

November 4, 2016

**The Mayor and Members of Council
Corporation of the City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2**

**Attention: Ms. Ulli S. Watkiss
City Clerk**

**Re: Proposed Amendment No. 321 to the Official Plan for the City of Toronto
Steeles - Redlea Regeneration Area , North Milliken Employment District
Council Agenda Item PG15.5 / Our File: PN 51 81**

Dear Mayor Tory and Members of Council:

We act as Land Use and Environmental Planning Consultants on behalf of several businesses situated in the North Milliken Employment Area, namely AGF / C&T, All-Weld Company Limited, Anchor Shoring & Caissons, D. Crupi & Sons, K-Line Insulators Limited, Edzar Investments / Structform and Trisan Construction. Our Clients are the Owners and Operators of businesses within the North Milliken Employment Area, that is the area generally defined by the area bounded by Steeles Avenue on the north, Midland Avenue on the east, McNicoll Boulevard on the south and Kennedy Road on the west, an area of approximately 103.3 hectares (i.e. 255 acres). For the most part, our Client's lands are presently zoned within Employment Heavy Industrial (EH) Zone under By-law No. 569-2013 or are within an area where the lands are zoned within the Industrial(M)/ General Industrial (MG) / Special Industrial (MS) Zones under By-law No. 24982, the Employment Area By-law of the former City of Scarborough, which remains in effect over a large portion of the area in question.

On October 17, 2016, the writer appeared before the Planning & Growth Management Committee on behalf of our Clients in relation to the proposed draft of Amendment No. 321 to the City of Toronto Official Plan concerning the Steeles-Redlea Regeneration Area. The draft document serves, among other matters, to designate the northerly portion of those lands generally located adjacent the southerly limits of Steeles Avenue, west of the GO Rail corridor, east of Redlea Avenue and north of the GO parking lot, having an area of approximately 3.5 hectares, within a Mixed Use land use classification. Designation of the lands in this manner is intended to allow for the introduction of the Global Fortune Group proposal which envisages the development of three residential condominium towers, ranging in height from 17 to 28 storeys, containing a total of 793 dwelling units in concert with some 14,720 square metres of retail/commercial floor space. The towers are connected by a three storey podium containing retail space and parking facilities together with a landscaped terrace above the retail areas at the base of the towers. Residential and retail tenant parking is proposed in three levels of underground parking.

It continues to be our position that the introduction of high density residential uses within the northerly portion of the Steeles-Redlea Regeneration Area will inevitably lead to the destabilization of this long established employment area. Approval of the Global Fortune proposal will result in pressure for the introduction of high density residential developments on adjacent lands. In turn, adoption of adjacent employment lands for high density residential uses will only be effective to further undermine the intended employment function of the area and serve as a catalyst to the displacement of core employment uses and activities and the degradation of a healthy and vibrant industrial area. Empirical observations suggest that, ultimately, the net effect will be the gradual adoption of employment lands by non-employment forms of land use contrary to Amendment No. 231 and the stated objectives of providing for the maintenance and reinforcement of employment areas in a manner which reinforces the financial base of the City of Toronto.

On behalf of our Clients, we requested that the Planning and Growth Management Committee not adopt the recommendations set out in the Staff Report (Item PG15.5). Specifically, we requested that the Planning & Growth Management Committee not recommend adoption of the proposed Official Plan Amendment No. 321 and that, in view of the potential impacts upon existing industrial uses within the North Milliken Employment Area, which impacts may reasonably be expected to result from the introduction of high density residential uses in the Steeles Redlea Regeneration Area, no further consideration be given to the introduction of residential and/or sensitive land uses within the Steeles-Redlea Regeneration Area. We further requested that the Planning and Growth Management Committee give consideration to the need to introduce an Amendment to the City of Toronto Official Plan which would serve to re-designate those lands referred to as the Steeles-Redlea Regeneration Area within the Employment Area land use classification as was originally intended under the initial drafts of Official Plan Amendment No. 231.

It is noted that the draft of Official Plan Amendment No. 231 was modified immediately prior to adoption of Amendment No. 231 to incorporate reference to the Steeles-Redlea Regeneration Area through the introduction of Site and Area Specific Policy No. 395. Unfortunately, our Clients were not aware of the revisions to the draft of Amendment No. 231 which provided for the introduction of the Site and Area Specific Policy 395 in response to the proposal of the Global Fortune Group. As a consequence, our Clients did not appeal the designation of lands within the Steeles-Redlea Regeneration Area.

The basis of our request follows from a detailed review and analysis of the built-form of the North Milliken Employment Area and the potential effect of the proposed Amendment No. 321 upon the future disposition of the industrial/employment base which presently exists in this area today. To assist the Council in the review and consideration of this matter, we have attached a series of drawings to illustrate how the land use planning framework proposed under Official Plan Amendment No. 321 will be effective to undermine the function of the Employment Area and the Core Employment uses which presently operate within this area.

Figure One - Map 19, Land Use Plan, City of Toronto Official Plan

Figure One represents the land use planning framework as it existed prior to the adoption of Official Plan Amendment No. 231 on December 18, 2013. Prior to adoption of Amendment No. 231, the North Milliken Employment Area was designated within the Employment Area land use classification under the City of Toronto Official Plan. The policy framework recognized the need to protect such areas for employment purposes with a view to ensuring the measure of flexibility necessary to provide for a stable employment base which served to strengthen the economic base of the City of Toronto.

