

January 31, 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
1125 LESLIE STREET, TORONTO
OUR FILE: 21284A**

On behalf of our client, Downing Street (1125 Leslie St) Inc. 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 properties municipally addressed as 1125 Leslie Street (hereinafter the “Subject Lands”) and shown below on **Figure 1. We are requesting designation of the lands as Mixed Use Area.**

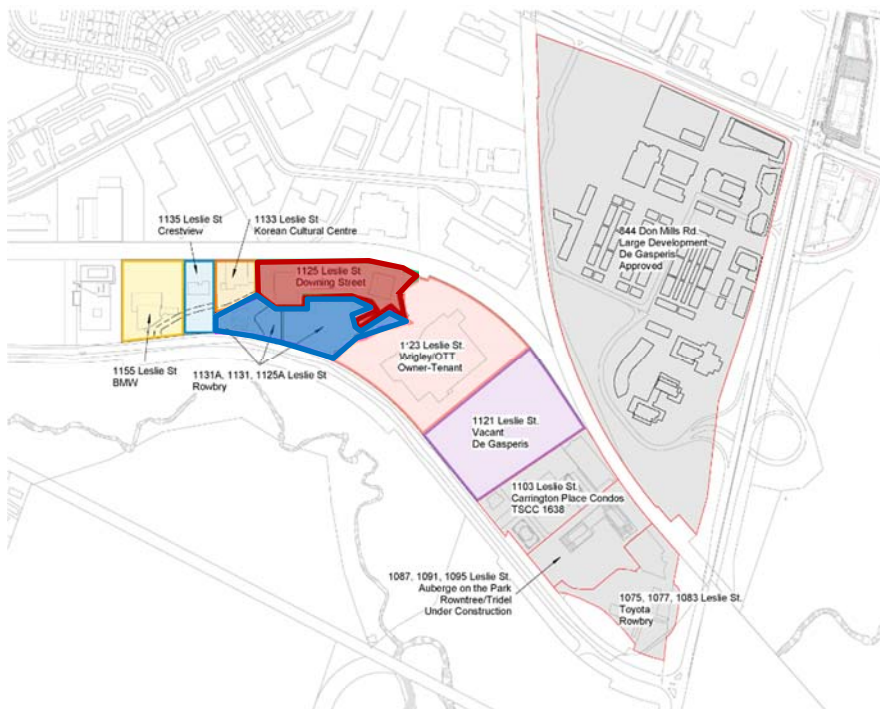


Figure 1 – Location of the Subject Lands (shown in red and adjacent conversion request in blue)

This request is being made concurrently with a similar request by the adjacent landowner at 1125A to 1131A Leslie Street.

History of Request & The Proposal

On July 30, 2021, our client and the adjacent landowner submitted an employment conversion request for the Subject Lands and adjacent lands (1125A to 1131A Leslie Street) as part of the City's municipal comprehensive review. The requested conversion is just one of a number of requests along this section of Leslie Street and includes others to the south (1121 and 1123 Leslie Street). The request was supported by planning, compatibility and urban design rationale reports and plans (submitted in July 2021 and augmented by further submissions to the City in January, May and June 2022). These materials can be found at the following link:

<https://www.dropbox.com/scl/fo/7nqf2ngry9iiejalu8yl/h?dl=0&rlkey=ukz688h1amjrk5ll9z177mpjo>

Once the home of significant employment, such as Sony and Wrigley's, due to global economic trends over the past twenty years has degraded. While some existing employment remains along this stretch of Leslie Street, it is not functioning as it was originally planned. The area contains 40 to 50 year old office and 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 well below in the normal 3.0 to 5.0 FSI range to support the level of transit infrastructure investment occurring with the Crosstown LRT and the Ontario Line.

