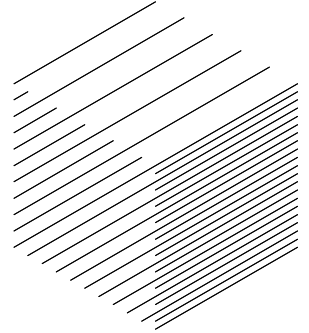


May 28, 2014

City Clerk
City Hall, 100 Queen St. West
10th Floor, West Tower
Toronto
Ontario, M5H 2N2

by email to pgmc@toronto.ca
And fax 416-392-1879

**Walker, Nott, Dragicevic
Associates Limited**
Planning
Urban Design



Attention: Nancy Martins
Administrator
Planning and Growth Management Committee

Dear Ms. Martins

**Re: Item PG33.4
Proposed City Initiated Official Plan Amendment
Site and Area Specific Policies in the Employment Area
In the Vicinity of Bermondsey Road and O'Connor Drive
1450 & 1500 O'Connor Drive ("Subject Sites")
Former Borough of East York
City of Toronto
Surrey Plaza Limited
Our File 09.552**

90 Eglinton Avenue East
Suite 970
Toronto, Ontario
M4P 2Y3
Tel. 416/968-3511
Fax. 416/960-0172
e-mail: admin@wndplan.com
web: www.wndplan.com

On behalf of our client, Surrey Plaza Limited, we are submitting these comments with respect to the proposed Official Plan Amendment which directly affects the Subject Sites.

The Subject Sites are designated as Employment Area on the Land Use Plan (Map 20). The Subject Sites are also located within Site and Area Specific Policy Area No. 146 within the City of Toronto's Official Plan.

Policy Area No. 146 outlines that residential uses are permitted on these lands subject to particular height and setback requirements and provided that compatibility issues (i.e. noise, vibration, odour, traffic, buffering/screening) between residential and industrial uses have been properly addressed. In addition, this policy area outlines that commercial and institutional are also permitted without limitations. Policy 146 was a direct result of earlier studies of the O'Connor Drive area which resulted in the allowance for residential uses subject to a very specific set of criteria and limitations. At the same time properties to the north and south of the Subject sites were permitted to have both commercial and institutional uses, in recognition of the fact that the O'Connor Drive frontages were to provide complementary and transitional uses to the west and to the east of O'Connor Drive.

Wendy Nott, FCIP, RPP
Robert A. Dragicevic, MCIP, RPP
Senior Principals

Peter R. Walker, FCIP, RPP
Special Consultant

Andrew Ferancik, MCIP, RPP
Senior Associate

Martha Coffey
Controller

When the City of Toronto adopted the current Official Plan the special policies were carried forward into the plan by way of the site specific policies. These use allowances were considered appropriate for the Subject Sites with the underlying Employment Areas designation in place.

The staff report at page 3 refers to OPA 231 which proposes to alter the underlying designation of the Subject Sites. The adoption of OPA 231 by the City of Toronto (which remains under appeal) does not alter the Site Specific policies and we were advised by City staff that this would continue to be the case. The City's Official Plan policies relating to employment lands in their entirety have been considered to be consistent with Growth Plan and the 2005 Provincial Policy Statement (PPS 2005") and would therefore have include the very policies now recommended to be deleted.

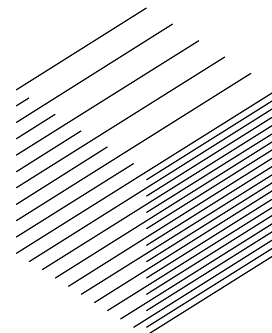
During the City staff review of the Employment Areas in the context of requests by others for conversion of employment land the Subject Sites and the policies in effect were not identified for further review since the allowance for the residential uses on the Subject Sites does not constitute a conversion as they are already permitted residential uses as a matter of Official Plan policy.

The residential uses permitted by the Site Specific policy have an extensive list of criteria to be addressed to ensure compatibility with surrounding land uses. The onus is clearly on the proponent of residential uses, and development of residential uses would therefore occur only that basis as assessed, reviewed and finally determined through a zoning bylaw amendment process as set out in the policy.

In our opinion, the Site Specific Polices applicable to the Subject Sites does not constitute a conversion of employment lands; does not result in an inherent incompatibility with employment uses as a result of the criteria and limitations in the polices all of which are to be tested during a zoning bylaw review process; and that the current policies have been put in place and considered by the City to be consistent with the Growth Plan and the PPS 2005. There has been no substantive change to either of these policies to suggest that the employment related policies would warrant the deletion of the Site Specific Policy 146 as applied to the Subject Sites.

We would therefore request that the proposed amendment not be approved as presented and as it would affect the Subject Sites.

We would note that while there was notice of a public meeting advertised in the newspaper, our client was never directly contacted about this matter. Given the site specific nature of the proposed amendments it would have been appropriate to have made an effort to contact our client directly to allow for further discussion on this matter.



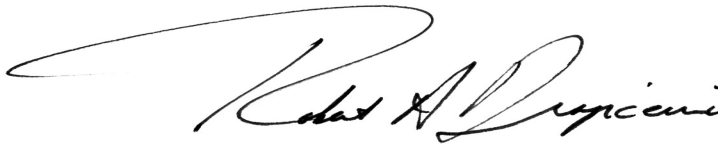
Our client is prepared to meet with staff further on this matter, following their review of this submission.

On behalf our client we request that our office (to the attention of the undersigned) be provided with Notice of the adoption of the proposed amendment, should that be the action taken by Council.

Should there be any questions or additional information required, please do not hesitate to contact me.

Yours very truly,

WALKER, NOTT, DRAGICEVIC ASSOCIATES LIMITED
Planning · Urban Design

A handwritten signature in black ink, reading "Robert A. Dragicevic". The signature is fluid and cursive, with a large, sweeping initial "R".

Robert A. Dragicevic, MCIP, RPP
Senior Principal

cc. Mr. Mario Cinelli, Surrey Plaza Limited

