

January 31, 2023

Ms. Sherry Larjani
President
Spotlight Affordable Ventures Association
550 Queen Street East, Suite 200
Toronto, Ontario
M5A 4G7

Dear Ms. Larjani:

**RE: 155 CONSUMERS ROAD, TORONTO
MODIFICATION TO CITY OF TORONTO OPA 591 TO ALLOW MIXED USE REDEVELOPMENT
OUR FILE 21151'K'**

Further to your request, please accept this planning opinion regarding the request to the Minister of Municipal Affairs and Housing by Spotlight Affordable Ventures Association ("Spotlight") to modify City of Toronto Official Plan Amendment 591 ("OPA 591") by redesignating the land use to *Mixed Use Areas* and adding to Chapter 7, Site and Area Specific Policies of the City's Official Plan, a Site and Area Specific Policy applicable to 155 Consumers Road which would permit a mixed use development subject to certain site specific conditions.

This modification involves an employment land conversion of 155 Consumers Road (the "Subject Lands") in order to permit residential uses on the Subject Lands along with employment lands uses.

Summary of Opinion

The request to modify OPA 591 as requested is appropriate and reasonable. It represents good planning and is in the public interest for the following reasons:

- The proposed conversion of employment lands to a land use designation which permits residential uses in addition to employment uses has addressed the Growth Plan and Toronto Official Plan conversion tests within the context of a Municipal Comprehensive Review ("MCR") process.
- The Subject Lands are not located within a Provincially Significant Employment Zone which is where employment areas of Provincial interest are intended to be protected.

- The modification provides for much needed housing. 1,200 new residential units, including 720 affordable housing units, will be created through this proposal.
- While the conversion will permit residential uses within the *Mixed Use Area*, the SASP policies will ensure that the Subject Lands will continue to support economic development and help the City achieve its employment forecasts through the provision of 400 jobs, a net increase of 338 jobs over what is accommodated on site today. It is not the type of conversion (i.e. provision of no employment) which the conversion policies of the Growth Plan were intended to prevent.
- The proposal for the Subject Lands is compatible and complementary with the surrounding eclectic mix of employment uses (retail, light industrial, service commercial). Where required, standard mitigation measures will be implemented to prevent or mitigate adverse effects on adjacent employment uses.
- The Subject Lands are fully serviced with water, wastewater and stormwater services that ensure the optimization and efficient use of existing municipal infrastructure for the proposed development.
- The proposed SASP policies are reasonable and appropriate.
- In summary, the requested modification will achieve the twin planning objectives of providing badly needed housing, including a substantial amount of affordable housing, while also significantly increasing the number of jobs on the Subject Lands.

Description of Subject Lands & Surrounding Area



Figure 1: Subject Lands (in orange)

The Subject Lands (**Figure 1**) are approximately 1.6 ha (3.99 acres) in size with frontage on Consumers Road and Yorkland Boulevard. The Subject Lands are currently utilized for office, restaurant, and educational purposes.



Figure 2: Bird's Eye View of the Subject Lands (in orange); Recent approved redesignation to *Mixed Use Areas* in red and requested in blue

The Subject Lands are located in the ConsumersNext Secondary Plan area, which includes an eclectic mix of land uses – residential / mixed use along Sheppard Avenue East; offices; educational establishments; places of worship; service commercial uses; automotive dealerships; and light manufacturing / warehouse uses. Land uses to the north include residential and park uses, along with a proposed mixed use (office and residential) proposal. To the immediate west are two major places of worship (Abu Huraira Centre and the Garden Korean Church), with educational (Lambton College in Toronto; Cestar College of Business, Health and Technology; North Toronto Christian School) and offices (Canadian Heart Research Centre; Paradise Developments; Colliers International) located further west. Offices (Onyx Guard Services; Investor Group), places of worship (Bodhi Meditation Centre; Carmel Logos Baptist Church) and educational uses (Hanson College) are located to the south. To the east, residential towers and several office buildings (including Amex Bank of Canada headquarters) exist.

In summary, the employment uses in immediate proximity to the Subject Lands are educational, office, or institutional in nature.

