



[Submitted Digitally]

Project No. 20344

February 2, 2023

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

Dear Ms. Larjani:

Re: ERO Posting 019-5868
City of Toronto Official Plan Amendment No. 591
11 Davies Avenue

1.0 INTRODUCTION

We are the planning consultants to 1152136 Ontario Inc., the owner of 11 Davies Avenue (the “subject site”). The lands are designated *Core Employment Areas* in the City of Toronto Official Plan. On December 17, 2020, we submitted an employment conversion request to the City on behalf of our client with respect to the subject site (Conversion Request #30). An addendum letter was provided to the City on May 17, 2022, which was accompanied by visuals for a 10-storey mixed use building massing concept and a draft Site and Area Specific Policy.

2.0 PURPOSE

The purpose of this letter is to set out our planning rationale in support of a request that the Province modify OPA 591 to include the redesignation of the subject site from its existing land use designation of *Core Employment Areas* to *Mixed Use Areas*. The redesignation would be accompanied by a modification to Map 2 (Urban Structure) of the Toronto Official Plan and the introduction of a Site and Area Specific Policy to be added to Chapter 7 of the Toronto Official Plan (draft provided with our May 17, 2022 letter).

The planning rationale set out in this letter is an update to, and should be read together with, the rationale included in our letters dated December 17, 2020 and May 17, 2022, which are appended hereto.

3.0 BACKGROUND

On December 17, 2020, we submitted an employment conversion request to the City with respect to the subject site.

On July 2, 2021, we provided a Land Use Compatibility Assessment, prepared by Gradient Wind Engineers, to the City in support of the employment conversion request.

On January 12, 2022, the Planning and Housing Committee received a report from City staff that included the preliminary assessments for Group 1 of the Conversion Requests. Attachment 1 of the staff report included a preliminary assessment of the conversion request for the subject site, which identified a number of issues to be considered and the following preliminary assessment:

“Based on staff’s preliminary review, the subject lands should be retained as employment and be designated as Core Employment Areas.”

On January 27, 2022, we attended a meeting with City staff to discuss the conversion request and the issues that had been identified in the preliminary assessment. During the meeting, we suggested that providing additional details regarding a potential future development on the subject site and, specifically, details regarding a mix of uses could be helpful to staff in its further evaluation of the request.

On May 17, 2022 we provided an addendum letter which described a development concept for a 10-storey mixed use building and provided a summary of changes to the relevant planning framework. The letter was accompanied by visuals of the massing concept and a draft Site and Area Specific Policy which would accompany the approval of the proposed conversion request.

Subsequently, on July 22, 2022, City Council adopted Official Plan Amendment No. 570, which delineated the boundaries of 57 Protected Major Transit Station Areas (PMTSA’s) throughout the City of Toronto. The subject site is included within the boundaries of the PMTSA associated with the planned Leslieville subway station (Site and Area Specific Policy 765). SASP 765 establishes a minimum population and

employment target of 300 residents and jobs combined per hectare for the PMTSA and assigns a minimum density of 1.0 FSI to the subject site.

On July 22, 2022, City Council adopted Official Plan Amendment No. 591, which amended the Official Plan with respect to Economic Health Policies and Policies for Employment Areas. OPA 591 amended policies and maps of the Official Plan, including amending the land use schedules and introducing Site and Area Specific Policies to facilitate employment conversion requests. OPA 591 has been forwarded to the Province for approval pursuant to Section 26 of the *Planning Act*.

4.0 DEVELOPMENT CONCEPT

While a development concept is not required to review and implement a conversion request, a development concept has been prepared for the subject site to illustrate a potential form of development in accordance with the requested *Mixed Use Areas* designation.