The policies applicable to lands designated as an Employment Area intended that uses which would detract from the economic function not be permitted to locate in the designated Employment Areas. The intent was to promote a well defined, viable and resilient Employment Area which could be sustained over time. It follows that, prior to the adoption of Official Plan Amendment No. 231, the approved policy framework did not provide for the introduction of residential land uses due to potential conflicts between land uses which exhibit differing priorities for the use of the lands in close proximity to one another.

Figure Two - Official Plan Designations and Existing Land Use / Post Amendment No. 231

As is readily apparent from the aerial photograph, with the exception of the Mon Sheong Retirement Home and the Mon Sheong Long Term Care Facility located adjacent the north-east corner of the intersection of Kennedy Road and McNicoll Avenue, none of the lands within North Milliken Employment Area are presently utilized for residential purposes.

Rather, the uses present vary from that of offices and retail and personal service commercial establishments to industrial uses. The planning framework advanced for this area under Amendment No. 231 was intended to promote the introduction of light industrial and commercial activities in the peripheral areas adjacent Kennedy Road, Steeles Avenue and Midland Avenue with Heavy Industrial or Core Industrial Uses in those areas removed from the residential areas and other sensitive land uses to the west of Kennedy Road and to the east of Midland Avenue.

As is apparent from a review of Figure Two, the majority of the lands forming the North Milliken Employment Area were designated within the Core or General Employment land use classifications. The primary focus of Official Plan Amendment No. 231 was to recognize the importance of Employment Lands in providing for a diverse economic base given that a finite supply of Employment lands exists within the City of Toronto.

Amendment No. 231 further recognized that the introduction of sensitive land uses may force industry to alter their operations as a result of potential land use conflicts and complaints from sensitive land uses even where the uses are located beyond the limits of the designated Employment Areas, and, that there is limited, if any, opportunity for the creation of Employment lands within the City.

Despite recognition of the potential for land use conflicts where dissimilar uses are located in close proximity of one another, and, that there is a finite supply of employment lands which must be maintained for employment purposes, Amendment No. 231 designated approximately 11 hectares, previously designated as Employment Lands and within an area primarily dedicated to employment forms of land use, within the Steeles-Redlea Regeneration Area through the introduction of Site and Area Specific Policy No. 395. This was done in the absence of detailed studies and an evaluation of the future community structure inclusive of the potential for destabilization of the employment area and the resulting pressure for the adoption of adjacent employment lands for residential purposes.

Reference is made to Section 4.7 of the approved Official Plan for the City of Toronto, specifically those policies which apply to areas identified as Regeneration Areas. The approved policy framework states, in part, that not all Regeneration Areas will have the same mix of land uses. While residential uses are recognized as one of the possible uses permitted within a Regeneration Area, the policy requires that regard be had for the contextual setting and the nature of adjacent areas while recognizing the opportunity for revitalization of underutilized lands.

In the case of the Steeles-Redlea Regeneration Area, one relatively small block of land having an area of approximately 1.7 hectares (i.e. 4.2 acres), is to be designated for High Density Residential land uses in response to the application of the Global Fortune Group. The balance of the lands are proposed for utilization in association with parking facilities to be developed by Metrolinx and/or are to remain designated as an Employment Area. In other words, the effect of Amendment No. 231 was to provide a "shoehorn" by which to ease in the introduction of the proposal of the Global Fortune Group and high density residential development.

From a land use planning perspective, we respectfully submit that other options exist which are in keeping with the intent of the need to protect Employment lands for employment purposes. It is further submitted that the proposal of the Global Fortune Group to develop three residential towers on the site, in association with retail and personal service commercial and office uses, should not be driving the land use planning decision making process with respect to the long term disposition of the lands in question. It remains that in the same sense that the lands are not designated within an Employment Area classification under Official Plan Amendment No. 231, the lands are not designated for high density residential development and therefore an amendment is required to the Official Plan to provide for the Global Fortune Group proposal.

There is a need to carefully consider the designation of the lands located at the northerly limit of the Steeles-Redlea Regeneration Area in a manner which provides for high density residential uses. This follows from the fact that area proposed for the introduction of the three towers is surrounded to the east, south and west by lands designated and utilized for Employment Area purposes, that is lands which are zoned to allow for a mix of commercial and light and heavy industrial activities. As is apparent from the nature of the employment core industrial uses which presently exist within or in the immediate vicinity of the Steeles-Redlea Regeneration Area, such uses are not considered to be compatible with the introduction of a high density residential area.

Figure Three - Zone Classifications Established Under By-laws No. 569-2013 and By-law No. 24982

Figure Three represents a consolidation of the Zone Classifications applicable to the lands under By-law No. 24982, the Employment Districts Zoning By-law of the former City of Scarborough, and By-law No. 569-2013. A review of the land use permissions applicable to lands zoned within the various land use classifications clearly demonstrates that residential land uses are not a permitted use in this area and that the uses permitted vary in nature from commercial activities to light and heavy industrial uses. Such uses frequently involve operations associated with outside storage and maintenance of equipment, generate heavy truck traffic, and, may result in other nuisance vectors associated with odour, fumes, noise, and, in the case of night operations, light sources which may be viewed by residents residing in the proposed towers as a form of pollution .

