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Reply to the Attention of Mary Flynn-Gulley
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Our File No. 224736
Date December 12, 2013

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E-MAIL (CLERK@TORONTO.CA)

Toronto City Council
13th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Attention: Ms. Ulli S. Watkiss, City Clerk

Dear Mayor and Members of Council:

**Re: City of Toronto
Official Plan Review: Employment Uses Policies
672 Dupont Street, Toronto
1109345 Ontario Ltd.
Item No. PG28.2 of the Toronto City Council Meeting
of December 16, 2013**

We are the solicitors retained on behalf of 1109345 Ontario Ltd., owners of the property municipally known as 672 Dupont Street (the "**Property**"). The Property constitutes approximately 1.97 acres located at the northwest quadrant of the intersection of Dupont Street and Christie Street in what is known as the Dupont Street Corridor. A 5-storey office and retail commercial building is located on the Property with a small 2-storey accessory building located towards the rear of the Property. The buildings on site were constructed in 1914 by the Ford Motor Company of Canada and the Property was listed on the City of Toronto Heritage Inventory on March 20, 1990. The Property is presently designated as an **Employment Area** under the City of Toronto's Official Plan (the "**OP**").

Further to the Municipal Comprehensive Review of Employment Lands completed by the City of Toronto with its required five-year review of the OP, in a letter from Weston Consulting to City Planning dated December 20, 2012 our client requested that the Property be designated as a **Mixed Use Area** to permit the development of medium density mid-rise mixed use buildings on the Property while maintaining the converted heritage office building and accessory building and providing additional office and commercial employment at the Property. A copy of this letter is attached for your reference.

The Dupont Street Corridor where the Property is located has evolved into a transitional area with characteristics similar to those found in the periphery of Employment Areas. Unlike typical locations on the periphery of Employment Areas, however, the Property has no significant connection to any of the larger Employment Areas that provide the traditional core and peripheral employment uses. For this reason, we respectfully submit that a Mixed Use Area designation would be appropriate and represent good planning. Allowing some Mixed Use development at major intersections along Dupont Street where transit nodes currently exist, such as the Property, would be advantageous for reasons including the improvement of connectivity and accessibility to existing employment areas.

In the Staff Report regarding the proposed Official Plan Review: Employment Uses Policies dated November 5th, 2013 (the “**Final Staff Report**”), City Planning recommends that:

- the portion of the Property that is within 30 metres of the abutting railway corridor be designated as **General Employment Areas**;
- the heritage building on the Property be retained for employment uses and designated as **General Employment Areas**; and
- the remainder of the Property be designated as **Regeneration Areas**.

City Planning further recommends that a Secondary Plan or Site and Area Specific Policy (“**SASP**”) be created for lands within the Dupont Street Corridor that are designated as Regeneration Areas and that will include a prohibition on development that includes residential uses until the study is complete and the Secondary Plan or SASP is in-force.

For the reasons described above, we respectfully submit that a General Employment Areas designation is not appropriate for the portion of the Property that is within 30 metres of the abutting railway corridor or for the heritage building on the Property. Such a designation prevents appropriate redevelopment of the Property to include both commercial and residential uses and is not necessary to protect the existing heritage buildings and office uses. The development of the Property proposed by our client is unique in that it proposes to maintain the heritage buildings as well as to maintain and add to the office and commercial employment uses on the Property, resulting in a net gain in jobs. The proposed residential uses would employ sufficient mitigation measures to ensure compatibility with abutting uses such as the rail line. Redevelopment of the Property to include a mix of residential and commercial uses, however, is not possible under the General Employment Areas designation.

Although a Regeneration Areas designation provides for a broad mix of commercial and residential uses, pursuant to Policy 4.7.2 of the OP, any new development of the Property is precluded until approval of a Secondary Plan. A Mixed Use Areas designation does not include such restrictions and would better allow for proper and timely redevelopment of the Property. We respectfully submit that a Secondary Plan or SASP is unnecessary for the development of the site.

Further, to date, the City has not undertaken an Avenues Study of the Dupont Street Corridor as they have for other transitional areas such as O'Connor Drive in East York. As a result, we respectfully submit that insufficient information is currently available to support City Planning's recommendation.

For the reasons described above, we respectfully submit that the Property should be designated as a Mixed Use Area in its entirety. No portion of the Property should be designated a General Employment Area.

