

December 17, 2020

Kerri A. Voumvakis and Jeffrey Cantos
Strategic Initiatives, Policy & Analysis, City Planning Division
City of Toronto
Metro Hall, 55 John Street, 22nd Floor
Toronto, Ontario M5V 3C6

Dear Ms. Voumvakis and Mr. Cantos,

**Re: Request for Employment Area Conversion
Municipal Comprehensive Review
11 Davies Avenue, Toronto**

1.0 INTRODUCTION

We are planning consultants to 1152136 Ontario Inc. with respect to an approximately 830 square metre site located at the northeast corner of Davies Avenue and Thompson Street, one block north of Queen Street East and immediately east of the Queen Street on-ramp to the Don Valley Parkway (the “DVP”). An aerial photo of the subject site is attached hereto as **Appendix A**.

The purpose of this letter is to request that the subject site be converted from its current *Core Employment Areas* designation to a *Mixed Use Areas* designation, or another appropriate designation that includes permission for non-employment uses, through the ongoing Municipal Comprehensive Review process.

The site is located within a small pocket of *Employment Areas* lands north of Queen Street East, which is surrounded by lands designated *Neighbourhoods*, *Apartment Neighbourhoods*, *Mixed Use Areas* and *Parks*. Lands designated *Employment Areas* in the immediate vicinity of the subject site include office uses, design studios, retail uses and other uses that are compatible with residential uses. There are no manufacturing operations in the immediate vicinity.

The site is within walking distance of streetcar stops along Queen Street East and Broadview Avenue, the Lower Don River Trail, a planned GO RER station and two subway stations along the Ontario Line.

Currently, the site is underutilized as a 2-storey office building and, due to its small size, cannot reasonably accommodate a larger-scale employment use such as a manufacturing or warehousing operation. Mixed-use/residential redevelopment on the

site would establish a more compatible land use relationship with Joel Weeks Park and the Rivertowne neighbourhood immediately east of the site than would the range of uses permitted under the *Core Employment Areas* designation and the existing I2 D3 zoning.

In addition, the requested conversion would allow for transit-supportive mixed-use intensification within walking distance of existing public transit and future higher-order transit and in proximity to an *Avenue* and the *Downtown and Central Waterfront*. The site is not located within a Provincially Significant Employment Zone (PSEZ), nor in an area requested to be identified as a PSEZ by the City.

2.0 SITE AND SURROUNDINGS

2.1 Subject Site

The site is rectangular in shape, with an area of approximately 831.4 square metres and frontages of approximately 23.8 metres on Davies Avenue and approximately 34.8 metres on Thompson Street, extending through to a public lane along its east limit.

The site is occupied by a 2-storey office building with a net rentable floor area of approximately 1,370.5 square metres that occupies the entire site and has a party wall condition with the building to the north. The main pedestrian entrance is from Davies Avenue. The building is occupied by a number of office and studio tenants, including Colourgenics, IX Gallery, Compass 360 Design and Advertising, Level Film, Eggplant Entertainment and The Vine.

The site is generally flat and there are no existing trees or landscaping on the site.

2.2 Surroundings

To the north of the subject site are a pair of 2-storey brick buildings with similar massing and setbacks as the building on the subject site (27 and 33 Davies Avenue). Tenants in these buildings include design studios (Yirego, Carol Sutton Fine Art, Augustus Jones and DMD Ltd.) and an acupuncture clinic.

Further north is a gravel surface parking lot accessed from the rear lane (39 Davies Avenue), a 3-storey brick office building (43 Davies Avenue) and a 2-storey office building (47 Davies Avenue), where Davies Avenue curves east and becomes Matilda Street. Tenants in these buildings include a product distribution company (Dempsey) and a media company (Our House Media).

On the north side of Matilda Street is a 2-storey office building (2 Matilda Street) with uses that include a café (Merchants of Green Coffee), an event space (the Jam Factory) and a specialty food store (Forbes Wild Foods). To the east is a 3-storey co-working office building known as East Room (8 Matilda Street and 50 Carroll Street).

Further north, at the southwest corner of Carroll Street and Dundas Street East, is the recently built 3-storey Grand Touring Automobiles car dealership (777 Dundas Street East).

To the east of the site, on the east side of the public lane, is Joel Weeks Park, a 0.95 hectare public park opened in 2012, which includes a basketball court, play structure, a splash pad, community garden and passive recreational areas (10 Thompson Street).

To the east of Joel Weeks Park are 3-storey rowhouses along Munro Street with residential uses further east. On the north side of the park, at the northeast corner of Matilda Street and Carroll Street, is a 4-storey residential apartment building (50 Matilda Street), with low-rise residential uses further north and east that form part of the Rivertowne neighbourhood (the former Don Mount Court redevelopment).

To the southeast of the site is a block bounded by Thompson Street, Carroll Street, Queen Street East and Hamilton Street that includes 3-storey mixed use buildings along Queen Street East and 2 and 3-storey residential dwellings further north.

To the south of the site is a property at 1 and 9 Davies Avenue and 600 Queen Street East, which includes a 5- and 6-storey converted warehouse building on the northerly portion of the property, containing office and studio uses, and one- and 2-storey wings extending south to the Queen Street frontage, including a retail store (Guff Furniture) and an automotive parts distribution and retail use (Motorcade Industries Inc.).

To the east along the Queen Street frontage is a 9-storey apartment building (630 Queen Street East) with ground floor retail uses, including a coffee shop (Dark Horse Espresso) and a car dealership (Genesis Downtown). A surface parking area is located to the rear of 630 Queen Street, with access from Carroll Street to the east.

To the west of the site, west of Davies Avenue, is the Queen Street on-ramp to the DVP northbound, the DVP, the Don River, the Lower Don River Trail and the GO Richmond Hill rail corridor, with the *Downtown and Central Waterfront* immediately west.

2.3 Transportation Context

The site is located in a highly transit-accessible location, in proximity to existing streetcar routes offering frequent transit surface and planned higher-order transit stations along the future Ontario Line and GO RER line.

