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Dear Ms. Perdomo:

**RE:            Employment Conversion | 5030618 Ontario Inc.  
                  Comments on the Approval of the City of Toronto OPA No. 591  
                  3601 Victoria Park Avenue, City of Toronto  
                  ERO Number: 019-5868**

Malone Given Parsons Ltd. (“MGP”) has been retained as the land use planners for 5030618 Ontario Inc. (the “Client”), owner of 0.87 hectares (2.15 acres) of land located at the southeast corner of Victoria Park Avenue and McNicoll Avenue, municipally known as 3601 Victoria Park Avenue in the City of Toronto (“Subject Lands”).

This submission continues upon our prior submissions to the City including:

- A letter dated August 3, 2021, providing our planning opinion on a request for an employment conversion for the Subject Lands; and,
- A letter dated June 30, 2022, providing our comments on the City’s preliminary planning assessment on the employment conversion request for the Subject Lands.

A full package of previous correspondence has been provided in Appendix 1.

The purpose of this letter is to provide additional comments on the City’s proposed Official Plan Amendment (OPA 591), which is under consideration for approval by the Ministry of Municipal Affairs and Housing. OPA 591 contains new and updated employment policies and proposes site specific employment conversions with other site-specific employment conversions (such as our Clients), occurring later in the process. While we understand the City’s intention is to consider the remaining employment conversion requests at a later date, given the urgency to supply housing, especially purpose-built-rental, it is our opinion that it is imperative to consider this employment conversion request as the Subject Lands represents an ideal opportunity to aid in the delivery of more attainable housing in the Province.

### **Conceptual Vision and Our Request**

The vision for the southern portion of the Subject Lands for a vibrant mixed use development is in our opinion more appropriate than its current General Employment designation. The Subject Lands benefit from close proximity to existing community amenities and jobs and possess the opportunity to be converted to a mixed use format without having an adverse impact to the

existing stable employment area. The Subject Lands are challenged by subpar locational characteristics for employment uses as envisioned by Provincial and Municipal policies and would be enhanced with a mix of uses to support both the residential and employment uses.

To realize this vision, we are requesting that the City redesignate the Subject Lands to *Mixed Use Areas* to permit a range of uses, including maintaining the existing employment uses. In support of this request, please find enclosed the following:

- Planning Opinion Letter (this letter);
- Previous Correspondence on City's Municipal Comprehensive Review (Appendix 1);
- Draft Official Plan Mapping Amendment requesting a redesignation to Mixed Use Areas on the Subject Lands (Appendix 2);
- Conceptual Development Plan (Appendix 3);
- Modified Compatibility & Mitigation Study (Appendix 4); and,
- Traffic Brief (Appendix 5).

### Existing Context

The Subject Lands currently contain a 5-storey office building with at-grade retail at the corner, with an adjoining 1-storey retail plaza fronting along Victoria Park Avenue as shown in Figure 1. The remainder of the Subject Lands is occupied by a large surface parking lot. Immediately to the south is a parking lot that is leased from Toronto Hydro that provides additional parking spaces for the Subject Lands. The Subject Lands are located at the southeastern limit of the Steeles Business Park.

Figure 1: Subject Lands Context



The surrounding context includes the following:

North

- Tendercare Nursing Home (4 storeys)
- Vintage Garden Life Lease (11-storeys), which is a component of the St. John's McNicoll Centre
- McNicoll Avenue (27m Right-of-Way)

East

- Townhouse-style Office Buildings (2-3 storeys)
- Surface Parking

West

- Victoria Park Transfer Station
- Victoria Park Avenue (36m Right-of-Way)

South

- Surface Parking
- Ontario Hydro Corridor

Low Density Residential

**Preliminary Development Concept**

In accordance with the preliminary concept prepared by Z Square (a copy attached hereto in Appendix 3), the redevelopment proposes to demolish the existing 1-storey restaurant on the south portion of the building and replace it with an 11-storey rental apartment building including a 6-storey podium. A 1-storey underground parking structure will be constructed to provide additional parking for the proposed redevelopment. Outdoor amenity space will be provided on the existing roof to the north, which will be in addition to the indoor amenity space.

A total of 110 residential units will be provided in the apartment building with a total Gross Floor Area (GFA) of approximately 8,600m<sup>2</sup>. The total GFA on the site will be approximately 15,000m<sup>2</sup> with a density of 1.73 FSI.

