### PH17.9 - Attachment 1 - Part 2

The Etobicoke Centre Secondary Plan area is achieving up to its objective as the "urban focal point for the western part of the City."8 Etobicoke Centre has seen the most development out of all of the Secondary Plans in Etobicoke and York in terms of number of projects (20), number of proposed residential units (8,445), and amount of proposed non-residential GFA (49,164 m<sup>2</sup>). The City has almost completed reconstruction of the Six Points intersection at Kipling, Dundas, and Bloor to support the development of Etobicoke Centre as a vibrant mixeduse transit-oriented community.9 This new road reconfiguration will make new land available for a new civic centre. recreation centre, library, child care facility and private development.

Scarborough Community Council area has a large amount of non-residential development within a number of Secondary Plan areas. In the Agincourt Secondary area, nine projects are collectively proposing 82,203 m<sup>2</sup> of non-residential GFA combined. The recently built Aquatic Centre for the Pan Am Games and a proposed student residence for the University of Toronto Scarborough Campus are within the Highland Creek Secondary Plan area. The Scarborough Centre Secondary Plan area contains 11 projects proposing 63,321 m<sup>2</sup> of non-residential GFA including retail, office and transit uses. Lastly, the Morningside Heights Secondary Plan area has attracted a large project proposing 29,447 m<sup>2</sup> of industrial uses, a warehousing/ distribution facility. These large projects show the importance of Secondary Plans in directing and managing nonresidential growth throughout the city.

The Garrison Common North Secondary Plan has successfully attracted a mix of residential and nonresidential development, in accordance with one of the Plan's major objectives to include a variety of proposed land uses. The area, which includes Liberty Village and the Centre for Addiction and Mental Health (CAMH) Queen Street site, contains 3.8% of the proposed residential units and 4.1% of the proposed non-residential GFA in all Secondary Plan Areas.

The Sheppard East Subway Corridor Secondary Plan area has also attracted a significant amount of development with 14,068 residential units proposed and 121,669 m<sup>2</sup> of non-residential development.

#### **Employment Areas**

#### What are Employment Areas?

Toronto's Employment Areas "are places of business and economic activity vital to Toronto's economy and future economic prospects".<sup>10</sup> In 2011, the City commenced its Municipal Comprehensive Review (MCR) of employment lands as required by the Places to Grow Act<sup>11</sup> with Council's adoption of Official Plan Amendment 231 (OPA 231)<sup>12</sup> which received Ministerial approval in part (with minor modifications) in July 2014.

OPA 231 includes new policies for the City's economic health and lands designated as Employment Areas. OPA 231 was appealed to the Ontario Municipal Board in 2014.

On January 30, 2020, the Local Planning Appeal Tribunal ("LPAT") issued its decision on the Council adopted policies related to Employment Area conversions. The LPAT decided in favour of the City's position that the City's Employment Areas are a finite land resource that should be preserved and protected for the long-term. The LPAT decision put into place a policy framework intended to provide a level of land use certainty that can help businesses make long-term investment decisions that support the city's economy and provide a diverse range of jobs.

# Development in Employment Areas

The Development Pipeline covers development activity during the years 2015 to 2019. Prior to June 2015, Employment Districts were part of Toronto's Urban Structure as described in Chapter 2 of the Official Plan. In June 2015, the Ontario Municipal Board approved portions of OPA 231, deleting the term Employment Districts within Chapter 2 and replacing it with the term Employment Areas. As such, this bulletin outlines development activity in the designated Employment Areas.

There is a long standing trend towards North American metropolitan areas losing manufacturing activities to suburban locations over time.13 Likewise, employment in the manufacturing sector in Toronto had been decreasing almost every year since 1983, declining from 22% to 9% of all jobs in 2016.14 However, the Toronto Employment Survey has reported increases in manufacturing employment over the last four years, adding 12,300 jobs and growing by 10% between 2016 and 2019. In 2019, the manufacturing sector accounted for 30% of all the jobs in the Employment Areas and 92% of manufacturing jobs in the city were located in Employment Areas.15 At the same time, Toronto's employment activity in Employment Areas has grown and diversified.

The protection and enhancement of Employment Areas is vital to the city's economic health. Employment Areas contained 3,618,281 m<sup>2</sup> or 30% of the city's proposed non-residential GFA from 2015 to 2019 (see Table 11 on page 27 and Maps 6 and 7 on pages 25 and 26). By 2019 year-end, 36% of these projects had been built, which amounts to 472,716 m<sup>2</sup> of new nonresidential floor space in 97 different development projects.

As development progresses on projects that have been approved, another 2,096,721 m<sup>2</sup> of non-residential GFA in 97 projects is expected to be constructed in Employment Areas. A further 77 projects with 1,048,844 m<sup>2</sup> of non-residential GFA is under review and may eventually be approved and constructed in Employment Areas.