The Ontario Line, formerly known as the Downtown Relief Line, is a 16-kilometre line proposed to connect the existing Exhibition (Ontario Place) GO station west of the Downtown Core to the Science Centre LRT Station at Eglinton Avenue East and Don Mills Road. The Ontario Line is planned to include 15 transit stations and will connect with Lines 1 and 2 of the TTC subway, TTC streetcar routes, the Eglinton Crosstown LRT and the GO Rail network.

The Ontario Line is planned to include underground and elevated sections and will share existing GO rail corridors in select areas. In the vicinity of the subject site, the Ontario Line will utilize the existing GO rail corridor (OP Maps 4 and 5) and will include two future stations: the East Harbour station south of Eastern Avenue, approximately 630 metres from the site, and the Leslieville station on Queen Street east of Broadview Avenue, approximately 590 metres from the site. East Harbour will also be the site of a GO RER station, planned to be constructed parallel to the Ontario Line platforms,

With respect to existing transit, the site is located within 100 and 120 metres of eastbound and westbound stops of the 501 Queen and 504 King streetcar routes, respectively, which provide all day, every day service every 10 minutes or better. The stops also serve the 503 Kingston Road streetcar route which provides weekday-only service. The site is also located approximately 355 metres from stops served by the 505 Dundas streetcar which provides all day, every day service every 10 minutes or better, all day.

Davies Avenue is a one-way two-lane local road with parking on the east side of the street. Davies Avenue intersects Queen Street East to the south and splits adjacent to the subject site, with the left branch leading to the northbound lanes of the DVP and the right branch continuing directly north as Davies Avenue. Thompson Street is a two-way two-lane road with parking on the north side of the street. There are sidewalks on the east side of Davies Avenue and on both sides of Thompson Avenue.

Queen Street East, one block south of the site, is a two-way four-lane east-west Major Arterial Road with a right-of-way width of 20 metres as per Map 3 of the Official Plan. The DVP to the west of the site is a six-lane two-way City highway with a right-of-way width greater than 45 metres that connects to the Gardiner Expressway to the south and Highway 404 to the north.

With respect to the cycling network, nearby cycling infrastructure includes the existing Lower Don River Trail, a multi-use recreational path along the Don River, and shared bike lanes on Dundas Street East.

3.0 PLANNING POLICY FRAMEWORK

3.1 Provincial Policy Statement (2020)

On February 28, 2020, the province issued the Provincial Policy Statement (2020), which replaced the Provincial Policy Statement (2014). The new 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 are required to be consistent with the Provincial Policy Statement (2020).

Among other matters, the 2020 PPS includes additional policies related to addressing a changing climate and supporting green infrastructure, enhancing land use compatibility policies for sensitive land uses, increasing minimum requirements for housing land supply and clarifying policies related to market-based housing by adding a reference to affordable housing (i.e. Policies 1.4.3 and 1.7.1 of the 2020 PPS).

We note that the 2020 PPS also includes additional language that encourages transit-supportive development. In particular, Policy 1.1.1 provides that healthy, liveable and safe communities will be sustained by promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs.

Regarding the conversion of employment areas to non-employment uses, Policy 1.3.2.5 states that:

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:

- a) there is an identified need for the conversion and the land is not required for employment purposes over the long term;*
- b) the proposed uses would not adversely affect the overall viability of the employment area; and*

- c) *existing or planned infrastructure and public service facilities are available to accommodate the proposed uses.*

3.2 Growth Plan for the Greater Golden Horseshoe (2019, as amended)

On May 16, 2019, a new Growth Plan (A Place to Grow: The Growth Plan for the Greater Golden Horseshoe) came into effect, replacing the Growth Plan for the Greater Golden Horseshoe, 2017. 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.

There are a number of changes from the previously applicable Growth Plan that are relevant to the subject site. One significant change was the identification of 29 provincially significant employment zones. Provincially Significant Employment Zones (PSEZ's) are areas defined by the Minister in consultation with affected municipalities for the purpose of long-term planning for job creation and economic development. These zones can consist of employment areas or mixed-use areas with a significant number of jobs.

The subject site is not located in a PSEZ and the City did not request the Province to add the site as a PSEZ when it provided comments regarding the proposed PSEZ mapping (February 26, 2019 City Council resolution adopting the recommendations of a February 25, 2019 Supplementary Report).

Policy 2.2.5.9 states that the conversion of lands within employment areas to non-employment uses may be permitted only through a municipal comprehensive review where it is demonstrated that:

- a) there is a need for the conversion;
- b) the lands are not required over the horizon of this Plan for the employment purposes for which they are designated;
- c) the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;
- d) the proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan; and
- e) there are existing or planned infrastructure and public service facilities to accommodate the proposed uses.

However, Policy 2.2.5.10 provides that, notwithstanding Policy 2.2.5.9, until the next municipal comprehensive review, lands within existing employment areas may be converted to a designation that permits non-employment uses, provided the conversion would:

- a) satisfy the requirements of Policy 2.2.5.9 a), d) and e);
- b) maintain a significant number of jobs on those lands through the establishment of development criteria; and
- c) not include any part of an employment area identified as a provincially significant employment zone unless the part of the employment area is located within a major transit station area as delineated in accordance with the policies in subsection 2.2.4.

Since the site is not included within a PSEZ, the tests set out in Policy 2.2.5.10 would be applicable. Specifically, by virtue of the cross-references in Policy 2.2.5.10, the applicable criteria are as set out in Policy 2.2.5.9(a), 2.2.5.9(d), 2.2.5.9(e) and 2.2.5.10(b).

With respect to higher order transit station, Policy 2.2.4.1 states that planning will be prioritized for major transit station areas on priority transit corridors, including zoning in a manner that implements the policies of the Growth Plan. Policy 2.2.4.2 states that the City of Toronto will delineate the boundaries of major transit station areas in a transit-supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station.

Policy 2.2.4.3 states that MTSA's on priority transit corridors or subway lines within be planned for a minimum density target of 200 residents and jobs per hectare for those that are served by subway.

Policy 2.2.4.6 states that within major transit station areas on priority transit corridors or subway lines, land uses and built form that would adversely affect the achievement of the minimum density targets in this Plan will be prohibited.

