



CHOICE PROPERTIES LIMITED PARTNERSHIP
**17 LESLIE STREET
EMPLOYMENT AREA CONVERSION REQUEST
PLANNING RATIONALE**

JULY 29, 2021

This planning rationale was prepared by Urban Strategies Inc. for Choice Properties Limited Partnership (“Choice Properties”) in support of an employment lands conversion request for the property known as 17 Leslie Street. The conversion request is being submitted for consideration within the City of Toronto’s Municipal Comprehensive Review of its Official Plan. This report and supporting studies fulfills the requirements of a conversion request application in accordance with provincial and municipal policy.

**URBAN
STRATEGIES
INC .**

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1

INTRODUCTION

1.1 PURPOSE OF THIS REPORT

Choice Properties Limited Partnership has engaged Urban Strategies Inc. (“Urban Strategies”) to prepare a Conversion Rationale in support of an employment land conversion request for their property municipally known as 17 Leslie Street in Toronto, located at the southeast intersection of Eastern Avenue and Leslie Street (“subject site” or “site”). The 26,385 square metre subject site is currently occupied by a single storey Loblaws grocery store, a Starbucks pad store and a large surface parking lot. This report outlines a request for a conversion of the subject site’s land use from a General Employment Areas designation in the City of Toronto Official Plan, to a Mixed Use Areas designation in order to permit a combination of residential and employment uses on the site.

In accordance with the policies of Section 26 of the Planning Act, the City of Toronto is currently undertaking a Municipal Comprehensive Review (MCR), which is a regular update required to align the City’s Official Plan with provincial policy. Specifically, the MCR process will align the Official Plan’s policies with the Province’s A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019) (the “Growth Plan”).

The MCR process includes a general review of existing employment and economic policies, a review of policies related to Core Employment Areas and General Employment areas, the establishment of minimum density targets for all Employment Areas, as well as consideration of requests to convert lands within Employment Areas. The City has established a 1-year window to receive requests for employment land conversions through the MCR process, running from August 4, 2020 to August 3, 2021. To guide and ensure consistency across applications, the City has approved “Attachment 3: Conversion and Removal Policies for Employment Areas” as part of its MCR work plan. Attachment 3 provides specific tests for the approval of conversion requests, which are intended to align with the criteria set out in Section 2.2.5.9 of the Growth Plan and Section 2.2.4 of the Official Plan.

This report will address the employment land conversion request for 17 Leslie Street, providing a rationale that responds to the City’s Conversion and Removal Policies for Employment Areas in accordance with Section 2.2.4.5, 2.2.4.7, 2.2.4.8 and Schedule 3 of the Official Plan and policy 2.2.5.9 in the Growth Plan.

1.2 SUMMARY OF THE CONVERSION RATIONALE

This Conversion Rationale establishes that 17 Leslie Street is an appropriate candidate site for a conversion from a General Employment Area to a Mixed Use Areas designation in the Official Plan.

Section 2 addresses suitability within the current and evolving context of the surrounding area.

Section 3 describes the preliminary development concept for the site.

Section 4 establishes at a high-level that this conversion will result in consistency and conformity with the applicable planning policy framework.

Section 5 provides a detailed response to each of the Conversion and Removal Policies for Employment Areas.

Section 6 provides a conclusion.

The Conversion Rationale, and specifically Section 5, makes references to several technical consultant studies which provide supporting data and recommendations. These have been submitted as part of the conversion request application package and are identified as follows:

- LEA Consulting - Transportation Consultant
- Counterpoint Engineering - Servicing and Stormwater
- SLR Consulting - Air Quality and Noise Consultant
- urbanMetrics - Land Economist

Overall, this Conversion Rationale and its supporting studies demonstrate that:

- The subject site is not required in its current form or Employment Area designation to meet the employment projections for the City of Toronto
 - From 2021 to 2051 Employment Land employment is forecast to decline by 30,000 jobs across the City, while Major Office employment is forecasted to grow by 300,000 jobs
 - The subject site can assist the City in accommodating the types of jobs that are forecasted, and in turn diversify the potential types of employment in the area
 - The conceptual development plans associated with this conversion request could accommodate up to 1,021 jobs, approximately 4 times what the existing buildings on the site can accommodate today
- The requested conversion will not negatively impact the viability of the adjacent Employment Area or employment uses
 - The subject site is located amongst a collection of Employment Areas oriented along Eastern Avenue that possess characteristics which are no longer appealing to modern industrial users, and as a result, several sites in the area are being re-developed for retail/service commercial and office commercial uses. The conceptual development of the subject site is consistent with these trends and the inclusion of a residential component will strengthen these uses, not destabilize an already evolving area surrounded by established residential communities
- The proposed conversion will support more appropriate land use relationships
 - There is a long established residential context immediately west of the subject site, in the form of low-rise houses
 - Several approved developments within the broader area have established a more intense, mixed-use character
 - Mixed-use development on the subject site can maintain an appropriate relationship with the remaining Employment Area lands to the east and west, which are already in close proximity to existing residential uses
- The proposed conversion will not create land use conflicts or increase the potential for complaints relating to the effects of employment uses on sensitive land uses
 - The site can be appropriately designed to mitigate any effects relating to noise and vibration, dust, emissions and odours
 - There are no concerns related to public health and safety
- The subject site represents one of the few opportunities for intensification within the surrounding area that can deliver a significant amount of residential uses. It is located within a strong market area that is in reasonable proximity to the Downtown core and the East Harbour Transit Hub, making this an ideal location for the introduction of residential uses

- There is sufficient servicing capacity and community infrastructure to support the proposed land use designation and a potential mixed-use development

For the reasons summarized above and detailed in the remainder of this Conversion Rationale, it is our opinion that the requested conversion represents good planning. It is consistent with the Provincial Policy Statement, and conforms to the policies of the Growth Plan for the Greater Golden Horseshoe and the City of Toronto Official Plan. In particular, it conforms to the policies and meets the tests related to employment land conversion in Section 2.2.5.9 of the Growth Plan and Section 2.2.4 of the Official Plan.

2

SITE AND SURROUNDING CONTEXT

2.1 THE SITE AND EXISTING CONTEXT

THE SUBJECT SITE

The subject site is located on the southeast corner of Leslie Street and Eastern Avenue, and is located within the broader South of Eastern Employment Area. The site is bound by Eastern Avenue to the north, Leslie Street to the west, Lake Shore Boulevard East to the south, and the City of Toronto Fleet Services to the east. The subject site is 26,385 square metres and is currently occupied by an 8,416 square metre single-storey Loblaws grocery store, a large surface parking lot containing parking spaces for 371 cars and a 371 square metre Starbucks on a stand-alone retail pad. The subject site has been occupied by a Loblaws grocery store for over 20 years.



The primary entrance into the subject site is at the signalized intersection off of Leslie Street. There is an additional entrance off of Eastern Avenue at the northern edge of the site. The Loblaws grocery store is located at the northern edge of the subject site, while the Starbucks is located at the southwest corner of the subject site. A large surface parking lot takes up the majority of the southern portion of the site, and surface parking lines the northern edge of the subject site along Eastern Avenue.



Subject Site from Eastern Avenue



Subject Site from Signalized Intersection



Southwest Corner from Leslie Street



Surface Parking Lot

ADJACENT AREAS

NORTH

To the north of the subject site along Eastern Avenue, are low-density commercial uses. North, west and east of the subject site are portions of the Leslieville neighbourhood, an established low-density residential area that is served by mixed-use commercial development along Queen Street East.

SOUTH

The subject site is bordered to the south by Lake Shore Boulevard East and the Lower Don Recreation Trail. South of the subject site is the recently constructed TTC Leslie Barns. On the Leslie Street edge of the TTC Leslie Barns is Leslie Barns Park, which runs north from Lake Shore Boulevard East, south to North Service Road. Leslie Barns Park is part of the Leslie Street Greening project, which aims to create a generous green corridor connecting the residential neighbourhoods north of Lake Shore Boulevard to the Port Lands, including Tommy Thompson Park. Southwest of the subject site are large format retail uses.

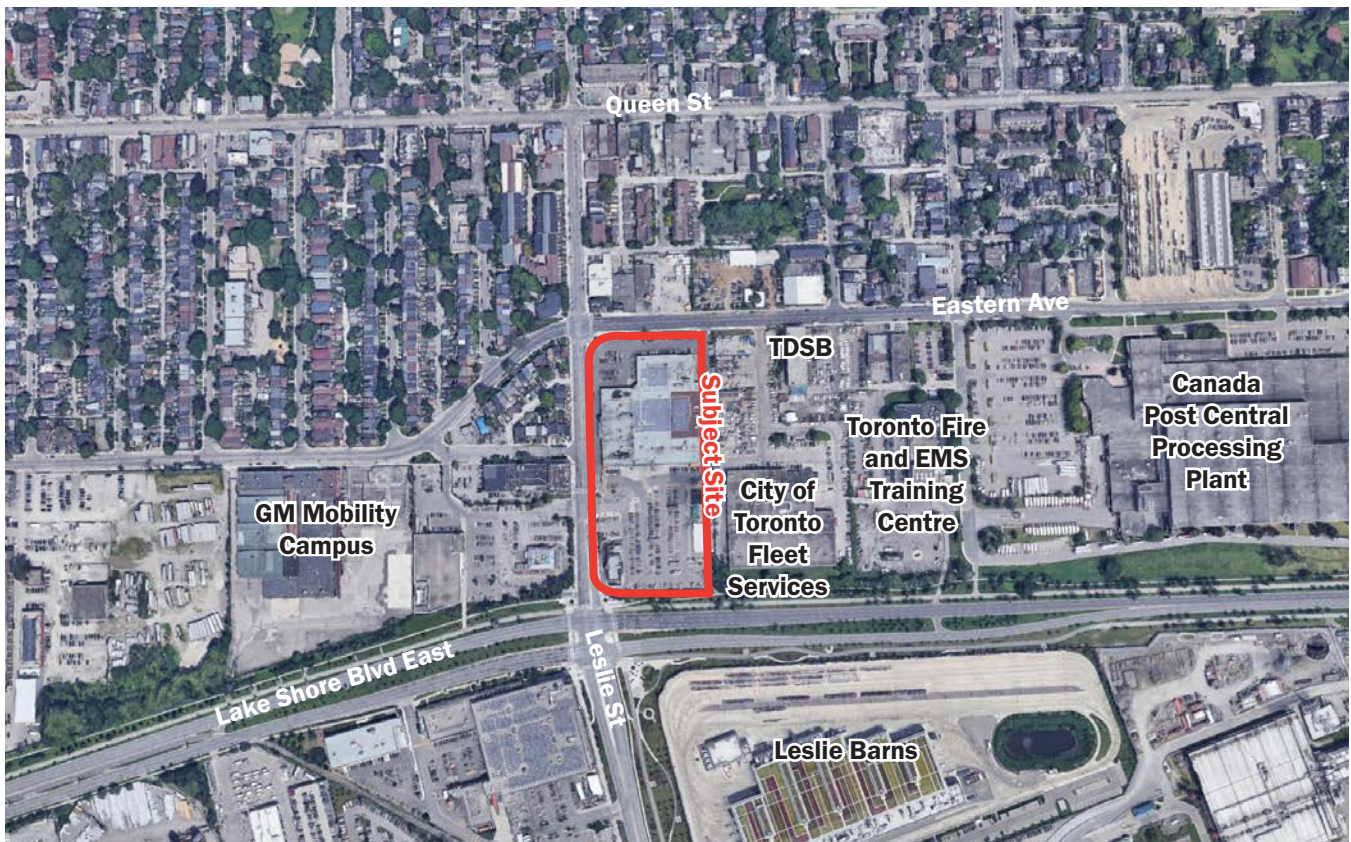


EAST

Immediately east of the subject site is the City of Toronto Fleet Services, which contains a large surface parking lot and vehicle repair facility and a Toronto District School Board facility that contains a two-storey building and a large surface parking lot. East of these two facilities on the south side of Eastern Avenue is an auto repair shop, a Toronto Fire and EMS Training Centre, and Canada Post's South Central Processing Plant. On the north side of Eastern Avenue, across the street from these employment uses are commercial uses with residential uses immediately behind.

WEST

Two different uses are found immediately west of the subject site: to the northwest is a residential enclave, which is part of the larger Leslieville neighbourhood and is bound by Eastern Ave, Leslie St and Mosley St. To the southwest is a three-storey office building and low-density food service commercial uses similar to the subject site. Further west of the subject site on the south side of Eastern Avenue, is the planned location for General Motors' Toronto GM Mobility Campus, which was approved in 2018 for office space, research and development facilities, an auto dealership and ancillary retail. Construction of the Mobility Campus has yet to take place, and the site is currently occupied by a vacant, two-storey office building and a vacant paved lot. On the north side of Eastern Avenue are low-density residential uses that are part of the larger Leslieville neighbourhood.



Aerial Image of Adjacent Area



Commercial uses north along Eastern Avenue



City of Toronto Fleet Services east of site



TTC Leslie Barns and large format retail south of site



Residential uses west of site

2.2 BROADER AREA CONTEXT

The subject site is located within a broader context that is undergoing significant change from a low-density single-use industrial and employment area, to an area with the capacity to support a greater variety of uses. The following section explores the characteristics and changing role of the South of Eastern Employment Area and the Port Lands area in relationship to the conversion request.

SOUTH OF EASTERN EMPLOYMENT AREA

The South of Eastern Employment Area is generally bounded by Eastern Avenue to the north, Lake Shore Boulevard to the south, the Don Valley Parkway to the west and Woodfield Road to the east. Formerly a location for metal processing and tanning among other industrial functions, the South of Eastern Employment area has transitioned over time to be used for film productions, car dealerships, auto shops, retail and commercial spaces, self-storage and public works facilities.