If non-residential development in Employment Areas is added to the development in the Downtown, Centres, Avenues, and Other Mixed Use Areas, the percentage of non-residential development occurring in an area targeted for growth rises to 89%. If Secondary Plan Areas are included, the percentage of non-residential development occurring in an area targeted for growth rises to 92%.

### Core Employment Areas and General Employment Areas

In December 2016, the Ontario Municipal Board issued a partial approval of OPA 231, bringing into effect the Core Employment Area and General Employment Area land use designations. Core Employment Areas are, for the most part, geographically located within the interior of Employment Areas. Uses that would attract the public into the interior of employment related lands and possibly disrupt industrial operations are not generally permitted in the Core Employment Areas. This separation prioritizes goods movement within Core Employment Areas and provides operating businesses certainty as to their surrounding uses. Uses permitted in Core Employment Areas are all types of manufacturing, processing, warehousing, wholesaling, distribution, storage, transportation facilities, vehicle repair and services, offices, research and development facilities, utilities, waste management systems, industrial trade schools, media, information and technology facilities, and vertical agriculture.

General Employment Areas are usually located on the periphery of Employment Areas on major roads where retail stores, service shops, and restaurants can serve workers in the Employment Areas and would also benefit from visibility and transit access to draw the broader public. Uses permitted in General Employment Areas include all those permitted in Core Employment Areas, as well as restaurants, retail, and service uses.<sup>16</sup>

In Core Employment Areas the quantity of non-residential GFA proposed between 2015 and 2019 has been increasing in magnitude. This indicates a growing development interest and investment in these areas. In the General Employment Areas, the largest amount of proposed non-residential GFA is in active projects, largely due to the East Harbour development at 21 Don Valley Parkway. There are more built projects in General Employment Areas than active projects, and more active projects than under review projects.

The Official Plan permits large format retail uses in General Employment Areas, while only ancillary retail is permitted within Core Employment Areas. These permissions support the creation of a buffer between potentially impactful operations in Core Employment Areas and nearby land use designations that permit sensitive uses, including residential. The majority of retail GFA proposed for Employment Areas is concentrated in General Employment Areas.

Employment Areas continue to provide an attractive location for development projects, in particular those that include industrial GFA. The current Pipeline contains almost 1.17 million m<sup>2</sup> of proposed new industrial GFA Areas (see Table 12 on page 28). The majority of the industrial GFA in Employment Areas, 80.3%, is proposed in Core Employment Areas while 19.7% is proposed in General Employment Areas. In Core Employment Areas, half of all proposed GFA is industrial, totalling 862,007 m<sup>2</sup> (see Tables 11 and 12 on pages 27 and 28). About 71% of all GFA built in Core Employment Areas over the last five years is industrial, accounting for 210,610 m<sup>2</sup> of GFA. An additional 199,907 m<sup>2</sup> of proposed industrial GFA in Core Employment Areas is under review.

#### Toronto's Non-Residential Market

The city's non-residential, including office, retail, institutional and hotels remained strong during the 2015 to 2019 Development Pipeline period. There was 595,872 m<sup>2</sup> constructed in projects larger 50,000 m<sup>2</sup> (see Table 9 on page 16). All of these projects were built and ready for occupancy before 2020.

The trend toward significant office construction is continuing. There is almost five times the amount of active non-residential development proposed than what was built in the last five years. The pursuit of large new projects by applicants as others are being completed points to a continuing demand for non-residential space in the city generally and in Downtown. A number of large non-residential projects are active or under review. Table 9 (on page 16) breaks down the largest proposed non-residential projects by status and location.





Source: Land Use Information System II

Development projects with activity between January 1, 2015 and December 31, 2019. Built projects are those which became ready for occupancy and/or were completed. Active projects are those which have been approved, for which Building Permits have been applied or have been issued, and/or which are under construction. Projects under review are those which have not yet been approved or refused and those which are under appeal.

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#### Source: Land Use Information System II

Development projects with activity between January 1, 2015 and December 31, 2019. Built projects are those which became ready for occupancy and/or were completed. Active projects are those which have been approved, for which Building Permits have been applied or have been issued, and/or which are under construction. Projects under review are those which have not yet been approved or refused and those which are under appeal.