The Growth Plan defines a major transit station area as:

“The area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.”

In addition to MTSAs, Policy 2.2.4.10 states that lands adjacent to or near existing and planned frequent transit should be planned to be transit-supportive and supportive of active transportation and a range and mix of uses and activities.

In this respect, the subject site within an 800-metre radius of two planned subway stations on the Ontario Line, with the closest being the Leslieville station, and the planned East Harbour GO RER station, as shown in **Appendix B**.

3.3 Official Plan

Growth Management

The growth management policies of the Official Plan direct growth to identified areas on Map 2, Urban Structure, which include *Centres*, *Avenues*, *Employment Areas* and the *Downtown*, where transit services and other infrastructure are available. The site is currently located within the *Employment Areas* in proximity to the *Downtown and Central Waterfront* and lands identified as *Avenues* in accordance with Map 2 (Urban Structure).

With the exception of small pockets of lands identified as *Employment Areas* including lands directly south of the subject site on Queen Street East, and lands within the Greenspace System, both sides of Queen Street east of the *Downtown* are identified as *Avenues*. To the west of the site, on the west side of the Don River, is the eastern boundary of the *Downtown and Central Waterfront* (**Appendix C**).

The *Avenues* are intended to accommodate mixed-use intensification, with an emphasis on residential growth. Directing growth to the *Avenues* is intended to achieve the following objectives, among others:

- using municipal land, infrastructure and services efficiently;
- concentrating jobs and people in areas well served by surface transit and rapid transit stations;
- promoting mixed use development to increase opportunities for living close to work and to encourage walking and cycling for local trips; and
- offering opportunities for people of all means to be affordably housed.

The *Downtown* is intended to evolve as a place to live and work and is planned to achieve, and exceed, the Growth Plan's minimum density target of 400 jobs and people per hectare. *Downtown* will continue to function as the region's premier employment area and will provide a range of housing with the intent of reducing commuting and automobile dependency.

Land Use Designation

The site is designated *Core Employment Areas* on Map 18 (Land Use Plan) of the City of Toronto Official Plan. Lands to the south, southeast and north are also designated *Core Employment Areas*, while lands to the immediate east are designated *Parks* and lands further east and northeast are designated *Apartment Neighbourhoods* and *Neighbourhoods*. Lands to the south and southeast on both sides of Queen Street East are designated *Mixed Use Areas* (**Appendix D**).

The Official Plan describes *Core Employment Areas* as places of business and economic activity. Permitted uses for lands that are subject to the *Core Employment Areas* designation include manufacturing, warehousing, wholesaling, transportation facilities, offices, research and development facilities, utilities, industrial trade schools, and media, information and technology facilities. In addition to the aforementioned primary uses, additional uses permitted in the *Core Employment Areas* designation include parks, small-scale restaurants, catering facilities and small-scale service uses.

The Official Plan indicates that *Mixed Use Areas* achieve a multitude of planning objectives by combining a broad array of residential uses, offices, retail and services, institutions, entertainment, recreation and cultural activities, and parks and open spaces. *Mixed Use Areas* will absorb most of the anticipated increase in retail, office and service employment in the coming decades, as well as much of the new housing.

Lands to the east and west of the Don River are located within the Natural Heritage System as per Map 9 of the Official Plan. Development within the Natural Heritage System must consider potential impacts and mitigation measures, if required.

3.4 Zoning

The site is subject to former City of Toronto Zoning By-law 438-86, as amended. The new City-wide Zoning By-law 569-2013 does not apply to the site. Under By-law 438-86, the site is zoned I2 D3 with a maximum height of 18.0 metres (see **Appendix E**, Zoning By-law 438-86, Zoning and Height Schedules).

The I2 (Industrial) zoning permits a specified range of industrial uses and commercial uses, including manufacturing and warehousing uses, custom workshops, studios, restaurants, banks and service shops. Despite the prevalence of offices in the area, office uses are not permitted by the I2 zoning, although the permissive exception in Section 12(1) 307 permits the continuance of lawful uses existing on the site as of July 20, 1993. Residential uses are not permitted,

3.5 Municipal Comprehensive Review

On June 29, 2020, City Council adopted the recommendations of the *Growth Plan Conformity and Municipal Comprehensive Review – Work Plan* Report dated May 19, 2020. The report outlines City Planning staff's recommended approach and work plan that will ultimately result in Official Plan Amendments required to align the Official Plan with the Province's Growth Plan (2019).

The report includes recommendations regarding an employment lands strategy which will be undertaken to satisfy the Growth Plan (2019) requirements to complete the conformity exercise and Municipal Comprehensive Review ("MCR"). In Attachment 3, the report lists the Conversion and Removal Policies for *Employment Areas* to be applied, in addition to those set out in the Growth Plan (2019). The commencement date for the MCR is August 4, 2020 and the window for employment conversion requests closes on August 3, 2021.

Attachment 3 includes Policies 2.2.4.14 to 2.2.4.18 inclusive, which were approved to implement the policy framework in the Growth Plan (2006). In particular, Policy 2.2.4.17 lists 9 criteria set out in paragraphs (a) to (i).

4.0 ANALYSIS

In our opinion, the conversion request appropriately addresses the applicable conversion criteria in Policies 2.2.5.9 and 2.2.5.10 of the Growth Plan and the conversion criteria set out in Policy 2.2.4.17 of the Official Plan. A detailed analysis is provided below.

4.1 Growth Plan Criteria

Policy 2.2.5.9(a). There is a need for the conversion:

- Transit-supportive residential/commercial intensification on the subject site will contribute to the achievement of population forecasts for the City as a whole as set out in the Growth Plan. Should the site be included within the delineated boundaries for the East Harbour and/or Leslieville major transit station areas, residential/commercial intensification on the subject site would also support the achievement of the minimum density targets specified for Major Transit Station Areas.

There is also a need for the conversion to address potential land use compatibility issues. Although the existing use of the site is compatible with Joel Weeks Park and the Rivertowne neighbourhood to the immediate east,

other employment uses that would be permitted as-of-right under the *Core Employment Areas* designation and the I2 D3 zoning would potentially be incompatible with the surrounding residential context.