Proposed Vision for the Subject Lands

If granted, the proposed modification would permit the redevelopment of the Subject Lands for a mixture of residential, employment and service commercial uses through a conversion of employment lands. The mixed-use redevelopment would include medical facilities (offices, clinics), commercial offices and affordable and market housing.

Approximately 100,000 sq ft of commercial and medical offices are proposed, along with supportive commercial uses, including retail, restaurants and other service commercial uses would be provided at grade. It is anticipated that over 400 jobs will be accommodated in this floor space, a new increase of 338 jobs over that which exists today.

In addition to increasing employment on the Subject Lands, approximately 1,200 new housing units are proposed to be created of various unit sizes. **Of this, 60% or 720 units, will be affordable.** Through Spotlight's existing relationships with affordable housing providers, these units will be realized (similar to other projects Spotlight is undertaking). This increase in both market and affordable housing will assist the Province and City in responding to the widely known housing crisis.

Renderings of the proposed redevelopment are shown below in **Figures 3** and **4**.



Figure 3: Proposed Mixed Use Redevelopment of 155 Consumers Road



Figure 4: Proposed Mixed Use Redevelopment of 155 Consumers Road

The redevelopment would be phased, such that the employment uses would be developed before or concurrently with the residential components of the project, as outlined below.

Modification/Conversion Request Analysis

We have assessed the supportability of converting the Subject Lands to permit the additional residential uses against the tests set out in Policies 2.2.5.9 and 2.2.5.10 of the 2020 Growth Plan for the Greater Golden Horseshoe (“Growth Plan”) and in the context of the Provincial Policy Statement and the policies of the Toronto Official Plan.

1. REVIEW OF APPLICABLE EMPLOYMENT POLICY

PROVINCIAL POLICY STATEMENT (PPS) 2020

The 2020 PPS came into effect on May 1, 2020, and is an important part of the More Homes, More choice: Ontario’s Housing Supply Action Plan. The goals of the proposed changes to the preceding 2014 PPS were to encourage an increase in the mix and supply of housing, protect the environment and public safety, reduce barriers and costs for development and support the economy and job creation. Overall, the PPS sets the policy foundation for regulating the development and use of land and also supports the provincial goal to enhance the quality of life for all Ontarians.

Building strong, healthy communities is one of the key policy directives of the PPS by managing land use efficiently and resiliently through accommodating an appropriate mix of residential, employment, institutional, recreation, park and open space uses and improving accessibility by removing land use barriers in order to create livable communities (**Policy 1.1.1**). Further, the PPS supports the promotion of healthy, livable, and safe communities through such matters as growth and intensification within settlement areas (**Policy 1.1.3.1**), land use compatibility (**Policy 1.2.6**), provision of housing (**Policy 1.4.1 & 1.4.3**), and the efficient use of public services and infrastructure (**Policy 1.6.3 & 1.6.6.1**) to support the City’s long-term economic prosperity while promoting a sense of place through well-designed built forms (**Policy 1.7.1**).

In particular, **Policy 1.3.1** of the PPS promotes economic development and competitiveness by providing an appropriate mix and range of employment uses, maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, encouraging compact, mixed-use development to support liveable and resilient communities, and ensuring the necessary infrastructure is in place for current and projected needs.

Policy 1.3.2.1 states that employment areas shall be protected and preserved for current and future uses and ensure that the necessary infrastructure is provided to support current and projected needs. Further, **Policy 1.3.2.4** states that 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 conversion.

Finally, **Policy 1.3.2.6** states that planning authorities shall protect employment areas in proximity to major goods movement facilities and corridors for employment uses that require those locations.

GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE, 2020

The Growth Plan for the Greater Golden Horseshoe (“Growth Plan”) was approved by the Province of Ontario on June 16th, 2006 and recently amended on May 2, 2019. It was most recently amended

through an Order in Council under the *Places to Grow Act* that came into effect on August 28, 2020. The Growth Plan sets out policies to manage growth in the Greater Golden Horseshoe to achieve compact, complete communities in the future. Similar to the PPS, the objectives of the Growth Plan are to create complete, healthy and safe communities with a focus on intensification in settlement areas and optimizing the use of existing infrastructure.

