

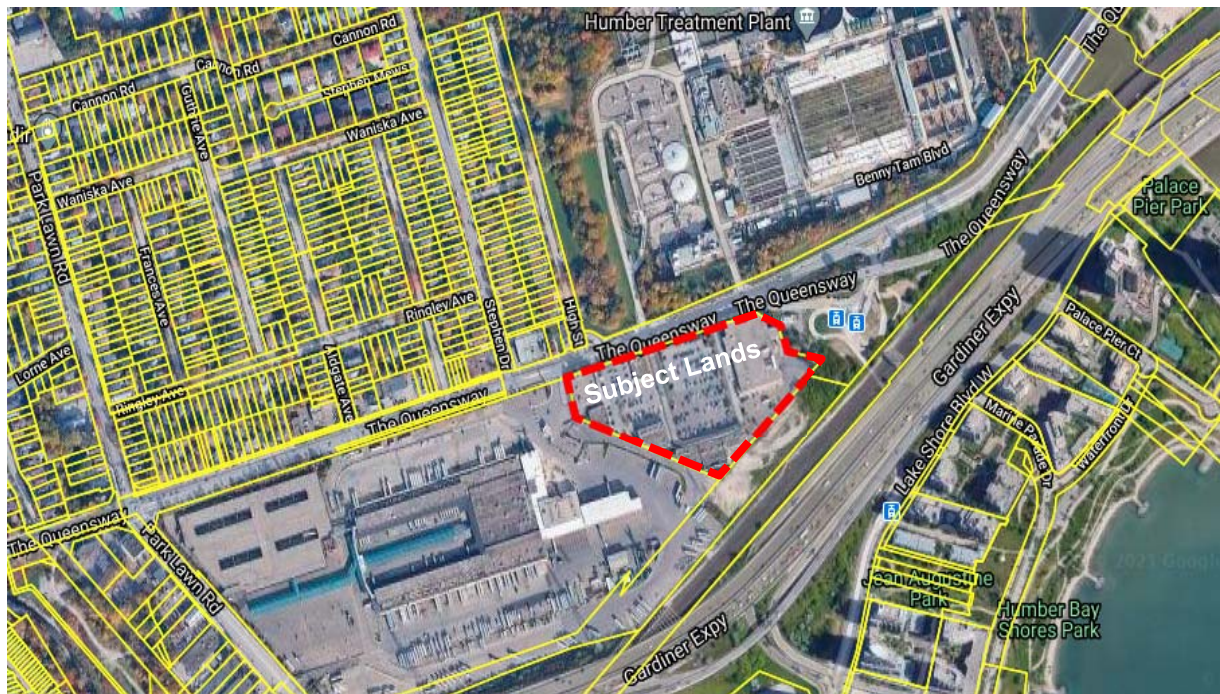
January 31, 2023

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  
125 THE QUEENSWAY, TORONTO  
OUR FILE: 20392'A'**

On behalf of our client, 125 The Queensway Inc. (“Fiera”) 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 conversions of the property municipally addressed 125 The Queensway (hereinafter the “Subject Lands”) and shown below on **Figure 1. We are requesting designation of the lands as Mixed Use Areas.**



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

## History of Request & The Proposal

On May 11, 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 May 2021 and augmented by further submissions to the City in March 2022). These materials can be found at the following link:

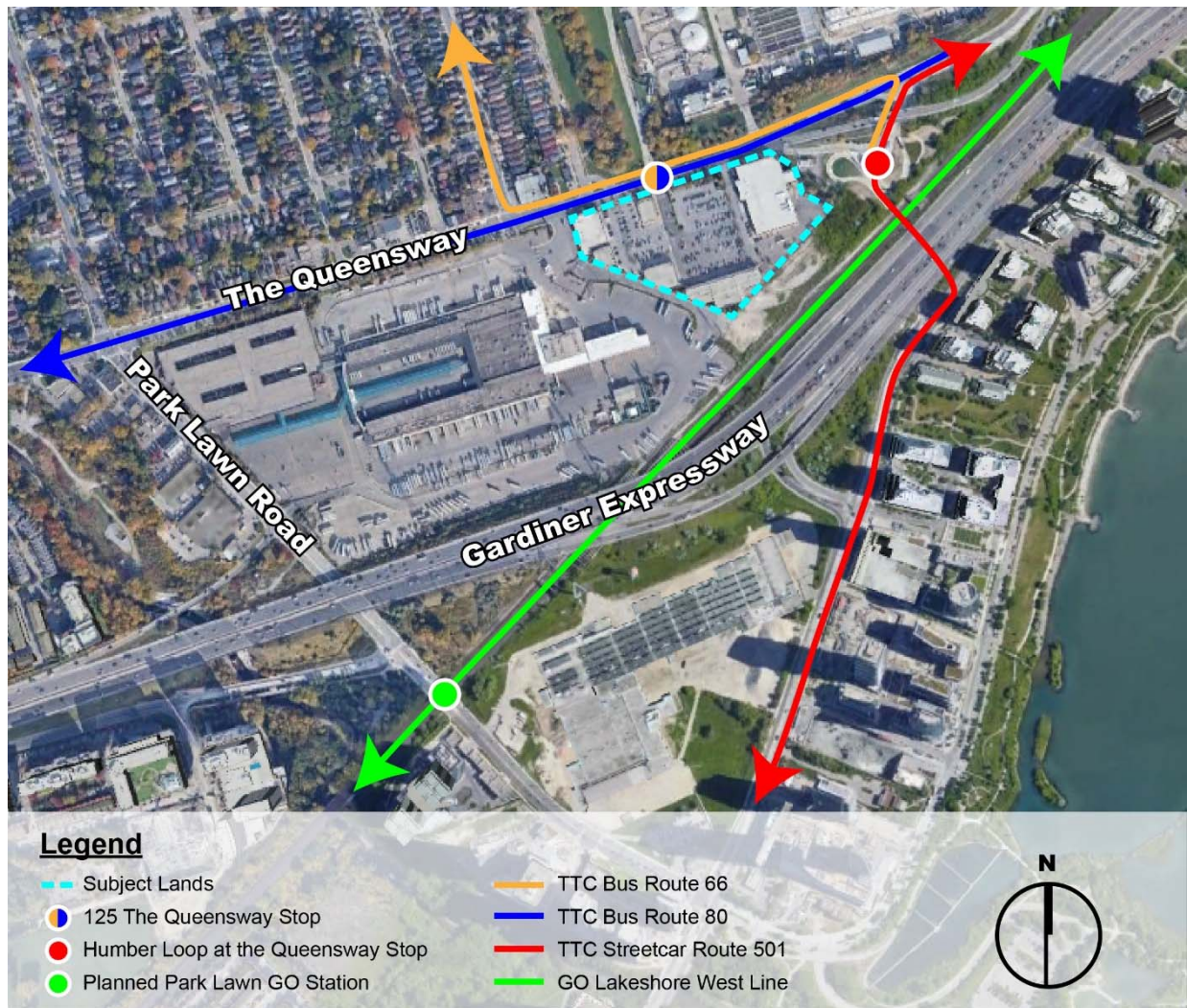
<https://www.dropbox.com/scl/fo/pbbvxd02rv1hok1m0nu2c/h?dl=0&rlkey=dsu3tuqds2x873eec4chxe43>

The Subject Lands have a net site area of approximately 2.85 ha (7.04 acres) and are currently occupied by a single storey commercial plaza and its associated parking area, which is anchored by a Sobeys grocery store, and consists of other commercial/retail uses within five (5) standalone buildings, including but not limited to LCBO, Shoppers Drug Mart, TD Bank, Pizza Pizza, Subway, First Choice Hair Cuts, and Pet Valu. The existing commercial gross floor area on the Subject Lands is 9,877 sq. m. (106,324 sq. ft.). The adjacent uses include the following:

<b>NORTH</b>	The Queensway, Humber Treatment Plant, South Humber Park and low-rise residential neighbourhood (northwest)
<b>EAST</b>	Humber Loop TTC Stop and the Gardiner Expressway
<b>SOUTH</b>	CNR Rail Corridor and the Gardiner Expressway
<b>WEST</b>	Ontario Food Terminal

The Subject Lands are generally located on the south side of The Queensway and north of the Gardiner Expressway, between Park Lawn Road and South Kingsway. Given the presence of the Ontario Food Terminal to the immediate west (which is identified as a Provincially Significant Employment Zone ("PSEZ"), and an established and protected employment use), the Subject Lands are surrounded by rigid and firm boundaries. The Subject Lands are not in a PSEZ.

There are currently two (2) driveways off of The Queensway that provide access to the Subject Lands. The Subject Lands are municipally serviced, and located within approximately 500 metres of the future proposed (not yet approved) Park Lawn GO Station, which forms part of the Christie Cookie Factory redevelopment southwest of the Subject Lands. In addition, the Subject Lands are located adjacent to the following existing public transit stops: the Humber Loop at the Queensway Stop on the 501 streetcar line and the 125 The Queensway Stop along bus routes 66 and 80. The transit infrastructure servicing the Subject Lands are shown in **Figure 2** below. The proposal will optimize the use of existing municipal infrastructure, and have access to nearby public service facilities, all in accordance with Provincial policy direction.



**Figure 2** – Existing and Planned Transit Servicing 125 The Queensway

The proposal for conversion envisions the Subject Lands being redeveloped as a mixed use centre that will consist of a mid-rise building at the northwest portion of the site and six high-rise mixed use towers ranging from 40 to 45 storeys heading further east. At least 10% affordable rental units will be provided within the redevelopment plans. A proposed public park of approximately 4,316 m<sup>2</sup> will be created at the south end of the Subject Lands. The proposal will be accessed from two new public roads which will subdivide the Subject Lands into smaller development blocks. A new road is proposed through the Subject Lands by the City connecting Lakeshore Boulevard West to The Queensway, which will provide direct access from the Subject Lands to the planned Park Lawn GO Station.

The following is a summary of the overall proposed GFA/FSI for the entire Subject Lands, based on the proposed uses:

Proposed Use	Total GFA (m <sup>2</sup> )	Total FSI	Estimated Units or Jobs
Commercial (Retail and Office)	10,663.3	0.31	795 jobs
Residential	218,094.0	6.33	2,827 units
TOTAL	228,757.4	6.64	