Rather the zoning by-laws infer that the lands in the North Milliken Employment Area are to developed and utilized for a range of commercial and industrial activities consistent with the various land use classifications, inclusive of core industrial uses. Under the existing planning framework such uses exist in harmony with the adjacent sensitive uses to the east of Midland Avenue and to the west of Kennedy Road, that is areas primarily developed for the purposes of low density, ground related dwellings. It follows that under the existing, approved land use planning framework the differing forms of land use are able to exist in reasonable manner which is sustainable over the long term.

Figure Four - Employment Lands - Development Constraints & Opportunities / Current Planning Scenario

Based upon readily available information, the development constraints and opportunities associated with those lands situated within the North Milliken Employment Area are illustrated on Figure Four. As is apparent from the drawing, the recommended minimum separation distance for Class Two industrial activities clearly provides for the introduction of such uses over a relatively large portion of the Employment Area. In addition, an opportunity exists for the continuation, expansion and/or introduction of Class Three Industrial activities on lands zoned within the Employment Heavy Industrial (EH) Zone where, subject to mitigation, adequate spatial separation exists.

It is further noted that the Class 3 Industrial Uses located within the North Milliken Employment Area are zoned within an appropriate zone classification and are operating in compliance with their Environmental Compliance Approvals, in balance with the Community Structure as a whole.

Figure Five - Employment Lands - Development Constraints & Opportunities / Post Amendment No. 321

Figure Five illustrates the potential impact of proceeding with the adoption of the proposed Amendment No. 321. Introduction of the proposed residential development adjacent the southerly limits of Steeles Avenue, north of the GO Rail parking facility, has the potential to significantly impact upon the use of those lands within 300 metres of the site and the operations of Class 2 and 3 industries. In addition to the proposal being advanced by Global Fortune the designation of the adjoining lands within the Mixed Use land use classification would allow for redevelopment of the existing Splendid China property and the adjacent lands, immediately to the east of Redlea Avenue, for high density residential purposes.

In accordance with the Ministry of the Environment and Climate Change (MOECC) Guideline "D-6", the potential exists for complaints in relation to industrial operations situated within 1000 metres of the proposed residential development. In fact, the initial studies undertaken by Golder on behalf of the City of Toronto recognized that the potential existed for complaints from the proposed residential development at distances beyond the recommended Ministry Guidelines. In other words, the effect of the proposed Official Plan Amendment No. 321 may be to limit the nature and scope of existing industrial activities located north and south of Passmore Avenue.

In essence, the effect of the proposed amendment is to contradict the intent and purpose of Official Plan Amendment No. 231 by providing for the introduction of a high density residential area, not peripheral to but in an area which forms an integral part of an established Employment Area. Introduction of high density residential land uses at this location may be effective to seriously compromise the integrity of the stated planning directions for the North Milliken Employment Area as a whole. Clearly, the current experience of the Toronto Transit Commission and the opposition to the construction of the Milliken McNicoll Bus Depot from the Mon Sheong residents underscores this position.

The issue of compatibility is further underscored by the fact that Global Fortune is requesting City Council to designate the lands as a Class Four Area wherein acceptable noise levels would be significantly less stringent than under the normal criteria to be applied to this area. The effect of the request of the Global Fortune Group to designate the area as a Class Four Area is to allow for noise levels of 60dba daytime and 55dba night time, a significant increase above the normally accepted levels of 50dba daytime and 45 dba night time. It is understood that should City Council not grant the requested designation, the Ministry's Noise Guidelines will not be met under the current proposal of the Global Fortune Group.

Adoption of the proposed Amendment No. 321 should not occur in the absence of consideration of the need for and the extent of the area for which a Class Four Area designation is being sought. This matter should be subject to close scrutiny as part of the matters to be addressed under the proposed amendment given the need for Council to formally recognize the area as a Class Four Area where significantly higher noise levels may be observed at receptor locations. It is respectfully submitted that it is incumbent upon the City of Toronto to examine the extent of the area to be classified as a Class Four Area as part of the land use planning process relating to the principle of development and not as part of the implementation process. It should further be recognized that, in accordance with the Guidelines, areas which presently contain sensitive forms of land use are not candidate areas for a Class Four designation.

Destabilization of the North Milliken Employment Area

Staff was previously directed by the Planning and Growth Management Committee to report on the effect of the proposed introduction of high density residential development within the Steeles-Redlea Regeneration Area from the perspective of destabilization of the adjacent Employment Lands. While in attendance at the public meeting held on July 21, 2016, we specifically requested clarification as to criteria utilized by Staff to assess the potential for destabilization of the area. At that time the response indicated that the assessment was on-going and that the City was relying, in part, upon the studies undertaken by the proponent and discussions with the Economic Development Department. A review of the materials attached to the Staff Report in support of the proposed amendment do not identify the criteria nor does the material provide for an explicit review of the factors which may contribute to destabilization of the North Milliken Employment Area.