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Core Employment Areas

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N A General Employment Areas

Centres and Downtown & Central Waterfront

### **Five Largest Active Projects**

- East Harbour at 21 Don Valley Parkway, which proposes to redevelop the Unilever site into a major retail, office, and transportation hub;
- 1201 Wilson Avenue, which proposed a mix of uses including an expansion of the Humber River Regional Hospital (HRRH), the Forensics Services and Coroners Complex (FSCC), and Provincial office buildings (subsequent phases of development under Provincial approvals are continuing);
- 82 Buttonwood Avenue, a redevelopment of West Park Health Care Centre and other institutional uses;
- 45 Bay Street, which includes a major office tower, an elevated park over a rail corridor and the GO bus terminal integrated into the project; and

 1 Yonge St, the development of three mixed-use towers and two commercial towers, including retail and hotel uses.

# Five Largest Under Review Projects

- 325 Front St W, a mixed-use development including residential, office and retail uses in four buildings (2 residential and 2 office) and open space uses over the rail corridor;
- 25 King Street West, 64-storey office building and addition to Hotel Victoria (approved by Council, appealed to the LPAT);
- 3401 Dufferin Street, a 20+ year phased mixed use plan for the Yorkdale Shopping Centre site which includes retail, office, hotel and residential uses;

- 433 Front Street West, the development of eight mixed-use buildings over the rail corridor (refused by Council; appealed to the LPAT); and
- 440 Front Street West, "The Well", a redevelopment of the Globe and Mail site with seven mixed use buildings including office and retail uses (approved by Council, appealed to the LPAT; the appeal was dismissed, site plan approvals were issued, and construction has begun, subsequent to this pipeline).

According to CBRE, Downtown accounts for 92% of the office space currently under construction in the GTA.<sup>17, 18</sup> Outside of Downtown, the bulk of office space construction is occurring beyond the city of Toronto boundaries within Vaughan, Mississauga, Oakville, and Burlington.<sup>19</sup>

### Table 11: Proposed Development in Employment Areas by Status

	Proj	ects	Proposed Non-Residential Gross Floor Area		
	Number	Number Percent		Percent	
City of Toronto	2,112		12,085,148	100.0	
Total Employment Areas	271	100.0	3,618,281	29.9	100.0
Built	97	35.8	472,716		13.1
Active	97	35.8	2,096,721		57.9
Under Review	77	28.4	1,048,844		29.0
Total Employment Areas	271	100.0	3,618,281	100.0	
Core Employment Areas	151	55.7	1,724,035	47.6	100.0
Built	47	31.1	294,789		17.1
Active	60	39.7	870,161		50.5
Under Review	44	29.1	559,085		32.4
General Employment Areas	120	44.3	1,894,246	52.4	100.0
Built	50	41.7	177,927		9.4
Active	37	30.8	1,226,560		64.8
Under Review	33	27.5	489,758		25.9

Source: City of Toronto, City Planning : Land Use Information System II.

Development projects with activity between January 1, 2015 and December 31, 2019. Built projects are those which became ready for occupancy and/or were completed. Active projects are those which have been approved, for which Building Permits have been applied or have been issued, and/or those which are under construction. Projects under review are those which have not yet been approved or refused and those which are under appeal. Gross floor area values are expressed in square metres.

Note: This table cannot be directly compared with Tables 1, 2, and 3 because the designated Employment Areas exist in Downtown, and because some projects' site areas may fall partially within Employment Areas and partially in another Growth Area boundary.

# The City of Toronto and the Provincial Growth Plan

It is important to understand Toronto's growth in the context of its population and employment. A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019) was brought into effect on May 16, 2019 by the Province.<sup>20</sup> It manages growth and development throughout the region that stretches around Lake Ontario from Niagara Falls to Peterborough, with Toronto at its centre. The Growth Plan contains population and employment forecasts to be used for planning and managing growth. These forecasts were revised in 2020. As of July, 2020, the 2019 Growth Plan forecasted 3.40 million people and 1.72 million jobs in Toronto by 2041.

#### **Population Forecasts**

Toronto's population was on track with the Growth Plan's prior population forecasts. The 2019 Growth Plan forecasts were based on a background study about forecasts by Hemson Consulting Ltd. in 2012. This study is the basis of the forecasts for 2031 to 2041 in Schedule 3 of the 2019 Growth Plan. These forecasts anticipated a 2016 population of 2,865,000 people (including Census undercoverage), and if interpolated to 2019, an anticipated 2019 population of 2,931,000 (see Table 13c on page 32).

On February 13th, 2020, Statistics Canada released their latest population estimates, estimating Toronto's population in 2019 to be 2,965,713 people.<sup>21</sup> This exceeds the anticipated population by 34,713 people. The City of Toronto's growth is firmly on track with the forecasts supporting the Growth Plan, if not slightly ahead.

On August 28, 2020, the Province released the amended A Place to Grow. The amended Growth Plan eliminates the 2031 and 2041 forecast years, replacing them with forecasts at 2051.

