



**WESTON  
CONSULTING**

planning + urban design

November 14, 2013

File 6549

City Clerk  
City Hall  
100 Queen Street West  
10<sup>th</sup> Floor, West Tower  
Toronto, Ontario  
M5H 2N2

**Attn: Nancy Martins, Administrator  
Planning and Growth Management Committee**

Dear Ms. Martins,

**RE: Proposed Official Plan Amendment Pertaining to Economic Health and Employment  
Lands Policies and Designations**

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Weston Consulting Group represents 80% of the lands within a portion of the Mimico GO Triangle bounded by Portland Street, Audley Street and the CN Rail Corridor. The lands are currently designated as an Employment Area in the City of Toronto Official Plan. Within the "Employment Area" designation, permitted uses include offices, manufacturing, warehousing, distribution, hotels, restaurants and small scale stores and services.

We understand that on November 21, 2013, the City's Planning and Growth Management Committee will consider a Staff Recommendation Report relating to a proposed Official Plan Amendment pertaining to economic health and employment lands policies and designations. We have reviewed a number of documents related to the Review and look forward to reviewing the Staff report when it becomes available November 15.

In the interim, we wish to ensure that our clients' views are considered by the Planning and Growth Management Committee prior to any recommendations on the proposed Official Plan Amendment being forwarded to Toronto City Council for its consideration.

Our review of the documentation available indicates that although no application or request for conversion was received by the City, Etobicoke York Community Council requested that the Chief Planner study the need for the transformation of this area. In a report to Planning and Growth Management Committee dated October 23, 2012, City Staff outlined their preliminary assessment of Conversion requests. In this report, Staff had proposed the redesignation of four sites, including the Mimico GO Triangle lands, to a "Regeneration Area" designation. This designation would permit a broad mix of commercial, residential and light industrial uses, among

others. The "Regeneration Area" designation is intended to be utilized to help attract investment, re-use buildings and encourage new construction to areas which may no longer be productive.

According to the October 23, 2012 report, Staff made this determination on the following basis:

***"City Planning Division and Economic Development, and Culture staff have considered four areas currently designated as Employment Area that share several defining traits. They are:***

- ***Serviced by an existing subway or GO station and suitable for transit-based intensification***
- ***Relatively small pockets of employment isolated from larger employment areas***
- ***Areas with little employment***
- ***Areas with vacant land parcels***
- ***Areas with poor public realm condition***
- ***Proximity to existing residential neighbourhoods with community facilities***
- ***Areas, with one exception, where residential development has already been constructed or approved and transition has already begun***
- ***Areas where the juxtaposition of residential and permissions for traditional industrial require a detailed blueprint for their future"***

According to a follow up report to Planning and Growth Management Committee dated April 23, 2013, it appears that although Staff continue to recommend redesignation to the "Regeneration Area" designation for two of the four sites (the third site is now home to a new cosmetics manufacturer and is no longer considered for redesignation), Staff have revised their position for the Mimico GO Station lands, and are now proposing to designate the lands as a General Employment Area, subject to Site Specific Policy 433. The Site Specific Policy would require that employment uses in the area be compatible with adjacent and nearby residential uses, and would require that a revitalization study for the area be undertaken to encourage economic growth and increase the amenitization of the area, including improved pedestrian and vehicular access to the Mimico GO Station. In general, however, the proposed designation maintains current permissions and does not address the issues outlined by Staff in their October 23, 2012 report.

Based on information contained in the April 23, 2013 report, it would appear that Staff may have revised their position on the basis that area business owners appeared to be disinterested in the redesignation of their lands: *"Staff held a meeting in March 2013 to discuss the potential study with property and business owners. However few attended to offer their vision for the future of the area."* The question of whether or not to redesignate these lands to the "Regeneration Area" designation appears to have been abandoned by Staff due to an apparent lack of interest from area business and property owners. However, the area continues to suffer from all of the issues outlined by Staff in their October 2012 report.

As indicated above, Weston Consulting Group has been approached by 80% of the owners in the eastern portion of the Mimico GO triangle. We have been asked to pursue the redesignation of the area to the "Regeneration Area" designation by these property and business owners. Regardless of whether the owners were organized enough to take part in the City's review of their area over the summer, they are clearly indicating their interest in pursuing that redesignation now. As such, we respectfully request that these lands be reconsidered for designation to the "Regeneration Area" designation per Staff's original position.

It is the owner's position that the initial staff proposal to redesignate these lands to the "Regeneration Area" designation was an appropriate recommendation and should be re-instated. We believe this is appropriate for the following reasons:

### **1. Context**

The area is currently characterized by a number of vacant parcels and underutilized buildings. The area is dominated by single storey buildings and is surrounded by residential development. There is an approval for a 242 unit, 27 storey residential condominium nearby on Royal York Road. Residential uses have continued to encroach on the area and are now impacting the ability of this employment area to function. As a sensitive land use, these residential areas are serving to preclude the establishment of new general employment uses in this area.

The rail line to the south effectively isolates these employment lands from employment areas to the southwest. It is clear that the lands are not performing to their potential as currently designated and aging infrastructure is taking a toll on the overall aesthetic and functionality of the area. We believe that the retention of a purely employment-based designation on these lands will serve to frustrate opportunities to revitalize this under-utilized area and discourage investment and regeneration.

