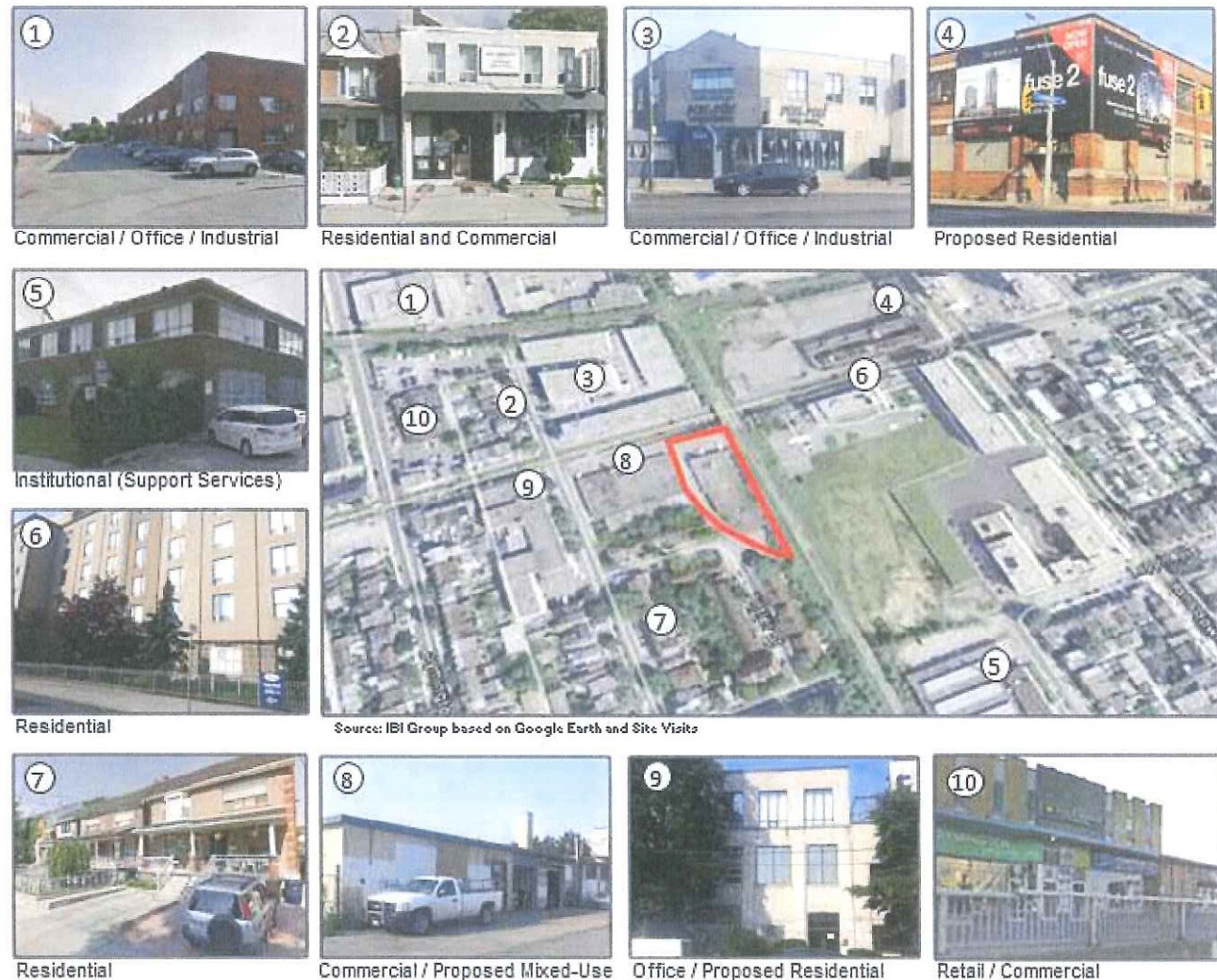


As shown in Figure 2, the subject site is surrounded by a range of uses, including low, medium and high-rise residential, retail, office, industrial and institutional. The redevelopment of the subject site for a mix of residential and commercial uses would be compatible with adjacent and surrounding land uses. Such site improvements would complement and further the efforts underway to revitalize the Dovercourt-Wallace Emerson-Junction neighbourhood.

