November 20, 2013

Planning and Growth Management Committee
Toronto City Hall
12th Floor, East Tower
100 Queen Street West
Toronto, ON M5H 2N2

Dear Committee:

Re: 50 Wilson Heights Boulevard

We represent Build Toronto Inc. with regards to their property located at the northwest corner of Wilson Heights Boulevard and Wilson Avenue, municipally addressed as 50 Wilson Heights Boulevard (the Subject Site).

We are writing to provide comments to the Planning and Growth Management Committee on item number PG28.2, Official Plan and Municipal Comprehensive Reviews: Amendments to the Official Plan for Economic Health and Employment Lands Policies and Designations and Recommendations on Conversion Requests.

The staff report and associated Amendment 231 to the City of Toronto Official Plan proposes to redesignate the Subject Site from “Employment Areas” to “Regeneration Areas”. The Amendment also proposes to implement Site and Area Specific Policy No. 387, affecting the Subject Site, which requires “that 50 per cent or greater of the gross floor area on lands in Parcel "A" (the Subject Site) be used for non-residential purposes”.

The Subject Site is quite unique among the sites the Committee is considering as it has long been zoned for residential purposes. The North York Zoning By-law 7625 currently zones the southern half of the site as “RM4” and the northern half as “R4”. Permitted uses in the R4 zone include single detached dwellings, whereas the RM4 zone permits a range of housing types, including apartment houses and multiple attached dwellings.

As the Subject Site is currently zoned to permit residential, it cannot and should not be considered a conversion.

Previous to the current Toronto Official Plan coming into effect, the North York Official Plan designated the southern half of the Subject Site as “Arterial Corridor Area”, and the northern half as “Industrial”, as shown on Schedule 1 attached to this letter. Within the “Arterial Corridor
Area” designation, permitted uses included a full range of housing, including high rise buildings as well as institutional and commercial uses.

It is unclear why the 2006 Toronto Official Plan designated the Subject Site as “Employment Areas”, but what is clear is that this designation is not appropriate for this site.

The Arterial Corridor Area designation in the North York Official was a precursor to the mixed use Avenues Designation in the current City of Toronto Official Plan. In our opinion, the policies of the Official Plan should reflect the current zoning on the Subject Site and the historic intent of the North York Official Plan for these lands to be treated as a mixed use Avenue. Such designation would be consistent with the treatment of the lands across the road on the south side of Wilson Avenue.

To require that 50% of the gross floor area of the Subject Site be used for non-residential purposes, and to require that it be implemented in the zoning by-law, is simply a down-zoning of the lands.

Our client is agreeable to providing some employment on the Subject Site consistent with a mixed use designation and is agreeable with requiring a Secondary Plan or a Site and Area Specific Study to set out how that mix of land uses will be achieved, but requiring a minimum of 50% of the gross floor area to be used for non-residential purposes is not reasonable on a currently residential zoned site.

As such, we request the Committee to change Site and Area Specific Policy No. 387, b) to state:

“b) A requirement for an appropriate mix of residential and non-residential land uses on each site including replacement of existing built and previously approved non-residential space”

We look forward to your response regarding this matter and looking forward to further discussions in the near future.

Yours very truly,

SORENSEN GRAVELY LOWES PLANNING ASSOCIATES INC.

Paul Lowes, MCIP, RPP
Principal
SCHEDULE 1
Excerpt from Map C.1: Land Use Plan from North York Official Plan (2000)