We thank you for your consideration and kindly ask that we be given notice of any decisions or recommendations made by Council going forward.

Yours truly,



Mary Flynn-Guglietti

CC: 1109345 Ontario Ltd.
Paul Bain
Jim Levac, Weston Consulting



**WESTON
CONSULTING**

planning + urban design

City of Toronto
City Planning Department
Official Plan Review
Policy & Research Division
Metro Hall, 23rd Floor
55 John Street
Toronto, Ontario M5V 3C6

December 20, 2012
File 6158

Attn: Paul Bain, Project Manager

Dear Sir:

**Re: Submission on Toronto Official Plan and
Municipal Comprehensive Review
672 Dupont Street
Northwest Corner of Dupont Street and Christie Street
1109345 Ontario Ltd.**

Weston Consulting Group Inc. (WCGI) are authorized agents to 1109345 Ontario Ltd, registered owners of 672 Dupont Street. As shown on the attached aerial photograph, these lands are located at the northwest quadrant of the intersection of Dupont Street and Christie Street. The site comprises a total area of 1.97 acres and is currently by a 5 storey office and retail commercial building with a small 2 storey accessory building towards the rear of the property. A surface parking area exists between the two buildings. The buildings on site were constructed in 1914 by the Ford Motor Company of Canada. The property was listed on the City of Toronto Heritage Inventory on March 20, 1990.

Subsequent to our attendance at the initial Official Plan Review Public Open House meetings last fall, we have had preliminary discussions in regard to this property with City Planning staff and had been awaiting the recent release of the report titled "Planning for a Strong and Diverse Economy: Official Plan/Municipal Comprehensive Reviews – Draft Policies and Designations for Employment" which was received, as amended, on November 8, 2012 at Planning and Growth Management Committee. We are aware of the approximately 85 conversion requests that have been received to date, 60 of which were addressed in the above-referenced report. At this point, we wish to submit formal comments on the ongoing Official Plan/Municipal Comprehensive Review exercise on behalf of our client as it pertains to these lands and would request consideration of our request as part of the second phase report on individual site specific conversion requests which we understand is scheduled for early 2013. We thank you for the opportunity to do so.

It is both ours and our client's position that the Toronto Official Plan Employment Policies need to be updated, particularly recognizing the structural shift in the overall National, Provincial and City economy that has occurred since the last Official Plan was prepared. Jobs in the manufacturing sector continue to decline, as borne out by the City's own statistics and it is our view that greater flexibility is needed to sustain the various designated Employment Districts throughout the City of Toronto. In particular, we believe that the Section 4.6 Employment Policies need to be re-examined as part of the ongoing Official Plan Review. At issue are the criteria used to establish Employment Area boundaries and the lack of provisions in the Official Plan allowing Mixed Use development in Employment areas subject to locational criteria. We believe that Mixed Use Area redevelopment may be highly appropriate in certain areas such as along boundaries of Employment areas fronting onto major streets or at major intersections which are serviced by transit and are in close proximity to existing community and commercial services and facilities, as is the case with this particular site. Further, we believe Section 2.2.4, Employment Districts: Supporting Business and Employment Growth needs to be re-examined in order make provisions that would support mixed use development at major nodes or intersections of existing Employment Areas.

The recently released report titled "Planning for a Strong and Diverse Economy: Official Plan/Municipal Comprehensive Reviews – Draft Policies and Designations for Employment" proposes the creation of three sub-categories of Employment Areas, namely Core Employment Areas, General Employment Areas and Retail Employment Areas. We believe this is a positive step forward in reflecting changing employment trends we have witnessed within the City over the past two decades with the loss of traditional manufacturing jobs and the emergence of increased office and retail employment. There has been a noticeable increase in the amount of retail employment uses establishing along the north side of Dupont Street, west of Avenue Road. In response to this, the City has recommended that a significant linear strip of lands along the north side of Dupont Street north to the CP Rail tracks, extending from Dovercourt Road easterly to Bedford Road be designated a "Retail Employment" area in its entirety. The location of the subject lands within the context of this proposed new designation is shown on the attached map (Map 34) from the City's recent report. This entire strip has evolved into a transitional area and is somewhat orphaned as it has no significant connection to any of the larger non-linear Employment Areas having the traditional core and peripheral types of employment uses. Arguably, this linear strip has taken on the characteristics of what we often see as the "periphery" of some of the larger Employment Areas, only without the actual connection to such an area. The City has not undertaken an Avenues Study of this area as they have done for other transitional areas such as O'Connor Drive in East York. As part of the recent discussions on the proposed new Employment Areas policies, a recommendation has come forward from Councillor Vaughan that the Dupont Street lands be identified as a "Regeneration Area" and instructed that an area study with design guidelines be undertaken and reported on through Planning and Growth Management Committee. We believe there is merit in this suggestion as there may be advantages in allowing some Mixed Use development at major intersections along