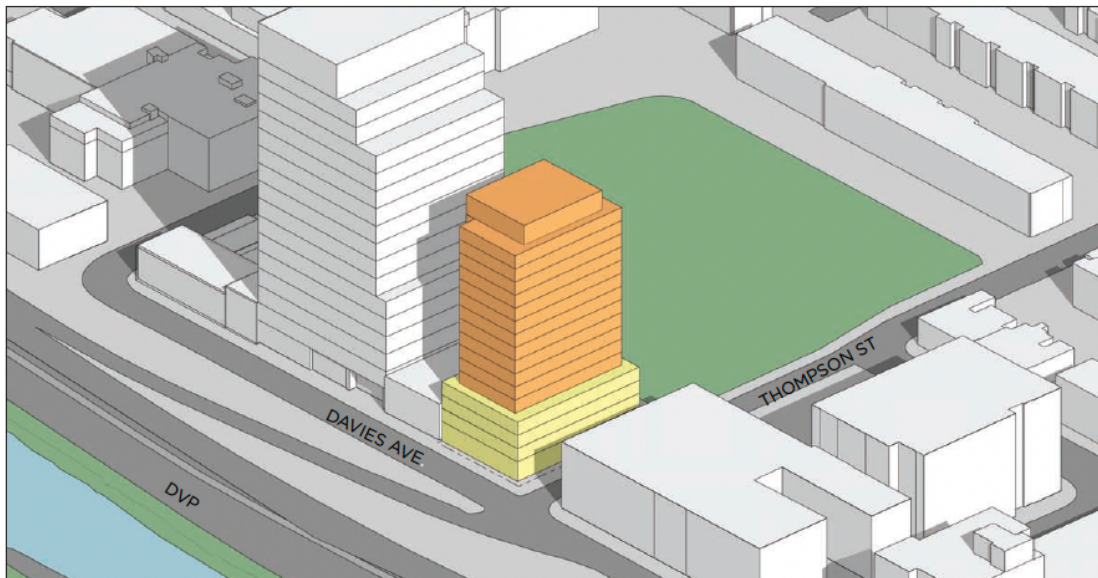


Figure 1 – View of development concept from the southwest (prepared by RAW)

The proposed development concept features a 16-storey mixed-use building with medical offices, a 24-hour medical clinic, a day care, and residential uses. The non-residential uses will be located within the first 4 floors of the building while Level 5 to Level 16 will include a total of 84 dwelling units. The 84 dwelling units will feature 24 one-bedroom units (29%), 48 two-bedroom units (57%) and 12 three-bedroom units

(14%). The concept has a total gross floor area of 10,076 square metres resulting in a density of 12.2 FSI. Four vehicular parking spaces and 100 bicycle parking spaces are included.

5.0 RATIONALE

In our opinion, the employment conversion request satisfies the applicable Growth Plan conversion criteria and Toronto Official Plan conversion criteria and supports mixed-use intensification in an area with existing frequent transit service and planned higher-order transit service. The planning opinions expressed in our initial letter (dated December 17, 2020) and addendum letter (dated May 17, 2022) continue to apply.

Since the time of our last letter (May 17, 2022), City Council adopted OPA No. 570 as described above. OPA 570 has been forwarded to the Province for approval pursuant to Sections 16 and 17 of the *Planning Act*. The current approximate density of the Leslieville PMTSA as delineated by OPA 570 is 148 people and jobs per hectare¹ and the City has planned for a minimum density of 300 people and jobs per hectare, which is in excess of the Growth Plan's minimum target of 200 people and jobs per hectare for MTSA's served by subways.

Within that context, we are of the opinion that the proposal for a mixed use development with residential and employment uses meets the goals, objectives and policies of the Province and City for PMTSA's. Furthermore, as large areas of the Leslieville PMTSA include lands designated *Neighbourhoods* and are primarily planned for modest residential intensification, it is vital that underutilized sites that are appropriate for greater levels of intensification be developed with a mix of uses.

We continue to be of the opinion that the proposed redesignation from *Core Employment Areas* to *Mixed Use Areas*, or a similar amendment that permits residential uses, represents good planning. The development concept included with this submission further demonstrates how a mixed use building is feasible on the subject site and would support population and job growth. The proposal would increase the amount of non-residential and employment uses on the subject site and introduce residential and community uses. Specifically, the proposal would increase the amount of non-residential gross floor area on the subject site from approximately 1,370 square metres to 2,377 square metres, the majority of which will be offices. In

¹ City of Toronto MTSA Interactive Engagement Tool. Employment and population densities are based on the 2016 Toronto Employment Survey.

addition, the proposal features 84 dwelling units, of which 71% will be family-sized two and three bedroom units. To support the planned population growth of the subject site and larger area, the concept includes a day care.

6.0 CONCLUSIONS

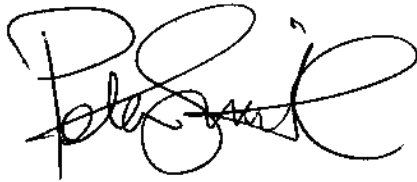
It remains our opinion that the requested employment conversion for the subject site represents good planning and will accommodate a mix of residents and jobs that will contribute to the achievement of forecasts/targets for the City as a whole and the proposed Leslieville Protected Major Transit Station Area.

The redesignation of the site to *Mixed Use Areas*, or the added permission for residential uses, would promote transit-supportive intensification and, with the addition of work-from-home jobs, would result in a net gain of jobs on the site.

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

Yours very truly,

Bousfields Inc.



Peter F. Smith, MCIP, RPP

cc: Jason Chiu, Client

Attachment 1: Employment Conversion Letter dated December 17, 2020

Attachment 2: Planning Addendum Letter dated May 17, 2022