As illustrated on the attached flow chart (refer to Figure 6), experience suggests that the destabilization of an area is an iterative process. In part, this forms the basis for the Provincial Policy Statement and the Provincial Growth Plan for the Greater Golden Horseshoe, entitled Places to Grow, which specifically promotes the protection of Employment Lands for employment related purposes. This is further reflected in the policies set forth under Official Plan Amendment No. 231 with respect to the conversion of Employment Lands to non-employment related uses.

To proceed with adoption of the proposed amendment will set up a policy framework which will promote the gradual destabilization of the area due to uncertainty and speculative interests. Business Owners and Operators will be reticent to provide for the continued capital investment necessary to sustain industry which, in turn, may result in the down scaling of operations, the loss of jobs and, ultimately, potential business closures. Such decisions and actions will only lead to further speculation and pressure for the adoption of the lands by residential forms of development.

Concluding Remarks

In conclusion, it is our submission that to proceed with further consideration of the proposed Amendment is simply effective to undermine the integrity of the North Milliken Employment Lands by reason of the following factors, namely:

- the introduction of high density residential uses will impair the necessary degree of flexibility required by industry to respond to changing market demands, processes and techniques;

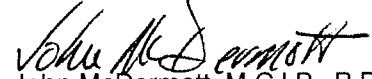
- the introduction of incompatible sensitive land uses may or may reasonably be expected to result in the implementation of enhanced regulations and measures to mitigate perceived impacts associated with industrial operations that currently exist and operate in a reasonably harmonious manner within the existing community structure;
- the possible need for industries located within the North Milliken Employment Area to introduce enhanced mitigation measures represents an extraordinary financial burden upon existing businesses, a factor which may, in turn, compromise their competitiveness in the market place resulting in the loss of jobs, plant relocation and/or closures;
- the introduction of high density residential uses will create pressure for the adoption of adjacent lands for similar purposes and, over time, the displacement of outside operations necessary to sustain employment uses;
- the mitigation measures proposed by the Global Fortune Group in relation to concerns regarding traffic impacts, noise, odour, dust and light pollution represent a thin veneer in response to the genuine concerns raised by our Clients.

It is submitted that the designation and development of the lands within the Steeles-Redlea Regeneration Area in a manner which provides for high density residential uses is contrary to the intent of the Provincial Growth Plan for Employment Lands, the Provincial Policy Statement, and, the underlying intent and purpose of Official Plan Amendment No. 231. Specifically, the proposed designation of the lands within the Steeles-Redlea Regeneration Area for high density residential purposes is contrary to the stated need to provide for resilient employment areas which foster a positive environment for the on-going capital investment by businesses necessary to sustain the employment base and job opportunities associated with the industries in this area.

Finally, there is the issue of need and of providing for appropriate locations for new growth and development. To the best of our understanding, the need to provide for adoption of lands within the North Milliken Employment Area for residential purposes is a matter not addressed at any time throughout the planning process. Given that the supply of employment lands represents a finite commodity, it would not seem prudent to introduce residential uses at this location given the potential for adverse impacts relative to existing and possible future commercial - industrial uses permitted within the North Milliken Employment Area.

In conclusion, while it is recognized that such matters as providing for intensification of the built form and the introduction of transit supportive densities are significant priority issues to be addressed by the City of Toronto, it remains that the need to provide for sustainable and resilient Employment Areas, which provide employment opportunities for area residents, is also a matter of considerable priority for the City of Toronto. On behalf of our Clients, we therefore submit that it is not representative of sound land use planning nor consistent with the stated intent of Official Plan Amendment No. 231 to provide for the introduction of a high density residential area in the northerly portion of the Steeles-Redlea Regeneration Area. An opportunity now exists to refine Site and Area Specific Policy 395 to preclude the introduction of uses which would undermine the integrity of the North Milliken Employment Area.

Sincerely yours,
McDermott & Associates Limited


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encl. (6)