The underlying technical forecast study to Amendment 1 was also prepared by Hemson Consulting Ltd. and released in 2020. The 2051 forecasts in the amended Growth Plan correspond to the Reference Scenario in the 2020 technical forecast study. That study contains a Reference Scenario with a 2016 population of 2,819,000 and a 2021 forecast population of 3,034,000. If the Reference Scenario is interpolated to 2019, the anticipated 2019 population is 2,948,000. Statistics Canada's 2019 population estimate is 2,965,713

#### Area Built Active **Under Review Total in Pipeline** % of Total 579,668 City of Toronto 230,917 355,584 1,166,169 100.0 214,264 515,632 343,524 92.0 **Employment Areas** 1,073,420 Core Employment 210.610 451.490 199.907 862.007 80.3 General Employment 3.654 64.142 143.617 211,413 19.7

### Table 12: Proposed Industrial GFA in Employment Areas

Source: City of Toronto, City Planning : Land Use Information System II.

Development projects with activity between January 1, 2015 and December 31, 2019. Built projects are those which became ready for occupancy and/or were completed. Active projects are those which have been approved, for which Building Permits have been applied or have been issued, and/or those which are under construction. Projects under review are those which have not yet been approved or refused and those which are under appeal. Gross floor area values are expressed in square metres.

Note: This table cannot be directly compared with Tables 1, 2, and 3 because the designated Employment Areas exist in Downtown, and because some projects' site areas may fall partially within Employment Areas and partially in another Growth Area boundary.

which is 17,713 above this forecast. The Hemson study also contains a High Scenario with a forecasted 2021 population of 3,040,000, which if interpolated to 2019, anticipates a population of 2,961,600.<sup>22</sup> Statistics Canada's 2019 population estimate for Toronto is 14,113 above this scenario. The City's population remains above the interpolated forecast scenarios of the latest technical background study that supports A Place to Grow as amended.

The continuation of the recent growth trends are uncertain due to the COVID-19 pandemic, which has been factored into the 2020 Hemson technical background study supporting the amendment to A Place to Grow. The study notes that its forecasts were originally premised on the population of the Greater Golden Horseshoe being consistent with the Ministry of Finance Population Projections through the forecast period. However, the study states that the proposed population forecasts were revised with a reduction of approximately 13% growth over the 2016 to 2021 period and a corresponding decline of 15% in GGH employment in 2020 Q2, with about three-quarters of the job losses anticipated to be recovered by 2021 Census Day. The study states that the long-term effects of the pandemic are very uncertain.23

#### **Employment Forecasts**

Each year for the past 37 years, the City Planning Division has conducted the Toronto Employment Survey, collecting employment information from every business establishment in the city. There were 76,560 business establishments counted in 2019. As an establishment based-survey, the Toronto Employment Survey does not capture all people working at home or from home, nor all of those who do not have usual places of work, such as construction workers. Thus, the total employment in the city is higher than reported by the Survey.

Up to July 2020, the 2019 Growth Plan contained an employment forecast for the City of Toronto of 1,720,000 jobs by 2041. If the average rate of employment growth reported by the Toronto Employment Survey 2019 were to continue (2.1% annually over the last ten years), Toronto would be likely to reach the Growth Plan 2041 forecast between 2023 to 2025, at least sixteen years before the forecast year. Therefore, the former forecast did not reflect the recent employment growth of the city. The medium- and long-term impacts of the COVID-19 pandemic are not yet known. The study supporting the revised forecasts in the amended Growth Plan states that the forecasts incorporate a severe economic contraction in 2020 while anticipating a return to pre-pandemic expectations within three years. Nevertheless, the study observes that the pandemic has the potential to affect the assumptions of the forecast, requiring ongoing monitoring.

A Place to Grow as amended August 28, 2020 contains a new forecast horizon of 2051 and a forecast of 1,980,000 jobs by that year. The intervening forecast years were removed from A Place to Grow. The Reference Scenario in the technical forecast study supporting the amended Schedule 3 forecast suggests an average annual growth rate of 10,629 jobs per annum from 2016 to 2051.

Over the past ten years, the City's employment grew by 2.1% or 27,661 jobs per annum or 2.6 times this rate of growth. The longevity of the Toronto Employment Survey, first launched in 1983, enables the calculation of average annual employment growth over the past thirty-five years of booms, busts and recoveries to compare to the proposed employment forecast at its new horizon thirty-five years beyond 2016. The City's total employment grew 1.1% or by 12,237 jobs per annum since 1984. This growth rate is 15% above the forecasted average annual growth rate suggested by the forecast study supporting the revised employment forecasts in Proposed Amendment 1. This suggests that the Reference Forecast may underestimate the city's employment growth over the long term. The High Forecast scenario anticipates 2,060,000 jobs by 2051, an average annual growth rate of 12,914 jobs over the thirty-five year forecast period. The historical growth of the past 35 years falls within the range between the Reference and High Forecast scenarios.