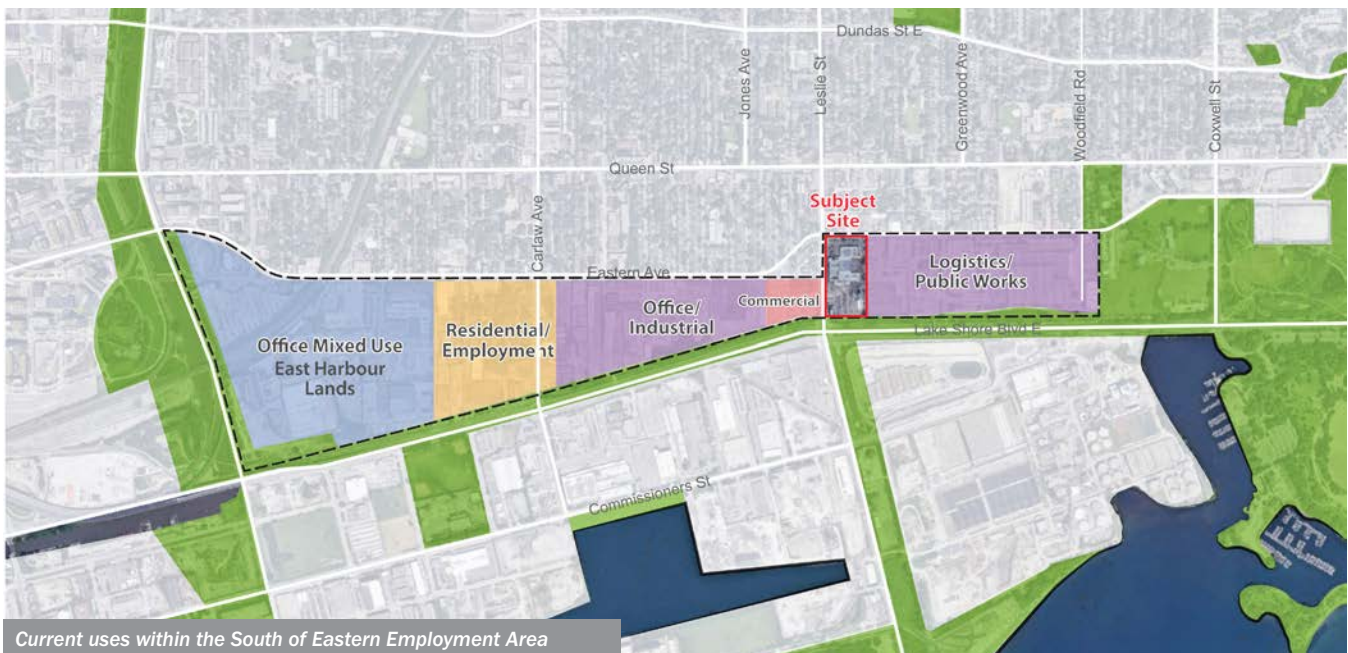
Recent development applications in the South of Eastern Area include the Toronto GM Mobility Campus, a 7-acre site, which as previously mentioned, has been approved for office space, research and development facilities, an auto dealership and ancillary retail. The most notable development application within the area is the East Harbour development at the Unilever lands, a 38-acre site that has been approved for 10 million

square feet of commercial development, and which will also be the site of a new multi-modal transit hub, incorporating connections to the GO Transit network, the planned Ontario Line, and a future TTC streetcar connection along Broadview Avenue. According to an April 2021 announcement by the Ministry of Transportation, East Harbour is seeking to add to its development with residential permissions.

While the South of Eastern Employment Area is mapped as one contiguous area, it has two distinct precincts within it divided by Leslie Street: the western portion which runs from Don Valley Parkway to Leslie Street, and the eastern portion which runs from the City of Toronto Fleet Services, which is immediately east of the subject site, to Woodfield Road.

The western portion is characterized by office uses, industrial uses, film uses, an established residential area along Logan Avenue, Morse Street and Carlaw Avenue, and the approved East Harbour redevelopment and multi modal transit hub.

While the western portion has a variety of employment uses as well as residential uses, the eastern portion is characterized by large public work facilities, such as the City of Toronto Fleet Services the Toronto District School Board facility and the Canada Post distribution centre. The interior edges of these two precincts where they



meet at Leslie Street are characterized largely by retail uses including the Loblaws and Starbucks on the subject site and a Fresh Co. and Wendy's on the western side of Leslie Street. The subject site is located at the nexus of these two distinct precincts, along the Leslie Street seam.

THE PORT LANDS

The subject site is located directly north of the Port Lands along Leslie Street, which acts as a gateway into the area. The Port Lands are currently undergoing a multi-year revitalization process guided by the Port Lands Planning Framework, which was approved by Council in 2017, and envisions the area as a vibrant mixed-use living and working environment. This vision is reflected in the Framework's land use plan, which permits a variety of uses including residential, productions, interactive and creative uses, light industrial and industrial uses and port uses. In total, it is estimated that revitalized Port Lands could result in a potential residential population of 16,500 to 21,000 people, and between 25,000 to 30,000 jobs.

QUEEN STREET CORRIDOR

The subject site is located less than 300m south of Queen Street East, which has a mix of commercial and residential uses in the form of predominately low-rise

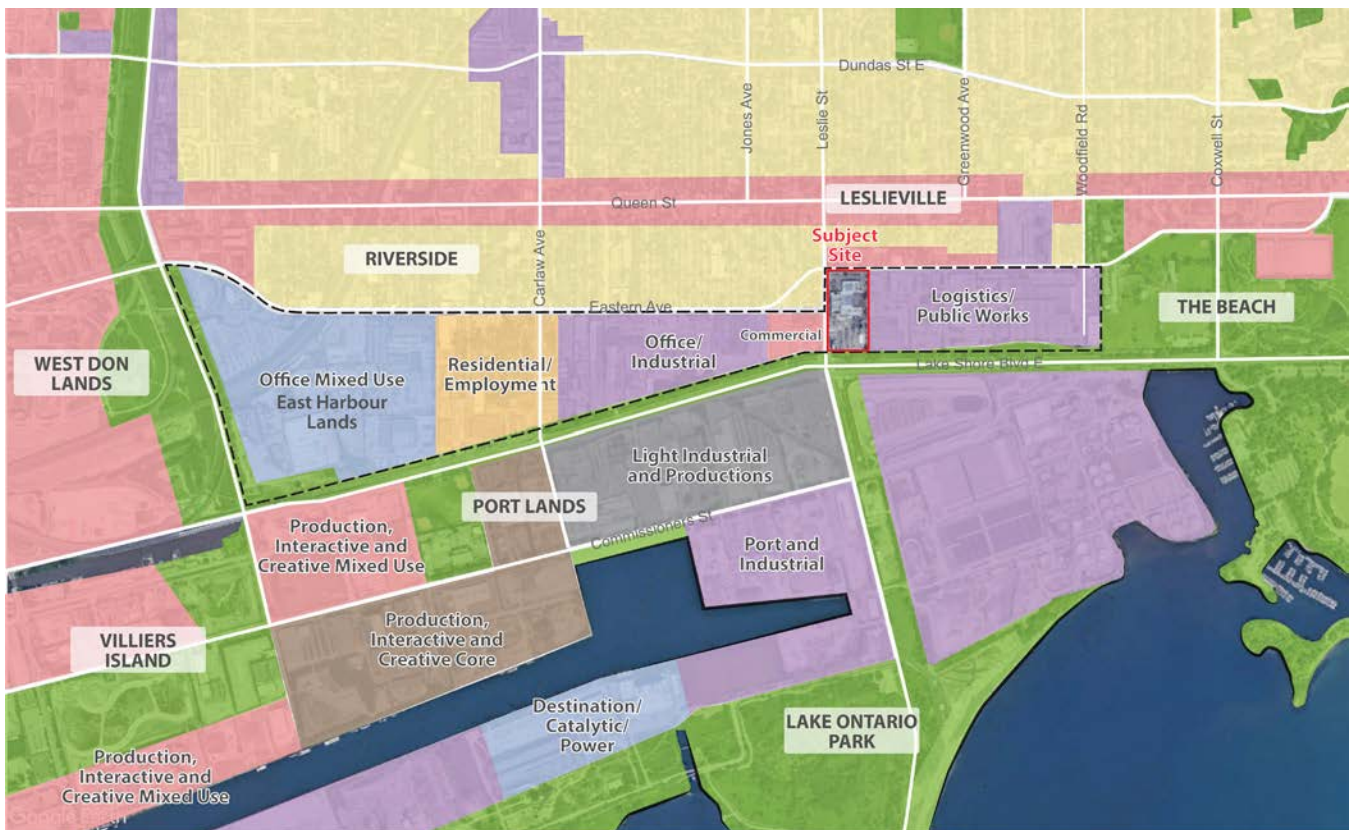
buildings. Queen Street East has evolved considerably over the last decade, and is experiencing residential intensification, primarily in the form of mid-rise development along Queen Street East.

LAKE ONTARIO PARK

The subject site is located at the centre of a green axis that extends south, east and west, giving the site excellent access to the waterfront and surrounding greenspaces and trails.

The green axis extends south along Leslie Street to Lake Ontario Park, which spans from Cherry Beach to Ashbridges Bay and provides connections to the Eastern Beaches and Tommy Thompson Park. Once fully realized, Lake Ontario Park will encompass 37 kilometres of shoreline and 375 hectares of land and water, and will be a landmark park for the City, providing excellent access to the waterfront for local residents and for residents across the City.

The east-west axis extends along Lake Shore Boulevard and includes the Martin Goodman Trail. The Martin Goodman Trail spans 22km from east to west and trail users can access numerous parks and public amenities along the waterfront.