Figure 2. Examples of Land Uses Surrounding 1453 Dupont Street



4. POLICY CONTEXT AND PLANNING ANALYSIS

The subject site is regulated by the following provincial and municipal planning policies and regulations:

- *Provincial Policy Statement (2005);*
- *Places to Grow – Growth Plan for the Greater Golden Horseshoe (2006);*
- *City of Toronto Official Plan (2006); and*
- *City of Toronto Zoning By-Law 569-2013.*

No secondary plan or site or area-specific policies apply.

The following provides an overview of the key guidelines and policy provisions pertaining to the conversion of employment lands and how growth can be properly managed and accommodated through mixed-use development and intensification of sites within well-served urban areas. The merits of the proposed conversion, as they pertain to the planning framework of the Province of Ontario and the City of Toronto, are also summarized below.

4.1 Provincial Policy Statement (2005)

The *Provincial Policy Statement* ("PPS") is issued under the authority of Section 3 of the *Planning Act* and came into effect March 1, 2005. It provides direction on matters of provincial interest related to land use planning and development and as per Section 3 of the *Planning Act*, decisions affecting planning matters "shall be consistent with" the PPS.

The PPS provides direction on the conversion of employment land uses to non-employment land uses. Specifically, Section 1.3.2 of the PPS requires 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".

As further described below, the City of Toronto is currently undertaking a 5-Year Official Plan Review and a Municipal Comprehensive Review, which are addressing employment land supply, designations and policies.

The PPS includes numerous policy objectives that are relevant to the subject site, in terms of how the redevelopment of the lands can contribute to the overall health and prosperity of the Dovercourt-Wallace Emerson-Junction neighbourhood and the City of Toronto as a whole. Of particular relevance to the subject site and proposed conversion, are the following policies of the PPS which pertain to optimizing the use of the land, promoting a mix of housing and employment and minimizing undesirable effects of development on adjacent lands.

1.1 Managing and Directing Land Use to Achieve Efficient Development and Land Use Patterns

1.1.1 Healthy, liveable and safe communities are sustained by:

- a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;
- b) accommodating an appropriate range and mix of residential, employment (including industrial, commercial and institutional uses), recreational and open space uses to meet long-term needs;
- c) avoiding development and land use patterns which may cause environmental or public health and safety concerns;
- e) promoting cost-effective development standards to minimize land consumption and servicing costs;
- g) ensuring that necessary *infrastructure* and *public service facilities* are or will be available to meet current and projected needs.

1.1.2 Sufficient land shall be made available through *intensification* and *redevelopment* and, if necessary, *designated growth areas*, to accommodate an appropriate range and mix of employment opportunities, housing and other land uses to meet projected needs for a time horizon of up to 20 years. However, where an alternate time period has been established for specific areas of the Province as a result of a provincial planning exercise or a *provincial plan*, that time frame may be used for municipalities within the area.

1.4 Housing

1.4.3 Planning authorities shall provide for an appropriate range of housing types and densities to meet projected requirements of current and future residents of the *regional market area* by:

- a) establishing and implementing minimum targets for the provision of housing which is *affordable to low and moderate income households*. However, where planning is conducted by an upper-tier municipality, the upper-tier municipality in consultation with the lower-tier municipalities may identify a higher target(s) which shall represent the minimum target(s) for these lower-tier municipalities;
- b) permitting and facilitating:
 - 1. all forms of housing required to meet the social, health and well-being requirements of current and future residents, including *special needs* requirements; and
 - 2. all forms of *residential intensification* and *redevelopment* in accordance with policy 1.1.3.3;
- c) directing the development of new housing towards locations where appropriate levels of *infrastructure* and *public service facilities* are or will be available to support current and projected needs;
- d) promoting densities for new housing which efficiently use land, resources, *infrastructure* and *public service facilities*, and support the use of alternative transportation modes and public transit in areas where it exists or is to be developed; and
- e) establishing development standards for *residential intensification*, *redevelopment* and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety.