#### **Housing Forecasts**

Toronto's housing growth is also on track with the household forecasts supporting the Growth Plan 2019 as of July 2020. The forecasts supporting the Provincial Growth Plan anticipate that the city needs to accommodate 399,270 households between 2001 and 2041. Canada Mortgage and Housing Corporation (CMHC) reported that 256,674 residential units were built from 2002 to 2019. This is 64% of the units required to accommodate the forecasted growth.<sup>24</sup>

The Development Pipeline contains 2,112 development proposals received by the City representing 435,069 residential units. Of these, 148,797 units are in active projects, those that have received at least their first Planning approval but are not yet built. This represents a further 37% of the required units (see Table 13a on page 32). Together, the units built from 2002 to 2019 and those units approved but not vet built total 405.471 units. This figure is 102% of the units required to accommodate the household growth to 2041 anticipated by the forecasts supporting the Growth Plan at just 18 years into the forty-year forecast period (see Figure 5a on page 31).

Not all development proposals are approved and some existing units are demolished to realize new housing. However, if the proposals in the Development Pipeline which are still under review are included, the total potential housing rises to 599,102 units or 150% of the forecasted household demand. This indicates that the city already has more than sufficient potential housing to accommodate the forecasted growth to 2041 (see Table 13a on page 32).

The Growth Plan as amended in 2020 is supported by a technical forecast study by Hemson Consulting Ltd completed in 2020. The Reference Forecast of that study anticipates 495,000 households need to be accommodated over the forty-year period from 2011 to 2051. CMHC reports that 129,193 units were completed between 2012 and 2019 inclusive. There are 148,797 units in development projects with their first Planning approval but not yet built. This is 56% of the units required to accommodate the forecasted growth over forty years. A further 193,631 units are in development projects still under review. Together this represents 95% of the units required to accommodate the forecasted growth to 2051. Not all submitted proposals are approved, and not all approved projects are built. However, given these trends. Toronto is well on its way to housing the population forecasted by A Place to Grow as amended in 2020 (see Table 13b on page 32).



### Figure 5a: Growth Plan Forecast to 2041

Figure 5b: Growth Plan Forecast to 2051



Source: City of Toronto, City Planning : Land Use Information System II; CMHC : Housing Now, GTA Edition tables.

Development projects with activity between January 1, 2015 and December 31, 2019. Built projects are those which became ready for occupancy and/or were completed. Active projects are those which have been approved, for which Building Permits have been applied or have been issued, and/or those which are under construction. Projects under review are those which have not yet been approved or refused and those which are under appeal.

#### **Table 13a: Growth Plan Forecasts**

	Potential Supply (Units)	%	Potential Supply Less Estimated Demolitions	%
Hemson Forecast 2001 - 2041	399,270	100.0	399,270	100.0
Completions 2002 - 2019	256,674	64.3	231,007	57.9
Active 2015-2019	148,797	37.3	133,917	33.5
Under Review 2015-2019	193,631	48.5	174,268	43.6
Total	599,102	150.0	539,192	135.0
Additional Potential Housing	199,832	50.0	139,922	35.0

Source: City of Toronto, City Planning: Land Use Information System II. Hemson Consulting Ltd, Greater Golden Horseshoe Growth Forecasts to 2041, Technical Report, November 2012. CMHC, Housing Now :Greater Toronto Area tables.

Development projects with activity between January 1, 2015 and December 31, 2019. Active projects are those which have been approved, for which Building Permits have been applied or have been issued, and/or those which are under construction. Projects under review are those which have not yet been approved or refused and those which are under appeal.

#### Table 13b: Growth Plan Forecasts

	Potential Supply (Units)	%
Hemson Forecast 2011 - 2051	495,000	100.0
Completions 2012 - 2019	129,193	26.1
Active 2015-2019	148,797	30.1
Under Review 2015-2019	193,631	39.1
Total	471,621	95.3

Source: City of Toronto, City Planning: Land Use Information System II. Hemson Consulting Ltd, Greater Golden Horseshoe Growth Forecasts to 2041, Technical Report, November 2012. CMHC, Housing Now :Greater Toronto Area tables.

Development projects with activity between January 1, 2015 and December 31, 2019. Active projects are those which have been approved, for which Building Permits have been applied or have been issued, and/or those which are under construction. Projects under review are those which have not yet been approved or refused and those which are under appeal.

#### **Potential Population**

There are approximately 148,800 units which are approved but not vet built in the Development Pipeline. If these units were completed and occupied at the average number of persons per household of units built in the last twenty years, 1996 to 2016, the potential population in these units could be about 260,900 people. In addition to the 2019 population estimate for the city of 2,965,713, this could bring the city's population to 3.2 million or 88% of the forecasted population at 2051. If the 193.600 units which were still under review at the end of 2019 were also approved, built and similarly occupied, the potential population in these additional units could be about 339,400 people.