Policy 2.2.5.9(d). The proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan:

- The subject site does not form part of a large contiguous employment area. The employment areas to the north and south of the site consist of small pocket of remnant employment lands along the east side of the DVP between Queen Street and Gerrard Street. These lands include Hydro One and City of Toronto facilities north of Dundas Street and office, studio, retail and car dealership uses between Dundas Street and Queen Street. To the east and south of these employment lands are lands designated *Apartment Neighbourhoods, Neighbourhoods, Mixed Use Areas and Parks*.

The conversion of the lands to permit non-employment uses would facilitate transit-supportive intensification on the site and would contribute to “the achievement of the minimum intensification and density targets” of the Growth Plan, specifically, the minimum density targets for major transit station areas on priority transit corridors and subway lines.

Policy 2.2.5.9(e). There are existing or planned infrastructure and public service facilities to accommodate the proposed uses:

- The site is well served by hard services, including planned higher order transit stations and existing public transit, and soft services including schools, childcare facilities, libraries, places of worship, parks and other community facilities and amenities.

Policy 2.2.5.10(b). (The conversion will ...) maintain a significant number of jobs on those lands through the establishment of development criteria:

- Given the size and location of the site, site-specific development proposals that would be permitted pursuant to the requested *Mixed Use Areas* designation will have the ability to accommodate significantly more jobs than exist on the site today (i.e. an estimated 30 jobs) through the inclusion of retail/commercial space, office space and/or residents working from home. In this respect, the City may ultimately wish to include a site and area specific policy specifying a

minimum job target for the site and/or a larger area within the major transit station area(s).

Toronto Official Plan Criteria

Policies 2.2.4.14 to 2.2.4.16 provide that the redesignation of land from an *Employment Area* to any other designation may only be permitted by way of a Municipal Comprehensive Review at the time of a municipal review of employment policies and designations under Section 26 of the Planning Act. Policy 2.2.4.18 requires the City to provide notice to “major facilities” and propane storage and distribution facilities when considering proposals to convert lands within *Employment Areas*.

Policy 2.2.4.17 provides that “the City will assess requests to convert lands within Employment Areas, both cumulatively and individually, by ‘considering whether or not’ ...” In other words, the criteria are matters to be considered, rather than tests to be met. As well, it follows that “compliance” with each and every criterion is not required, but rather that the evaluation balances and reconciles consideration of the listed criteria. The analysis set out below responds in that spirit.

a) There is a demonstrated need for the conversion(s) to:

- 1. meet the population forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe; or**
- 2. mitigate existing and/or potential land use conflicts:**

- Transit-supportive residential/commercial intensification on the subject site will contribute to the achievement of population forecasts for the City as a whole as set out in the Growth Plan, as well as the minimum density targets specified for Major Transit Station Areas.

While City-wide population forecasts should not be determinative, Schedule 3 of the Growth Plan, as amended by Growth Plan Amendment No. 1, forecasts a population of 3,650,000 for the City of Toronto by 2051. The 2016 Census data indicates that population growth in Toronto is falling short of the updated Growth Plan forecast. The City’s population growth from 2001 to the 2016 population of 2,822,902 (adjusted for net Census undercoverage) represents only 73.2% of the growth that would be necessary on an annualized basis to achieve the population forecast of 3,650,000 by 2051.

More fundamentally, the current use of the site for a low-rise office building does not optimize the use of land and infrastructure. A mixed residential/commercial development would make more efficient use of the site

and help to maximize the number of potential transit riders within the immediate vicinity of existing frequent transit service and planned higher-order transit stations.

- b) The lands are required over the long-term for employment purposes;**
- c) The City will meet the employment forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe:**

- In our opinion, the lands are not required to be reserved over the long term solely for employment purposes. Strategically, the continued designation of the site as *Employment Areas* is not required in order to maintain a land base for “major facilities” given its location within a small pocket of employment lands and in proximity to two planned subway stations on the Ontario Line.

Based on employment growth between 2001 and 2018, it appears that the City will achieve, and likely surpass, the employment forecast in the Growth Plan well before the 2051 horizon date. On a City-wide basis, the estimated number of jobs was 1,700,000 as of 2018 (the most recent available data)¹. On that basis, the growth in employment between 2001 and 2018 was 142% of what would be required on an annualized basis to achieve to 2051 Growth Plan target of 1,980,000.

In addition, specific development proposals for the site that would be permitted pursuant to the requested *Mixed Use Areas* designation will have the ability to accommodate significantly more jobs than exist on the site today (i.e. an estimated 30 jobs) through the inclusion of retail/commercial space, office space and/or residents working from home.

- d) The conversion(s) will adversely affect the overall viability of an *Employment Area* and maintenance of a stable operating environment for business and economic activities with regard to the:**
 - 1. compatibility of any proposed land use with lands designated *Employment Areas* and major facilities, as demonstrated through the submission of a Compatibility/Mitigation Study in accordance with Policies 2.2.4.5, 2.2.4.7 and 2.2.4.8 and Schedule 3 for any proposed land use, with such policies read as applying to lands within *Employment Areas*;**
 - 2. prevention or mitigation of adverse effects from noise, vibration, and emissions, including dust and odour;**

¹ Russell Mathew evidence on behalf of the City of Toronto at the OPA 231 LPAT hearing (July 29, 2019 witness statement, paragraph 48).

- 3. prevention or mitigation of negative impacts and minimization of the risk of complaints;**
 - 4. ability to ensure compliance with environmental approvals, registrations, legislation, regulations and guidelines;**
 - 5. ability to provide appropriate buffering and/or separation of employment uses from sensitive land uses, including residential;**
 - 6. ability to minimize risk to public health and safety:**
- In our opinion, the requested conversion will not adversely affect the overall viability of the *Employment Area* and the maintenance of a stable operating environment for business and economic activities.

The site is located within an area with numerous residential, commercial and office uses, in proximity to lands designated *Mixed Use Areas*, *Parks*, *Neighbourhoods* and *Apartment Neighbourhoods* and in proximity to the *Avenue* along Queen Street East and the *Downtown* immediately west side of the Don River.