1.6 Infrastructure and Public Service Facilities

1.6.5.4 A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support the development of viable choices and plans for public transit and other alternative transportation modes, including commuter rail and bus.

1.7 Long-Term Economic Prosperity

1.7.1 Long-term economic prosperity should be supported by:

- a) optimizing the long-term availability and use of land, resources, *infrastructure* and *public service facilities*;
- b) maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets;
- c) promoting the redevelopment of *brownfield sites*;
- e) planning so that major facilities (such as airports, transportation/transit/rail infrastructure and corridors, intermodal facilities, sewage treatment facilities, waste management systems, oil and gas pipelines, industries and resource extraction activities) and *sensitive land uses* are appropriately designed, buffered and/or separated from each other to prevent *adverse effects* from odour, noise and other contaminants, and minimize risk to public health and safety.

1.8 Energy and Air Quality

1.8.1 Planning authorities shall support energy efficiency and improved air quality through land use and development patterns which:

- a) promote compact form and a structure of nodes and corridors;
- b) promote the use of public transit and other alternative transportation modes in and between residential, employment (including commercial, industrial and institutional uses) and other areas where these exist or are to be developed;
- c) focus major employment, commercial and other travel-intensive land uses on sites which are well served by public transit where this exists or is to be developed, or designing these to facilitate the establishment of public transit in the future;
- d) improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion; and

- e) promote design and orientation which maximize the use of alternative or renewable energy, such as solar and wind energy, and the mitigating effects of vegetation.

While the City of Toronto Municipal Comprehensive Review is still underway, this report demonstrates that the subject 0.93 acres is not appropriate or required for traditional employment purposes and that the conversion is needed to ensure compatibility with adjacent sensitive land uses.

The requested conversion of the subject site is consistent with the policies of the PPS and will help meet the Province's objectives for building strong communities that have an appropriate mix of uses, range of housing choices and densities that supports existing infrastructure, transit and active transportation.

4.2 Places to Grow – Growth Plan for the Greater Golden Horseshoe (2006)

The *Growth Plan for the Greater Golden Horseshoe* ("the Growth Plan") was prepared by the Ministry of Public Infrastructure Renewal in 2006, and was established under the *Places to Grow Act*, 2005. The Growth Plan is a framework for implementing the Province's vision for building stronger, prosperous communities by managing growth patterns in the region to 2031.

Policy 2.2.6.1 of the Growth Plan requires municipalities to maintain an adequate supply of lands for a variety of employment uses to accommodate provincial growth forecasts. Consistent with the PPS, policy 2.2.6.5 states that municipalities may permit conversion of lands within employment areas, to non-employment uses only through a municipal comprehensive review where it has been demonstrated that:

- a. there is a need for the conversion
- b. the municipality will meet the employment forecasts allocated to the municipality pursuant to this Plan
- c. the conversion will not adversely affect the overall viability of the *employment area*, and achievement of the *intensification target*, *density targets*, and other policies of this Plan
- d. there is existing or planned infrastructure to accommodate the proposed conversion
- e. the lands are not required over the long term for the employment purposes for which they are designated
- f. cross-jurisdictional issues have been considered.

As noted, the City of Toronto is currently undertaking a 5-Year Official Plan Review and a Municipal Comprehensive Review.

The Growth Plan includes numerous guiding principles and policies that are relevant to the subject site and the conversion request and proposed future redevelopment. Of particular relevance are the following policies which pertain to managing growth.

2.2.2 Managing Growth

1. Population and employment growth will be accommodated by –
 - a) directing a significant portion of new growth to the built-up areas of the community through intensification.
 - b) focusing intensification in intensification areas.
 - d) reducing dependence on the automobile through the development of mixed-use, transit-supportive, pedestrian-friendly urban environments.
 - f) ensuring the availability of sufficient land for employment to accommodate forecasted growth to support the GGH's economic competitiveness.
 - g) planning and investing for a balance of jobs and housing in communities across the GGH to reduce the need for long distance commuting and to increase the modal share for transit, walking and cycling.