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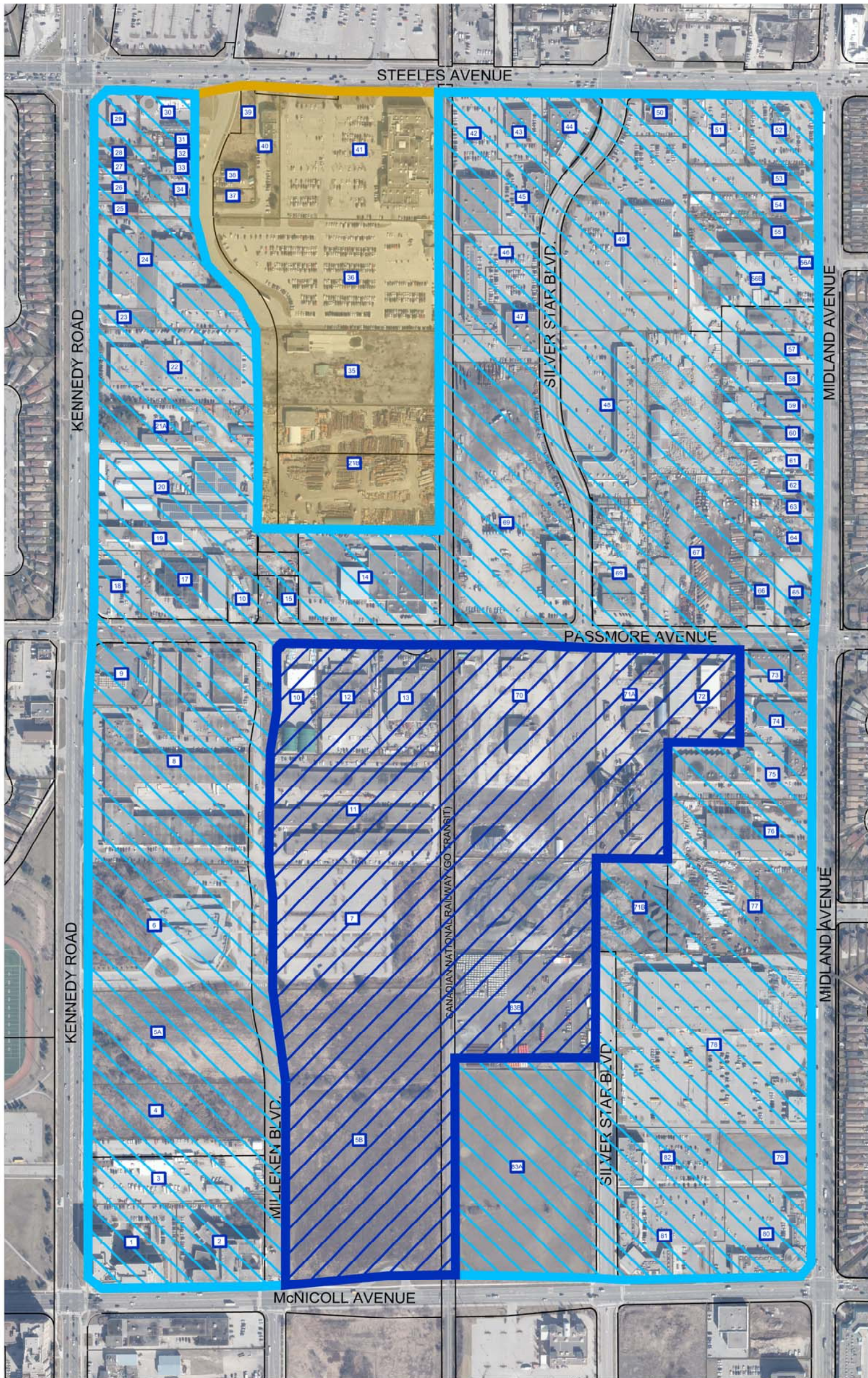
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Official Plan Designations & Existing Land Use

