

# SPOTLIGHT

DEVELOPMENT

February 3, 2023

Honourable Steve Clark  
Minister of Municipal Affairs & Housing  
Ministry of Municipal Affairs & Housing  
Province of Ontario  
777 Bay Street, 17th floor  
Toronto, Ontario  
M7A 2J3

Dear Minister Clark:

RE: COMMENTS ON OPA 591 – ERO #019-5868; MINISTRY #20-OP-222176  
155 CONSUMERS ROAD, TORONTO

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Please accept these comments from our company, Spotlight Affordable Ventures Association (“Spotlight”), regarding City of Toronto Official Plan Amendment 591 (“OPA 591”) as it affects 155 Consumers Road (the “Subject Lands”).

We are respectfully requesting that you modify OPA 591 to change the designation of the Subject Lands on Map 19 of the City’s Official Plan from *General Employment Areas* to *Mixed Use Area*, as shown below on **Figures 1** and **2** and add a Site and Area Specific Policy to Chapter 7 of the Official Plan in the form set out below which would apply to the Subject Lands.

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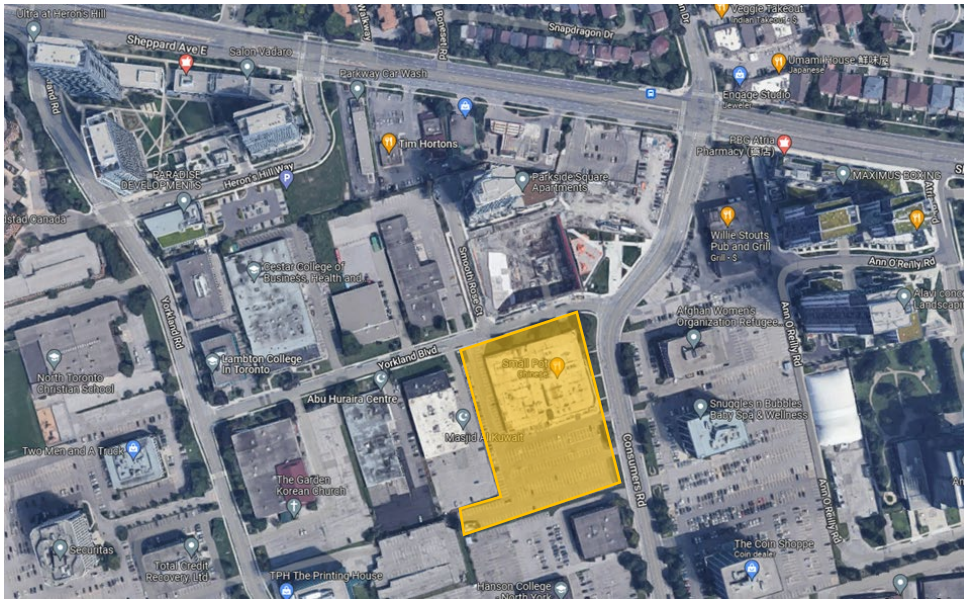


Figure 1 – Location of the Subject Lands



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

## Background to Request

The City has undertaken a further Municipal Comprehensive Review (“MCR”) resulting in the adoption of OPA 591. We have recently become involved with this property and were previously unable to make submissions to the City with respect to the redesignation of the Subject Lands to *Mixed Use Areas* as part of the OPA 591 review process. Given the deepening housing crisis and the substantial planning

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merit of the proposal, we have decided to address the Minister in the context of his consideration of OPA 591 and seek the Minister's modification requested in this submission.

### **The Development Proposal**

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.**

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Figure 3: Proposed Mixed Use Redevelopment of 155 Consumers Road

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**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.

## Request of the Minister

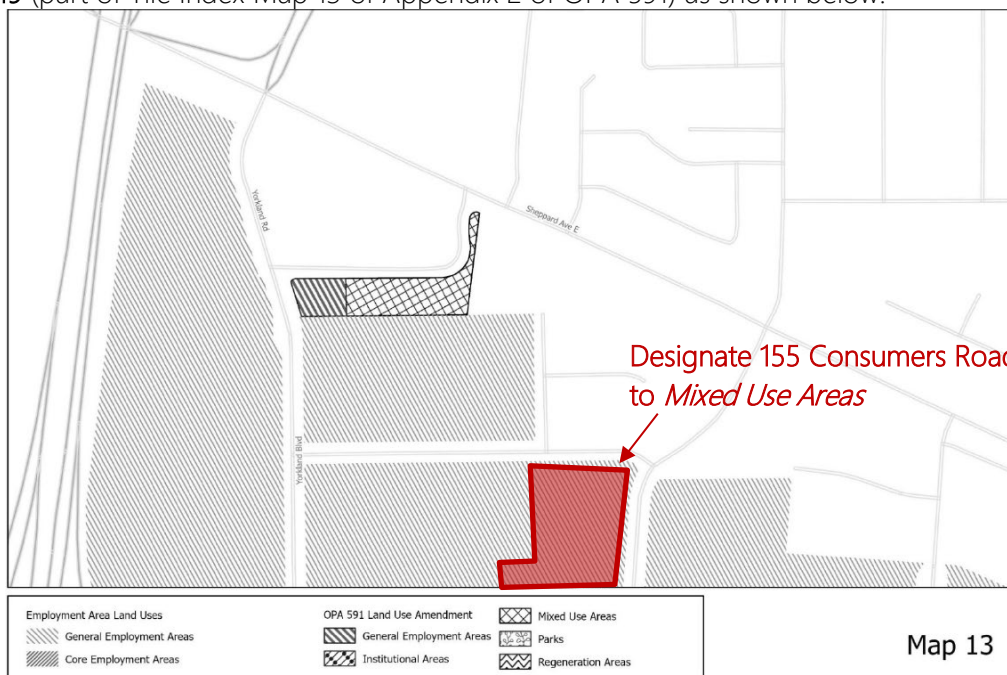
We are requesting that you utilize your powers under the Planning Act as the approval authority of OPA 591 to modify it in order to grant the conversion request for 155 Consumers Road. To this effect we request the following modifications:

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



Figure 5 – Removal of Subject Lands from Employment Area 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.



Map 13

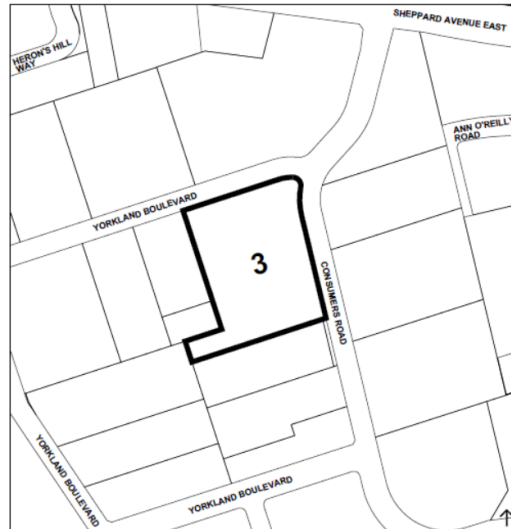
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**Figure 5** – Designate Subject Lands from General Employment Area to Mixed Use Area as shown on excerpt from Official Plan Land Use Designation Map 19 (Tile Map 13 of OPA 591, Appendix 2)

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

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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.

## Planning Justification Report

In support of this request, Mr. McKay, a Registered Professional Planner with MHBC, has prepared a Planning Opinion on the modification (attached hereto). In summary, Mr. McKay concludes that 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 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.

His summary conclusion is that the requested modification will achieve the twin planning objectives of providing badly needed housing and facilities for seniors while also significantly increasing the number of jobs on the Subject Lands.

## Overall Conclusion

The proposal would allow the construction of 1,200 new residential dwelling units (including rental and ownership, with **720 affordable units being provided**), with the non-residential components accommodating at least 400 jobs. This proposal is consistent with and conforms to Provincial Policy and structured around the optimization of existing municipal services, infrastructure and transit services.

The Subject Lands represent a situation where a conversion is appropriate, given that the existing use of the Subject Lands represents an underutilization of the Subject Lands in comparison to the mid- and high-rise mixed use development which could occur as shown and also considering the marginal impact of the removal of the 1.6 hectares would have on the City's supply of employment lands given they are not used for employment land employment uses, but rather for an existing retail / commercial plaza. The proposed conversion and the redevelopment it will permit will allow for the efficient use of the land and the optimization of infrastructure while increasing the amount of jobs on site and providing for 1,200 new residential housing units including 720 affordable housing units.

The proposed conversion of employment lands to a *Mixed Use Areas* designation meets the intent and purpose of the policies with respect to employment land conversions as outlined in the Growth Plan and the City of Toronto Official Plan and has been demonstrated as follows:

1. The proposed conversion will revitalize and reinvigorate the Subject Lands, through a redevelopment into a vibrant, transit oriented development as depicted in this letter.
2. The proposed conversion would allow the provision of a mix of housing tenure, unit size and affordability, with over 1,200 housing units being created, including 720 affordable housing units.
3. The proposal will include the retention of the retail / service commercial function of the Subject Lands and an increase in employment through the provision of commercial / medical office space. An estimated 400 employees will be accommodated in the proposal, an increase of 338 jobs from what exists today.
4. The proposed conversion for the Subject Lands is compatible with existing surrounding employment uses which are substantially office, educational and institutional in nature (with no industrial uses in the immediate surroundings). Further, given this lack of industrial uses in the immediate area, the proposal will not affect the ability of facilities to comply with applicable

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Provincial and City of Toronto regulations. Appropriate mitigation measures related to noise and air quality impacts arising from transportation facilities will be implemented where required.

5. The Subject Lands are fully serviced with water, wastewater and stormwater services such that the proposed conversion will ensure the optimization and efficient use of existing municipal infrastructure for the proposal.

In conclusion, we feel this is a reasonable request, which will result in badly needed housing along with an increase in employment on the Subject Lands. We are committed to this project and the delivery of affordable housing in this area of the City.

Thank you.

Yours truly,

**Spotlight Affordable Ventures Association**



Sherry Larjani  
President

*Encl.*