While the City of Toronto Municipal Comprehensive Review is still underway, this report demonstrates that the requested conversion of the 0.93 acres will not adversely affect the overall viability of employment areas within proximity to the site. The lands have limited ability to accommodate new employment in a traditional stand-alone, format. Other employment areas and employment districts within the City of Toronto hold much greater potential to accommodate future job growth. The conversion is required in order to ensure compatibility with adjacent residential land uses. The requested conversion of the subject site conforms to the Growth Plan and is consistent with the policy objectives for creating vibrant neighbourhoods and complete communities.

4.3 City of Toronto Official Plan (2006)

The *City of Toronto Official Plan* was approved by the OMB on July 6, 2006. Since that time, there have been various amendments, but the consolidated Official Plan has been in effect since December 2010.

The Official Plan designates the subject site as 'Employment Areas'. The 'Employment Area' designation includes places of business and economic activity. As per Section 4.6.1, 'uses that support this function consists of: offices, manufacturing, warehousing, distribution, research and development facilities, utilities, media facilities, parks, hotels, retail outlets ancillary to the preceding uses, and restaurants and small scale stores and services that serve area businesses and workers.' Residential uses are not permitted within the 'Employment' designation. The small parcel of land to the west of the subject site is designated 'Employment Areas' and lands to the north of the subject site, on the opposite side of Dupont Street, are also designated 'Employment'. Unlike the subject site, these lands are contiguous to a much larger employment area. Lands to the east are designated 'Apartment Neighbourhoods' and lands to the west and south are designated 'Neighbourhood', which permits low-scale housing (e.g. single-family, semi-detached, duplexes, triplexes, townhouses and walk-up apartments - no higher than 4 storeys) and low scale local institutions, small-scale retail, service and office.

The subject site is not within a designated 'Employment District' shown on Map 2 (Urban Structure) of the *City of Toronto Official Plan* and neither are the adjacent lands (i.e. 299 Campbell) or employment lands within the surrounding area. As noted in the Official Plan, most Employment Districts are characterized by manufacturing, warehousing and product assembly activities and they are where the City intends to accommodate the majority of future job growth.

The *City of Toronto Official Plan* suggests that, "Employment Areas need to function well and be attractive for new firms". As previously described and illustrated by the Figure 1 and 2 and the site photos, the subject site is not well-suited for commercial uses given the lack of direct access and poor visibility from Dupont Street. Given the adjacent sensitive (residential) land uses, the site cannot function well with an industrial operation.

The *City of Toronto Official Plan* contains several policies on how to direct growth and change in the City and how to build a city that successfully improves the quality of life. The requested conversion and proposed redevelopment and intensification of 1453 Dupont Street would help the City of Toronto achieve policy goals such as:

2.1.1 Toronto will work to manage growth in a method which:

- a) Focuses urban growth into a pattern of compact centres and corridors;
- b) Makes better use of existing urban infrastructure and services; and
- g) Increases the supply of housing in mixed use environments to generate opportunities for people to live and work locally.

3.1.2 Housing

1. A full range of housing, in terms of form, tenure and affordability, across with City and within neighbourhoods, will be provided and maintained to meet the current and future needs of residents. A full range of housing includes: ownership and rental housing, affordable and mid-range rental and ownership housing, social housing, shared and/or congregate-living housing arrangements,

supportive housing, emergency and transitional housing for homeless people and at-risk groups, housing that meets the needs of people with physical disabilities and housing that makes more efficient use of the existing housing stock.

2. The existing housing stock will be maintained and replenished. New housing supply will be encouraged through intensification and infill that is consistent with this Plan.

The requested conversion is consistent with the City's intent to maintain the majority of its designated 'Employment Areas', other than some smaller and isolated parcels of employment land. The proposed redevelopment and intensification of the subject site will help the municipality achieve its policy objectives for protecting managing growth and providing a full range of housing within its various neighbourhoods.