In total, the Development Pipeline could represent a potential population of over 600,000 people. In order to realize new housing, some existing units may be demolished. Previous exercises have used a 10% demolition rate, which exceeds actual rates observed. If all of the Pipeline units approved and not vet built or under review were built and occupied, and demolished units accounted for, the added population could be about 540,000 people. Added to the 2019 population estimate, the Pipeline would contribute to a city population of about 3.5 million or 96% of the 2051 population forecast contained in the Provincial Growth Plan.

#### **Table 13c: Population Estimate versus Growth Plan Forecasts**

Growth Plan	Supporting Forecast	Forecast Scenario	Interpolated At	Population Estimate <sup>1</sup>	Estimate versus Forecast
Year			2019	2019	
Growth Plan 2013	Hemson 2012 <sup>2</sup>	Reference	2,931,000	2,965,713	+34,713
A Place to Grow 2019	Hemson 2020 <sup>3</sup>	Reference	2,948,000	2,965,713	+17,713
A Place to Grow 2020	Hemson 2020 <sup>3</sup>	High	2,951,600	2,965,713	+14,113

Sources:

1: Statistics Canada, Annual Demographic Estimates: Sub-provincial Areas, July 1, 2019, Cat.No. 91-214-X, released February 13, 2020

- 2: Hemson Consulting Ltd, Greater Golden Horseshoe Growth Forecasts to 2041, November 2012
- 3: Hemson Consulting Ltd, Greater Golden Horseshoe: Growth Forecasts to 2051, August 26, 2020

### Provincially Significant Employment Zones in the City of Toronto

The Province released A Place to Grow: Growth Plan for the Greater Golden Horseshoe on May 16, 2019 which, among other matters, put in place a framework for Provincially Significant Employment Zones (PSEZs). This Growth Plan and this framework were amended August 28, 2020.

PSEZs are intended to be areas of high economic output, and are strategically located to provide stable, reliable employment across the region. They provide opportunities to improve coordination between land use planning, economic development, and infrastructure investments to support investment and job creation over the longer-term. The Growth Plan (2019) defines PSEZs as:

Areas defined by the Minister in consultation with affected municipalities for the purpose of long-term planning for job creation and economic development. *Provincially significant employment zones* can consist of *employment areas* as well as mixed-use areas that contain a significant number of jobs. Municipalities are only able to convert lands within PSEZs and non-PSEZs to permit non-employment uses provided that a number of "tests" set out in the Growth Plan (2019) are met (see Growth Plan Policies 2.2.5.9 and 2.2.5.10).

There are currently 29 PSEZs in the region and 11 PSEZs fall within the City of Toronto as identified by the Minister on December 20, 2019. The Ontario Food Terminal was the most recent PSEZ accepted by the Province and one of the City's recommendations.

There are 183 proposed projects located within the identified Provincially Significant Employment Zones (PSEZs) in Toronto. Of these, 95 projects are within the lands designated as Core Employment Areas and 67 projects are within the General Employment Areas. The remaining 21 projects in PSEZs are located within other land use designations. The Province may continue to modify the PSEZ geographies and the analysis below is based on the most recent geographies available at the time of this bulletin.

### Table 14: Projects in Provincially Significant Employment Zones (PSEZs

	PSEZ	Not in PSEZ	Total	% in PSEZ	% Not in PSEZ
Core Employment Areas	95	61	156	61%	39%
General Employment Areas	67	65	132	51%	49%
Other Areas within City	21	1,803	1,824	1%	99%
Total Projects in Pipeline	183	1,929	2,112	9%	91%

Source: City of Toronto, City Planning: Land Use Information System II

Development projects with activity between January 1, 2015 and December 31, 2019. Built projects are those which became ready for occupancy and/or were completed. Active projects are those which have been approved, for which Building Permits have been applied or have been issued, and/or those which are under construction. Projects under review are those which have not yet been approved or refused and those which are under appeal.





Source: Land Use Information System II

Development projects with activity between January 1, 2015 and December 31, 2019. Built projects are those which became ready for occupancy and/or were completed. Active projects are those which have been approved, for which Building Permits have been applied or have been issued, and/or which are under construction. Projects under review are those which have not yet been approved or refused and those which are under construction.

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# Density of Jobs and People in Growth Areas

Toronto's Official Plan seeks to direct growth to the Centres and Downtown "in order to promote mixed use development to increase opportunities for living close to work and to encourage walking and cycling for local trips."<sup>25</sup>

The Provincial Growth Plan sets minimum gross density targets to be achieved by 2031 for Urban Growth Centres (UGCs). The minimum gross density target is 400 residents and jobs combined per hectare for each Centre and for Downtown.

Table 15 shows the density of people and jobs per hectare for Downtown and each Centre between 2006 and 2019, and for the city overall. Since 2006, each of these areas has become steadily denser. North York Centre and Yonge-Eglinton Centre have achieved the 400 people and jobs per hectare target, as early as 2006 in the case of Yonge-Eglinton Centre. Table 15 also shows that Downtown and the Centres have intensified in comparison to the city overall, as the Growth Plan has directed.