The site is within the southern portion of lands designated *Core Employment Areas* along the east side of the DVP and immediately abuts lands designated *Parks* to the east with lands designated *Mixed Use Areas* to the southeast along Queen Street East.

The lands to the immediate north of the site at 27 and 33 Davies Avenue and the properties further northward toward and including Matilda Street appear to consist exclusively of office, small-scale warehousing and commercial uses. Furthermore, these lands are located within the Natural Heritage System and therefore future employment uses that would adversely impact the Natural Heritage System would not be permitted. Office uses, commercial uses and small-scale manufacturing and warehouse uses are not anticipated to produce adverse noise, vibration or other emissions such as dust and odour.

Given the nature of the existing uses within the *Employment Areas* designation and the small size of the *Employment Area*, it is our opinion that a compatibility/mitigation study is not necessary in this case in order to satisfactorily address this criterion.

- 7. reduction or elimination of visibility of, and accessibility to, employment lands or uses;**
- 8. impact upon the capacity and functioning of the transportation network and the movement of goods for existing and future employment uses:**

- The requested conversion would not have any impact on the visibility of, or accessibility to, the pockets of employment uses to the north, which do not have visibility from Queen Street East but would continue to be visible from the DVP.

The road network serving the existing employment uses consists of local streets and laneways which currently serve both residential and employment uses e.g. Davies Avenue, Thompson Street, Matilda Street and Carroll Street. Accordingly, the requested conversion would not materially affect the usage of the surrounding street network,

- 9. removal of large and/or key locations for employment uses;**
- 10. ability to provide opportunities for the clustering of similar or related employment uses; and**
- 11. provision of a variety of land parcel sizes within the *Employment Area* to accommodate a range of permitted employment uses:**

- In our opinion, the subject site is not a large and/or key location for employment uses. With a total area of approximately 830 square metres, the site cannot accommodate a medium to large space-extensive industrial operation. The entire *Employment Areas* pocket is not large enough to effectively accommodate a meaningful employment “cluster”.

e) The existing or planned sewage, water, energy and transportation infrastructure can accommodate the proposed conversion(s):

- The subject site is located within an area that is well served by existing transportation, water, sewer and energy infrastructure. The site is located one block north of a Major Arterial road in proximity to existing frequent transit service and cycling infrastructure and planned higher order transit stations, specifically the future East Harbour and Leslieville stations on the Ontario Line.

f) 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:

- The site is within walking distance of numerous existing and planned schools, parks, recreation centres and other community facilities and services, including Joel Weeks Park, the Lower Don River Trail, Jimmy Simpson Recreation Centre and Park, the Queen/Saulter public library, Riverdale public library,

Dundas Junior Public School, Seed Alternative School and Queen Alexandra Middle School.

g) Employment lands are strategically preserved near important transportation infrastructure such as highways and highway interchanges, rail corridors, ports and airports to facilitate the movement of goods:

- While site is adjacent to an on-ramp to the DVP, it is not sufficiently large to accommodate large-scale manufacturing or warehousing activities that would generate significant truck traffic. Accordingly, proximity to the DVP in this case provides minimal benefit with respect to the movement of goods.

h) The proposal(s) to convert lands in an *Employment Area* will help to maintain a diverse economic base accommodating and attracting a variety of employment uses and a broad range of employment opportunities in Toronto:

- The site's location in an area with existing frequent transit service, cycling infrastructure and planned higher order public transit can facilitate a wide variety of uses including residential, commercial and office. The proposed conversion has the ability to provide a range of jobs on the site, including work-from-home jobs, which can be accessed by a variety of non-automobile transit options.

i) Cross-jurisdictional issues have been considered:

- The site is located more than 16 kilometres from the nearest neighbouring municipality; accordingly, there are no cross-jurisdictional issues.

5.0 CONCLUSIONS

In our opinion, the conversion of the site to permit non-employment uses appropriately addresses the criteria set out in the Growth Plan (2019) and the City's Municipal Comprehensive Review process.

The proposed conversion will support the public investments being made in the planned East Harbour and Leslieville stations on the Ontario Line. The proposed conversion would facilitate mixed use development on a site that is within walking distance to existing frequent transit service, planned higher order transit and cycling infrastructure.

Due to the size of the site, the employment functions are generally limited to office and

studio uses and other uses that do not require large sites. The uses found in the *Core Employment Areas* to the north and south of the site consist of office, studio and retail uses, which would be compatible with residential/mixed-use development on the subject site.

The request to permit non-employment uses, including residential uses, while maintaining existing office uses, will support the achievement of the minimum density targets specified in the Growth Plan and will contribute to the evolving mixed use character within the Queen Street East corridor.

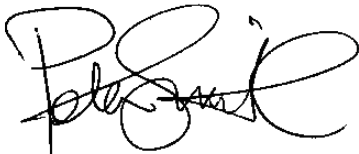
Furthermore, the analysis set out in this letter demonstrates that, due to the existing, planned and permitted uses in the vicinity of the site, the conversion would not negatively impact the viability of employment areas in the vicinity.

In summary, it is our opinion that the proposed conversion would be compatible with surrounding land uses, would not negatively affect the viability of other employment uses in the vicinity, and would be consistent with the policy directions set out in the PPS and Growth Plan.

If there are any questions with respect to this submission, please do not hesitate to contact the undersigned or Daniel Rende of this office.