Dupont Street where transit nodes currently exist. In the case of the subject property at 672 Street, our client has an interest in seeking innovative and creative ways of maintaining the converted heritage office building and accessory building but converting most of the surface parking area to permit a medium density mid-rise mixed use buildings with new underground parking that would service both the existing office building and future potential mixed use building. As an established long-standing office employment use in the area, our client would be looking to add additional office and commercial employment to the site in addition to creating new opportunities for mixed use employment and residential uses. In this regard, we would request consideration be given to designating the entire corner property as a "Mixed Use" area. We believe this is good planning and should be incorporated into the Official Plan and Municipal Comprehensive Review for the following reasons:

1. Mixed Use areas should not necessarily follow hard boundaries such as roads or natural boundaries but reflect existing and logical development patterns along major arterial roads serviced by public transit or surround around major intersections that border the boundaries between Employment Areas and Neighbourhoods. A recent Policy Paper titled *"Balanced and Bolder: Recommendations for Strengthening Toronto's Official Plan"* prepared by the Office of Councillor Peter Milczyn supports policies aimed at linking residential and employment growth. This report further recommends policies which *"further integrate City employment lands into the urban fabric to encourage improved accessibility, maintain a healthy mix of residential and employment growth throughout the City"*. The report also goes on to support *"the establishment of mixed use centres on the fringes of existing employment lands, focusing on areas that currently demonstrate poor connectivity and limited accessibility."* As evidenced by the number of proposals for mixed use redevelopment along major roads bounding Employment Areas that are coming before Toronto's Planning and Growth Management Committee in recent times, there clearly is a demand for transit supportive mixed use along many of the major roads, avenues and intersections.
2. The subject lands are predominantly occupied by traditional office employment uses which have evolved and prospered at this location. There is no intention of converting the office building to a non-employment use. As such, there will be no displacement of employment uses or jobs on the site. In view of the foregoing, this particular request is somewhat unique as it is not a conversion request to redevelop a viable employment site, but rather seeks to fully utilize the site through intensification to permit Mixed Use redevelopment only on those portions of the site where this is practical and feasible.
3. The recommendation contained within the report titled "Planning for a Strong and Diverse Economy: Official Plan/Municipal Comprehensive Reviews – Draft Policies and Designations for Employment" to redesignate the subject lands to a "Retail Employment Area" designation should be further re-analyzed to determine whether sites such as this have the locational attributes which warrant Mixed use development/intensification in the absence of a formal development application. Further, some consideration should be given to whether the amount of Retail Employment along the entire Dupont Street linear strip, is excessive or could be supported by limited Mixed Use development at key intersection locations.

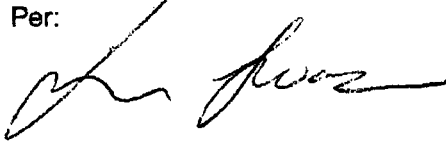
4. By allowing some Mixed Use intensification/redevelopment on the subject property, there will be a net gain in jobs locally created since the existing office building use will remain on the site.

We appreciate the opportunity to participate in this important policy initiative and would be happy to meet and discuss our concerns and requests with you. Please do not hesitate to contact me at ext 289 or via email at jlevac@westonconsulting.com, should you have questions or wish to meet and discuss this issue further. Thank you.

Yours truly,

Weston Consulting Group Inc.

Per:



Jim Levac, BAA, MCIP, RPP
Senior Associate

Encl.