The proposal maintains the remainder of the existing commercial and office uses on the site, while providing additional affordable rental units into the City's housing stock, which are sorely needed throughout the City.

**Planning Rationale**

In order to support this proposed redevelopment, an employment conversion request is required through the City's Municipal Comprehensive Review process, which is currently underway and is accepting requests for employment area conversions. We are seeking, on behalf of our Client, a *Mixed Use Areas* designation for the Subject Lands.

The economic landscape of the City is in the process of a shift. The trend of employment land being a large component of job growth is slowing down and there is a growing concentration of jobs that are in the knowledge/creative based economies that require flexible and innovative office space solutions. Employers who deliver these jobs increasingly prefer to be located in mixed-use, urban

areas, rather than in traditional mono-use employment areas, which the Subject Lands are currently located within.

The changing economic landscape makes land use planning for employment uses challenging. Proper planning for employment uses is key to achieving Provincial and Municipal objectives of efficiently using infrastructure and encouraging transit-supportive development. Conventional planning practices for employment uses have traditionally been to promote single-use employment blocks. This is evident in suburban office/business parks that have no residential uses and are dominated by low to mid-rise office buildings with large surface parking lots and limited amenities for workers.

The basis of this request is to allow non-employment uses on the Subject Lands while maintaining a significant amount of jobs and to provide greater flexibility on the site to be able to develop as a higher-density mixed-use development with rental housing. The proposal would not eliminate employment uses, but re-position the Subject Lands from a single-employment use site to a multi-use development that is active throughout the day as opposed to only during normal business hours. Permitting non-employment uses will allow the Subject Lands to adapt to a changing employment market where young and educated workers are prioritizing workplaces that are increasingly accessible and closer to various amenities. This type of development can attract a range of residential and non-residential investments which in turn supports the economic resiliency of the City.

Maintaining the entirety of the Subject Lands exclusively for employment use does not optimize the use of the land as a mixed-use development that would be better suited in this area and that would support the existing transportation and public infrastructure investment. A mixed-use development would contribute to the creation of a complete community and offer residents the ability to live, work and play in the same area.

**Employment Area Conversion Criteria**

In support of the employment conversion request, consistency and conformity to the requirements of the Provincial Policy Statement (2020), A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020) and Toronto Official Plan (2015) are provided in the table below.

Section	Policy	Response
Provincial Policy Statement, 2020		
1.3.2.4	Planning authorities may permit conversion of lands within employment areas to non-employment uses through a comprehensive review, only where it has been demonstrated that the land is not required for employment purposes over the long term and that there is a need for the	<p>The City is undertaking a MCR and is accepting employment conversion requests as part of this process.</p> <p>The responses to the below tests demonstrate that the Subject Lands are not required solely for employment purposes over the long term and that it is desirable to develop this site for a mixed-use development containing rental housing and leverage its proximity to existing community amenities.</p>

Section	Policy	Response
	conversion.	
1.3.2.5	<p>Notwithstanding policy 1.3.2.4, and until the official plan review or update in policy 1.3.2.4 is undertaken and completed, lands within existing employment areas may be converted to a designation that permits non-employment uses provided the area has not been identified as provincially significant through a provincial plan exercise or as regionally significant by a regional economic development corporation working together with affected upper and single-tier municipalities and subject to the following:</p> <ul style="list-style-type: none"> <li>a) there is an identified need for the conversion and the land is not required for employment purposes over the long term;</li> <li>b) the proposed uses would not adversely affect the overall viability of the employment area; and</li> <li>c) existing or planned infrastructure and public service facilities are available to accommodate the proposed uses.</li> </ul>	<p>The Subject Lands are identified within the fringe of a Provincially Significant Employment Zone (“PSEZ”). Lands within a PSEZ are restricted from employment conversion prior to an MCR. As the City is currently undertaking an MCR process, it is my opinion that this policy is satisfied and consistent with the PPS so long as the criteria are met. As demonstrated in this table, it is our opinion that the criteria have been met.</p>
A Place to Grow, 2020		
2.2.5.9a)	There is a need for the conversion.	The vision for the Subject Lands is to optimize this area of the City by proposing a more compact development consisting of rental housing to complement and support the existing