4.4 City of Toronto Zoning By-Law 569-2013

The City of Toronto Zoning By-law 569-2013 was approved by City Council on April 3rd, 2013 and it was enacted on May 9th, 2013. It may be appealed under Section 34 (19) of the Planning Act. As noted on the City's website, even though it is appealed, the City's Chief Building Officer and the Committee of Adjustment will apply the new Zoning By-law to applications filed after the enactment.

As shown in Figures 9 and 10, the subject site is zoned as *E-289-Employment Industrial*. A maximum density of 2.0 FSI is permitted along with building heights of 14 m at the north end and 12 m at the south end.

The requested conversion is consistent with existing zoning in proximity to the subject site and the rezoning which is occurring within the surrounding area.

5. CONVERSION REQUEST FOR 1453 DUPONT STREET

The subject 0.93 acre site is currently designated 'Employment Areas', though it has not been identified as an 'Employment District' on Map 2 (Urban Structure) of the City's Official Plan. Given the small and isolated location of the parcel, changes to the industrial sector and the proximity of residential uses, the 'Employment Areas' designation is no longer the most appropriate designation for the subject site. The Dovercourt-Wallace Emerson-Junction neighbourhood is experiencing steady renewal and intensification. A higher-density mix of residential and commercial uses on 1453 Dupont Street would better utilize existing municipal infrastructure and services (e.g. transit, retail and community services) and would contribute to the ongoing revitalization of the neighbourhood.

As previously noted, the existing SKOR Cash N' Carry Wholesale Marketplace employs approximately five people full-time and approximately six people part-time. The small parcel does not significantly contribute to the local employment base and it is not part of a larger employment cluster. The redevelopment of the subject site for mixed-use will generate immediate construction jobs as well as longer-term employment through:

- The management and maintenance of the condominium;
- Ground floor commercial (e.g. retail or professional offices);
- Opportunities for live-work units; and
- Accommodating the growing proportion of Toronto's jobs which are classified by Statistics Canada as 'work from home'

A 'Mixed-Use Areas' designation could facilitate a substantial increase the number of jobs provided for on the subject site, in comparison to employment created through either wholesale retail or a stand-alone retail.

The introduction of residential and commercial uses is more compatible with adjacent land uses and the emerging fabric of the surrounding community, including the conversion request and proposed future redevelopment of 299 Campbell Avenue.

6. CONCLUSIONS

The requested conversion of 1453 Dupont Street from an 'Employment Areas' designation to a 'Mixed Use Areas' designation is both desirable and appropriate from a land use planning perspective. Specifically, the conversion request is appropriate for the following reasons:

- Non-employment uses are compatible and complimentary to existing and emerging mixed-use and residential development on adjacent lands;
- The subject site is not part of a larger, contiguous employment area or employment district;
- The conversion will have no direct impact on the function or viability of surrounding employment lands or existing businesses/operations;
- The viability of redeveloping the subject site for employment uses is impacted due to existing and proposed sensitive land uses to the south, east and west;
- The site is physically suitable to accommodate mixed-use development;
- Existing municipal infrastructure and services exist to support redevelopment and intensification, and will be better utilized;
- The conversion conforms with and supports the policies and objectives of the *Provincial Policy Statement* and *Places to Grow - the Growth Plan for the Greater Golden Horseshoe*; and
- The redevelopment of the subject site for mixed-use purposes is consistent with the overall planning goals and objectives of the *City of Toronto Official Plan*.

Based on a review of the subject site, adjacent and surrounding land uses, and the applicable planning policy framework, the requested conversion will facilitate an appropriate use and form of land development and represent good planning. It is our professional opinion that the requested conversion of 1453 Dupont Street warrants the support of City council and staff.

Respectfully submitted this 29th day of August, 2013.

Regards,

IBI Group



Amy Shepherd, MCIP, RPP
Associate

I hereby certify that this Planning Justification Report was prepared by a Registered Professional Planner, within the meaning of the Ontario Professional Planners Institute Act, 1994.