Yours very truly,

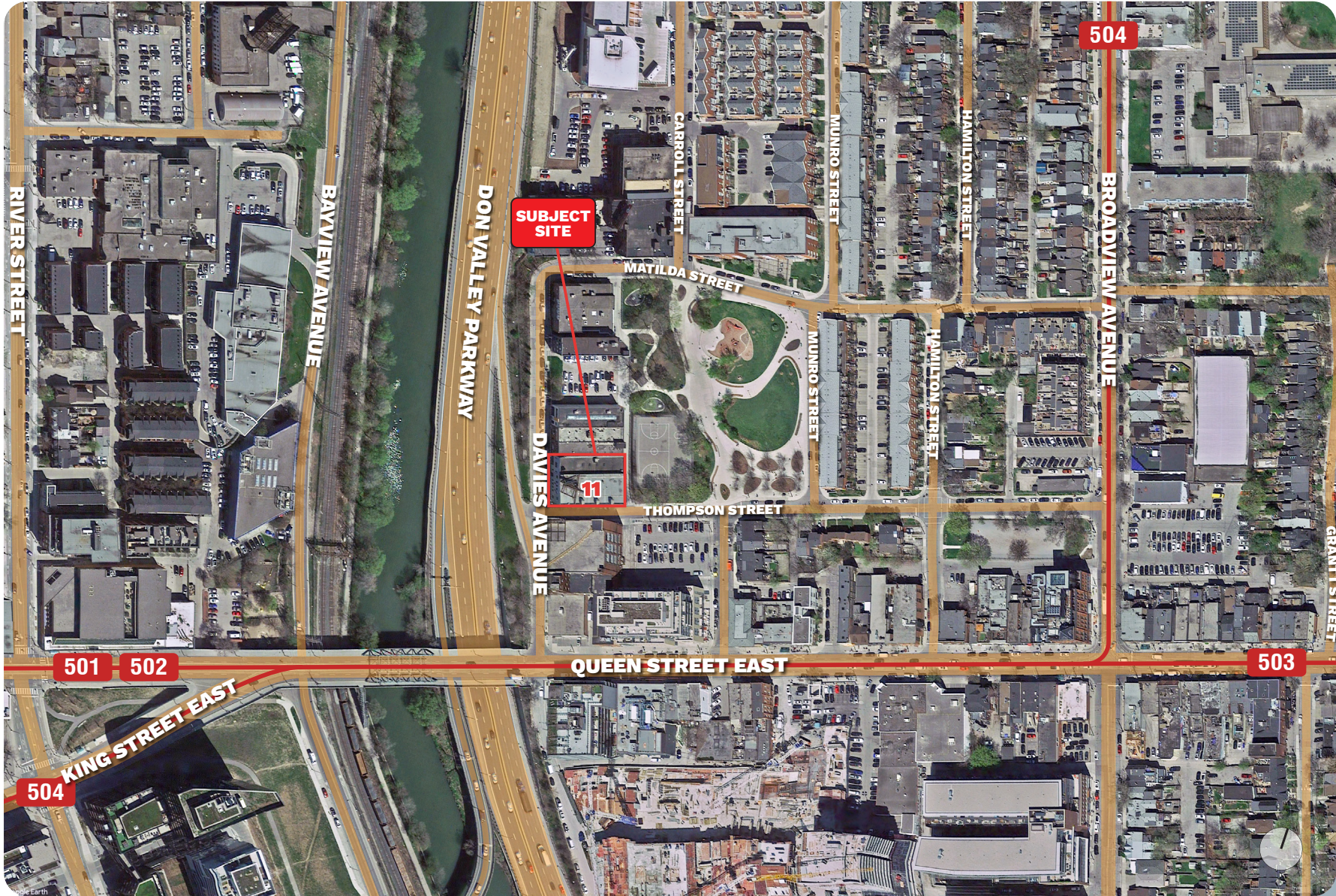
Bousfields Inc.