Section	Policy	Response
		<p>commercial and office uses. The location of the Subject Lands is well positioned for a more urban development that blends a vibrant mix of uses which are functionally and/or physically integrated while delivering much needed rental housing. It would give an opportunity for people who work or go to school in the area, the option to live closer to where they need to commute to, and breathe life into an area that is traditionally only active during the weekday. Specifically, the nearby Seneca College campus generates a strong demand for student housing, which the rental housing project can help fulfill with its easy access via multiple transit lines (Routes 24, 39, 42 and 939B).</p> <p>This type of mixed-use development has the potential to realize the development on these lands in the near term by allowing people to live, work and play in the same neighbourhood, which furthers the role that planning plays in supporting the economic resilience, productivity, and success of the regional economy. This portion of the development will infuse residential component into an employment area that would otherwise potentially remain stagnant.</p> <p>If the Subject Lands were to be limited to employment uses, this area would likely remain underutilized and would not meet the objectives of good land use principles. There is a need to convert the Subject Lands to allow for residential development while maintaining or increasing the number of jobs over time in order to meet the growth target by 2051 as directed by the Growth Plan.</p>
2.2.5.9b)	The lands are not required over the horizon of this Plan for the employment purposes for which they are designated	The General Employment Area designation permits a range of office, industrial and manufacturing uses. The business offices/research and development facilities uses however are attracted to amenity-driven employment areas that offer a broader land-use mix. As such, limiting it to just employment uses would be a sub-optimal use of the site as it



Section	Policy	Response
		<p>would be better suited for a mixed-use form of development. A mixed-use containing the existing employment uses will still maintain a cluster of economic activity in the area and will attract a wider variety of employment opportunities than previously available.</p> <p>Limiting development on this site to general employment uses would be a lost opportunity to fully realize the potential of the Subject Lands and given the employment shift away from traditional single use employment land, may stagnate the attractiveness of this site for current and future non-residential tenants. A mixed-use development that maintains a similar amount of employment space would provide a compatible, compact, and pedestrian accessible development that will contribute to attracting jobs and talent.</p> <p>Employment growth in the City’s economy has largely been driven by knowledge-based/creative industries which tend to locate in offices. Land extensive employment (such as manufacturing/ distribution) still play a role in the City’s employment mix but these uses are better suited in areas that have immediate highway/intermodal access or within the interior of larger Employment Areas. The Subject Lands are located at the exterior of the employment area and do not have immediate access to a highway/intermodal infrastructure.</p> <p>By allowing mixed-use development, there will be increased flexibility to provide for a type of development that is compatible and will attract additional investments and employment opportunities. In addition, it will also allow people and jobs to be located in close proximity to existing community amenities to better utilize the site for a range of uses, which will make more efficient use of these lands. The conversion request will not take away the existing employment permissions but rather provide flexibility to meet both population and employment forecasts as directed by the</p>

Section	Policy	Response
		Growth Plan.
2.2.5.9c)	The municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;	<p>See response to A Place to Grow Criteria 2.2.5.9b.</p> <p>Any future development application to permit non-employment uses on the Subject Lands would maintain a similar amount of jobs on the site. This request is not intended to eliminate the employment function from the site, but to add residential and complimentary use permissions.</p> <p>It is our opinion that by allowing a mixed-use development, it will make these lands more attractive from an employment perspective and will aid in returning the existing space to full occupancy and over the horizon of the plan, have a better opportunity to expand and offer more employment space/jobs.</p>
2.2.5.9d)	The proposed uses would not adversely affect the overall viability of the employment area or prime employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan	<p>The redevelopment of the Subject Lands for the uses proposed will not have any negative influence on the function of the remaining surrounding employment lands. The adjacent lands consists of low rise office space, seniors residences and commercial space. The envisioned mixed-use development would be compatible with the existing surrounding uses as it would maintain the existing employment buildings and site the proposed residential rental apartment on the south side of the building.</p> <p>The envisioned mixed-use development of the site can maintain a similar amount of jobs, and will have the potential to expand in the future and provide a mix of uses that delivers much needed rental housing for the community. As such, the envisioned mixed-use development will aid the City in meeting its compact and complete community objective of the PPS, Growth Plan, Official Plan.</p> <p>Furthermore, as noted in the Modified Compatibility &amp; Mitigation Study prepared by</p>



