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November 20, 2013

Project: BL.TO

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,

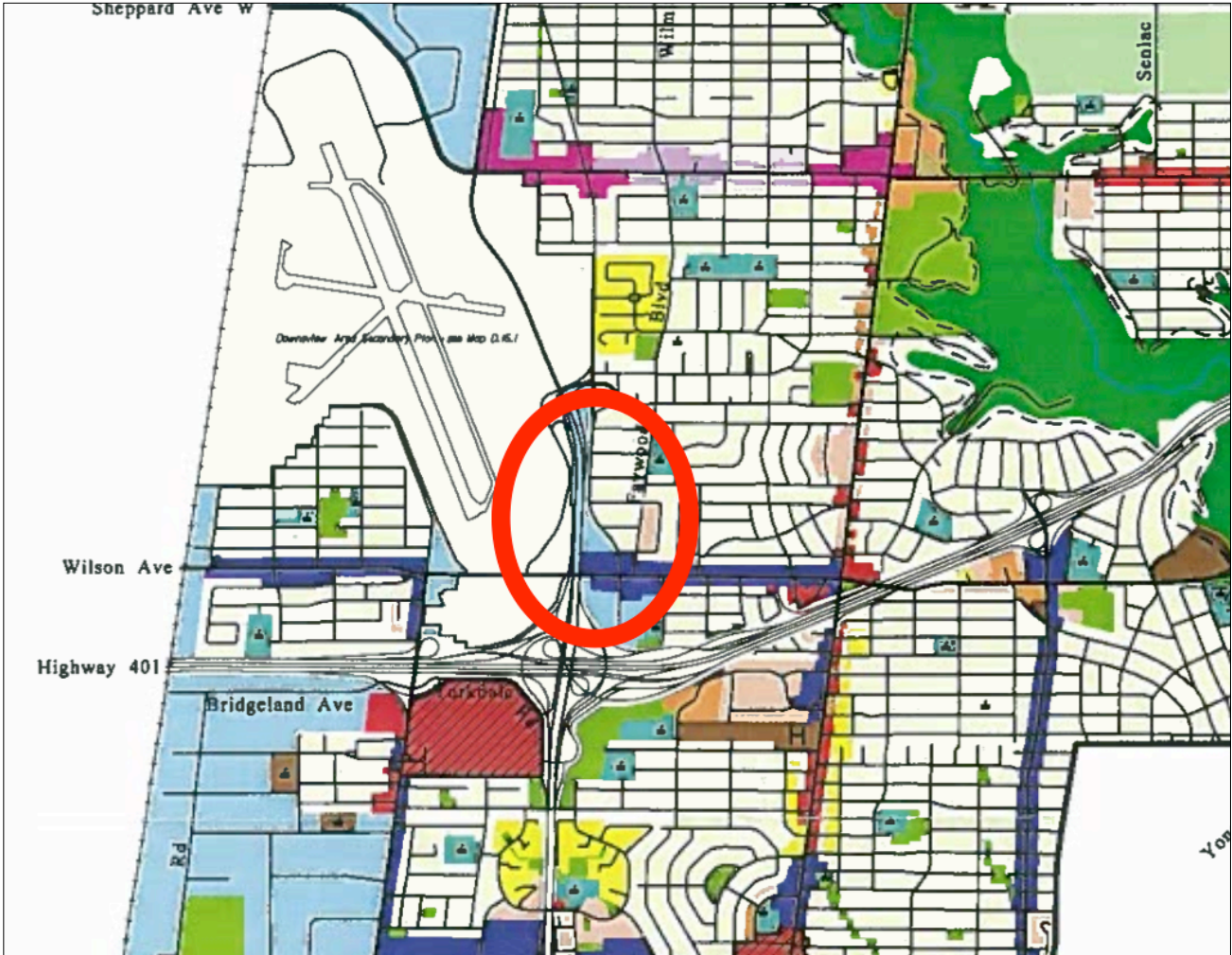
SORENSEN GRAVELY LOWES PLANNING ASSOCIATES INC.

A handwritten signature in black ink, appearing to read 'Paul Lowes', written in a cursive style.

Paul Lowes, MCIP, RPP
Principal

SCHEDULE 1

Excerpt from Map C.1: Land Use Plan from North York Official Plan (2000)



Map C.1 : Land Use Plan

LEGEND - LAND USE DISTRICTS

RESIDENTIAL DENSITY ONE (RD1) (See Part C.4)	CEMETERY (CEM) (See Part C.2)	MIXED COMMERCIAL RESIDENTIAL (MCR) (See Part D.14)
RESIDENTIAL DENSITY TWO (RD2) (See Part C.4)	PUBLIC UTILITY (PUT) (See Part C.7)	MIXED USE (MU) (See Part C.10)
RESIDENTIAL DENSITY THREE (RD3) (See Part C.4)	INDUSTRIAL (IND) (See Part C.8)	ARTERIAL CORRIDOR AREA (ACA) (See Part C.10)
RESIDENTIAL DENSITY FOUR (RD4) (See Part C.4)	GENERAL-INSTITUTIONAL (G-INS) (See Part C.5)	SUB-CENTRE (See Part C.10)
RESIDENTIAL DENSITY FIVE (RD5) (See Part C.4)	COMMERCIAL (COM) (See Part C.5)	FALSTAFF RESIDENTIAL POLICY AREA (FRPA) (See Part D.9)
LOCAL OPEN SPACE (LOS) (See Part C.2)	TRANSITIONAL MIXED USE AREA (TMUA) (See Part C.10)	SCHOOL SITE (MINOR INSTITUTIONAL- SEE DISTRICT PLANS)
VALLEY OPEN SPACE (VOS) (See Part C.2)	SHEPPARD WEST-COMMERCIAL (SW-COM) (See Part D.14)	V.I.Z. BOUNDARY (See Part C.2)
		HOSPITAL (See Part C.8)