Copy: 1109345 Ontario Limited (Attn: Joe & Lorenzo Di Donato)
Councillor Mike Layton, Ward 19: Trinity-Spadina
Councillor Peter Milczyn, Chair, Planning and Growth Management Committee



**WESTON
CONSULTING**
planning + urban design

File Number: 6166
Date Drawn: 16 OCT 2012
Drawn By: SM
Planner: JL
Scale: see scale bar
CAD: 6166/air photo/FBS gfa's.dgn



LEGEND

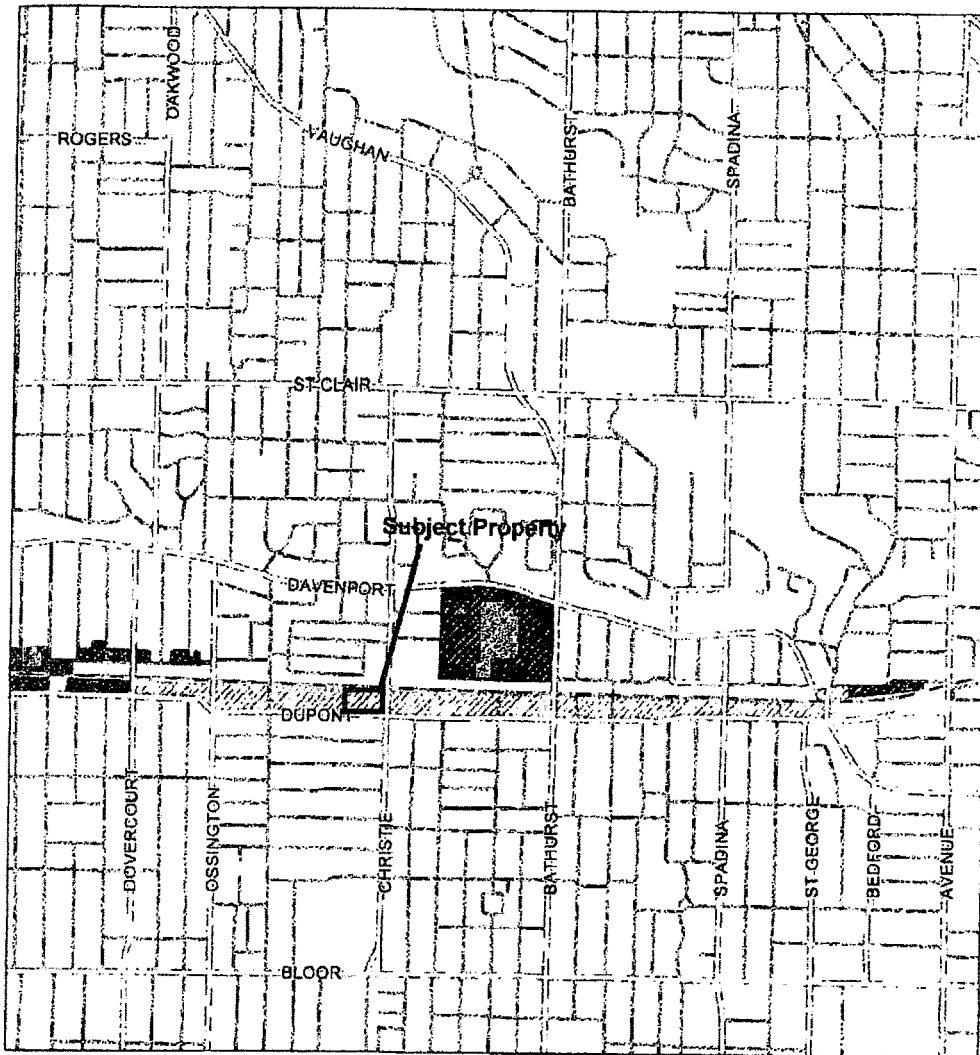
 SUBJECT LANDS

0 10 20m
SCALE

Air Photograph from First Base Solutions Inc.
Date of photography: 2011

AIR PHOTOGRAPH

672 DUPONT STREET
TORONTO



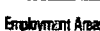




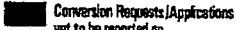







TORONTO City Planning

Proposed Designations for Current Employment Areas

Map 34

Official Plan Review/Municipal Comprehensive Review - Draft for Public Consultation Purposes

 Neighbourhoods	 Parks & Open Space Areas	 Employment Areas	 Utility Corridors
 Apartment Neighbourhoods	 Natural Areas	 Core Employment	 Conversion Requests (Applications yet to be reported on)
 Mixed Use Areas	 Parks	 General Employment	
 Regeneration Areas		 Retail Employment	

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Not to Scale
11/08/2012