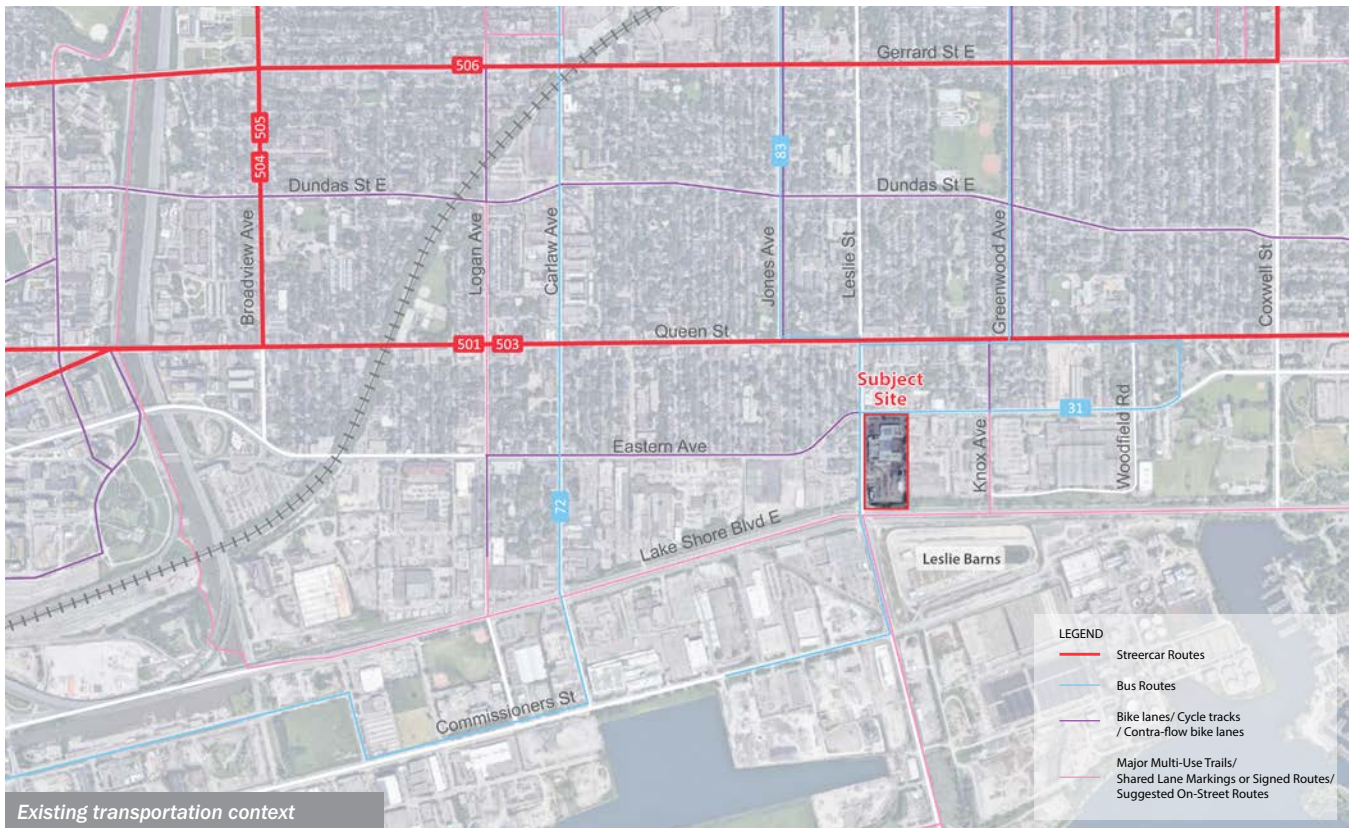


Current and proposed uses within the broader context area

2.3 TRANSPORTATION CONTEXT

EXISTING TRANSPORTATION CONTEXT

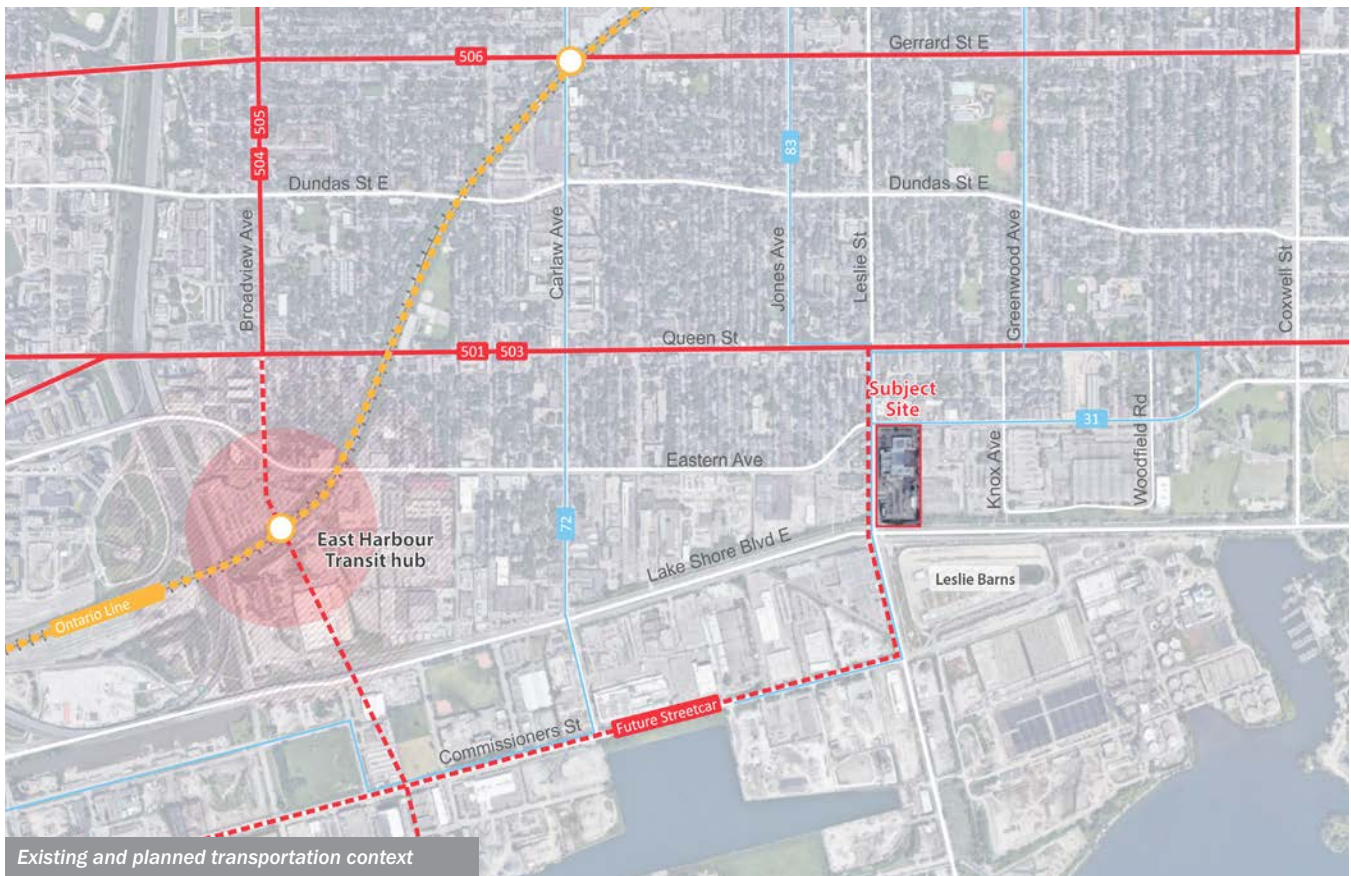
The subject site is in close proximity to the 501 Queen streetcar, which is part of the TTC's 10 minutes or better network as well as the blue night network. The blue night network is the TTC's late-night bus service, where buses run from 1:30 AM to 5 AM. This allows access to the site 24 hours a day. The subject site is served by the 31 Greenwood bus route, which runs north from Greenwood subway station south to Queen Street where it then completes a loop south down Leslie Street, east along Eastern Avenue and then north along Woodward Avenue. The subject site is also served by the 83 Jones bus, which runs north from Donlands subway station south to Commissioners Street.



FUTURE TRANSPORTATION NETWORK

The subject site is approximately 1.5km east of the planned East Harbour Transit Hub. The East Harbour Transit Hub will incorporate connections to the GO rail/ SmartTrack on the Lakeshore East and Markham/ Stouffville lines, the planned Ontario Line subway station, and a future TTC streetcar connection along the extended Broadview Avenue, which will connect with the broader TTC streetcar network. The East Harbour Transit Hub is envisioned as a new Union Station to the east, and will make East Harbour as well as the larger South of Eastern Employment Area one of the most transit-connected places in the City.

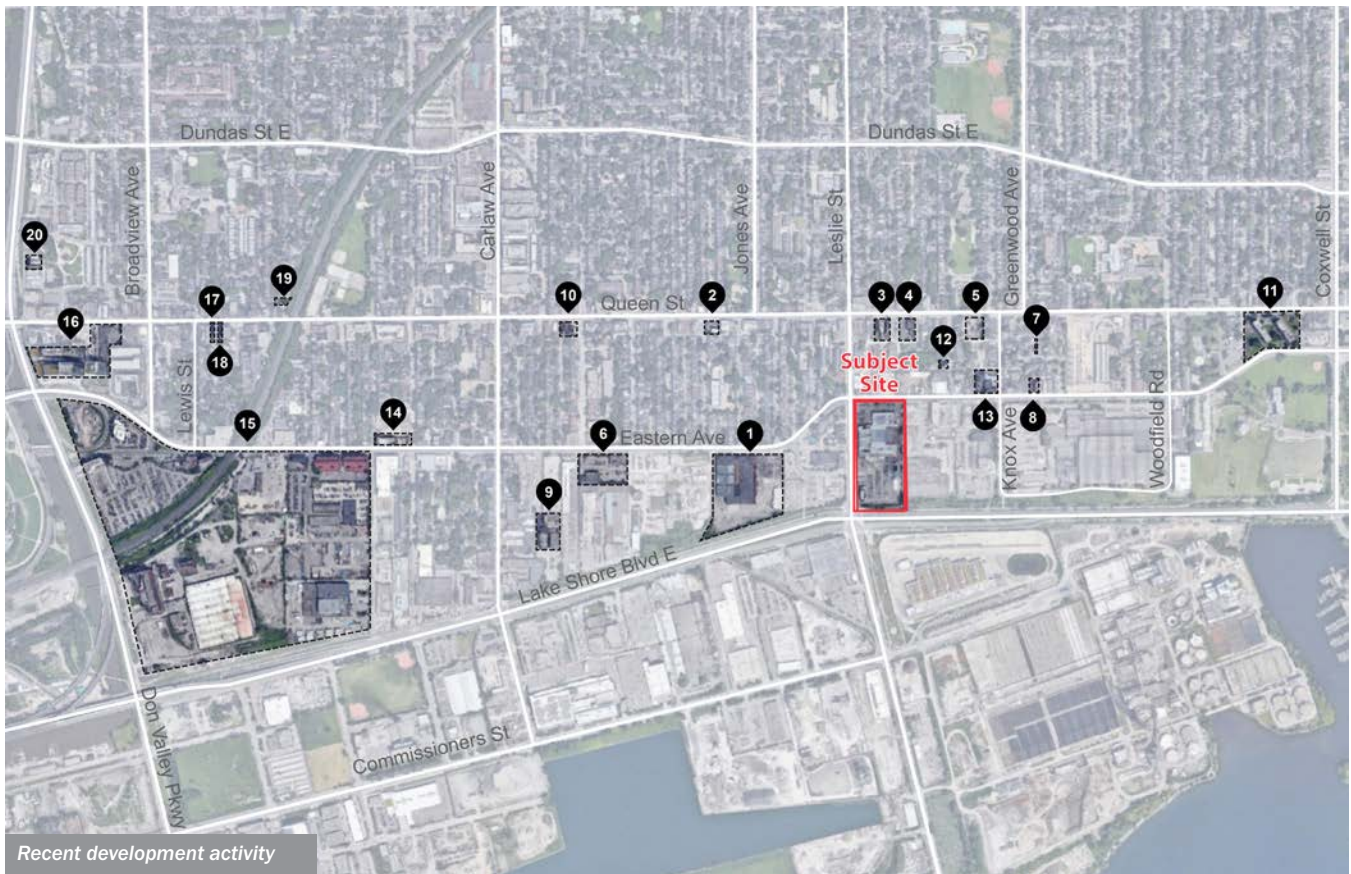
The Port Lands Planning Framework has identified the extension of streetcar service south along Leslie Street to Commissioners Street where a dedicated streetcar route is planned. This future streetcar service would further connect the subject site with the rest of the Downtown and the Port Lands.



2.4 RECENT DEVELOPMENT ACTIVITY

The area surrounding the subject site has experienced some mid-rise, mixed-use development along Queen Street East and Eastern Avenue. Along these corridors, this area has been transitioning away from predominantly low-rise built forms, into a more compact and dense built form to accommodate the demand for housing in an area that offers a wide range of amenities and is well connected to the Downtown core. While new development has primarily been mid-rise in character along the relatively narrow main street corridors, greater densities and tall buildings have been approved in locations that can accommodate more intensive development. This includes the 17-storey recently approved development at 1555 Queen Street East (TCHC Don Summerville

Apartments), the approved development at 77-79 East Don Roadway, which has heights of up to 20-storeys and East Harbour, which has been approved for heights of up to 50 storeys. Despite recent shifts towards residential development in the surrounding area, the subject site remains one of the few sites capable of accommodating high-density transit-oriented development.



Map #	Address	Application Type	Height (Storeys)	Res. Units	Approval	Non-Residential Uses
1	721 Eastern Avenue	OPA and Rezoning	5, 10	None	2017	Offices, retail, auto dealership
2	1151 Queen Street East	Rezoning	6	47	2020	Retail
3	1249-1251 Queen Street East	Rezoning	6	29	2020	Retail
4	1285 Queen Street East	Rezoning	6	72	2020	Retail
5	1327-1339 Queen Street East	Rezoning	8	91	2016	Retail
6	629, 633, 675 Eastern Avenue	Rezoning	10, 9, 4	None	2015	Office/flex space, retail, hotel
7	2 Minto Street	Site Plan	4	8	Under Review	None
8	914 Eastern Avenue	Site Plan	2	3	Under Review	None
9	65-87 Heward Avenue	Site Plan	6	None	Under Review	Retail, restaurant and office uses
10	1001 Queen Street East	Rezoning and Site Plan	6	16	2018	Retail
11	1555-1575 Queen Street East	Site Plan	17, 16, 10	770	Under Review	Retail
12	46-48 Laing Street	Rezoning	4	7	Under Review	None
13	880-882 Eastern Avenue	Rezoning	12	157	Under Review	Retail
14	462 Eastern Avenue	OPA and Rezoning	9	308	2016	Retail
15	East Harbour	Rezoning	10, 12, 14, 15, 20, 25, 26, 30, 40, 42, 50	None	2018	Office, retail, cultural and entertainment uses
16	77-79 East Don Roadway, 15, 25, 30 Baseball Place, 661 - 677 Queen Street East	Rezoning	6,12,14, 20	898	2017	Retail, auto dealership
17	751 Queen Street East	Site Plan	5	9	Under Review	Retail
18	759-763 Queen Street East	Rezoning	6	29	Under Review(?)	Retail
19	8 De Grassi	Site Plan	5	17	Under Review	None
20	33-39 Davies Ave	Rezoning	20	None	Under Review	Office



GM Mobility Campus Rendering

GM MOBILITY CAMPUS

The approved GM Mobility Campus is a multi-use facility containing office, research and development facilities and vehicle sales and service space. This development is indicative of the change in employment uses within the South of Eastern Employment Area, away from more traditional employment uses towards office and retail based employment.



Don Summerville Rendering

TCHC DON SUMMERVILLE REVITALIZATION

The revitalization of Don Summerville will result in a total of 770 residential units being added to the area, with heights of up to 17 storeys.



Riverside Square Rendering

RIVERSIDE SQUARE

This completed high-rise development has created 898 new residential units within the broader area.



East Harbour Rendering

EAST HARBOUR

Currently approved for over 10 million square feet of non-residential space, East Harbour is currently seeking approval to include residential uses. This re-development is centred around the creation of the East Harbour Transit Hub, which will connect to GO Transit, the future Ontario Line, SmartTrack services and the TTC streetcar lines.

3

PRELIMINARY DEVELOPMENT CONCEPT

3.1 DEVELOPMENT FRAMEWORK

INTRODUCTION

The following section outlines the details of the conceptual development framework for the subject site. It first describes the opportunities and challenges and key considerations impacting the site and how these have shaped the proposed concept. Section 3.2 elaborates on the conceptual demonstration plan and master plan proposed for the subject site.

Choice Properties has not advanced detailed development plans for the subject site, and there are no related applications for an Official Plan Amendment or Zoning By-law Amendment accompanying this conversion request. The conceptual demonstration plan has been prepared to illustrate how the subject site could be developed in a way that is compatible with the surrounding employment uses, while contributing to the establishment of a complete community.

SITE CONSIDERATIONS

The location and surrounding context of the subject site presents a number of opportunities, challenges and considerations, which have shaped the conceptual development framework. This includes decisions about where specific uses should be located within the subject site and what relationships can be strengthened or formed between the proposed mix of uses and the surrounding land uses.