**Figures 3, 4, 5 and 6** show the proposed redevelopment of the Subject Lands.

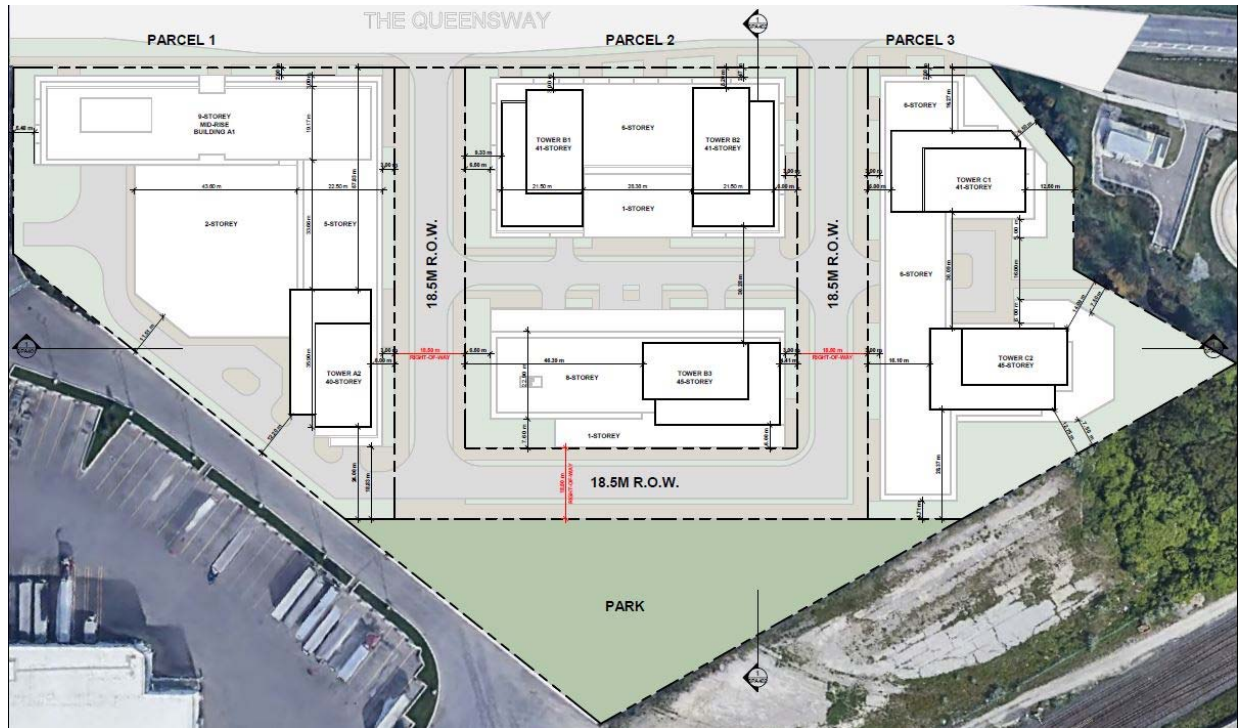


Figure 3 – Conceptual Site Plan for Proposed High-Rise Mixed Use Development Site



Figure 4 – Conceptual Massing of Proposed High-Rise Mixed Use Development (Street View Looking West)



**Figure 5** – Conceptual Massing of the Proposed Mixed Use Development (Aerial View Looking Northwest)



**Figure 6** – Conceptual Massing of the Proposed Mixed Use Development (Aerial View Looking Southeast)

In addition, a proposed +/- 4,316m<sup>2</sup> park will be located at the south end of the Subject Lands. The proposed park has a central location that is accessible and connected to all three proposed development parcels, and will be available for the use of future tenants, workers and shoppers anticipated as a result of the overall proposed development.

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

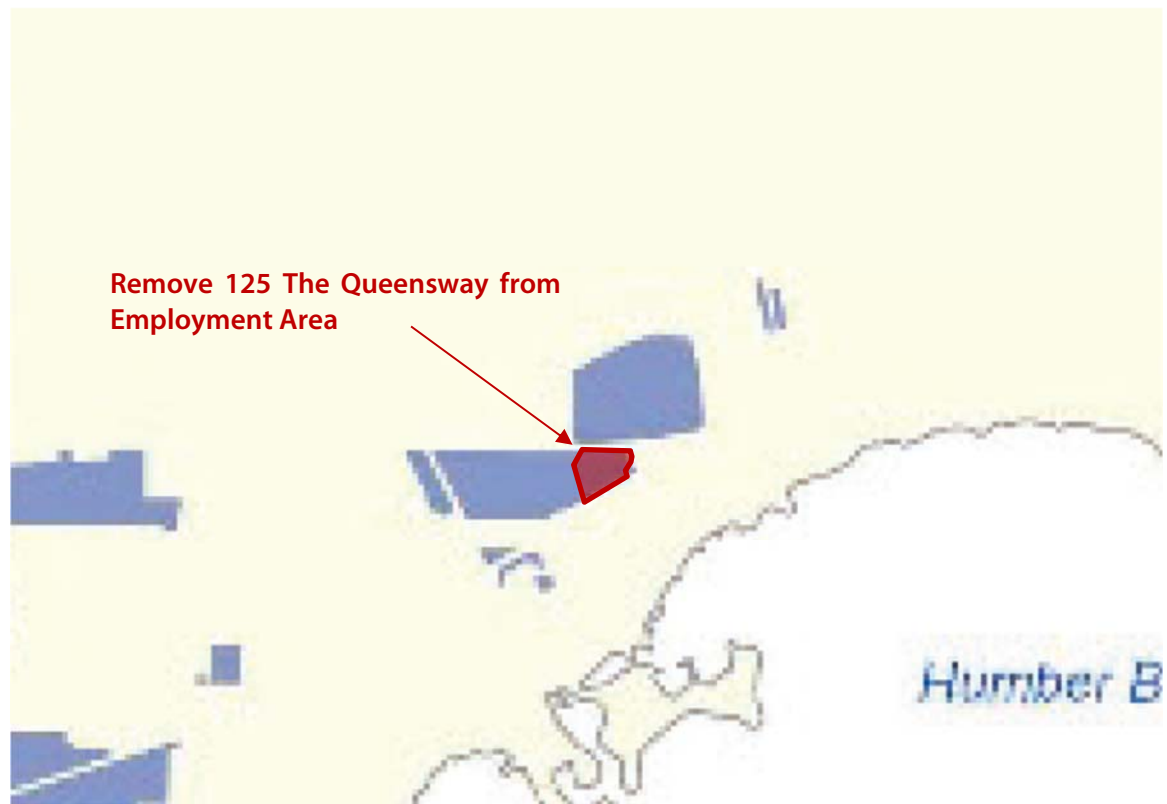
potential of the mall which would provide significant amounts of housing as well as employment opportunities in a rejuvenated and revitalized urban format in proximity to the planned Park Lawn GO Station (a proposed PMTSA).