If the density trends continue, it is likely that Downtown will exceed the UGC density target well before 2031. The 2019 density of the Downtown UGC area is estimated to be 388 people and jobs per hectare. According to the Census, the Downtown UGC population increased by 41,668 people between 2011 and 2016 or 19 persons per hectare. According to the City's Toronto Employment Survey, the employment increased by 142,740 jobs between 2011 and 2019 or 67 persons per hectare (see Figure 6 on page 37).<sup>26</sup> The increase in density as a result of this growth is an additional 86

Density (People and Jobs Per Hectare)					
2006	2011	2016	2019	2006-2019	
Actual	Actual	Actual	Actual	Population Change	
60	62	66	68	14%	
265	302	354	388	47%	
250	288	306	305	22%	
137	144	151	164	20%	
385	455	480	460	19%	
138	156	172	171	24%	
482	570	604	595	23%	
	2006 Actual 60 265 250 137 385 138	2006         2011           Actual         Actual           60         62           265         302           250         288           137         144           385         455           138         156	2006         2011         2016           Actual         Actual         Actual           60         62         66           265         302         354           250         288         306           137         144         151           385         455         480           138         156         172	2006         2011         2016         2019           Actual         Actual         Actual         Actual           60         62         66         68           265         302         354         388           250         288         306         305           137         144         151         164           385         455         480         460           138         156         172         171	

### Table 15: Density of People and Jobs Per Hectare in Urban Growth Centres

Sources: City Planning, Land Use Information System II. City Planning, Toronto Employment Surveys 2006, 2011, 2016, 2019. Statistics Canada, 2006, 2011 and 2016 Censuses, custom tabulations.

The 2006, 2011 and 2016 numbers were calculated based on employment values from the Toronto Employment Survey and population values from the latest Census. The 2019 figures include the 2016 Census and 2019 Employment Survey results.

people and jobs per hectare over the 2011-2019 period. If the current trends continued for another two years, the additional density would yield a total of 412 people and jobs per hectare in 2021, exceeding the minimum Urban Growth Centre density target well before 2031. The timing of the city's growth will be affected by its recovery from the impacts of the COVID-19 pandemic.

The 2021 density of the Downtown UGC can also be estimated based on development activity. The 2016 Q4 Pipeline contained 42,556 residential units in projects within the Downtown UGC that were built between 2012 and 2016. This area also contained a further 45,236 units in projects which were active.<sup>27</sup> The number of units in active projects is greater than the number of units that were built between 2012 and 2016. Similarly, this is true of the 2019 Q4 Pipeline in which there are 56,835 units proposed in active projects within the Downtown UGC, 11% more units than those active between 2011 and 2016, and 16% more units than those built between 2015 and 2019. If a similar number of units in active projects were realized between 2016 and 2021 as were built between 2011 and 2016 with the same population and employment growth, the Downtown UGC would increase by an additional 111,080 people and jobs. The resulting density would be an additional 52 people and jobs per hectare for a total of 405 people and jobs per hectare (due to rounding). If current trends continued for another five years, the resulting density of the Downtown UGC would therefore achieve the minimum Urban Growth Centre density target well before 2031. The city's growth could be impacted by the uncertainties of the COVID-19 pandemic.



#### Figure 6: City of Toronto Employment

Source: Toronto City Planning, Toronto Employment Survey

#### **Pandemic Response**

In response to the global pandemic of the Coronavirus Disease 2019 (COVID-19), the City of Toronto quickly adapted by implementing remote work and continued to deliver services online and via virtual formats. During this time, both the City Planning and Toronto Building Divisions have continued to receive Planning applications and Building Permit applications, review development proposals, issue Building Permits, and perform final inspections of recent construction.

Over the five-year period from 2015 to 2019, CMHC reports 91,626 completed residential units. The development pipeline similarly captured 92,641 units that were built during this period. The difference in these numbers is due to methodology. CMHC surveys construction sites while City Planning defines built residential units as those which have reached the stage of Ready for Occupancy and/or Work Completed based on Building Permits. While the methodologies used by CMHC and City Planning differ, the number of built residential units are closely comparable.

In the first six months of 2020, City Planning received applications for 93 development projects proposing 33,171 residential units and 177,477 m<sup>2</sup> of nonresidential GFA. By comparison to the same period last year, more residential and non-residential proposals were submitted, proposing 78% more residential units and about 53% of the non-residential GFA. The comparatively high number of development proposals submitted in 2020 shows continuing confidence in development in Toronto in the foreseeable future even in the face of the pandemic. Despite the cancellation of meetings of the Planning and Housing Committee scheduled for March, April, and May of 2020, a comparable number of development projects and residential units were approved in the first half of 2020 as compared to the same period in 2019. A total of 33 projects proposing 5,528 residential units received at least their first approval in the first half of 2020 compared to 29 projects and 5,584 residential units in the first half of 2019.