RELATIONSHIP TO EXISTING EMPLOYMENT USES

The City of Toronto Fleet Services is located immediately east of the subject site. As will be discussed in more detail in Section 5, mitigation measures on the subject site are not anticipated to be required. Through the conceptual site organization there is an opportunity to create a buffer between the subject site and the City of Toronto Fleet Services, ensuring an appropriate land use relationship.

LESLIE STREET EDGE

Leslie Street from Eastern Avenue to Lake Shore Boulevard East is the western edge of the subject site. Leslie Street is an important gateway into the Port Lands and the waterfront's park system, and there is an opportunity to reinforce this by exploring the creation of a linear open space along the Leslie Street edge of the site.

ADJACENT RESIDENTIAL USES

The north western edge of the subject site faces a low-rise neighbourhood, that is comprised of predominantly 2 to 3 storey semi-detached houses. The subject site is separated from these residential uses by Leslie Street. Patterns of building massing and heights will need to respond to this relationship.

FRAMEWORK DEVELOPMENT

CONCEPTUAL SITE ORGANIZATION

The proposed conceptual framework illustrates the overall site organization and potential locations for future development including: new streets and blocks and parks and open spaces.

As illustrated, a new street network through the subject site has been proposed, which could create three new blocks on the subject site. The proposed street network would retain the current access point on Leslie Street at the signalized intersection, and would extend Mosley Street east into the subject site. A new north-south street on the eastern edge of the subject site would allow for loading and access to all three blocks, and would create a buffer between the existing employment uses to the east and the subject site.

The conceptual linear open space network is strategically located on the Leslie Street edge of the subject site. This location will allow for a greater buffer between the subject site and the adjacent residential and low-rise uses west of the site. The location will also allow for a continuous linear greenspace along Leslie Street as the Leslie Barns Park is located immediately south of Lake Shore Boulevard. This would contribute to the Leslie Street Greening project and would further reinforce Leslie Street as a green gateway into the Port Lands and the waterfront.

LAND USE

The conceptual framework ensures a broad mix of uses that support a complete community. The conceptual framework includes the addition of residential uses to the subject site, which could include a diversity of tenure types. The conceptual framework provides for the full replacement of the 8,633 square metres of retail space that exists on the site today, and introduces office uses, significantly increasing the amount of non-residential space.

CONNECTIVITY AND ACCESS

The subject site has the potential to become more accessible through the addition of new streets, mid-block connections and open spaces. There is an opportunity to extend the existing street network into the subject site, creating better porosity through the site. The creation of a new north-south street on the eastern edge of the site, would allow for appropriate servicing and access. The conceptual linear parks and open space network could connect to the existing Martin Goodman Trail network, making the site more accessible to pedestrians and cyclists. Further, the location of the conceptual parks and open space network on the edge of the subject site, would enable a generous and high-quality public realm.



Conceptual Development Framework

3.2 MASTER PLAN CONCEPT

CONCEPTUAL DEMONSTRATION PLAN

The demonstration plans presented in this report are only conceptual and illustrate the potential development of the site consistent with the development framework.

The conceptual demonstration plans illustrate that Block A could be a mixed-use block with non-residential uses at grade. Block B is anticipated to accommodate predominately residential uses, while Block C is anticipated to accommodate the replacement food store as well as office and retail uses.

The open space illustrated could potentially provide for a full parkland requirement. For the purposes of this proposed conversion application, any references to parkland requirements at this stage are conceptual and would be further explored at the development application stage.

The conceptual demonstration plans illustrate a potential range of heights including several towers. The demonstrated podiums are proposed to range from 2 to 8 storeys while positioning peak height to the centre of the subject site. The conceptual tower heights are proposed to range from 6 storeys to 31 storeys, with transitions towards the adjacent low-rise residential neighbourhood located to the west.

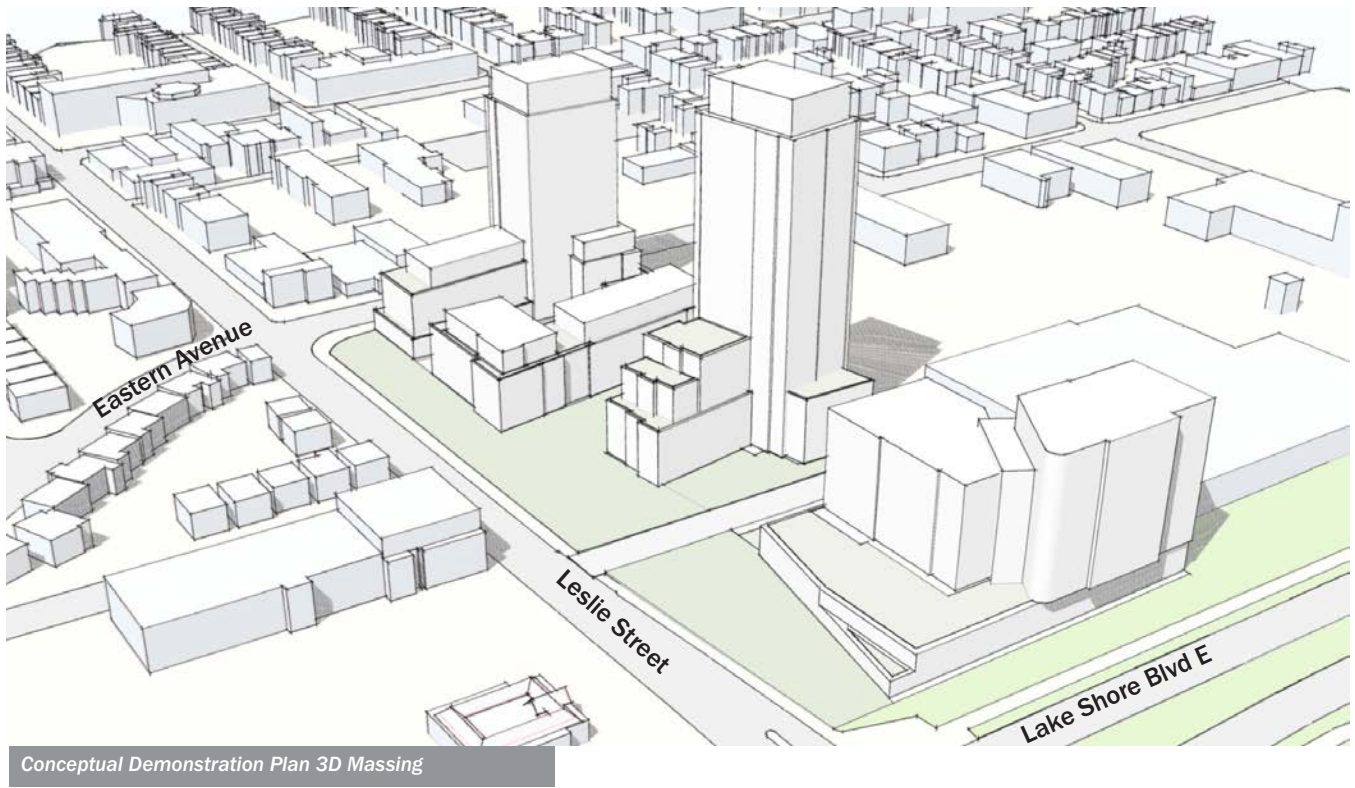
The conceptual development framework permits various built form approaches and tower configurations. Ultimately, it supports a variety of urban built form typologies that are suitable in their response to the existing conditions on and around the site.

Architectural details and unit configurations would be determined through detailed design of a development concept at the time of a development application. However, the conceptual plans demonstrate that there is flexibility with respect to the number of towers, heights, and dimensions of the built form. This flexibility embedded into the concept ensures responsiveness to the nearby employment areas to create appropriate relationships and avoid adverse impacts on existing employment uses.



Conceptual Demonstration Plan

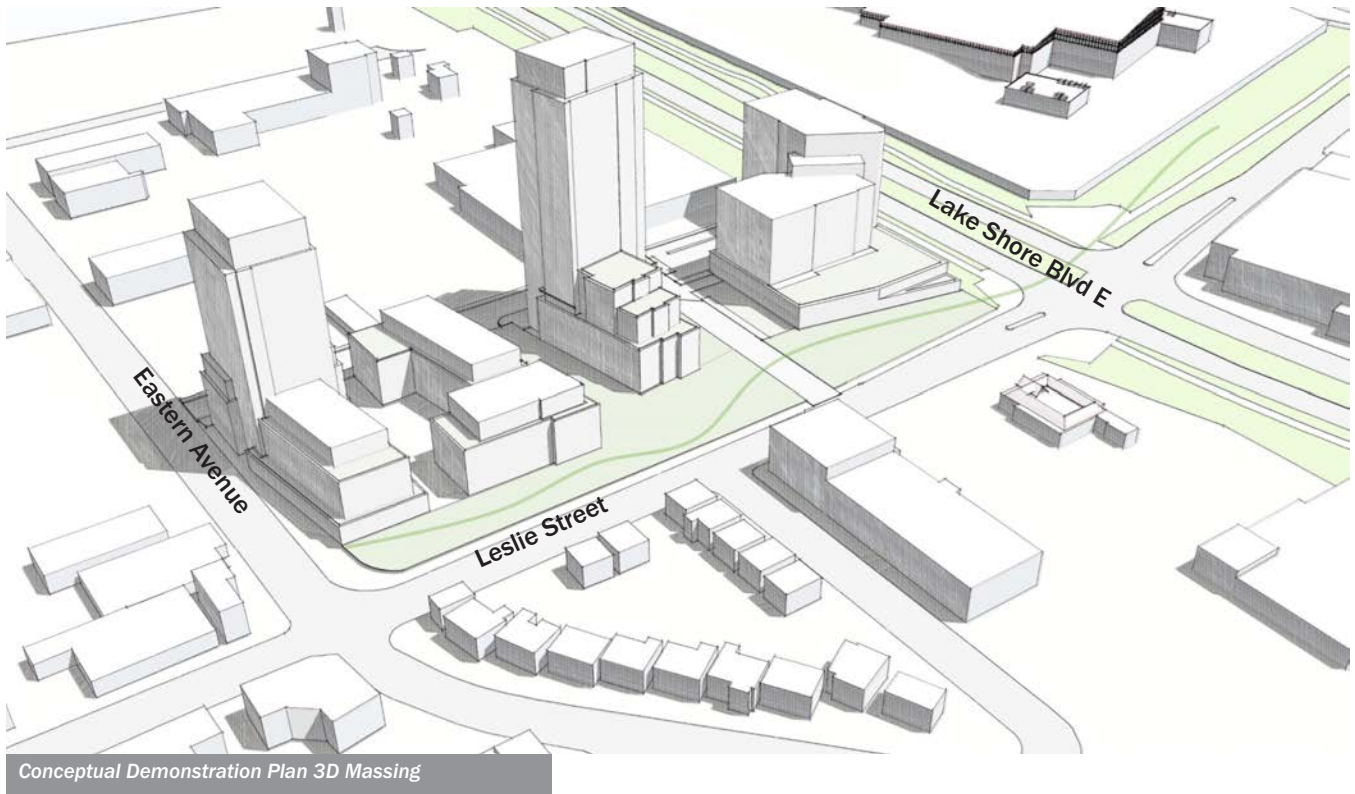
Conceptual Use	Block A	Block B	Block C	Total
	GFA (m2)			
Residential	39,000	31,000	-	70,000
Retail	1,000	-	8,000	9,000
Office	-	-	6,000-12,000	6,000-12,000
Non-Residential	-	4,000	-	4,000



Conceptual Demonstration Plan 3D Massing

CONCEPTUAL VIEW LOOKING NORTH

The conceptual view looking north highlights the height transitions towards Leslie Street and the adjacent low-rise neighbourhood. This conceptual view also illustrates the linear parks and open space network along Leslie Street, which creates a buffer between the site and the adjacent low-rise uses. This linear park system and the height transitions ensure that the subject site is appropriately responding to its surrounding context.



CONCEPTUAL VIEW LOOKING SOUTHEAST

The conceptual view looking southeast highlights how the conceptual linear park network can connect to the existing Leslie Barns park, creating a significant linear greenspace along Leslie Street.

4

PLANNING POLICY FRAMEWORK

4.1 PROVINCIAL POLICY FRAMEWORK

This section outlines the relevant provincial and municipal planning policy framework that applies to the Site. A summary discussion of how the proposed conversion is consistent with and conforms to the Provincial Policy Statement (PPS), Growth Plan, and the City of Toronto Official Plan is presented in this section. A Conversion Request is proposed to modify the subject site's land use designation from General Employment Areas to Mixed Use Areas. Based on the analysis outlined below, it is our opinion that the proposed conversion is appropriate and represents good planning.

4.1.1 PROVINCIAL POLICY STATEMENT (2020)

The Provincial Policy Statement, 2020 provides broad policy direction on land use planning and development related to provincial interests with which Toronto's planning decisions must be consistent.

The PPS policies support the building of strong and healthy communities through efficient land use and development patterns (Section 1.0). Section 1.1, which promotes efficient and resilient land use and development patterns, also promotes the provision of a broad range of affordable and market-based residential forms, as well as employment including industrial and commercial uses (Policy 1.1.1b). Policy 1.1.1e supports the integration of land use planning, growth management, intensification and transit/infrastructure supportive development to minimize land consumption and optimize servicing. Settlement Areas are to be the focus of growth and development, including through intensification and redevelopment providing for a range of different uses (Policy 1.1.3).