The requested conversion would allow for the revitalization of the area and include a mix of residential and non-residential (employment) uses in support of transit infrastructure investment. The proposed development will assist in maintaining a diverse economic base and opportunities for employment in the immediate neighbourhood. The proposed conversion, if approved, would provide for significant persons and jobs which would support the Sunnybrook Park Major Transit Station Area. We estimate that, at a minimum, the development if converted would easily achieve over the minimum density target of 160 persons and jobs per hectare mandated by the Growth Plan). 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 than what exists today.

We estimate that the redeveloped property can deliver approximately 1,000 housing units and 6,200 square metres of non-residential development (accommodating approximately 300 jobs).

The demonstration plan is depicted below in **Figure 2**.



Figure 2 – Redevelopment Demonstration Plan

On July 22, 2022 City of Toronto Council adopted OPA 591. While OPA 591 modified the parent Official Plan and responded to conversion requests, it did not deal specifically with the request to convert the Subject Lands. Our client sees this as a significant failure by the City to recognize the redevelopment potential of these underutilized 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 clear planning merit of the proposal, our client has decided to address the Minister in the context of his consideration of OPA 591 and seek the Minister’s modification requested in this submission.

Request of the Minister

On behalf of our clients, we are requesting that the Minister utilize his powers under the Planning Act as the approval authority of OPA 591 to modify it in order to grant the conversion request for 1125 Leslie Street. To this effect, we request 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 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 Areas on Land Use Designation Map 20** (part of Tile Index Map 21 of Appendix 2 of OPA 591) as shown below.



Figure 6 – Designate Subject Lands from General Employment Area to *Mixed Use Areas* as shown on excerpt from Official Plan Land Use Designation Map 20 (Tile Map 21 of OPA 591, Appendix 2)

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



“XXX. 1125 Leslie Street

A mixed use development, including residential uses, is permitted provided that:

1. A minimum of 6,200 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, office, hotel, community and / or institutional uses.
2. Non-residential uses will be constructed in each phase, prior to, or concurrent with any residential uses in such phase, to provide an appropriate mix of non-residential and residential uses in all phases of development.”

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 to help address the housing crisis.

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 would facilitate the construction of approximately 1,000 new residential dwelling units, with the non-residential components creating at least 300 jobs.

The Subject Lands represent a situation where a conversion is appropriate, given that the existing use 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. Further the intensification of the Subject Lands would support the future transit infrastructure being invested in by the Province (the Eglinton LRT and Ontario Subway Line are both within walking distance to the Subject Lands). Given the Subject Lands would be intensified from a jobs perspective, the proposal would have a positive impact on the City's employment base, helping it achieve its employment targets. The proposed conversion and the associated redevelopment will result in a more efficient use of the land and the optimization of infrastructure while enhancing the employment opportunities on site.

Through the course of the submissions to the City, we have provided detailed analysis of the conversion policies as well as responses to questions and comments received from City staff. These submissions, which are found in the download link provided, support our conclusions that 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. Specifically, we have demonstrated that:

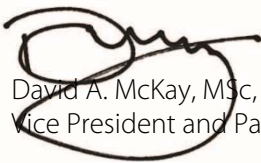
1. The proposed conversion will revitalize and reinvigorate the Subject Lands, through a redevelopment into a vibrant, transit oriented development as depicted in the Demonstration Plan.
2. The proposed conversion would allow the provision of a mix of housing tenure, unit size and affordability, providing an estimated 1,000 housing units.
3. Along with new housing, the proposal would retain the employment function of the Subject Lands with an equivalent or greater amount of commercial and office space. An estimated 300 employees will be accommodated.
4. The proposed conversion for the Subject Lands is compatible with existing surrounding employment uses as determined through the SLR analysis.
5. The proposal will not affect the ability of surrounding facilities to comply with applicable Provincial and City of Toronto regulations. Appropriate mitigation measures related to noise and air quality impacts arising from transportation facilities will be implemented where required.
6. 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



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

cc: *Clients*
D. Bronskill, Goodmans LLP