Although the Draft Official Plan Amendment contemplates the preparation of a revitalization study, we are of the opinion that the "Regeneration Area" designation, which offers a broader range of uses, would be a more effective route to the revitalization of this area. The "Regeneration Area" designation permits a broad range of uses which we believe would serve to better assist area landowners in the redevelopment and revitalization of the area and would offer better opportunities to protect existing sensitive land uses in the vicinity.

### **2. Proximity to Major Transit Infrastructure/Mimico GO Station**

Given the location of the lands within walking distance of the Mimico GO Station, the lands within the Triangle are uniquely suited to the development of a broad range of uses which would assist in the creation of a vibrant urban space. There are excellent opportunities for intensification, infill and redevelopment in this area. The introduction of permissions which would facilitate the development of a wider range of uses would have a tremendous positive impact on the area and introduce a level of pedestrian activity which is not present in the area as currently designated.

Given the lands are located within walking distance of the Mimico GO Station, it would be anticipated that this area would be more intensively utilized. Clearly this has not occurred. There is nothing to suggest that the maintenance of the current designation and limited permissions will produce the range and intensity of development which would be anticipated for any area in close proximity to inter-regional rapid transit.

### **3. Limitations on Trucking**

The owners of the lands have advised that the City has imposed limitations on truck traffic in the area as a result of increasing residential development in the area. Owners have advised that these limitations have had impacts on their businesses. The imposition of constraints to the operation of legitimate businesses in a legitimate business area is counter-productive to the goal of encouraging economic growth in the area as outlined in the proposed site specific employment policy for this area.

### **4. Noise Complaints**

The owners of the lands have advised that there have been an increase in the number of noise complaints in the area as a result of conflict between existing employment and residential uses. Resident complaints about business operations can lead to the relocation of existing business from the area. This relocation can result in increased vacancy rates within the employment area and increased decline of the area. This decline, and associated lack of monitoring and maintenance in the area, can lead to additional safety and compatibility issues.

Taken together, all of these issues have resulted in a reduction in the feasibility of operating businesses in this area while recent residential approvals have served to further undermine the area's functionality. As a result, the area can no longer function effectively as an employment area due to increasing conflict between this area and nearby residential areas. The City has attempted to deal with this conflict by imposing restrictions on truck traffic and access. The proposed Site Specific General Employment policy is proposed to require that employment uses in the area be compatible with adjacent and nearby residential uses. Clearly, the City has identified that the proximity of these two distinct but existing areas is causing undue impacts to both. There is no reason to suspect that the level of conflict between local residents and existing businesses will not continue to escalate with the resultant increase in resident frustration with local business operations and the associated increase in complaints filed with the City. Although the currently proposed site specific "General Employment" designation also includes direction for staff to undertake a revitalization study, the conflict which exists between existing employment uses and the nearby residential area may serve to discourage any investment by the business community in this area, leading to further decline.

Alternatively, the redesignation of the lands to the "Regeneration Area" designation will assist in addressing this ongoing issue by permitting a broad range of uses in the area. This flexibility will serve to attract a broader market segment, resulting in the introduction of new development and

new investment in the area. As new development is proposed, it can be designed to minimize impacts to the existing residential area and serve to revitalize the area, intensifying land uses to a level which would be expected in an area well-served by Inter-Regional Rapid Transit.

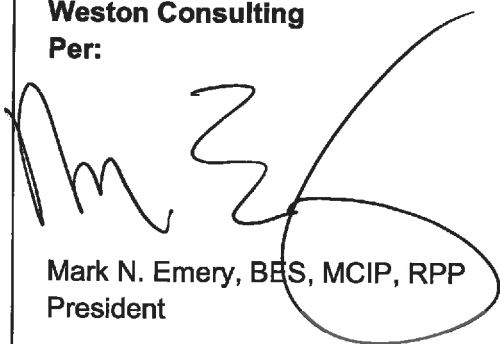
The intent of the policies of the "Regeneration Area" designation is to attract investment and encourage new construction and redevelopment of areas which are largely vacant and underutilized. Given the unique circumstances of residential encroachment; increased employment use vacancy rates; undeveloped or under-developed parcels; the isolation of this area from other employment areas; and the location of the Mimico GO Station within walking distance, this area is a prime candidate for the type of revitalization and reinvestment that is envisioned by the policies of the "Regeneration Area" designation. As such, we strongly recommend that the lands be redesignated to the "Regeneration Area" designation to allow area landowners the opportunity to broaden the range of uses on their lands and to encourage the investment of private capital resources to this area through revitalization, infill, intensification and redevelopment.

Accordingly, on behalf of our clients, we request that the Official Plan amendment as currently proposed for this area not be supported by the Committee or adopted by City Council and that the City revisit Staff's original preliminary assessment for this area, with the ultimate objective of redesignating the lands to the "Regeneration Area" designation to reduce conflict, encourage investment in and the revitalization and intensification of this underutilized area.

We request notice of any decision of the Committee and/or Council with respect to the proposed Official Plan Amendment.

Should you have any questions or require any further information, please do not hesitate to contact either the undersigned or Deborah Alexander.

Yours truly,  
**Weston Consulting**  
Per:



Mark N. Emery, BES, MCIP, RPP  
President

c. J. Mangiardi, Melrose Paving Company Ltd.