Section 1.2.6 addresses land use compatibility, including the planning and development of sensitive land uses to avoid, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, and to minimize risk to public health and safety (Policy 1.2.6.1). The PPS provides that planning authorities shall protect the long-term viability of industrial, manufacturing or other uses vulnerable to encroachment by ensuring that proposed sensitive uses are only permitted subject to the following conditions:

- A. There is an identified need for the proposed use;
- B. Alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations;
- C. Adverse effects to the proposed sensitive land use are minimized and mitigated; and,
- D. Potential impacts to industrial, manufacturing or other uses are minimized and mitigated.

Section 1.3 addresses employment uses, with policies supporting a mix of employment, institutional and broader mixed uses to meet long-term needs and promote economic development. The policies encourage compact, mixed-use development that incorporates compatible employment uses, and the provision of a range of housing options and densities in support of livable and resilient communities (Policy 1.3.1d).

Policy 1.3.1 also establishes that planning authorities shall plan for, protect and preserve employment areas for current and future use, and that residential and other sensitive land uses shall be prohibited in areas planned for industrial/manufacturing uses. However, Policy 1.3.2.4 allows authorities to permit the conversion of employment areas to non-employment use through a comprehensive review.

Section 1.7 addresses long-term economic prosperity, which is supported by promoting opportunities for economic development, encouraging residential uses to respond to market-based needs, provide a range of housing options for a diverse workforce, and optimizing the long-term availability and use of land, resources, infrastructure and public service facilities (1.7.1).

The proposed conversion meets the policy tests for conversion requests outlined in the PPS, which will be covered in greater detail in Section 5 of the report. There is a demonstrated need for the conversion as there are a limited number of sites suitable for significant intensification opportunities within the surrounding area. The subject site is located in close proximity to the Downtown and is well served by existing transit, community services and facilities. The proposed conversion represents an opportunity to provide a diversity of housing types and much needed housing supply, while increasing the amount of employment space on the subject site.

Furthermore, as outlined in Section 5 and in the supporting study by SLR Consulting, no adverse air impacts, noise or vibration from surrounding industrial uses are anticipated on the subject site. SLR Consulting has found that any potential noise from the surrounding road network can be appropriately mitigated by implementing design measures such as central air-conditioning and upgraded window glazing.

From an economic perspective, the report by urbanMetrics indicates that the operations of adjacent employment uses would not be adversely affected by the proposed conversion. The collection of employment lands where the subject site is located have been undergoing a transition away from traditional employment uses towards primarily retail/service commercial uses over the past 20 years. As such, the proposed conversion, which would maintain retail uses on the site, will not have a significant impact on the surrounding employment lands.

The proposed conversion and intended redevelopment of the subject site is consistent with the directions of the PPS as it will allow for a compact and optimized land use pattern, and will provide for a range of uses in a Settlement Area that is well-served by public transit and infrastructure. Furthermore, the conversion would allow for a broadened mix of uses including compatible employment that promotes economic development in the area, increased housing options, and a more livable, healthy community.

4.1.2 GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE (2019)

The Growth Plan for the Greater Golden Horseshoe directs regional growth including where and how growth should occur, the provision of infrastructure to support growth, and the protection of natural systems. Toronto's planning decisions are required to conform to the Growth Plan. On May 16, 2019, the Province brought into effect A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019. This new Growth Plan replaces the previous version (2017).

The subject site is located within a built-up area and a designated employment area under the Growth Plan. A land use conversion and mixed-use redevelopment of the subject site would reinforce Growth Plan policies including making efficient use of land and infrastructure, prioritizing intensification, developing complete communities, and supporting a strong and competitive economy.

Section 2.1.1, Managing Growth, supports the achievement of complete communities that:

- Feature a diverse mix of land uses including residential and employment, and convenient local access to local services and public service facilities (2.2.1.4a);
- Expand convenient access to a range of transportation options, including options for the safe, comfortable and convenient use of active transportation (2.2.1.4d); and,
- Provide for a more compact built form and a vibrant public realm (2.2.1.4e).

Section 2.2.5, Employment, directs that economic development and competitiveness will be promoted by making more efficient use of existing employment areas and vacant and underutilized employment lands by increasing employment densities (2.2.5.1a) and integrating and aligning land use planning and economic development goals and strategies to retain and attract investment and employment (2.2.5.1d). Furthermore, the Growth Plan's goals for employment areas include developing built form supportive of transit and active transportation networks, while minimizing surface parking (2.2.5.4). Policy 2.2.5.8 states that the development of sensitive land uses, such as residential, will avoid, or where avoidance is not possible, minimize and mitigate adverse impacts on industrial, manufacturing or other uses vulnerable to encroachment.

As per policy 2.2.5.9, 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:

- There is a need for the conversion;
- The lands are not required over the horizon of this Plan for the employment purposes for which they are designated;
- The municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;
- 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,
- There are existing or planned infrastructure and public service facilities to accommodate the proposed uses.

The Growth Plan (2019) introduced Provincially Significant Employment Zones (PSEZ) across the Greater Golden Horseshoe, one of which applies to the subject site. Policy 2.2.5.12 provides that the Minister may identify provincially significant employment zones and may provide specific direction for planning in those areas to be implemented through appropriate official plan policies and designations and economic development strategies. Applications for conversions from employment uses designations on lands within these identified PSEZs may only be considered through an MCR process.

The proposed conversion and associated future redevelopment of the subject site would conform to the policies of the Growth Plan with regard to supporting more efficient use of land and infrastructure, diversifying the mix of land uses through the compact, transit-supportive development, minimizing surface parking and automobile dependence and contributing to the integration of economic development with land use planning by re-investing in underutilized employment lands.

The subject site is located in an area where there are limited opportunities for high-density, transit-oriented development. The proposed conversion would allow for residential development, including a diversity of tenure types in an area that has a strong residential market,

is well connected to the Downtown and is in proximity to a range of services and amenities, including the East Harbour Transit Hub. Further, the City is currently facing a housing crisis with supply consistently falling short of demand. The proposed conversion represents an opportunity to provide much needed housing supply, while continuing to provide significant employment space on the subject site.

As indicated in the Employment Area Impact Assessment prepared by urbanMetrics, Employment Land employment, which is generally characterized by manufacturing, transportation, warehousing and logistics is forecast to decline by 2051, while Major Office and Population Related employment will increase. The proposed conversion and conceptual development framework will maintain the current retail and service commercial employment opportunities on the subject site, while also providing for additional net new growth in jobs.

The proposed conversion will not be disruptive to meeting employment targets, as it is not contributing significant job opportunities in its current large format retail use with surface parking. Further, the proposed land use redesignation and prospective development could provide between 19,000 - 25,000 square metres of non-residential GFA, serving as a replacement for existing employment GFA on the site and increasing employment density on the site.

The subject site is located within a PSEZ, and the proposed conversion will not have an impact on the larger PSEZ. The subject site's edge condition, as well as the fact that the large format retail store immediately west of the site is not located within the PSEZ, will allow the site to be removed without impacting the larger PSEZ. The proposed conversion of the subject lands will accommodate a significant number of additional jobs, underscoring the importance of the proposed development on the subject site toward meeting the goals and objectives of the Growth Plan.

Overall, the viability of the employment area will not be adversely impacted by the proposed conversion. The collection of Employment Areas oriented along Eastern Avenue possess characteristics which are no longer appealing to modern industrial users, and as a result, several sites in the area are being re-developed for retail/service commercial and office commercial uses. The

proposed conversion and conceptual development of the subject site is consistent with these trends and the inclusion of the residential component will strengthen these uses, not destabilize an already evolving area surrounded by established residential communities.

Further, the proposed conversion will contribute to population and employment intensification targets in the area, and will maintain a significant number of jobs while also providing for a diversified economic base through the inclusion of a wide range of employment options.

Sufficient infrastructure and public service facilities are also planned or in place that will be able to support the proposed conversion. The subject site is accessible by the existing public transit network, and is located near the planned East Harbour Transit Hub, where the proposed Ontario Line will intersect with two GO Transit lines and an extended streetcar line along Broadview Avenue. The subject site is also well connected to pedestrian and cycling routes, including the Martin Goodman Trail, which runs along Toronto's waterfront and allows pedestrians and active transportation users to travel across the Downtown. The site is located in an area that is very well served by public parks and open space, and is in close proximity to the Port Lands where an estimated 65 hectares (160 acres) of parks and open space will be maintained and created.

4.2 MUNICIPAL POLICY FRAMEWORK

4.2.1 CITY OF TORONTO OFFICIAL PLAN (2021 OFFICE CONSOLIDATION)

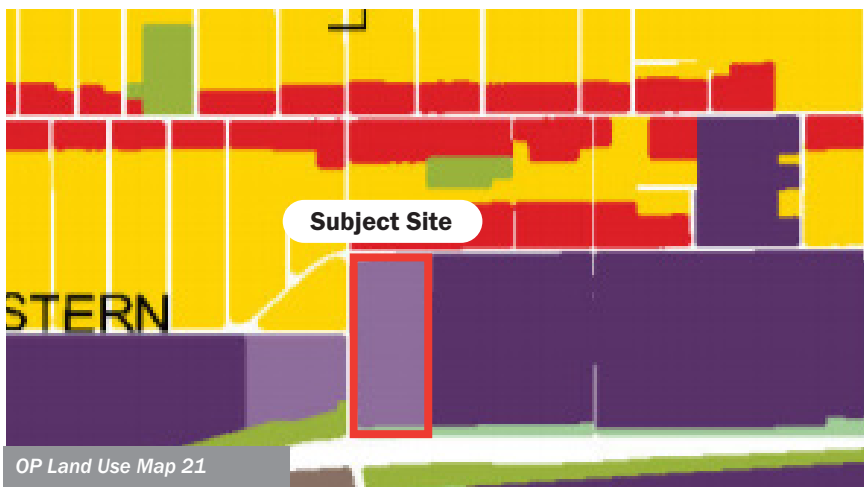
The City of Toronto Official Plan (“Official Plan”), adopted by City Council in 2002, sets out policies to guide the growth of the City to 2031. The following section is based on the April 2021 Official Plan office consolidation.

The Official Plan is generally supportive of intensification in locations anticipated for growth, and of mixed-use development that provides for new housing and jobs contributing to more complete communities. The plan promotes efficient land use and development that optimizes public transit and servicing, and which supports active transportation, an enhanced public realm and more pedestrian-friendly environments.

The subject site is identified as being within an Employment Area on Map 2 Urban Structure Plan, and is designated General Employment Areas on Map 21 Land Use Plan. Policies specific to designated Employment Areas provide detailed direction for the preservation of jobs and employment lands, and for land use conversions that introduce sensitive uses in these areas, where appropriate. These policies will be discussed briefly in this section, while Section 5 will identify and respond directly to the specific conversion tests established by the City of Toronto through the Conversion and Removal Policies for Employment Areas as part of the Official Plan Review.



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



- Legend - Land Use Designations
- 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

GROWTH AREA POLICIES

Chapter two of the Official Plan sets out policies to shape the growth and change that will occur in the City. Policy 2.1.1 sets out the main framework for dealing with growth, including:

- A.** Focusing urban growth into a pattern of compact centres and corridors connected by an integrated regional transportation system;
- B.** Making better use of existing urban infrastructure and services;
- D.** Reducing auto dependency and improving air quality;
- G.** Increasing the supply of housing in mixed use environments to create greater opportunities for people to live and work locally; and,
- J.** Improving the competitive position of the Toronto regional economy and creating employment opportunities.

Policy 2.2.2 identifies the primary areas where the Official Plan seeks to locate growth, which include the Downtown, Centres, Avenues and Employment Areas as designated on Map 2, Urban Structure. This policy further establishes clear intentions for directing growth to these areas, including:

- A.** Using municipal land, infrastructure and services efficiently;
- B.** Concentrating jobs and people in areas well served by surface transit and rapid transit stations;
- D.** Promoting mixed use development to increase opportunities for living close to work and to encourage walking and cycling for local trips;
- E.** Offering opportunities for people of all means to be affordably housed; and
- F.** Facilitating social interaction, public safety and cultural and economic activity.

The proposed conversion of the subject site to a Mixed Use Areas designation will facilitate more compact development in an area that is in close proximity to public transit and a vibrant mixed-use retail corridor along Queen Street East. Further, there are limited opportunities for large scale mixed-use intensification within the eastern portion of the former City of Toronto and the proposed conversion represents a limited opportunity to contribute to intensification within the

area. The potential redevelopment will support a more efficient use of land, infrastructure and services while contributing to an increased supply of housing and jobs in a mixed-use environment, providing opportunities for people to live and work locally with reduced dependence on private automobiles.

EMPLOYMENT AREA POLICIES

2.2.4 provides specific policies for Employment Areas, including both Core and General Employment Areas. Policy 2 directs that Employment Areas will be used exclusively for business and economic activities in order to:

- A.** Retain sufficient availability of lands, for both current and future needs, for industrial functions such as manufacturing and warehousing which are permitted only within Employment Areas and Regeneration Areas;
- B.** Protect and preserve Employment Areas for current and future business and economic activities;
- C.** Provide for and contribute to a broad range of stable full-time employment opportunities;
- D.** Provide opportunities for new office buildings, particularly within walking distance to higher order transit;
- F.** Maintain and grow the City's business tax base;
- H.** Maintain the market attractiveness of the Employment Areas for employment uses;
- K.** Contribute to a balance between jobs and housing to reduce the need for long-distance commuting and encourage travel by transit, walking and cycling; and,
- I.** Provide work opportunities for residents of nearby neighbourhoods.

Additionally, Policy 3 promotes a more intensive use of lands in Employment Areas for business and economic activities in order to make better use of a limited supply of available lands.