Section	Policy	Response
		<p>SLR Consulting, the proposed redevelopment, with the incorporation of mitigation measures, will:</p> <ul style="list-style-type: none"> <li>• Unlikely to result in increased risk of complaint and nuisance claims;</li> <li>• Unlikely to result in operational constraints for the major facilities;</li> <li>• Unlikely to result in constraints on major facilities to reasonably expand, intensify or introduce changes to their operations;</li> <li>• Unlikely to result in constraints for new major facilities to reasonably be established in the Employment Area;</li> </ul>
2.2.5.9e)	<p>There are existing or planned infrastructure and public service facilities to accommodate the proposed uses</p>	<p>Future redevelopment of the Subject Lands would rely on an extension and/or improvement of existing municipal sewer and water services, as required. This will minimize the need for new infrastructure.</p> <p>Furthermore, as demonstrated in the Traffic Brief prepared by Crozier Consulting Engineers, the existing road network has sufficient capacity to support the proposed apartment building.</p>
Toronto Official Plan, 2015		
2.2.4 (14)	<p>The redesignation of land from an Employment Area designation to any other designation, by way of an Official Plan Amendment, or the introduction of a use that is otherwise not permitted in an Employment Area is a conversion of land within an Employment Area and is also a removal of land from an Employment Area, and may only be permitted by way of a Municipal Comprehensive Review.</p>	<p>The applicant is requesting a conversion during a City-initiated Municipal Comprehensive Review.</p>

Section	Policy	Response
	<p>The introduction of a use that may be permitted in a General Employment Area into a Core Employment Area or the redesignation of a Core Employment Area into a General Employment Area designation is a conversion and may only be permitted by way of a Municipal Comprehensive Review.</p>	
<p>2.2.4 (15)</p>	<p>The conversion of land within an Employment Area is only permitted through a City-initiated Municipal Comprehensive Review that comprehensively applies the policies and schedules of the Provincial Growth Plan.</p>	<p>The City is undertaking a Municipal Comprehensive Review. See responses to Growth Plan criteria.</p>
<p>2.2.4(16)</p>	<p>Applications to convert lands within an Employment Area will only be considered at the time of a municipal review of employment policies and designations under Section 26 of the Planning Act and a concurrent Municipal Comprehensive Review under the Growth Plan for the Greater Golden Horseshoe. Applications to convert lands within an Employment Area received between such City-initiated Official Plan Reviews will be not be considered unless Council directs that a Municipal Comprehensive Review be</p>	<p>The City is undertaking a Municipal Comprehensive Review.</p>

Section	Policy	Response
	initiated.]	
2.2.4(17a)	there is a demonstrated need for the conversion(s) to meet population forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe	See response to A Place to Grow criteria 2.2.5.9a)
2.2.4(17b)	the City will meet the employment forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe	See response to A Place to Grow Criteria 2.2.5.9b) and c).
2.2.4(17c)	there is a demonstrated need for the conversion(s) to mitigate existing and/or potential land use conflicts;	There are no existing land use conflicts.
2.2.4(17d)	the lands are not required over the long-term for employment purposes;	See response to A Place to Grow Criteria 2.2.5.9b).
2.2.4(17e)	the conversion(s) will not adversely affect the overall viability of the Employment Area and maintenance of a stable operating environment for business and economic activities with regard to the:	
2.2.4(17e)i	compatibility of the proposed land use with existing employment uses or employment uses permitted in the zoning by-law in the Employment Area;	See response to A Place to Grow Criteria 2.2.5.9d).  In addition, the employment uses permitted in the Zoning Bylaw are similar to the existing uses within the employment area and as such, as demonstrated in the response to A Place to Grow Criteria 2.2.5.9d)
2.2.4(17e)ii	interference with the function of existing employment uses by affecting Environmental	N/A