Schedule 3 of the Growth Plan forecasts a population of 3,650,000 and 1,980,000 jobs for the City of Toronto respectively by 2051.

The policies within Section 2.2 discuss the management of growth to accommodate a greater number of people and jobs in order to build complete, compact and transit-oriented communities through the better use of land and infrastructure. Policies within the Growth Plan require development to support and achieve complete communities. Of key importance to the current analysis are **Policy 2.2.5.9** and **Policy 2.2.5.10** respecting conversions of employment lands.

The conversion of lands within employment areas to non-employment uses may be permitted only through a municipal comprehensive review (MCR) where it is demonstrated that in **Policy 2.2.5.9**:

- 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.

Notwithstanding the above, until the next MCR, **Policy 2.2.5.10** states that 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.

It is noted that the Subject Lands are not located within a Provincially Significant Employment Zone.

CITY OF TORONTO OFFICIAL PLAN

The City of Toronto Official Plan (“Toronto OP”) was approved on July 6, 2006 by the Ontario Municipal Board. The Toronto OP was consolidated in February 2019 with sections remaining under appeal. The Subject Lands are designated “Employment Areas” on Map 2 “Urban Structure” of the Toronto OP, and “General Employment Area” on Map 19 “Land Use Plan”.

On May 8, 2020, the final LPAT Order was issued which approved the “Conversion and Removal Policies for Employment Areas” for the Toronto Official Plan (i.e. Policies 2.2.4.14 to 2.2.4.18), which establish the tests for employment conversions, in conjunction with the noted policies of the Growth Plan (and further discussed in Section 2.2 of this letter).

Additional policies currently in force and relevant to the Subject Lands, amongst others, are as follows:

- Build a more liveable urban region by better utilizing existing urban infrastructure and services (**Policy 2.1.1 b**)
- Increase the supply of housing in mixed use environments to create greater opportunities for people to live and work locally (**Policy 2.1.1 g**)
- Coordinate transportation and land use planning to attract more people and jobs to targeted growth areas in the City that are supported by good and affordable transit services and other infrastructure (**Policy 2.2.1.a**)
- Sensitive land uses, including residential uses, where permitted or proposed outside of and adjacent to or near to Employment Areas or within the influence area of major facilities, should be planned to ensure they are appropriately designed, buffered and/or separated as appropriate from Employment Areas and/or major facilities (**Policy 2.2.4.5**)
- A complete application to introduce, develop or intensify sensitive land uses, including residential uses, in a location identified in Policy 5 shall include a Compatibility/Mitigation Study, which will be addressed in the applicant’s Planning Rationale (**Policy 2.2.4.6**)
- **Policy 3.4.21** which requires compatibility to occur between major facilities and sensitive land uses, including mitigation as required (covered by Policy 2.2.4.6 as noted above)

2. RATIONALE FOR CONVERSION AND ANALYSIS RELATIVE TO APPLICABLE CRITERIA/POLICY TESTS

An employment conversion request is to address **Policies 2.2.5.9 and 2.2.5.10** of the Growth Plan, as well as **Policies 2.2.4.14 to 2.2.4.18** of the Official Plan. We have considered these applicable policy tests for conversion of employment lands to non-employment purposes, and the following is a summary of our analysis with respect to the revised proposal.

2.1. GROWTH PLAN EMPLOYMENT CONVERSION POLICY TESTS & ANALYSIS

Growth Plan Policy	Analysis/Response
<p>Policy 2.2.5.9 <i>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:</i></p> <p><i>a) there is a need for the conversion;</i></p>	<p>There is a need for this conversion.</p> <p>There is a significant need for all types of housing in Toronto, including affordable housing.</p> <p>Allowing for the conversion to a mixed use designation will unlock the current underutilized land to better accommodate the City’s growing housing needs, <u>including ownership, rental housing with a substantial amount of it being affordable housing</u> (1,200 new units will be provided for, including 720</p>