COMPATIBILITY AND MITIGATION OF SENSITIVE USES

Section 2.2.4 also includes Compatibility and Mitigation measures relating to sensitive land uses, including residential. Policy 5 directs that sensitive land uses, where permitted or proposed outside of and adjacent to or near Employment Areas, should be planned to ensure they are appropriately designed, buffered and/or

separated from Employment Areas and/or major facilities as necessary to:

- A.** Prevent or mitigate adverse effects from noise, vibration, and emissions, including dust and odour;
- B.** Minimize risk to public health and safety;
- C.** Prevent or mitigate negative impacts and minimize the risk of complaints;
- D.** Ensure compliance with environmental approvals, registrations, legislation, regulations and guidelines at the time of the approval being sought for the sensitive land uses, including residential uses; and,
- E.** Permit Employment Areas to be developed for their intended purpose.

Policies relating to requests to convert Employment Areas to other uses are also contained in Section 2.2.4. This includes a requirement that Employment Area conversions only be permitted through a Municipal Comprehensive Review (Policy 14), and that any request to introduce sensitive land uses into an Employment Area will include a Compatibility/Mitigation Study (Policies 6, 7b, and 7c). A Compatibility/Mitigation Study must identify and evaluate options to achieve appropriate design, buffering and/or separation distances between employment uses and the proposed sensitive land uses.

Policies 14 through 17 of Section 2.2.4 establish the criteria to be applied by the City in determining the appropriateness of a request for the conversion of land within an Employment Area. Section 5 of this report will respond in detail to these policies and will comprise the primary rationale for this conversion request, including the criteria of a Compatibility/Mitigation Study.

In general, the proposed conversion and anticipated future mixed-use redevelopment – including the possibility for increased employment GFA on-site, supports the intent of the Employment Areas policies in Chapter 2 of the Official Plan. The proposal aims to contribute to the economic activity of the area and enhance the site’s market appeal for employment uses through more flexible and contemporary offerings, such as attractive new office space. Being within walking distance to public transit including the 83 Jones and 31 Greenwood bus routes, the 501 Queen Streetcar as well as a network of bike lanes and bustling mixed-use district along Queen Street East and a few stops from the East Harbour Transit Hub, the site is positioned to contribute to a desirable local balance of jobs and housing opportunities.

The South of Eastern Employment Area is characterized by an existing mix of compatible employment and residential uses. Beyond the South of Eastern Area, a recent development context has emerged that consists of mixed-use and residential forms that have introduced greater density, along with integrated non-residential and employment uses. Compatibility with the existing and planned land use context will be demonstrated in Section 5 of this report, with attention to mitigation strategies, massing and design considerations for future mixed-use redevelopment.

ECONOMIC HEALTH AND DIVERSIFICATION POLICIES

The preamble for Section 3.5, Toronto’s Economic Health, states that “by designating areas suitable for population and job growth, this Plan creates opportunities for development to accommodate diverse business ventures Downtown, in the Centres, along the Avenues and in the Employment Areas.” It continues, stating that “by moving away from specialized single-use districts and emphasizing the mixing of urban activities, this Plan sets out flexible and adaptive policies to meet the changing economic conditions of the future and create a vibrant City.”

Section 3.5.1 supports the creation of a strong and diverse economic base. The policies promote the achievement of a broad range of employment opportunities capable of attracting and expanding employment clusters, including transit-oriented office growth within walking distance of rapid transit stations. The Section 3.5.1 preamble notes that almost half of the City’s current jobs and a majority of its future jobs are in offices. Given the state of road congestion throughout the City and Region, it is imperative to promote office growth on rapid transit lines as potentially millions of square metres of new office space are added over the coming decades.

Policy 1 notes that Toronto’s economy will be expanded to provide for future employment needs, including by:

- A.** Maintaining a strong and diverse economic base;
- B.** Contributing to a broad range of stable full-time employment opportunities for all Torontonians; and,
- H.** Providing incubation space for new start-up firms to establish themselves and grow.

Policy 3 provides that a balanced growth of jobs and housing across the City will be pursued to:

- A.** Maintain a complete community;
- B.** Reduce the need for long distance commuting and lessen regional road congestion; and,
- C.** Increase the proportion of travel by transit, walking and cycling.

Policy 6 states that new office development will be promoted in Mixed Use Areas and Regeneration Areas in the Downtown, and all other Mixed Use Areas, Regeneration Areas and Employment Areas within 500 metres of an existing or approved and funded subway, light rapid transit or GO station.

The proposed conversion and the type of mixed-use redevelopment that would be enabled through a conversion conforms with the Official Plan policies to strengthen and diversify the economic base, particularly by embracing a mix of urban activities in recognition of changing local market conditions and future employment trends.

The subject site has the potential to provide new office space within proximity to the planned East Harbour Transit Hub. This planned regional transit hub will bring people within approximately 1.5km of the subject site, or an approximately 20-minute walk. There is an opportunity to bridge the last mile between the transit hub and the subject site through local transit, bicycling and pedestrian infrastructure, reducing the need for commuting by private car.

MIXED USE AREAS DESIGNATION POLICIES

Chapter four of the Official Plan describes the policies for land use designations. The preamble text of the chapter discusses Designations for Growth and identifies Mixed Use Areas, Employment Areas, Regeneration Areas and Institutional Areas as designations that will accommodate most of the city's anticipated growth in jobs and population.

Chapter four also provides that Mixed Use Areas consist of a broad range of commercial, residential and institutional uses, which may include single use or mixed-use buildings, as well as parks and open spaces. These areas will enable people to live, work and shop in the same area, encouraging less reliance on cars and the

creation of lively, walkable districts along transit routes. Most of the city's anticipated increase in retail, office and service employment, as well as new housing, is anticipated in Mixed Use Areas.

Policy 2, addressing the applicable Development Criteria, states that development in Mixed Use Areas will:

- A.** Create a balance of high quality commercial, residential, institutional and open space uses that reduces automobile dependency and meets the needs of the local community;
- B.** Provide for new jobs and homes for Toronto's growing population on underutilized lands in the Downtown and Central Waterfront, Centres, Avenues and other lands designated Mixed Use Areas, creating and sustaining well-paid, stable, safe and fulfilling employment opportunities for all Torontonians;
- G.** Have access to schools, parks, community centres, libraries and childcare; and,
- H.** Take advantage of nearby transit services.

The Mixed Use Areas designation policies promote growth that provides for new homes and jobs to support a growing population, specifically on lands that are underutilized. The proposed conversion would enable the type of growth that is consistent with these policies, including new and sustainable employment opportunities in a suitable location, and new open space. The subject site is underutilized in its current form and designation, especially considering its location close to Downtown, with convenient access to nearby transit modes, and to a range of community services and amenities.

EMPLOYMENT AREAS DESIGNATION POLICIES

As previously noted, the subject site is currently designated General Employment Areas in the Official Plan, and is therefore expected to accommodate growth in jobs.

Chapter four of the Official Plan sets out permitted uses for Core and General Employment Areas. General Employment Areas are defined as places for business and economic activities, with permitted uses including: all types of manufacturing, processing, warehousing, wholesaling, distribution, storage, transportation facilities, vehicle repair and services, offices, research and development facilities, utilities, waste management systems, industrial trade schools, media, information and

technology facilities, vertical agriculture, restaurant and service uses (Policy 4.6.3).

Section 4.6 establishes that General Employment Areas are generally geographically located on the periphery of Employment Areas on major roads, frequently serving as a buffer between industries in the interior of Employment Areas and nearby residential uses.

Section 4.6.5 states that major retail developments (6,000 or more square metres) are only permitted in a General Employment Area through an amendment to the City's Official Plan and the enactment of a site specific zoning by-law by way of a City-initiated Municipal Comprehensive Review.

The subject site is located along the Leslie Street seam, at the nexus of the western and eastern sections of the South of Eastern Employment Area. The site is not within the interior of an employment area, but rather occupies a clear edge, which faces a mix of uses including mixed use lands on the north side of Eastern Avenue, neighbourhoods to the immediate northwest and west as well as other stand-alone commercial buildings along Leslie Street. In addition, the existing condition of the site is inconsistent with the intention of a General Employment Area as it contains a major retail development.

The buffer function that these lands currently serve, could be accommodated within a mixed use format. This has been demonstrated in the conceptual development framework where new streets and open space help play a role in creating a condition that is compatible with the uses within the interior of the Employment Area while also providing for non-residential GFA. It is also important to note that the site is currently occupied by a grocery store, a population-related use providing a small number of jobs, and which is understood to attract the general public to this area. The current use is not ancillary in function to the other industrial and employment uses in the Employment Area.

BUILT FORM POLICIES

Chapter three of the Official Plan provides the primary policies that direct and shape the form of new development within the City of Toronto.

Section 3.1.1 outlines policies relating to an enhanced public realm, emphasizing quality architecture, landscape

and urban design for new development. This Section establishes that new development will be located and organized to fit with its existing and/or planned context, and notes that new development will frame and support adjacent streets, parks and open spaces to improve the safety and pedestrian interest in these spaces (Policy 3.1.2.1). It also provides that the location of vehicle access, parking and loading should be organized in order to minimize the impacts on the safety and attractiveness of the public realm (Policy 3.1.2.2).

Only conceptual development strategies have been considered for the subject site to date, but the proposed conversion anticipates mid-and high-rise, mixed-use developments that are contextually appropriate and respond to the surrounding land uses and buildings. This has been done by establishing building heights and street wall conditions that appropriately respond to the built form along Leslie Street. Conceptual development as illustrated in this conversion proposal would also enhance the public realm condition by providing for a linear open space network along Leslie Street, and by increasing pedestrian porosity through the site through a new street network. A more thorough discussion and justification relating to built form would be submitted with future Official Plan Amendment and/or Zoning By-law Amendment submissions should a conversion be secured.

4.2.2 PREVIOUS CITY OF TORONTO MUNICIPAL COMPREHENSIVE REVIEW (2012)

The City last conducted an in-depth analysis of its Employment Areas in 2012 as part of its previous Municipal Comprehensive Review. Employment Area policy matters that emerged out of the previous MCR were brought into the City's Official Plan through Official Plan Amendment 231 (OPA 231). Choice Properties Limited Partnership has appealed OPA 231 as it applies to the subject site.

5

ANALYSIS OF CONVERSION AND REMOVAL POLICIES FOR EMPLOYMENT AREAS

This section responds directly to the conversion tests established through Attachment 3 of the City's Growth Plan Conformity and Municipal Comprehensive Review Work Plan. These tests correspond to the conversion and Removal Policies for Employment Areas found in Section 2.2.4 (Policy 17) of the Official Plan, and capture the criteria for employment land conversion found within Section 2.2.5.9 of the Growth Plan (2019).

In responding to each of these tests, it will be demonstrated that:

- The requested conversion is required to establish appropriate land use relationships in an area which already includes a defined mixed-use and residential character and is well served by public transit;
- The requested conversion will contribute to achieving population and jobs forecasts in the Growth Plan;
- The requested conversion will better enable the subject site to contribute to a more diverse economic base;
- The conversion will not create incompatible land use relationships:
 - Any adverse effects from noise, vibration, emissions, dust or odour will be prevented or appropriately mitigated;
 - The requested conversion will not result in any public health risks, or non-compliance with environmental regulations or standards;
- The conversion will not adversely affect the overall viability of the Employment Area;
- There is sufficient servicing capacity and community infrastructure to support the proposed conversion; and,
- There are no cross-jurisdictional issues relevant to the conversion request.

5.1 THE REQUESTED CONVERSION WILL CONTRIBUTE TO ACHIEVING GROWTH PLAN TARGETS AND TO A MORE APPROPRIATE LAND USE RELATIONSHIP

OP Policy 2.2.4.17. a) there is a demonstrated need for the conversion to:

- 1. Meeting the population forecasts allocated to the City in the Growth Plan; or**
- 2. Mitigate existing and/or potential land use conflicts**

The proposed conversion will help contribute to population and job forecasts.

The City of Toronto is forecast to grow by over 600,000 new residents and 280,000 new jobs between 2021 and 2051. For the subject property to best support the Growth Plan population forecasts for the City of Toronto and to satisfy provincial and municipal employment policies, it must evolve from its current low-density large format retail that supports few jobs and does not match current employment trends.

urbanMetrics' report indicates that the City of Toronto will experience a decline of approximately 30,000 Employment Area jobs to 2051. Furthermore, urbanMetrics notes that the area surrounding the subject site is no longer a thriving employment area that supports industrial and manufacturing uses. Therefore, if preserved as traditional employment land, it is unlikely that the subject site would be able to provide jobs within an employment category that is broadly declining across the city and acutely in the local context area.

In contrast to traditional employment land jobs, robust office job growth is predicted for Toronto to 2051. urbanMetrics notes that Major Office employment is expected to nearly double from 2021 to 2051. Moreover, office developments typically have much greater employment densities than traditional employment lands. urbanMetrics estimates the replacement of the existing employment GFA on the site with the potential new non-residential uses would support up to 1,021 jobs, more than four times what can currently be accommodated in the existing buildings on the site and contributing needed space for a sector that will experience strong growth over the next three decades.

Increasing the job density of the subject site through future mixed-use redevelopment will also result in greater conformity with key PPS, Growth Plan and Official Plan policies. Section 1.1.1 of the PPS promotes efficient development and land use patterns while Section

1.7 ensures that long-term economic prosperity is supported by optimizing the use of land and promoting opportunities for economic development. Section 2.2.5 of the Growth Plan promotes economic development and competitiveness by encouraging more efficient use of under-utilized employment lands, through increasing employment densities (2.2.5.1a) and aligning land use planning and economic development goals to attract investment and employment (2.2.5.1d). Official Plan Policy 2.1.1 establishes that a priority for accommodating growth is improving the competitive position of the Toronto regional economy and creating employment opportunities. The proposed conversion and potential mixed-use redevelopment of this site would meet the policy objectives stated above by:

- Promoting efficient development and land use patterns;
- Supporting long-term economic prosperity by creating more job opportunities;
- Increasing employment density; and,
- Aligning land use planning with the actual competitive position of the Toronto economy.