Section	Policy	Response
	Compliance Certificates of industries and their renewal, or complaints of adverse effects to the Ontario Ministry of the Environment under the Environmental Protection Act which could require changes to industrial operations or restrict operating hours;	
2.2.4(17e)iii	ability to provide appropriate buffering of employment uses from sensitive residential and institutional uses;	The Subject Lands contains sufficient space to have the ability to provide buffering through mitigation measures as determined through technical studies as part of a formal development application.
2.2.4(17e)iv	implementation of the Ontario Ministry of the Environment D series guidelines for compatibility between industry and sensitive uses or any successor guidelines;	See concurrently submitted Modified Compatibility & Mitigation Study prepared by SLR Consulting, which demonstrates that the Ontario Ministry of the Environment D series guidelines can be implemented.
2.2.4(17e)v	impact on the affordability of property or building leases or land purchase costs for employment uses and tax assessments in the Employment Area;	The proposal maintains a similar amount of non-residential space and will not impact the existing surrounding employment lands, nor set a precedence for other conversions. Therefore, the introduction of rental housing will not have an impact on the affordability of the property, building leases, land purchase costs for employment uses and tax assessments.
2.2.4(17e)vi	reduction or elimination of visibility of, and accessibility to, employment lands or uses;	The Subject Lands are located at the southern boundary of the employment area. The proposed redevelopment is also located at the southern portion of the property, which is adjacent to the hydro corridor. This will not reduce or eliminate any visibility to significant views along this corridor and furthermore, will not remove any existing prominent employment uses at the corner of Victoria Park Avenue and

Section	Policy	Response
		McNicoll Avenue.
2.2.4(17e)vii	impact upon the capacity and functioning of the transportation network and the movement of goods for existing and future employment uses;	<p>See response to A Place to Grow criteria 2.2.5.9e).</p> <p>The apartment rental building is forecasted to generate 27 and 25 two-way vehicle trips during the weekday a.m. and p.m. peak periods, respectively. When accounting for the removal of the existing restaurant use, the net trip generation resulting from the proposed development is forecasted to be 27 and -63 two-way vehicle trips on the boundary road network. The redevelopment is therefore expected to result in fewer trips on the boundary road network during the weekday p.m. peak period as the apartment building is expected to generate fewer trips than currently generated by the existing restaurant use. Trip generation in this range is not typically associated with traffic operations issues and therefore it is expected that the employment conversion request is supportable in principle from a traffic operations perspective. See Traffic Brief prepared by Crozier Consulting Engineers for further details.</p>
2.2.4(17e)viii	removal of large and/or key locations for employment uses; and	<p>The proposal will not remove a location for employment uses, but rather add non-employment uses to the Subject Lands. Furthermore, while the Subject Lands are located at the periphery of the employment area, bordered to the south by a hydro corridor/residential uses, the most key location of the Subject Lands, at the corner of Victoria Park Avenue and McNicoll Avenue will be maintained.</p>
2.2.4(17e)ix	maintenance of the identity of the Employment Area.	See response above.
2.2.4(17f)	the existing or planned sewage, water, energy and transportation infrastructure can	See response to A Place to Grow criteria 2.2.5.9e).

Section	Policy	Response
	<p>accommodate the proposed conversion(s);</p>	
<p>2.2.4(17g)</p>	<p>in the instance of conversions for residential purposes, sufficient parks, libraries, recreation centres and schools exist or are planned within walking distance for new residents;</p>	<p>As shown on the Community Amenities map attached to this letter, there are numerous schools (5) and parks (3) within walking distance (~800m), in addition to the open space area along the hydro corridor. These amenities are important to have within walking distance. Community centres and libraries typically have a larger catchment area and so these amenities are located slightly further away with 2 community centres and 3 libraries within 2km of the Subject Property.</p> <p>Furthermore, as part of a future development application, a cash-in-lieu parkland payment will be required, which will have the potential enhance the existing facilities in the area.</p>
<p>2.2.4(17h)</p>	<p>land already appropriately designated and zoned for the proposed non-employment use(s) is available outside of Employment Areas;</p>	<p>While there are other lands appropriately designated and zoned for mixed uses, that does not limit the City’s ability to provide additional lands designated for mixed uses where appropriate. Through this municipal comprehensive review, the City is mandated by the Province to undertake integrated planning to manage forecasted growth to the horizon of the Growth Plan. By permitting this conversion request, the Subject Lands will be able to provide a mix of uses that will better utilize existing and planned infrastructure.</p> <p>Furthermore, the Growth Plan forecasts are minimums and municipalities through a municipal comprehensive review, are to apply the forecasts in Schedule 3 or such higher forecasts through this process for planning and managing growth to the horizon of this Plan. As noted earlier, the proposed conversion request will not remove the existing employment permissions and will only enhance the lands ability to provide both population and jobs to the horizon of this plan.</p>