Post Official Plan Amendment No. 231



OFFICIAL PLAN LEGEND

-  CORE EMPLOYMENT AREA
-  GENERAL EMPLOYMENT AREA
-  STEELES-REDLEA REGENERATION AREA

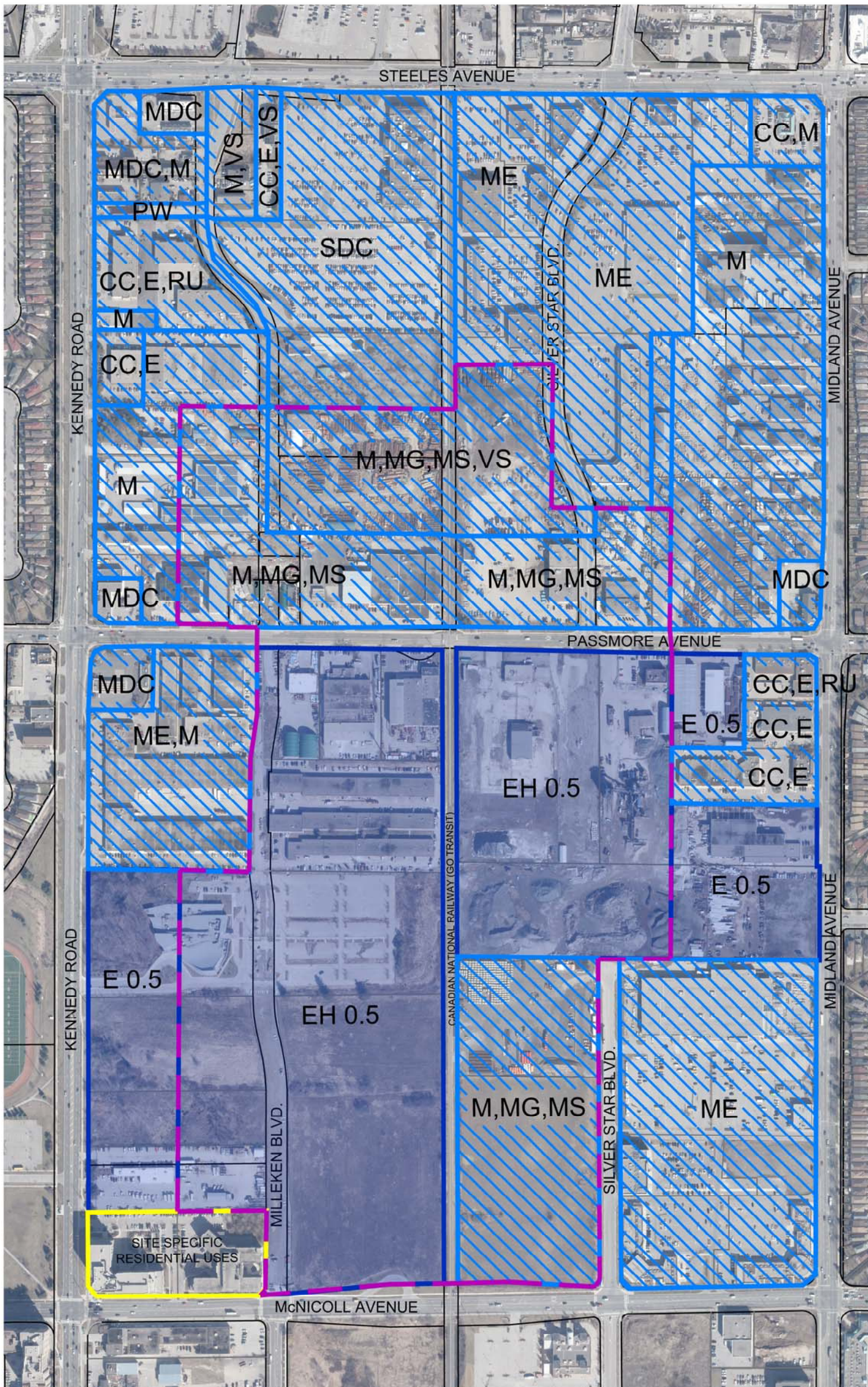
LAND USE INDEX

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24. Multi-Unit Commercial Industrial Complex
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26. Active Green & Ross
27. Care Right Auto
28. Retail and Service Commercial Establishments
29. Petro Canada - Retail Gasoline Establishment
30. Medical & Holistic Centre / Car Wash
31. Vacant Buildings
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33. Wales College Learning Centre
34. Redley's Auto Parts / Jebson Auto Repair
35. Vacant Lands
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44. Retail and Personal Service Commercial Establishments
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46. Retail and Personal Service Commercial Establishments
47. Retail and Personal Service Commercial Establishments
48. Retail and Personal Service Commercial Establishments
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- 56B. Century Concrete Products / Commonwealth Brick
57. Xin Hui Construction Inc.
58. Annbo Hardwood Flooring & Stairs
59. Contop Construction Inc.
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61. Modern Building Supplies
62. Art Stone Gallery Corp.
63. Calco Solvents Ltd.
64. Calco Solvents Ltd.
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66. York Tech Supply / Contractor's Establishment
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78. Midland Square (Rona Building Centre & Retail Service Commercial Uses)
79. Vacant Property
80. Maxum Centre
81. Maxum Centre
82. Maxum Professional Centre
- 83A. Vacant Property
- 83B. Metrolinx Temporary Works Yard



Zone Classifications

By-law No. 24982 & By-law No. 569-2013



ZONE LEGEND

BY-LAW No. 24982

- CC COMMUNITY COMMERCIAL ZONE
- E EMPLOYMENT ZONE
- M INDUSTRIAL ZONE
- ME MIXED EMPLOYMENT ZONE
- MDC INDUSTRIAL DISTRICT COMMERCIAL ZONE
- MG GENERAL INDUSTRIAL ZONE
- MS SPECIAL INDUSTRIAL ZONE
- RU RECREATIONAL ZONE
- SDC SPECIAL DISTRICT COMMERCIAL
- VS VEHICLE SERVICE
- PW PLACE OF WORSHIP

