



**WESTON  
CONSULTING**

planning + urban design

Planning and Growth Management Committee  
City of Toronto  
100 Queen Street West  
Toronto, Ontario M5H 2N2

May 15, 2013  
File 5951

**Attn: Councillor Peter Milczyn, Chair**

Dear Sir,

**RE: Employment Lands Conversion Request (Staff Report Dated April 23, 2013)  
855 Oxford Street  
City of Toronto**

Weston Consulting is the planning consultant representing 855 Oxford Street Investments Ltd, the owners of property located at 855 Oxford Street in the City of Toronto. A request was submitted to the City of Toronto on July 6, 2012 to consider the conversion of the subject lands from the "*Employment Areas*" designation in the City of Toronto Official Plan to a designation that would permit a wider range of uses including residential uses.

With reference to the above mentioned Staff Report, City Planning Staff's preliminary assessment of the conversion request stated that "*these lands should be retained for employment uses and be designated as Core Employment Areas.*" In response to this preliminary assessment we are pleased to provide additional information about the subject lands and local context. In our opinion, the conversion request has merit based on sound planning rationale and we request that this information be considered by City Planning Staff and the Committee.

The subject lands are located southeast of the F.G. Gardiner Expressway and Islington Avenue Interchange and are accessed from Oxford Street. The property has an area of approximately 4,000m<sup>2</sup> (43,000ft<sup>2</sup>). The subject lands contain an industrial building that was formerly used as a vehicle collision reporting centre and is currently vacant. The surrounding land use context is as follows:

- North** – Across Oxford Street is the F.G. Gardiner Expressway
- South** – An existing brewery with access to Evans Avenue
- East** – A residential townhouse development
- West** – Islington Avenue and ramps to the F.G. Gardiner Expressway

The subject lands and the brewery to the south of the lands are designated "Employment Areas" and in our opinion there are limited opportunities to intensify the employment uses on these

lands based on the stability of the existing brewery and the lack of appropriate access to subject lands for employment uses. In our opinion, a wider range of uses, including residential uses, would provide a better utilization of the subject lands.

### **Transportation and Access Constraints for Employment Uses**

Based on our assessment of the lands, the surrounding road network and access configuration, it is recognized that access to the subject lands is constrained. The operational considerations for industrial uses and other employment uses on the subject lands would result in truck traffic, deliveries, and potentially loading operations in direct conflict with the adjoining stable residential uses. Furthermore, all traffic to the subject lands would be required to flow through residential streets, with properties that have frontage on these residential streets. By permitting a wider range of uses on the subject lands, including particularly residential uses, these potential conflicts would be significantly diminished.

The existing transportation conditions are the result of an approved employment land conversion of adjacent properties in 2006 that resulted in all vehicular access to the site having to traverse local residential streets before reaching the subject lands. Alternate access options were discussed with City of Toronto Community Planning and Transportation Planning in 2012 including the opportunity for direct access to Islington Avenue in conjunction with planned improvements to the Islington Avenue interchange; however, these options were not considered to be viable by City Staff.

### **Ongoing Employment Lands Review**

The ongoing review of the City of Toronto Official Plan includes a focus on employment land policies, including the City's approach to employment lands conversions. In the *Consultation Summary Report* (March, 2013) of proposed economic health and employment policies it states that it is the City of Toronto's intent to maintain 98% of current employment lands in an employment designation. It was explained at public open houses that despite the intention to preserve employment lands, it may be appropriate to "*permit conversion of a few sites to resolve existing or potential land use conflict.*" An example of an appropriate instance for a conversion was given of an existing concrete plant at Wilson Avenue and Murray Road, where conversion was recommended due to conflicts with adjacent residential uses. The subject lands afford similar consideration given the proximity of adjacent residential uses to the lands and their configuration. The ability for the lands to accommodate certain industrial uses would be limited based on Provincial land use compatibility guidelines, which provides further limitations to the viability of these lands for traditional employment uses.

### **Size Considerations and Employment Land Viability**

It is further recognized that the subject lands represent a very small portion of the overall employment land inventory in the City of Toronto and if converted to other uses would result in a negligible decrease to the City's employment land supply.