Section	Policy	Response
2.2.4(17i)	new residents or institutional users on the lands would be adversely affected by noise, vibration, odours and other air emissions, dust and other particulates or other contaminants;	<p>See concurrently submitted Land Use Compatibility Report, which demonstrates that new residents on the lands will not be adversely affected by noise, vibration, odours and other particulates/contaminants.</p> <p>From an air quality perspective, the assessment has identified the potential need for receptor-based mitigation measures such as screened fresh air intakes, and warning clauses due to the odour related to the Victoria Park Transfer Station. Warning clauses associated with fugitive dust and neighbouring industrial emissions may also need to be considered to be registered on title for the lands and included in any property ownership documentation. With the inclusion of receptor-based odour mitigation, adverse air quality impacts from surrounding industrial/ institutional facilities are not anticipated.</p> <p>Based on the current screening level assessment adverse noise impacts from surrounding industrial/institutional facilities are not anticipated, and noise mitigation measures are not required. The applicable NPC-300 noise guideline limits will be met. Typical Mitigation measures (upgraded façade construction), and various warning clauses may be required to ensure that the applicable transportation noise guidelines are met for roadway noise.</p> <p>Adverse vibration impacts from industrial facilities are not anticipated at the Project. Adverse vibration impacts from transportation sources are not anticipated.</p>
2.2.4(17j)	the ability to provide opportunities for the clustering of similar or related employment uses is maintained;	The Subject Lands maintains the employment uses with the general building structure. Surface parking remains (with the planned addition of landscaping), which provides sufficient and similar intensification opportunities for further clustering of additional employment uses.
2.2.4(17k)	a sufficient supply of optimum-sized land	The parcel size remains the same and the general building structure is maintained with



Section	Policy	Response
	<p>parcels is maintained in the Employment Area for the range of permitted employment uses;</p>	<p>only additional intensified use on the southern portion of the existing building. The remainder of the building will maintain and allow for a range of permitted employment uses.</p>
<p>2.2.4(17l)</p>	<p>employment lands proximate to essential linkages, such as supply chains, service providers, markets, and necessary labour pools are preserved;</p>	<p>All existing access points off Victoria Park Avenue and McNicoll Avenue will be maintained. Also, the ability of utilizing the existing road network for current and future employment users on the Subject Lands will be preserved as no changes are proposed to the general building envelop and internal road network.</p>
<p>2.2.4(17m)</p>	<p>employment lands are strategically preserved near important transportation infrastructure such as highways and highway interchanges, rail corridors and airports to facilitate the movement of goods;</p>	<p>The Subject Lands are located at the exterior of the employment area and do not have immediate access to a highway/intermodal infrastructure. The closest highway interchanges are located at Steeles Avenue and Finch Avenue, which is approximately 2.0 kilometres away. The closest rail corridor and airport to facilitate goods movement would be CPR Railway Yard, which is located over 8 kilometres away and Pearson Airport, which is located over 31 kilometres away.</p> <p>As such, these Subject Lands are not proximate to any major transportation infrastructure.</p>
<p>2.2.4(17n)</p>	<p>the proposal(s) to convert lands within an Employment Area will maintain and grow, or potentially diminish the City's tax base;</p>	<p>The proposed redevelopment will generally maintain the commercial/employment tax base, with the potential to further enhance the tax base through the residential component. The proposed redevelopment will likely increase the overall tax base with additional housing (i.e. rental apartment).</p>
<p>2.2.4(17o)</p>	<p>the proposal(s) to convert lands in an Employment Area will help to maintain to a diverse economic base accommodating and attracting a variety of employment uses and a broad range of stable full-time employment</p>	<p>See response to A Place to Grow criteria 2.2.5.9b).</p>

Section	Policy	Response
	opportunities in Toronto;	
2.2.4(17p)	the conversion(s) will retain work opportunities for residents of nearby neighbourhoods; and	The proposed redevelopment will maintain the employment uses on the site and work opportunities for residential of nearby neighbourhoods will be maintained.
2.2.4(17q)	cross-jurisdictional issues have been considered.	The location of the Subject Lands entirely within the City of Toronto, and the nature of the uses proposed are such that no cross-jurisdictional issues are expected to arise.