Growth Plan Policy	Analysis/Response
	<p>affordable units) which addresses a number of important Provincial and City objectives.</p> <p>The proposal for the Subject Lands achieves and addresses this key Provincial and City need, while increasing employment at the same time. To this effect the proposal will also provide increased employment opportunities that will replace the existing jobs on the Subject Lands (an increase from the existing 62 jobs to 400 jobs).</p>
<p><i>b) the lands are not required over the horizon of this Plan for the employment purposes for which they are designated;</i></p>	<p>This criterion does not apply for a conversion outside of a Provincially Significant Employment Zone, which is the case here.</p> <p>Regardless, the Subject Lands are designated as “General Employment Area” on the Land Use Plan of the Toronto OP. General Employment Areas are intended to provide for retail and service commercial uses. The use of these lands today is for a retail and service commercial uses, which will remain in place and thus the use of the lands for their current purpose will remain following the conversion. Further, the significant amount of new employment created (400 jobs) through the office and medical office jobs enhance the employment base from what exists on the Subject Lands.</p> <p>In our opinion the Subject Lands will continue to provide for employment, with further increased employment, and therefore conforming with the intent of this policy.</p>
<p><i>c) the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;</i></p>	<p>This criterion does not apply for a conversion outside of a Provincially Significant Employment Zone, which is the case here.</p> <p>Notwithstanding, the Subject Lands will not be removed from the inventory of lands providing employment because (as previously noted in this letter), the proposal expands the employment base on the Subject Lands, from 62 jobs to 400 jobs (a net increase of 338 jobs) while providing for much needed housing.</p>

Growth Plan Policy	Analysis/Response
	<p>While there is a removal of employment lands within an Employment Area designation, the conversion will in fact accommodate more employment growth than the current circumstances, thereby conforming with this policy.</p>
<p><i>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</i></p>	<p>The proposal would not adversely affect the <u>overall</u> employment area to the south, west and east of the Subject Lands. The existing employment area is an eclectic mix of office, educational, retail, service commercial and institutional uses. No manufacturing uses are in proximity to the Subject Lands. It is therefore our opinion that the conversion will not adversely affect the overall viability of the ConsumersNext area, which contains a broad mixture of employment uses – office, educational, retail and service commercial uses.</p> <p>Furthermore, the proposed development contributes to the achievement of the minimum intensification and density targets in the City through the provision of accommodation of 400 jobs on the Subject Lands (at an estimated 250 persons and jobs per hectare) as well as 1,200 new housing units (of which 720 are affordable).</p> <p>There will be no significant compatibility issues caused by the conversion.</p>
<p><i>e) there are existing or planned infrastructure and public service facilities to accommodate the proposed uses.</i></p>	<p>The Subject Lands have available full municipal services (water, sanitary, storm). The Subject Lands are about a 15 minute walk or 10 minute bus ride to the Don Mills Subway Station. Existing Toronto Transit Commission (TTC) bus transit routes 24B and 167A are accessible immediately south of the Subject Lands along Yorkland Boulevard, and bus routes 85, 85A, and 985A along Sheppard Avenue East are accessible within a 5 minute walking distance (i.e. less than 200 metres). They will also be within walking distance to the future Sheppard Avenue East subway extension. There are several nearby places of worship, government offices, and schools. Abundant park space is also located within walking distance that will service future residents and employees of the proposal,</p>

Growth Plan Policy	Analysis/Response
	including Muirhead Park, Wishing Well Park, Vradenburg Park and Bridlewood Park. In our opinion this policy has been satisfied.

2.2. CITY OF TORONTO EMPLOYMENT CONVERSION & REMOVAL POLICY TESTS & ANALYSIS

Official Plan Policy	Analysis/Response
Policy 2.2.4.14 <i>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. 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 also a conversion and may only be permitted by way of a Municipal Comprehensive Review.</i>	<p>The proposal for the Subject Lands represents an employment conversion request within the context of adopted OPA 591 (as a result of a Municipal Comprehensive Review).</p> <p>The request would redesignate the Subject Lands from “General Employment Area” designation to a “Mixed Use Areas” designation.</p> <p>This is the appropriate time to make this request.</p>
Policy 2.2.4.15 <i>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.</i>	See above commentary re: Policy 2.2.4.14.
Policy 2.2.4.16 <i>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 initiated.</i>	See above commentary re: Policy 2.2.4.14.
Policy 2.2.4.17 <i>The City will assess requests to convert lands within Employment Areas, both cumulatively and individually, by considering whether or not:</i>	As is commonly accepted, there is a housing crisis facing the Province and the City, in particular in regard to affordable housing.