In addition, although it is recognized that lands in close proximity to highways are desirable for employment uses, smaller tracts of land with access constraints, such as the subject lands, are

not as desirable, as they cannot accommodate a critical mass of employment uses. The viability of employment areas is often characterized by good accessibility and large parcels of lands.

### **Compliance with Provincial Policies**

The PPS states in Section 1.3.2 that:

*Planning authorities may permit conversion of lands within employment areas to non-employment uses through a comprehensive review, only where it has been demonstrated that the land is not required for employment purposes over the long term and that there is a need for the conversion.*

The proposed conversion meets this requirement as the lands are a very small portion of the City's employment land inventory and will not result in a significant decrease in employment land supply in the City. There is a demonstrated need for the conversion as the current potential for land use conflict between the existing lands and adjacent residential uses has the potential to become a significant issue.

The Growth Plan provides additional considerations for the conversion of employment lands in Section 2.2.6.5. Table 1 provides a summary of these policies and explains how the requested conversion meets these requirements:

**Table 1 – Compliance with Growth Plan policies for employment lands conversions**

Growth Plan policies from Section 2.2.6.5	Compliance in requested conversion
a. there is a need for the conversion	The potential land use conflict between an industrial use on the subject lands and existing residential uses is sufficient to determine that there is a need to convert the subject lands and remove the potential negative impacts to existing dwellings.
b. the municipality will meet the employment forecasts allocated to the municipality pursuant to this Plan	While the City has identified a need to promote the retention of employment lands overall, the subject lands represent only a small portion of the employment lands inventory and will not significantly detract from the City's ability to meet demand for employment lands.
c. the conversion will not adversely affect the overall viability of the <i>employment area</i> , and achievement of the <i>intensification target</i> , <i>density targets</i> , and other policies of this Plan	The subject lands are located on the edge of the employment district and are separated from most nearby employment uses by arterial roads, thereby mitigating impacts of a conversion to the adjoining employment area.

Growth Plan policies from Section 2.2.6.5	Compliance in requested conversion
d. there is existing or planned infrastructure to accommodate the proposed conversion	The existing transportation infrastructure is better suited to accommodate residential land uses as there is potential conflict with the current designation. There are other services in place to accommodate residential development.
e. the lands are not required over the long term for the employment purposes for which they are designated	The City of Toronto has sufficient other employment lands to accommodate new employment development. It is also recognized that the lands have limited ability to attract certain employment uses based on surrounding residential uses.
f. cross-jurisdictional issues have been considered.	There are no identified cross-jurisdictional issues associated with the proposed conversion.

### Conclusion

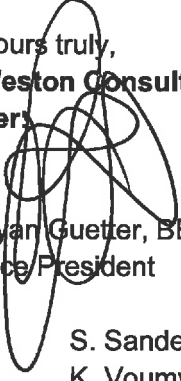
While it is acknowledged that the City of Toronto has determined to preserve employment lands wherever possible, the subject lands represents an unique instance where a conversion is appropriate given the potential negative impacts of employment uses on a residential neighbourhood and the limited impact the removal of the subject lands would have on the City's supply of employment lands. For the reasons outlined herein, we suggest that the conversion request represents good planning and should be implemented. The proposed conversion is consistent with the information presented by City of Toronto staff during the public consultation phase of the Official Plan review process and complies with Provincial policies for employment land conversions.

It is recognized that our letter of July 6, 2012, requested a conversion to the "Neighbourhoods" designation; however, in order to provide additional flexibility it may be appropriate to consider the lands for a "Mixed Use" designation. This would afford the greatest flexibility in the use permissions for the lands.

We would be please to meet with Toronto City Councillors and/or Staff to discuss this matter further. For additional information please contact the undersigned or Justin Adema (ext. 306).

Yours truly,  
**Weston Consulting**

Per:



Ryan Guetter, BES, MCIP, RPP  
Vice President

- c. S. Sanderson, 855 Oxford Street Investments Ltd
- K. Voumvakis, City of Toronto
- P. Bain, City of Toronto