In addition to the site's potential contribution to City employment forecasts, the requested conversion will also enable the site to contribute to meeting population forecasts. Whereas the site under its current designation cannot provide any housing, conversion to a Mixed Use Areas designation would enable it to accommodate quality housing in combination with new, higher density employment space. While the City of Toronto continues to be on track to meet, and very likely exceed, population forecasts in the Growth Plan, the provision of new housing options remains a provincial and municipal priority. This is particularly true for compact development that can deliver housing within a mixed-use format that supports complete communities. The subject site is located within a broader area where there are few sites for significant residential intensification. The proposed conversion of the subject site can help deliver much needed housing supply with a diversity of tenure types in an area that is located in proximity to the East Harbour Transit Hub, Downtown and other community services and facilities.

The proposed conversion will improve land use relationships

The proposed conversion will establish a more compatible relationship with the surrounding land uses. Due to the site's location on the edge of the employment area with direct proximity to an intersection, and a low-rise residential area to the west, the site is generally not suited for accommodating any form of employment uses except for commercial and office uses, both of which can be accommodated within a mixed-use development as illustrated in the conceptual development framework. Further, the proposed conversion will improve land use relationships by connecting the existing and potential residential uses and neighbourhood to the waterfront and trail system, capitalizing on the excellent location of the subject site at the centre of a green axis that extends south, east and west.

5.2 THE LANDS CAN BE APPROPRIATELY CONVERTED WHILE CONTRIBUTING TO A MORE DIVERSE ECONOMIC BASE

OP Policy 2.2.4.17. b) The lands are required over the long-term for employment purposes

OP Policy 2.2.4.17. c) The City will meet the employment forecasts allocated to the City in the Growth Plan

The City of Toronto has not currently completed its Land Needs Assessment as part of its ongoing Municipal Comprehensive Review, which will establish if there are sufficient employment lands to accommodate employment land growth. This is a city-wide study, and will address not only forecasted growth to 2051, but will also consider city-wide applications for employment land conversions and their implications for the ability to accommodate employment growth.

Based on the 2051 Hemson Technical Forecasts released in August 2020, which form the basis of Schedule 7 of the Growth Plan and are to be used in the Land Needs Assessment, the City of Toronto is forecasted to see a decline of 30,000 Employment Land jobs from 2021 to 2051.

Conversely, the Growth Plan forecasts predict major growth in office demand. This represents an overall shift in the nature of employment across the GTHA, which has seen a decline in manufacturing and an increase in knowledge-based jobs. The City of Toronto is one of the few municipalities in the Greater Golden Horseshoe that is forecasting a decline in Employment Land employment.

Furthermore, the potential redevelopment of the subject site is anticipated to generate more jobs on site than the existing use, and within a space format more supportive of the changing nature of employment and retailing formats in the city, which is emphasizing a shift away from stand-alone large format retail stores with large amounts of surface parking. The anticipated provision of non-residential space as illustrated in the conceptual development framework could provide up to 1,021 jobs, approximately four times the number of jobs that can be accommodated on the subject site today, resulting in net new employment opportunities for this area and the City of Toronto at large.

OP Policy 2.2.4.17. 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

As was noted above, the proposed conversion has the potential to expand the employment density of the site by replacing the existing employment GFA with a variety of new spaces that can better accommodate existing and forecasted demands for retail and office space.

In its current format and land use designation, the site is underutilized and likely not generating a significant amount of jobs as it could be in an intensified mixed-use format. urbanMetrics notes that in addition to the proposed high-density residential development, providing a variety of employment spaces within the proposed development will grow the City's tax base. urbanMetrics estimates that if the proposed conceptual framework is fully implemented, it could generate nearly \$31.1 million in one-time public revenues over the construction period and some \$4.2 million annually upon its completion. This will significantly increase the amount of taxes generated from the subject site by a factor of eight.

Incorporating a mix of employment uses within the proposed conversion and redevelopment proposal will serve to maintain current economic conditions in the area and will also enhance these existing conditions through the introduction of broader employment opportunities (e.g. office, services, medical, etc.). The replacement of the existing Loblaws store in a more compact retail format, along with the addition of broader employment opportunities proposed on the site will not only retain jobs or residents in nearby neighbourhoods, but will also expand the availability of job opportunities. This ensures that the proposed conversion is in alignment with the PPS, which states that long-term economic prosperity should be supported by promoting opportunities for economic development

OP Policy 2.2.4.17. d) 10. Ability to provide opportunities for the clustering of similar or related employment uses

The potential mixed-use development on the subject site will be appropriate and beneficial for the site in the context of a broader economic profile for the City.

As noted by urbanMetrics, employment within the South of Eastern Employment Area has generally decreased from some 7,200 employees in 2000 to approximately 4,340 employees in 2020 with the Manufacturing & Warehousing and Office Sectors each declining by almost 50%. This illustrates the areas shift from a traditional employment area toward a more specialized and local serving commercial area. Further, this area is home to just 0.3% of citywide employment activity or approximately 1% of the City's Employment Land employment and does not represent a significant cluster of any one industry category. Conversely, the East Harbour office hub is anticipated to provide up to 50,000 office jobs, in addition to residential uses.

The proposed conversion would support the clustering of contemporary knowledge-based employment space along Eastern Avenue. This area is seeing an increase in development and investment in modern and innovative employment space as illustrated by the approved GM Mobility Campus and East Harbour developments. In addition, the proposed conversion and potential introduction of residential uses, could further support this cluster of office uses, as it creates opportunities for people to live in close proximity to where they work.

OP Policy 2.2.4.17. 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

The subject site is not located along, or in close proximity to transportation infrastructure needed to support traditional employment uses. As noted by LEA Consulting, the subject site and the surrounding employment uses are accessed by a series of minor arterial roads, not by highways. While these minor arterial roads accommodate trucks, they also accommodate a variety of transportation users such as public transit, pedestrians, cyclists and cars.

5.3 THE REQUESTED CONVERSION WILL NOT CREATE INCOMPATIBLE LAND USE RELATIONSHIPS

OP Policy 2.2.4.17. d) The conversion(s) will not 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 the lands designated Employment Areas and major facilities

The proposed conversion does not present any risk to the viability of the existing employment uses in the area or any issues of incompatibility. All potential concerns related to incompatible uses can be mitigated through design measures including established and straightforward methods that will adequately reduce the risks of complaints.

OP Policy 2.2.4.17. d) 2. prevention or mitigation of adverse effects from noise, vibration, and emissions, including dust and odour

The proposed conversion and future mixed-use redevelopment can appropriately co-exist with the remaining employment lands in the area, providing a high-quality living and working environment, while protecting for the viability of the continued employment uses in the wider employment area.

The analysis of potential noise, vibration, dust, odour and emission conditions provided below indicate that the risk of complaints from future occupants of a mixed-use building can be prevented and mitigated through straightforward and well-established design, construction, and notification measures.

NOISE AND VIBRATION

SLR Consulting has conducted a Compatibility and Mitigation study pertaining to the subject site, assessing the proximity of a new mixed-use development to adjacent industrial and transportation facilities. SLR Consulting's findings conclude that adverse noise impacts from industrial facilities are not anticipated and with the inclusion of mitigation measures such as upgraded window glazing, barriers, and warning clauses, adverse noise impacts from transportation sources are not anticipated. Adverse vibration impacts from industrial and transportation facilities are not anticipated and no mitigation measures will be necessary.

EMISSIONS, ODOUR AND DUST

SLR Consulting has determined that adverse air quality impacts from surrounding industrial sources are not anticipated. SLR Consulting recommends that qualitative assessments be undertaken for the Dufferin Concrete and CanRoof facilities during subsequent portions of the Planning process in order to fully identify potential impacts and any required mitigation measures. If required, air quality mitigation could include source-based mitigation and common receptor-based measures such as air intake placement, the use of dust and carbon filters for development building mechanical systems, and restrictions on locations of facades and amenity areas, warning clauses and other measures.

OP Policy 2.2.4.17. d) 3. prevention or mitigation of negative impacts and minimization of the risk of complaints

A future mixed-use development on the subject site can be appropriately designed and developed to prevent or mitigate any potential complaints and negative impacts. Measures that can be implemented include:

- Façade upgrades, noise barriers to ensure that noise from surrounding industrial facilities are mitigated
- Strategically locating fresh air intakes
- Providing filters on fresh air intakes
- Strategically locating outdoor amenity areas

OP Policy 2.2.4 17. d) 4. ability to ensure compliance with environmental approvals, registrations, legislation, regulations and guidelines

SLR Consulting concludes that the proposed conversion and potential mixed-use development of the site will not affect the industrial facilities' compliance with applicable Provincial environmental policies, regulations, approvals, authorizations and guidelines, including the City's Noise By-law. As the of the MECP Guideline D-6 and Publication NPC-300 are me, the potential mixed-use development is:

- Unlikely to result in increased risk of complaint and nuisance claims;
- Unlikely to result in operational constraints for the major facilities; and,
- Unlikely to result in constraints on major facilities to reasonably expand, intensify or introduce changes to their operations.

OP Policy 2.2.4.17. d) 5. ability to provide an appropriate buffering and/or separation of employment uses from sensitive land uses, including residential

The Compatibility and Mitigation Study prepared by SLR Consulting addresses the D6 Guidelines with regards to minimum separation distances between existing industrial facilities and proposed residential development. As per the D6 Guidelines, recommended minimum separation distances for Class I facilities is 20 metres, 70 metres for Class II facilities, and 300 metres for Class III facilities.

SLR Consulting inventoried local industries within 1000m of the subject site and determined that there are two Class III facilities, five Class II facilities, and seven Class I facilities.

The two Class III facilities are CanRoof, an asphalt plant that manufactures fiberglass shingles, and Ash Bridges Bay Treatment Plant, a wastewater treatment facility operated by the City of Toronto. Both of these facilities are outside of the recommended separation distance of 300m. In addition, both of these facilities are currently located near residential uses that are approximately the same distance from these facilities as the subject site.

All of the Class II facilities except for the Toronto District School Board (TDSB) vehicle maintenance facility, are located outside of the minimum recommended separation distance of 70m. The TDSB's property line is located approximately 65m from the subject site, while the actual vehicle maintenance facility is set back approximately 10m from the property line, creating a buffer of more than 70m from the subject site. In addition, the TDSB vehicle maintenance facility is located less than 70m away from existing low-density residential uses.

The majority of the Class I facilities are located outside of the recommended 20m minimum separation distance. However, it is important to note that these Class I facilities are currently located within or less than 20m from existing residential uses, and are operating without impact on these sensitive land uses.

OP Policy 2.2.4.17. d) 6. ability to minimize risk to public health and safety

There are no significant risks to public health and safety relating to the proposed conversion. As summarized above, potential effects on a future mixed-use development relating to noise, vibration, odour, emissions or dust can be appropriately mitigated through the aforementioned building design and separation distances.

5.4 THE REQUESTED CONVERSION WILL NOT ADVERSELY AFFECT THE OVERALL VIABILITY OF THE EMPLOYMENT AREA

OP Policy 2.2.4.17. d) 7. reduction or elimination of visibility of, and accessibility to, employment lands or uses

The proposed conversion will not result in the reduction/elimination of visibility or accessibility to employment lands within the South of Eastern Employment Area. All of the remaining employment lands within the South of Eastern Area have direct visibility from Eastern Avenue, and visibility is not important for the majority of the employment uses successful operation. The adjacent retail uses immediately west and south of the site are located along the Leslie Street edge and will continue to be highly visible and accessible.

OP Policy 2.2.4.17. d) 8. impact upon the capacity and functioning of the transportation network and the movement of goods for existing and future employment uses

According to the Transportation Impact Assessment prepared by LEA Consulting, the conceptual development framework is expected to generate 373 two-way vehicular trips during the AM peak hour and 424 two-way vehicular trips during the PM peak hour. The existing retail use on the site currently generates 379 and 414 two-way vehicular trips during the AM and PM peak hours, respectively. Given that the results of the trip generation remain largely unchanged, it is anticipated that the potential redevelopment will have a negligible traffic impact upon the transportation network and the movement of goods for existing and future employment uses. Thus, the conversion will not affect the viability of the neighbouring employment area and a stable operating environment for businesses and other economic activities will be maintained.

OP Policy 2.2.4.17. d) 9. removal of large and/or key locations for employment uses

As noted by urbanMetrics, the collection of Employment Area lands where the subject site is located have been undergoing a transition away from being a significant concentration of traditional employment uses towards primarily retail/service commercial uses over the past 20 years. In addition, the adjacent residential and retail uses significantly constrain the types of Employment Area uses that could be developed.

OP Policy 2.2.4.17. d) 11. provision of a variety of land parcel sizes within the Employment Area to accommodate a range of permitted employment uses

The subject site is not a key location for solely employment uses, being on the edge of an Employment Area, adjacent to mixed-use areas, and nearby low-rise residential areas. With a site area of approximately 2.63 hectares, the site is underutilized in its current format as large format retail with significant surface parking. These uses are not contributing a significant amount of job opportunities to the immediate community and the wider employment area, and the surface parking on the site could be intensified to further accommodate a greater range of amount of employment uses in the form of retail, commercial, and office uses. The subject site is not a strong contributor to the area's employment function that could not be replaced as part of a more intensive development.