BY-LAW No. 569-2013

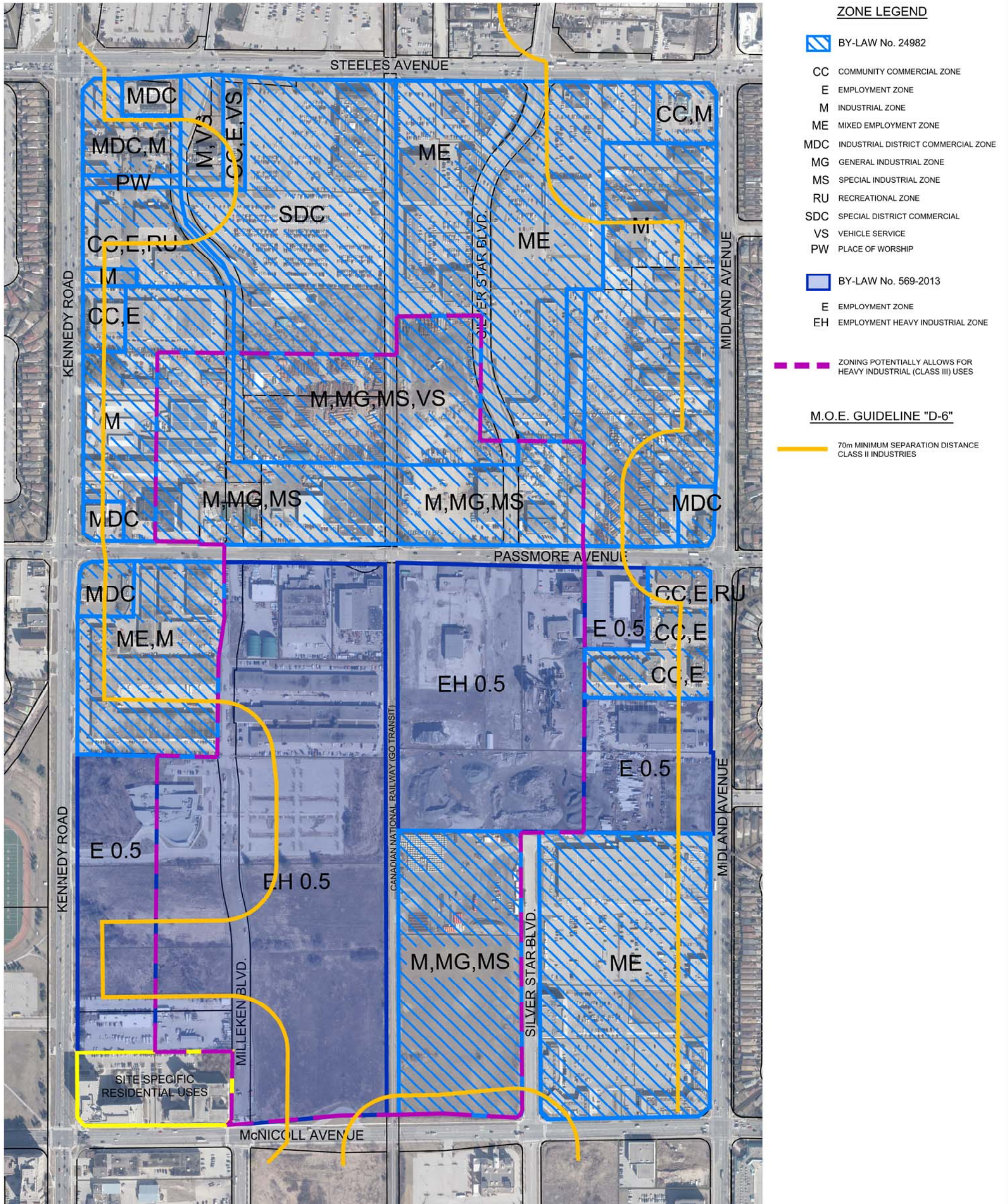
- E EMPLOYMENT ZONE
- EH EMPLOYMENT HEAVY INDUSTRIAL ZONE

ZONING POTENTIALLY ALLOWS FOR HEAVY INDUSTRIAL (CLASS III) USES



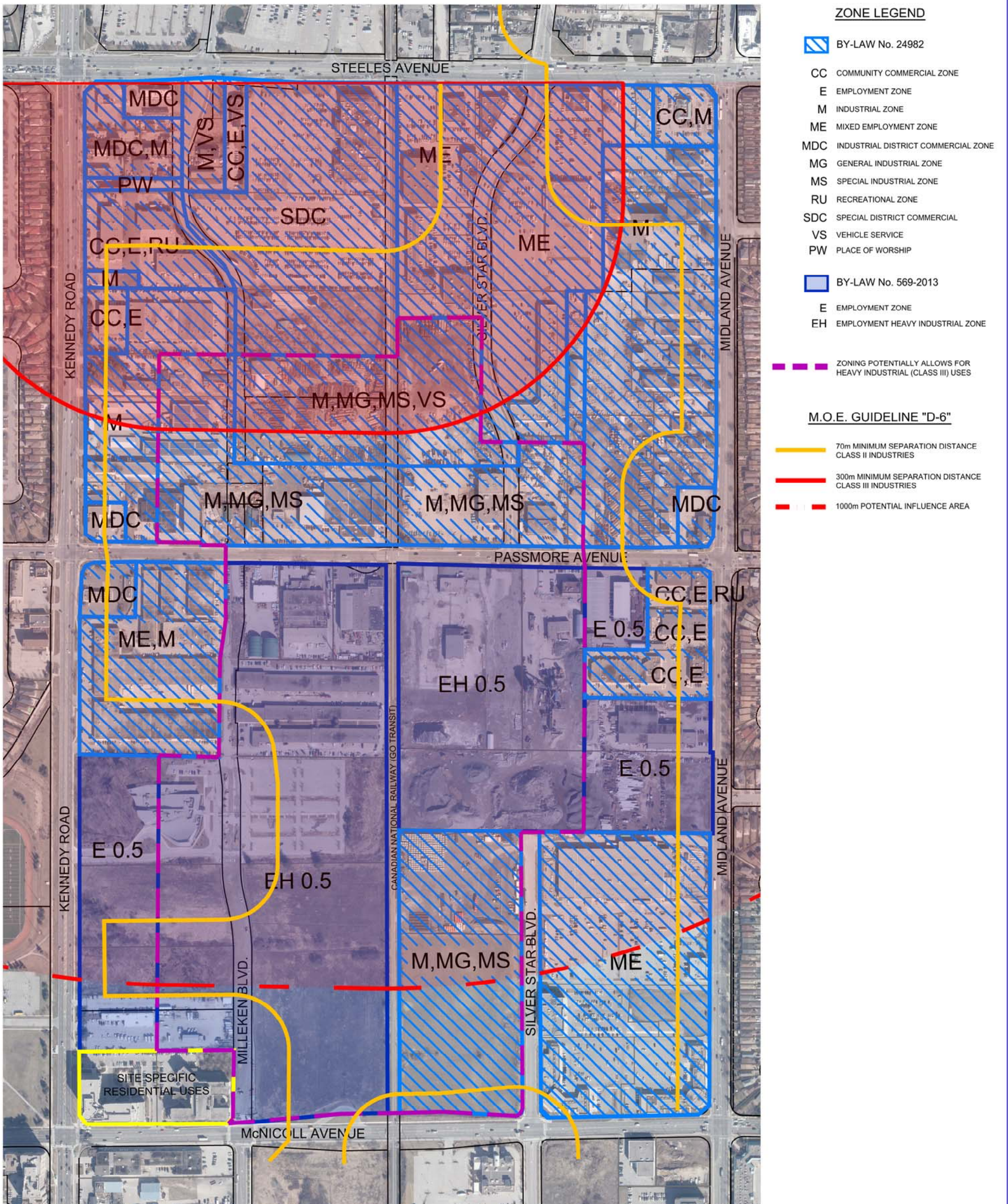
Employment Lands - Development Constraints & Opportunities