Peter F. Smith B.E.S., MCIP, RPP

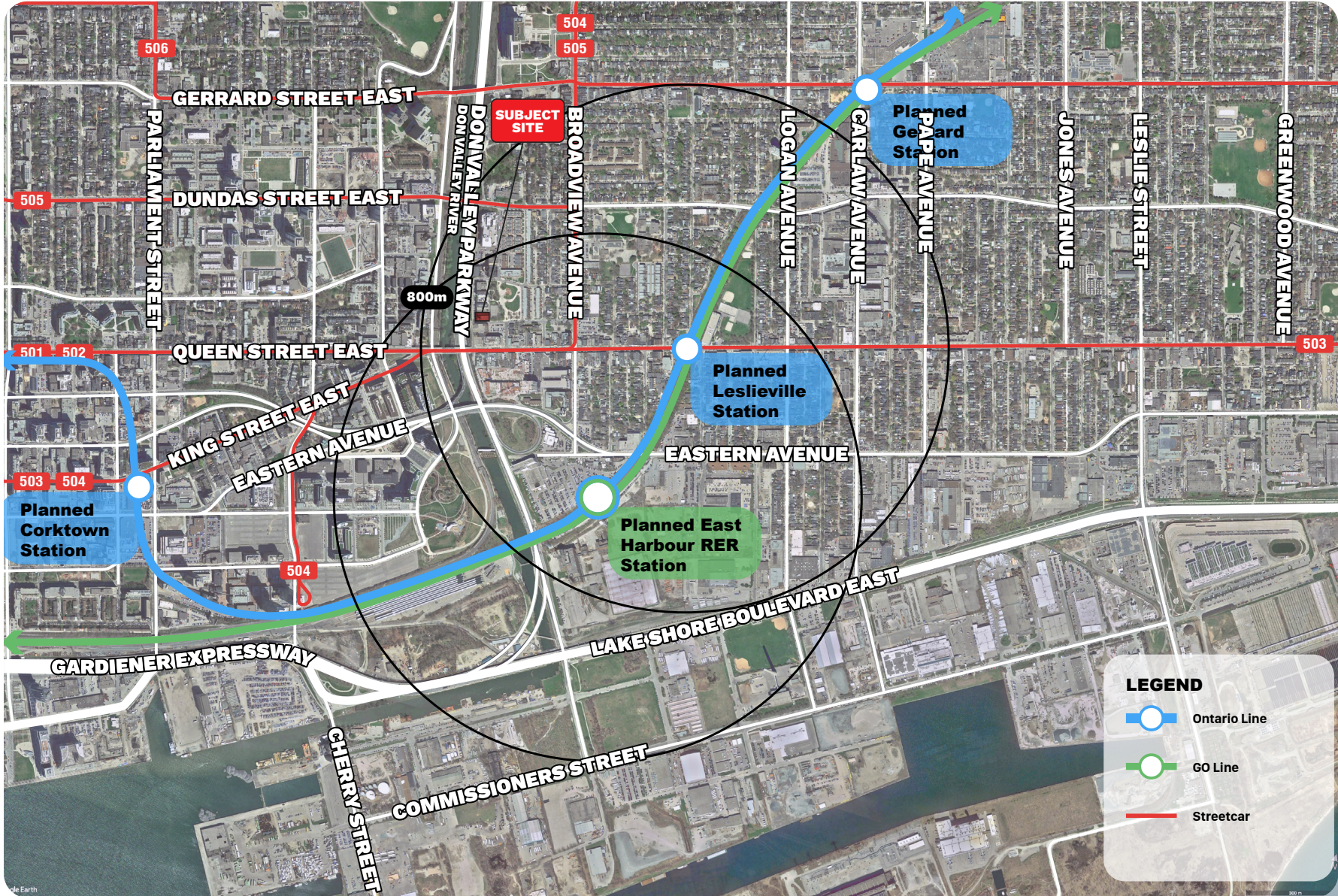
PFS/rml:jobs

cc: *Jason Chiu, Client*



Appendix A

Aerial Photo - Site Context










Appendix B

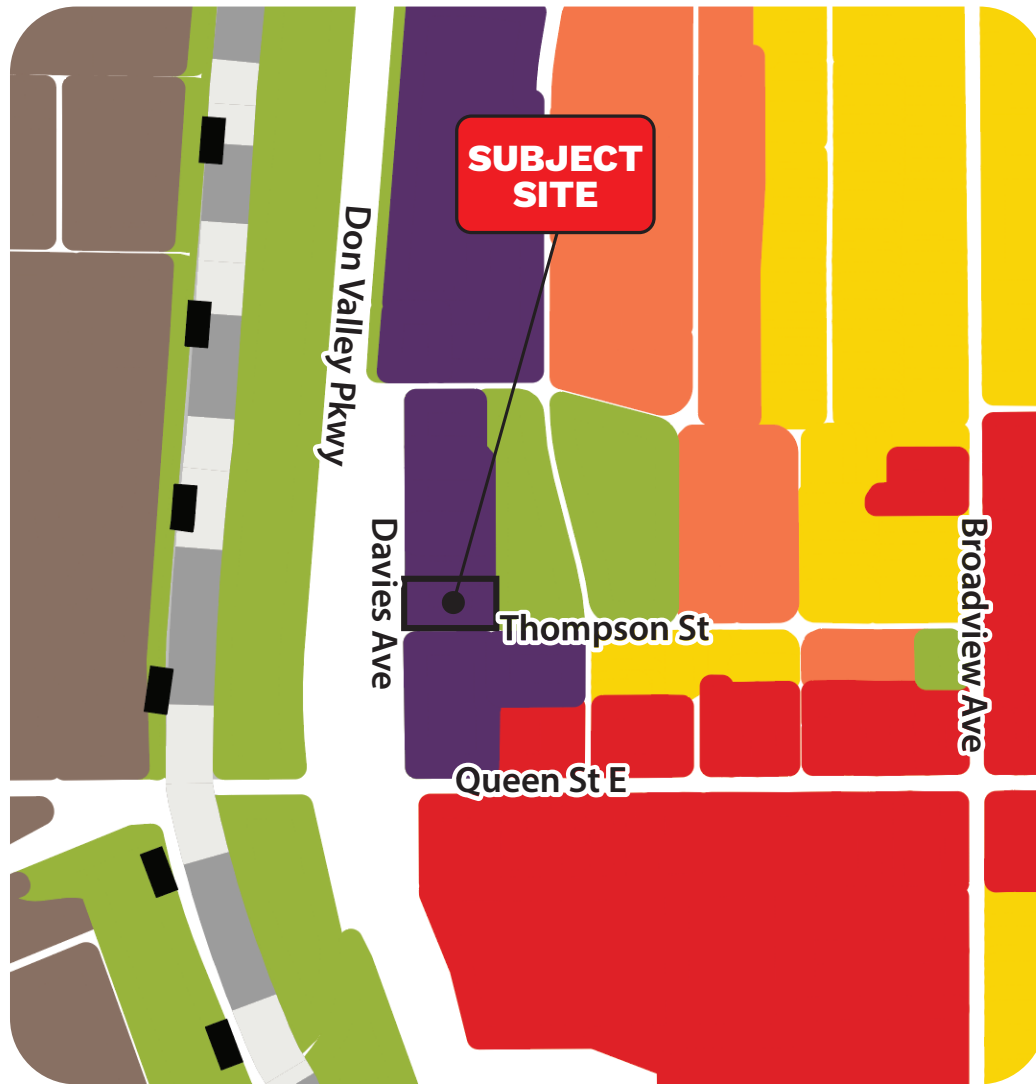
Aerial Photo - Surrounding Context



Urban Structure Legend

-  Avenues
-  Centres
-  Employment Areas
-  Downtown and Central Waterfront
-  Green Space System
-  Greenbelt Protected Countryside
-  Greenbelt River Valley Connections