5.5 THERE IS SUFFICIENT INFRASTRUCTURE AND SERVICING CAPACITY TO SUPPORT THE PROPOSED CONVERSION

OP Policy 2.2.4.17. e) the existing or planned sewage, water, energy and transportation infrastructure can accommodate the proposed conversion(s)

Counterpoint Engineering has prepared a Preliminary Servicing Investigation to assess the capacity of the municipal water distribution systems. Counterpoint Engineering concludes that there is available municipal servicing that can support the potential mixed-use development.

SANITARY

Both Leslie Street and Eastern Avenue contain available separated sanitary servicing, including a trunk sewer in Leslie Street and a local sanitary sewer in Eastern Avenue, which travels east where it connects into a trunk sewer at the intersection of Laing Street and Eastern Avenue. While the connection(s) location for private sanitary servicing is not known, it is assumed to be from either Leslie Street or Eastern Avenue, or both. The potential mixed-use development would likely be serviced from the existing sanitary sewer in Eastern Avenue, or if required, a direct connection into the trunk sewer in Leslie Street. If a direct connection into the Leslie Street trunk is permitted, there will be sufficient capacity available to service the subject site and the potential mixed-use development. If a connection is made into the sewer in Eastern Avenue, further analysis will be required of the sewers from the subject site to the connection into the trunk sewer at Eastern Avenue and Laing Street. Given that the sanitary sewer in Eastern Avenue runs east, and that the trunk for this sewer is in close proximity to the subject site, it is unlikely that the proposed conversion will have a large impact on the servicing capacity for the employment lands to the east and west of the subject site.

STORM

Both Leslie Street and Eastern Avenue contain available storm servicing. While the connection(s) location for storm servicing is not known, it is assumed to be from either Leslie Street or Eastern Avenue, or both. The subject site's imperviousness is currently greater than 50%, and does not contain stormwater controls, resulting in increased stormwater runoff. The proposed re-development of the subject site, which will be required to meet the City of Toronto's Wet Weather Flow Management Guidelines, will result in an improvement in the downstream municipal sewer capacity. This will increase

capacity in the storm system, having a positive impact on the stormwater capacity to service adjacent employment lands.

WATER

Leslie Street, Eastern Avenue and Lake Shore Boulevard East contain available watermain servicing. A number of municipal fire hydrants are adjacent to the subject site, including two along the Eastern Avenue frontage and three along the Leslie Street frontage. The connection(s) location for private water servicing is not known but assumed to be either from Leslie Street or Eastern Avenue or both.

In order to demonstrate adequate domestic and fire flow servicing, a hydrant flow test was completed on a hydrant connected into the Leslie Street watermain. The results of the hydrant flow test indicate that the available flow in the municipal system at 140kPa is approximately 633L/s, which exceeds the maximum day plus fire flow demand rate of 219 L/s for the subject site. As such, the municipal watermain system is expected to support the potential mixed-use development, and is not expected to impact the larger employment area.

TRANSPORTATION

According to LEA Consulting, the potential mixed-use development is expected to generate almost the same amount of trips as the existing retail use on the site does today, creating a negligible impact on the surrounding road network. Given this, the proposed conversion will not have an adverse impact on the larger employment area and the existing infrastructure will be able to accommodate the proposed conversion.

OP Policy 2.2.4.17. 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

It is our understanding that a full Community Services and Facilities (CS&F) Study is not required as part of this conversion request. As such, a CS&F Study will be prepared for submission as part of a future application for Official Plan Amendment and/or Zoning By-law Amendment at 17 Leslie Street at such time that the City of Toronto deems a land use conversion supportable for the subject site. Therefore the analysis of community services and facilities is based on a desktop review of existing services and facilities in the area.

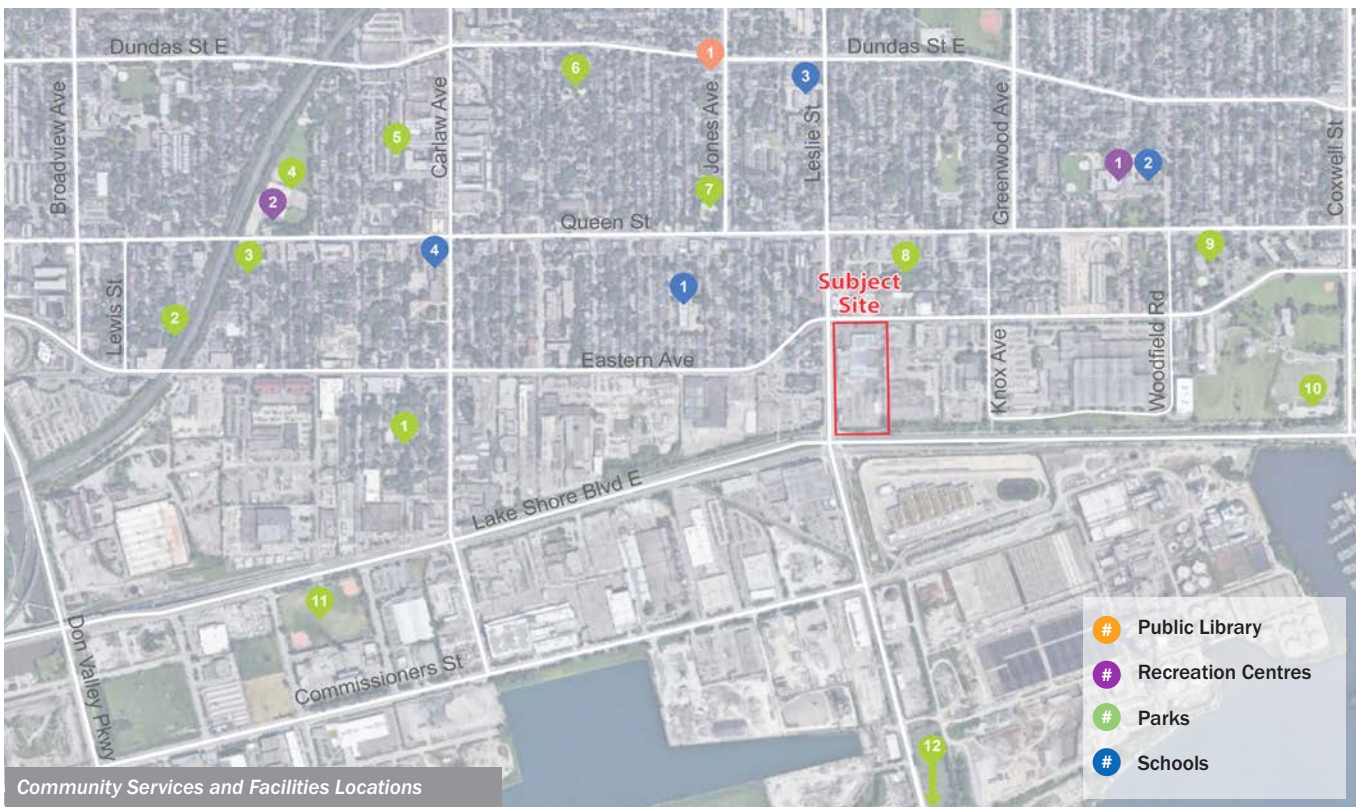
The subject site is within walking distance of a full range of recreational facilities, schools and public amenities, many within a 10 to 20-minute walk. These services include the nearby parks/open spaces, libraries, community/recreational facilities and schools listed below.

- A total of four schools are located within the surrounding area, three of which are part of the Toronto District School Board (TDSB) and one which is part of the Toronto Catholic District School Board (TCDSB). There are no secondary schools located within the surrounding area.
- Two recreation centres, S.H. Armstrong and Jimmie Simpson, are located within the surrounding area. Jimmie Simpson is a hub for recreation programming and offers a wide range of activities including swimming, fitness, youth, sports, after school and pre-school programming.
- The subject site is located within the highest quintile of the City's Parkland Provision, with numerous parks located within the surrounding area. The proposed conceptual framework for the subject site includes a

new public park and open space, potentially providing additional park space on the site and within the surrounding area.

- The Jones Branch of the Toronto Public Library is less than a 20-minute walk from the subject site. In addition to providing access to audio and book collections, computers, printers and other equipment for persons with disabilities, the Jones Branch has a dedicated Teen Zone.

As previously discussed, the subject site is in close proximity to the Port Lands, which is currently undergoing a multi-year revitalization process guided by the Port Lands Planning Framework. The Port Lands Planning Framework identifies a number of schools, child care facilities, community recreation centres and other community services and facilities that will be needed to accommodate planned growth in the Port Lands. While none of these community services and facilities have yet been built or actualized, it is likely that these future community services and facilities will accommodate new residents within the broader area.



SCHOOLS

MAP #	NAME	ADDRESS	SCHOOL BOARD	SCHOOL TYPE
1	Bruce Junior Public School	51 Larchmount Avenue	TDSB	Elementary
2	Duke Connaught Junior and Senior Public School	70 Woodfield Road	TDSB	Elementary
3	St. Joseph Catholic School	176 Leslie Street	TCDSB	Elementary
4	Morse Street Junior Public School	180 Carlaw Avenue	TDSB	Elementary

RECREATION CENTRES

MAP #	NAME	ADDRESS
1	S.H. Armstrong Community Centre	56 Woodfield Road
2	Jimmie Simpson Recreation Centre	870 Queen Street East

LIBRARIES

MAP #	NAME	ADDRESS
1	Toronto Public Library Jones Branch	118 Jones Avenue

PARKS AND OPEN SPACES

MAP #	NAME	ADDRESS
1	Morse Street Playground	76 Morse Street
2	Saulter Street Parkette	25 Saulter Street
3	McCleary Playground	75 McGee Street
4	Jimmie Simpson Park	872 Queen Street East
5	John Chang Neighbourhood Park	50 Colgate Avenue
6	Hideaway Park	23 Audley Avenue
7	Leslie Grove Park	1158 Queen Street East
8	Maple Leaf Forever Park	62 Laing Street
9	Jonathan Ashbridge Park	20 Woodward Avenue
10	Beach Skateboard Park	1420 Lake Shore Blvd East
11	McCleary Park	755 Lake Shore Blvd East
12	Lake Ontario Park	-

5.6 THERE ARE NO CROSS-JURISDICTIONAL ISSUES RELEVANT TO THE CONVERSION REQUEST

OP Policy 2.2.4.17 i) cross-jurisdictional issues have been considered

There are no known cross-jurisdictional issues that are relevant to the proposed conversion. The subject site is only within the municipal jurisdiction of the City of Toronto, and there are no other jurisdictional policies, regulations, ownerships, or easements of significance to this application.

6

CONCLUSION

CONCLUSION

It is our opinion that the proposed employment land conversion is appropriate and desirable for the subject site and its surrounding context and represents good planning. The conversion request satisfies all the tests for employment land conversion set out in Section 2.2.5.9 of the Growth Plan and Section 2.2.4 of the Official Plan. In particular, this Conversion Rationale and the supporting technical studies included with this submission demonstrate that:

- **The conversion is needed to create a more appropriate land use relationship** between the subject site and the adjacent residential and mixed-use land uses. The sites edge condition will allow this to be achieved while also maintaining compatibility with the remaining employment lands. The proposed conversion will also improve land use relationships by connecting the subject site and the surrounding residential neighbourhood to the waterfront and trail system.
- **The subject site is not anticipated to be required as Employment Areas to meet the employment projections for the City of Toronto.** Employment forecasts indicate that heavier industrial related jobs are in decline, and that Toronto's job growth to 2051 will consist almost entirely of office jobs.
- **The conversion will not negatively impact the viability of the Employment Area.** The subject site is located amongst a collection of Employment Areas oriented along Eastern Avenue that possess characteristics which are no longer appealing to modern industrial users, and as a result, several sites in the area are being re-developed for retail/service commercial and office commercial uses. The conceptual development plan for the subject site is consistent with these trends and the inclusion of a residential component will strengthen these uses, not destabilize an already evolving area surrounded by established residential communities.
- **The proposed conversion will not create land use conflicts or increase the potential for complaints.** The site can be appropriately designed to mitigate any effects relating to noise and vibration, dust, emissions and odours.
- **There is sufficient servicing and capacity, as well as community infrastructure and facilities** that can

support the proposed conversion and conceptual development concept.

- **The subject site represents one of the few opportunities for intensification within the surrounding area that can deliver a significant amount of residential uses.** It is located within a strong market area that is in reasonable proximity to the Downtown core and the East Harbour Transit Hub, making this an ideal location for the introduction of residential uses.

In addition to meeting the conversion tests, the proposed conversion and potential future mixed-use development are consistent with the Provincial Policy Statement and conform to the policies of the Growth Plan and the City of Toronto Official Plan.

The proposed conversion is consistent with the Provincial Policy Statement objectives to create efficient development and land use patterns; support a mix of employment opportunities to meet long-term needs; and to encourage compact, mixed-use development that incorporates compatible employment uses and a range of housing options and densities in support of livable and resilient communities.

The proposed conversion likewise conforms to Growth Plan policy directions to make efficient use of the existing land and infrastructure by prioritizing intensification, contributing to a complete community and supporting a stronger, more diverse economy by maintaining or increasing local employment uses. The proposed conversion would enable increased employment density on this under-utilized site, consistent with goals of integrating land use planning and economic development, and strategies to attract new investment and add jobs in employment areas.

The Official Plan also promotes more intensive use of lands in Employment Areas for business and economic activities to make efficient use of a limited supply of available land in the city. The proposed conversion and potential mixed-use redevelopment conform to the intent of Employment Areas policies in this regard, aiming to contribute to the economic activity of the area through new and varied employment opportunities accessible to residents of the adjacent neighbourhoods.