Current Planning Scenario



Employment Lands - Development Constraints & Opportunities

Post Amendment No. 321 (Proposed)



Destabilization of Employment Areas Is An Iterative Process

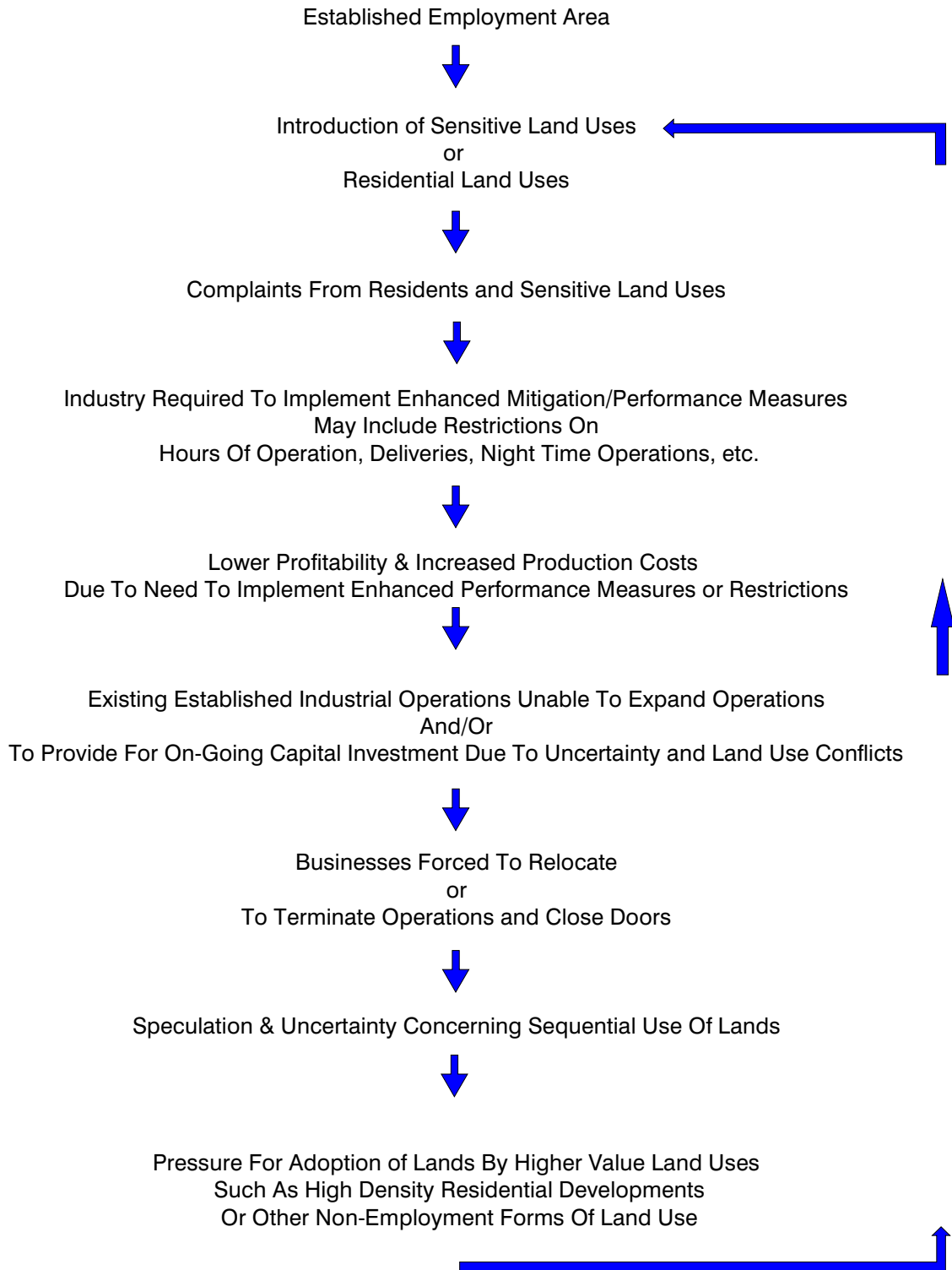


Figure 6