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 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 125 The Queensway. 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.



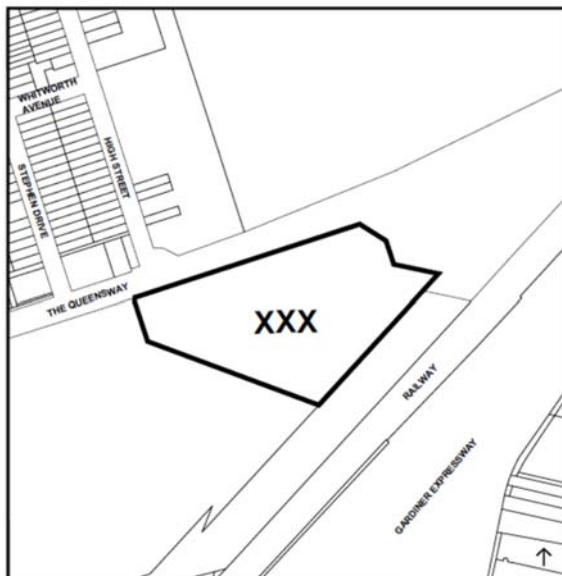
**Figure 7** – Removal of Subject Lands from Employment Areas as shown on excerpt from OPA 591, Appendix 1: Map 2

2. We request the Subject Lands be **designated Mixed Use Areas on Land Use Designation Map 15** (part of Tile Index Map 35 of Appendix 2 of OPA 591) as shown below.



**Figure 8** – 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. 125 The Queensway**

1. A minimum of 10,000 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, office, hotel, community and / or institutional uses.
2. A minimum of 2,800 residential units are permitted, of which a minimum of 280 shall be affordable housing units at full build out and may be provided for in phases.
3. Non-residential uses will be constructed in each phase, prior to, or concurrent with residential development to provide an appropriate mix of non-residential and residential growth 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 allow the construction of over 2,800 new residential dwelling units (including rental and ownership, with at least 280 affordable units being provided), with the non-residential components accommodating housing at least 795 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. Further the intensification of the Subject Lands would support the future transit infrastructure being invested in by the Province (the planned Park Lawn GO Station is 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 redevelopment it will permit will allow for the 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 over 2,800 housing units (including 280 as affordable units).



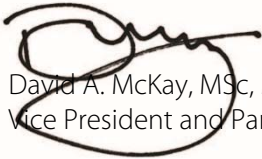
3. Along with new housing, the proposal would retain the employment function of the Subject Lands with an equivalent or greater amount of commercial and office space. An estimated 795 employees will be accommodated.
4. The proposed conversion for the Subject Lands is compatible with existing surrounding 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*