As detailed above, the analysis demonstrates that the tests posed by the PPS, Growth Plan, and City of Toronto Official Plan have been met, and that the submitted request is appropriate and represents good planning.

#### Response to City's Comments

We have additionally reviewed the preliminary assessment for the Subject Lands as part of the City's Group 2 Assessments (ID No. 090) as well the City of Toronto staff report related to the Recommended Official Plan Amendment for City-wide Employment Policies and Conversion Requests dated June 20, 2022.

Based on the City's preliminary assessment, they concluded that the Subject Lands should be retained as *Employment Areas*. We respectfully disagree, and it is our opinion that some residential uses on the southern portion of the Subject Lands will enhance the sustainability and viability of the employment uses, while maintaining the current employment functions on the lands and generate a much-needed housing type (i.e. rental housing) for the City. This will also contribute to the creation of compact, complete communities, without impairing the City's ability to accommodate its employment growth allocations.

As part of City staff's preliminary review of the conversion request, they identified issues. We have summarized those issues and provided our response in the table below.

Issue	Response
Proximity to the Victoria Park Transfer Station, a Class II Industrial City facility that is required to service the area;	See concurrently submitted Land Use Compatibility Report, which demonstrates that new residents on the lands will not be adversely affected by noise, vibration, odours and other particulates/contaminants.  From an air quality perspective, the assessment has identified the potential need for receptor-based mitigation measures such as screened fresh air intakes, and warning clauses due to the odour related to the Victoria Park

Issue	Response
	<p>Transfer Station. Warning clauses associated with fugitive dust and neighbouring industrial emissions may also need to be considered to be registered on title for the lands and included in any property ownership documentation. With the inclusion of receptor-based odour mitigation, adverse air quality impacts from surrounding industrial/ institutional facilities are not anticipated.</p> <p>Based on the current screening level assessment adverse noise impacts from surrounding industrial/institutional facilities are not anticipated, and noise mitigation measures are not required. The applicable NPC-300 noise guideline limits will be met. Typical Mitigation measures (upgraded façade construction), and various warning clauses may be required to ensure that the applicable transportation noise guidelines are met for roadway noise.</p> <p>Adverse vibration impacts from industrial facilities are not anticipated at the Project. Adverse vibration impacts from transportation sources are not anticipated.</p>
<p>Cumulative impact of multiple conversion requests on the overall viability of the Employment Area and its planned function;</p>	<p>The redevelopment of the Subject Lands for the uses proposed will not have any negative influence on the function of the remaining surrounding employment lands. The adjacent lands consists of low rise office space, seniors residences and commercial space.</p> <p>The envisioned mixed-use development of the site can maintain a similar amount of jobs, and will have the potential to expand in the future and provide a mix of uses that delivers much needed rental housing for the community. As such, the envisioned mixed-use development will aid the City in meeting its compact and complete community objective of the PPS, Growth Plan, Official Plan.</p> <p>Furthermore, the conversion request in the area (1020 McNicol Avenue) is already occupied by a form of residential housing (long term care facility) that has operated with no issues and is being supported by City staff. That request and our request will not affect the overall viability of the Employment Area.</p>
<p>Provision of a variety of land parcel sizes to accommodate a range of permitted employment</p>	<p>The request will not change the variety of the parcel sizes available for employment uses. The parcel size remains the same and the general building structure is maintained with</p>