Official Plan Policy	Analysis/Response
<p>a) <i>There is a demonstrated need for the conversion(s) to:</i></p> <ol style="list-style-type: none"> 1. <i>meet the population forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe; or</i> 2. <i>mitigate existing and/or potential land use conflicts;</i> 	<p>The proposal will contribute to the City of Toronto in meeting its population forecasts and specifically through the provision of market housing and <u>affordable housing</u> including ownership and rental housing (1,200 new units will be provided for, including <u>720 affordable units</u>).</p> <p>There will be no significant compatibility issues caused by the conversion.</p>
<p>b) <i>The lands are required over the long-term for employment purposes;</i></p>	<p>The Subject Lands will continue to provide, over the long term, 400 jobs (a net increase of 338 jobs), therefore conforming to this policy.</p>
<p>c) <i>The City will meet the employment forecasts allocated to the City in the Growth Plan for the Greater Golden Horseshoe;</i></p>	<p>The proposal will contribute to the City meeting its employment forecasts by providing for 400 jobs (a net increase of 338 jobs), therefore conforming to this policy.</p>
<p>d) <i>The conversion(s) will adversely affect the <u>overall</u> viability of an Employment Area and maintenance of a stable operating environment for business and economic activities with regard to the:</i></p>	
<ol style="list-style-type: none"> 1. <i>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;</i> 	<ol style="list-style-type: none"> 1. As described previously, the Subject Lands are surrounded by office, educational, service commercial and institutional uses. Traditional employment uses which cause emissions which need to be mitigated do not exist in proximity to the Subject Lands. Therefore compatibility is generally achieved by the lack of immediately abutting employment uses.
<ol style="list-style-type: none"> 2. <i>prevention or mitigation of adverse effects from noise, vibration, and emissions, including dust and odour</i> 	<ol style="list-style-type: none"> 2. The proposal will not be adversely affected by noise, vibration, and air emissions (including dust and odour) given the surrounding office, educational, institutional and commercial uses.
<ol style="list-style-type: none"> 3. <i>prevention or mitigation of negative impacts and minimization of the risk of complaints;</i> 	<ol style="list-style-type: none"> 3. See response to #2 above. As to the risk of complaints, given the surrounding uses complaints are not anticipated.

Official Plan Policy	Analysis/Response
4. <i>ability to ensure compliance with environmental approvals, registrations, legislation, regulations and guidelines;</i>	4. See response to #2 above. Given the lack of industrial type uses in the immediate area, it is unlikely that the proposal will cause any existing industry to “fall out of compliance”.
5. <i>ability to provide appropriate buffering and/or separation of employment uses from sensitive land uses, including residential;</i>	5. There is no need for buffering or separation in regard to the land uses surrounding the Subject Lands, given the nature of these land uses.
6. <i>ability to minimize risk to public health and safety;</i>	6. No public health and safety risks are anticipated given the nature of the surrounding land uses.
7. <i>reduction or elimination of visibility of, and accessibility to, employment lands or uses;</i>	7. There is no reduction or elimination of accessibility to the remaining employment land in the employment area, given the existing road network which is not being modified. The Subject Lands are a relative small property. Visibility to the employment area will not be eliminated or materially reduced, given the significant visibility of the employment area from both Highway 404 and Highway 401.
8. <i>impact upon the capacity and functioning of the transportation network and the movement of goods for existing and future employment uses;</i>	8. No undue impacts on the capacity and functioning of the surrounding transportation network and the movement of goods for existing and future employment uses are anticipated given the lack of said uses in the area and the existing comprehensive road network through the ConsumersNext area.
9. <i>removal of large and/or key locations for employment uses;</i>	9. The proposal does not remove employment uses from the Subject Lands. 400 jobs will be accommodated as part of the proposal (a net increase of 338 jobs).
10. <i>ability to provide opportunities for the clustering of similar or related employment uses; and</i>	10. The proposal will result adds to the existing office cluster in the immediate

