrounding road network can accommodate a planning and design framework for the Subject Lands which could accommodate a range of land uses at a transit supportive density as shown in the Demonstration Plan should the conversion request be approved.
6. The proposal will not affect the ability of surrounding facilities to comply with applicable Provincial and City of Toronto regulations, as identified in the RWDI Land Use Compatibility & Mitigation Study conducted by RWDI. Appropriate mitigation measures related to noise and air quality impacts arising from transportation facilities will be implemented where required.

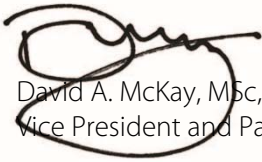
7. The Subject Lands are fully serviced with water, wastewater and stormwater services such that the proposed conversion will ensure the optimization and efficient use of existing municipal infrastructure for the proposal.

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 'D. McKay', is written over a light orange rectangular background.

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

cc: *Client*
Project Team