Issue	Response
uses	only additional intensified use on the southern portion of the existing building. The remainder of the building will be maintained, which allows for a range of permitted employment uses.
Ability to provide a stable and productive operating environment for existing and new businesses and their economic activities	<p>The envisioned mixed-use development would provide additional customers for the existing and new businesses in the area and would breathe life into an area that is only active during the day.</p> <p>As such, it would increase the stability and operating environment for businesses in this, while not being disruptive in nature, as further noted in the response below.</p>
Compatibility and/or appropriateness of the proposed mitigation measures with surrounding existing and permitted land uses, and review of the nearby environmental compliance approvals;	<p>The envisioned mixed-use development would be compatible with the existing surrounding uses as it would maintain the existing employment buildings and site the proposed residential rental apartment on the south side of the building.</p> <p>As noted in the Modified Compatibility &amp; Mitigation Study prepared by SLR Consulting, the proposed redevelopment, with the incorporation of mitigation measures, will:</p> <ul style="list-style-type: none"> <li>• Unlikely to result in increased risk of complaint and nuisance claims;</li> <li>• Unlikely to result in operational constraints for the major facilities;</li> <li>• Unlikely to result in constraints on major facilities to reasonably expand, intensify or introduce changes to their operations;</li> <li>• Unlikely to result in constraints for new major facilities to reasonably be established in the Employment Area;</li> </ul> <p>Furthermore, as stated in the Modified Compatibility &amp; Mitigation Study prepared by SLR Consulting, with the use of feasible mitigation measures, the Project will not affect the compliance of local industrial facilities with applicable Provincial environmental policies, regulations, approvals, authorizations and guidelines, including the City’s Noise Bylaw.</p>
Proximity and access to higher order transit.	While the Subject Lands are not located near higher order transit, it benefits from easy access to multiple transit lines

Issue	Response
	<p>(Routes 24, 39, 42 and 939B).</p> <p>The vision for the Subject Lands is to optimize this area of the City by proposing a more compact development consisting of rental housing to complement and support the existing commercial and office uses. The location of the Subject Lands is well positioned for a more urban development that blends a vibrant mix of uses which are functionally and/or physically integrated while delivering much needed rental housing. It would give an opportunity for people who work or go to school in the area, the option to live closer to where they need to commute to, and breathe life into an area that is traditionally only active during the weekday. Specifically, the nearby Seneca College campus generates a strong demand for student housing, which the rental housing project can help fulfill with its easy access via multiple transit lines.</p> <p>This type of mixed-use development has the potential to realize the development on these lands in the near term by allowing people to live, work and play in the same neighbourhood, which furthers the role that planning plays in supporting the economic resilience, productivity, and success of the regional economy. This portion of the development will infuse residential component into an employment area that would otherwise potentially remain stagnant.</p> <p>If the Subject Lands were to be limited to employment uses, this area would likely remain underutilized and would not meet the objectives of good land use principles. There is a need to convert the Subject Lands to allow for residential development while maintaining or increasing the number of jobs over time in order to meet the growth target by 2051 as directed by the Growth Plan.</p>

As detailed above, the analysis demonstrates that the City’s issues have been addressed. This is in addition to the analysis that demonstrates that the tests posed by the PPS, Growth Plan, and City of Toronto Official Plan have been met, and that the submitted request is appropriate and represents good planning.

**Conclusion**

In summary, the vision for the southern portion of the Subject Lands for a vibrant mixed-use development is considered to be more appropriate than its current General Employment designation. The Subject Lands benefit from close proximity to existing community amenities and jobs and possess the opportunity to be converted to a mixed-use format without having an adverse impact to the existing stable employment area. The Subject Lands are challenged by subpar locational characteristics for employment uses as envisioned by Provincial and Municipal policies and would be enhanced with a mix of uses to support both the residential and employment uses.

It is our opinion that some residential uses on the southern portion of the lands will enhance the sustainability and viability of the employment uses, while maintaining the current employment functions on the lands and generate a much-needed housing type (i.e. rental housing) for the City. This will also contribute to the creation of compact, complete communities, without impairing the City's ability to accommodate its employment growth allocations. To realize this potential, it is requested that the conversion be supported and redesignated the Subject Lands to Mixed Use. It is our opinion that this proposal aligns with the Provincial target of creating 1.5 million new homes within Ontario.

Current employment uses will be largely maintained on the Subject Lands, which will ensure the protection of employment land and jobs for the City to accommodate forecasted employment growth. It is our opinion that the proposal represents good planning and is in the public interest.

On behalf of our Client, we appreciate the opportunity to provide input on the City of Toronto's Official Plan Amendment (OPA No. 591) and look forward to continuing to engage with Municipal and Provincial Staff throughout the process. Should you have any questions with respect to this request, please do not hesitate to contact me at 905.513.0170 x 113 or [jwong@mgp.ca](mailto:jwong@mgp.ca).

Yours very truly,

**MALONE GIVEN PARSONS LTD.**



**Jack Wong, MCIP, RPP  
Associate**

cc.

*Client*