Official Plan Policy	Analysis/Response
	area, providing 100,000 sq ft of new commercial and medical office space.
11. <i>provision of a variety of land parcel sizes within the Employment Area to accommodate a range of permitted employment uses;</i>	<p>11. The proposal does not remove employment uses from the Subject Lands. 400 jobs will be accommodated as part of the proposal (a net increase of 338 jobs).</p> <p>The proposed mixed use development is a more efficient and optimal utilization of the Subject Lands. The proposal intensifies the lands and provides for increased employment density through a mixed use format.</p>
e) <i>The existing or planned sewage, water, energy and transportation infrastructure can accommodate the proposed conversion(s);</i>	The Subject Lands have direct access to TTC bus routes that operate along Sheppard Avenue East and within the ConsumersNext area and are within a 15 minute walk to the Don Mills subway station. The proposal will be connected to, and will optimize the efficiency of existing municipal infrastructure (water, sanitary, storm).
f) <i>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;</i>	The Subject Lands are located in proximity to existing public service facilities, such as Parkway Forest Community Centre, North Toronto Christian School, Forest Manor Public School, Muirhead Public School, Brian Public School, numerous parks as noted previously, Toronto Public Library Fairview Branch and a variety of nearby places of worship.
g) <i>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;</i>	The Subject Lands are located in proximity to Highways 401 and 404. The ConsumersNext area is an eclectic mix of employment, the majority being office, educational and institutional in nature. This employment area therefore is not a major source of manufacturing of goods which would require access to these highways for the movement of goods.
h) <i>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; and</i>	The proposal includes medical, office and ancillary retail employment opportunities which will occur concurrently with any residential development of the Subject Lands. Approximately 400 jobs will be accommodated at full build out. The proposal will enhance the

Official Plan Policy	Analysis/Response
	economic base as a result of the proposed employment uses on site.
i) <i>Cross-jurisdictional issues have been considered.</i>	There are no cross-jurisdictional issues associated with the proposed conversion.
<p>Policy 2.2.2.4.18 <i>When assessing proposal(s) to convert lands within Employment Areas, the City will:</i></p> <p>a) <i>notify all major facilities whose influence area(s) includes any portion of the lands proposed to be converted; and</i></p> <p>b) <i>notify all facilities that store, distribute or handle propane whose required separation distances by law and/or regulation may include any portion of the lands proposed to be converted.</i></p>	<p>a) There are no major facilities in proximity to the Subject Lands which need to be notified.</p> <p>b) There are no propane facilities within required separation distances.</p>

Based on the assessment above, it is our opinion that the proposal to convert the Subject Lands to permit residential uses in addition to employment uses is appropriate and represents good planning. The proposal and request for conversion has addressed the Growth Plan and Toronto OP conversion tests within a MCR process. In order to implement this conversion, OPA 591 is required to be modified accordingly.

3. THE PROPOSED MODIFICATION TO OPA 591

Based on our assessment and conclusions above, the following modifications to OPA 591 would be required:

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



Figure 5 – Removal of Subject Lands from *Employment 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 19** (part of Tile Index Map 13 of Appendix 2 of OPA 591) as shown below.