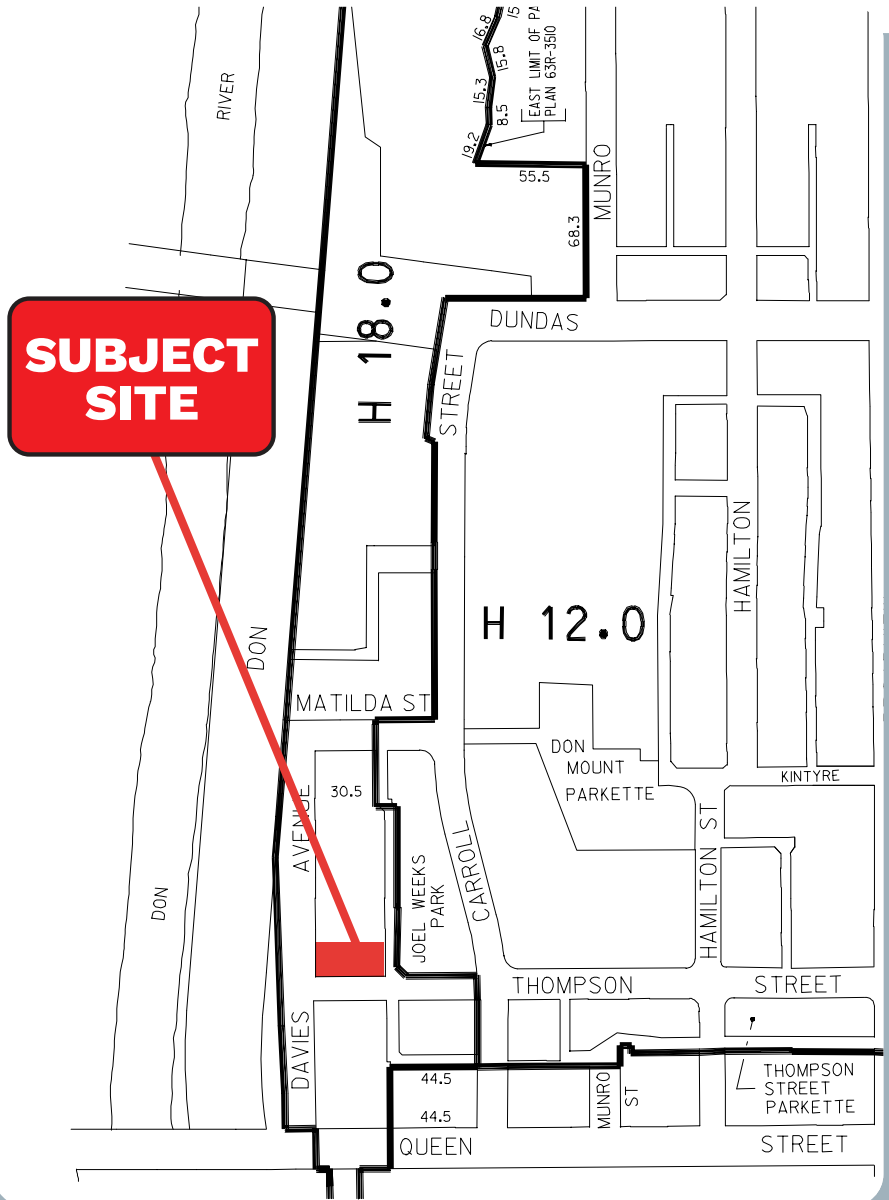
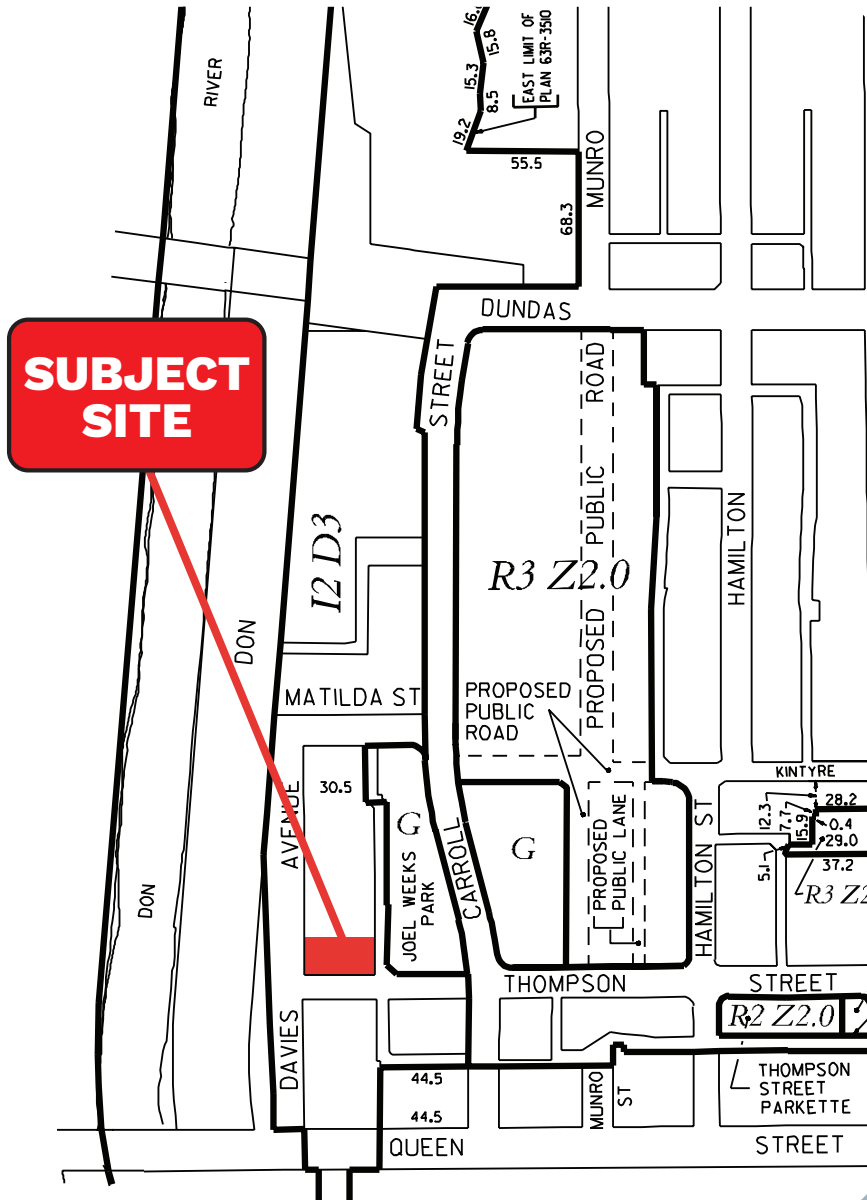




Land Use Designation Legend

- Neighbourhoods
- Apartment Neighbourhoods
- Mixed Use Areas
- Natural Areas
- Parks
- Other Open Space Areas (Including Golf Courses, Cemeteries, Public Utilities)
- Institutional Areas
- Regeneration Areas
- General Employment Areas
- Core Employment Areas
- Utility Corridors





Appendix E

Toronto Zoning By-law 438-86