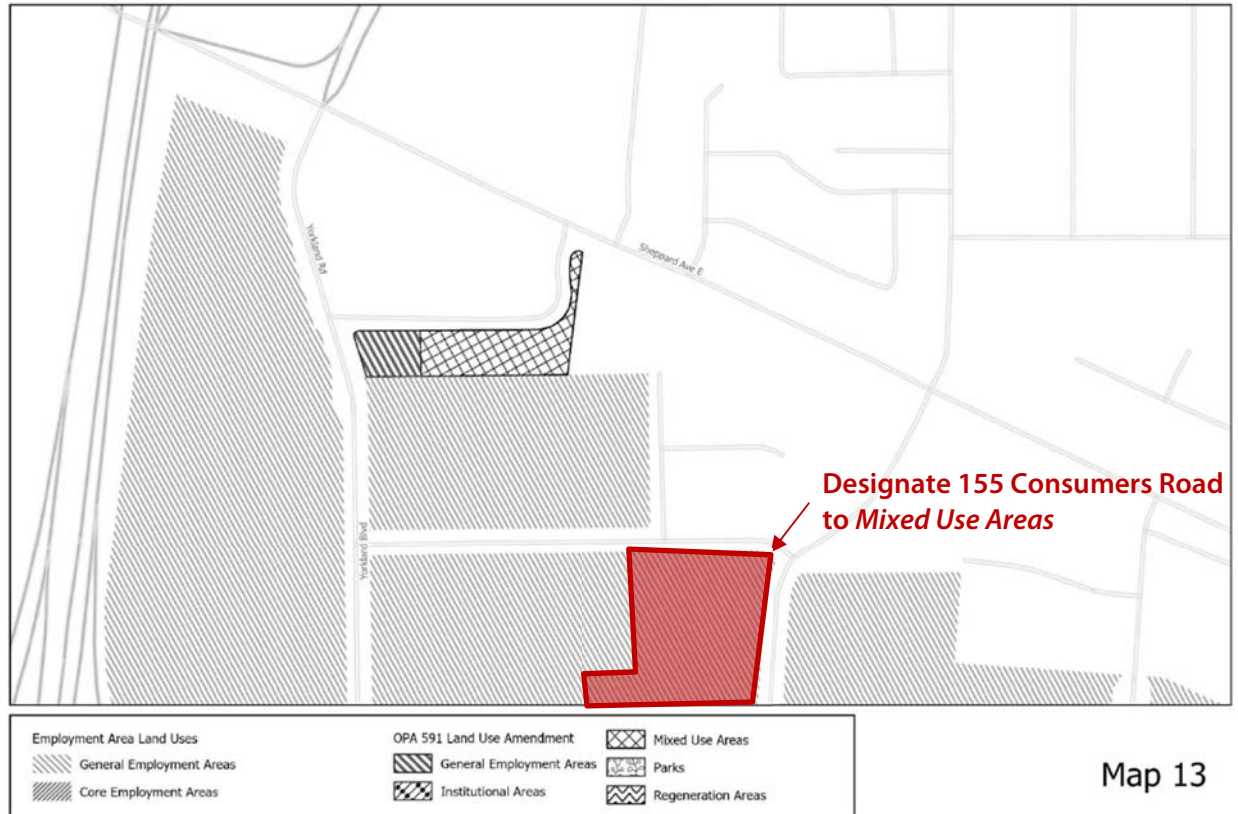
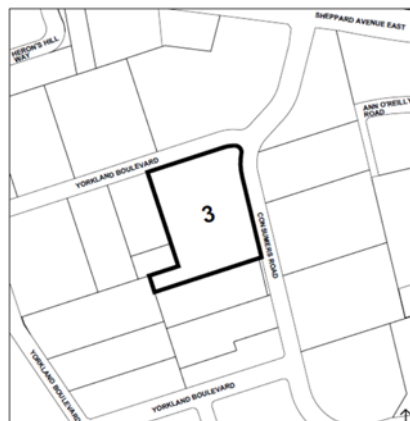


Figure 6 – Designate Subject Lands from General Employment Area to Mixed Use Area as shown on excerpt from Official Plan Land Use Designation Map 19 (Tile Map 13 of OPA 591, Appendix 2)

3. We request that Chapter 6, Secondary Plans, be amended as follows:
 - A. Chapter 6, Section 38, ConsumersNext Secondary Plan is amended by adding Site and Specific Policy 3 for the lands known municipally in 2021 as 155 Consumers Road, as follows:

3. 155 Consumers Road



A mixed use development is permitted on the lands provided that:

- a) A minimum of 9,290 square metres of employment gross floor area of the total gross floor area across the entire lands will:
 - i) be developed and maintained prior to or concurrent with residential uses;
 - ii) be comprised of uses permitted in Core Employment Areas and General Employment Areas that are compatible with residential uses.
 - b) A minimum of 1,200 residential units will be permitted, of which a minimum of 720 units will be affordable housing units, which may be phased over time.
- B. Chapter 6, Section 38, ConsumersNext Secondary Plan Map 38-4, Potential Tall Building Locations and Maximum Densities, is amended by adding a maximum permitted FSI of 6.5 calculated across the entire site on the lands known municipally in 2021 as 155 Consumers Road as shown on the map above as Site and Area Specific Policy 3.
- C. Chapter 6, Section 38, ConsumersNext Secondary Plan Map 38-5, Districts and Nodes Plan, is amended by adding to the Sheppard and Victoria Park Corridor the lands known municipally in 2021 as 155 Consumers Road as shown on the map above as Site and Area Specific Policy 3.
- D. Chapter 6, Section 38, ConsumersNext Secondary Plan Map 38-6, Land Uses, is amended by adding Mixed Use Areas to the lands known municipally in 2021 as 155 Consumers Road as shown on the map above as Site and Area Specific Policy 3.
- E. Chapter 6, Section 38, ConsumersNext Secondary Plan Map 38-10, Potential Tall Building Locations and Maximum Heights, is amended by adding Location with Potential Tall Building and a Maximum 131 metres tower permitted to the lands known municipally in 2021 as 155 Consumers Road as shown on the map above as Site and Area Specific Policy 3.

These modifications would implement the proposal as discussed above. They would ensure that the non-residential components are constructed prior to or concurrently with any residential development, ensuring that the lands remain as a source of significant employment. It is anticipated that mitigation of any potential undue adverse affects would be addressed in the detailed design stage in accordance with the policy of the Site and Area Specific Policy.

The proposed modifications to OPA 591 are appropriate, reasonable, represent good planning and are in the public interest.

4. OVERALL CONCLUSION

This proposal is in line with Provincial Policy and structured around the optimization of existing municipal services, infrastructure and transit services. The proposal contemplates a high-rise mixed use development that will provide office, retail / service commercial and medical employment opportunities. This will be combined with the provision of 1,200 residential units, include ownership and rental tenures, of which 720 units will be affordable housing.

It is acknowledged that the City is determined to preserve employment lands wherever possible. In this context, the Subject Lands represent a unique instance where a conversion to permit some residential uses is appropriate, given that the existing use of the Subject Lands represents an underutilization of the Subject Lands in comparison to the proposed high-rise mixed use development, and also considering that the employment potential of the them is enhanced not diminished by the proposal. Further, there is no removal of lands from the City's supply of employment lands (employment will still occur on the Subject Lands); merely the addition of a supply of badly needed housing.

In our opinion, the proposal and the modifications represent good planning and are in the public interest for the following reasons:

- The proposed conversion of employment lands to a land use designation which permits residential uses in addition to employment uses has addressed the Growth Plan and Toronto Official Plan conversion tests within the context of a MCR process.
- The Subject Lands are not located within a Provincially Significant Employment Zone which is where employment areas of Provincial interest are intended to be protected.
- The modification provides for much needed housing, including a substantial amount of affordable housing. 1,200 new residential units, including 720 affordable housing units, will be created through this proposal.
- While the conversion will permit residential uses within the *Mixed Use Area*, the SASP policies will ensure that the Subject Lands will continue to support economic development and help the City achieve its employment forecasts through the provision of 400 jobs, a net increase of 338 jobs over what is accommodated on site today. It is not the type of conversion (i.e. provision of no employment) which the conversion policies of the Growth Plan were intended to prevent.
- The proposal for the Subject Lands is compatible and complementary with the surrounding eclectic mix of employment uses (retail, office, educational, institutional, service commercial). Where required, standard mitigation measures will be implemented to prevent or mitigate adverse effects on adjacent employment uses.
- The Subject Lands are fully serviced with water, wastewater and stormwater services that ensure the optimization and efficient use of existing municipal infrastructure for the proposed development.
- The proposed SASP policies are reasonable and appropriate.

In conclusion, the requested modification will achieve the twin planning objectives of providing badly needed housing, specifically **720 affordable housing units**, while also significantly increasing the number of jobs on the Subject Lands.

Please feel free to us if you have any questions or wish to discuss in further detail.

Thank you.

Yours Truly,
MHBC

A handwritten signature in black ink, appearing to read 'D. McKay', is written over a light beige rectangular background.

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