The pandemic did not slow construction activities across the city. Construction was deemed an essential service by the Province of Ontario. According to CMHC, 9,753 units began construction and 55,509 units were under construction during the first half of 2020. This compares well with the first half of 2019 when 9.624 units began construction and 51,241 units were under construction. From mid-March to mid-July, the Toronto Building Division issued 12,250 Building Permits representing 19,156 residential units and 1,401,089 m<sup>2</sup> of non-residential GFA.

The pandemic has not deterred development activity in the first half of 2020. However, many of these projects might have been pre-sold and were advancing through the development process before the pandemic hit Toronto. Ongoing monitoring of development activities will be necessary to assess the long term impact of the pandemic and the progress of the economic recovery.



#### Culture-Sensitive Development in the "Two Kings"

Culture, in all its dimensions, is a fundamental component of sustainable development and cultural heritage resources are an intrinsic part of Toronto's historic and evolving urban landscape. Despite the recognized importance of conserving historic places, heritage conservation and development are sometimes perceived as separate or opposed fields. Globally, however, a sustainable development framework has emerged as the new development model placing culture at the heart of development. As Toronto grows and changes, historic buildings play a crucial role in place-making. It is precisely the mix of historic and modern that attracts the innovation and investment that supports our economy.

Land use planning and heritage conservation work together to preserve the City's legacy while enabling significant opportunities for revitalization and growth.

Our city's historic districts, landmark buildings, archaeological resources, cultural institutions and events combined with layers of associated memories and stories convey what makes us distinct from other global cities. The identification of cultural heritage resources is increasingly informing contextual, place-based development that builds on what makes Toronto a unique, competitive and livable city and, in a time of great change and uncertainty, provides a solid foundation for the future.

In 2015, City Planning brought into force its first revision to the Official Plan heritage policies since 2004. The Official Plan contains a number of policies related to properties on the City's Heritage Register and properties adjacent to them. Emphasizing the role that heritage conservation plays in citybuilding, Section 3.1.5 of the Official Plan states that, "Cultural heritage is an important component of sustainable development and place making. The preservation of our cultural heritage is essential to the character of this urban and liveable City that can contribute to other social, cultural, economic and environmental goals of the City."

The key piece of legislation that governs heritage conservation in Ontario is the Ontario Heritage Act (OHA) (RSO 1990, Amended 2005), which was created to support conservation, protection and preservation of heritage resources in the Province.

The City of Toronto's Heritage Register currently represents 9,600 parcels involving 14,400 property-related addresses which are either Listed, Designated under Part IV of the Ontario Heritage Act ("the Act"), or Designated within Heritage Conservation Districts under Part V of the Act.

Heritage Conservation Districts (HCDs) are one tool in the city planning toolkit that Toronto uses to conserve places that matter. Under Part V of the Act municipalities are enabled to establish HCDs where their official plan outlines provisions to do so. The City of Toronto's Official Plan supports the identification, evaluation and designation of HCDs. HCDs provide place-based policies that conserve and enhance storied neighbourhoods, while pointing to opportunities for contextually appropriate growth and change.

Twenty-one of the 36 HCDs (58%) in the City of Toronto are within or overlap the Downtown Plan area. Of these 21 HCDs, 14 are in force, four are under appeal and three are under study and nearing completion. Within the 21 HCDs, there are six HCDs that contain active development projects: Cabbagetown (Northwest); East Annex; Queen Street West; South Rosedale; Union Station; and Yorkville-Hazelton. These six HCDs contain 36 projects which propose 6,089 residential units and 966,649 m<sup>2</sup> of non-residential GFA.

In this section, historic context and heritage development are discussed in relation to the King-Spadina and King-

Parliament areas, located on either side of the financial district in downtown Toronto. The "Two Kings", as many refer to the two areas, include parts of Toronto's oldest neighbourhoods, and a diverse collection of buildings, streetscapes and public spaces that reflect their dynamic evolving history, including the original ten blocks of the Town of York within the King-Parliament area where streets like Front, Esplanade, Church and Market all indicate their original use and historic geography. While both areas have always been truly mixeduse neighbourhoods - with vibrant residential, commercial, institutional and industrial activities - by the mid-20th century, the Two Kings had fallen into decline, largely due to a failing industrial sector as manufacturing moved to the suburbs or offshore.

In 1995, the Kings Regeneration Initiative was formed under former City of Toronto Mayor Barbara Hall and the Two Kings were reimagined as mixed-use urban neighbourhoods that integrated their historic building stock through adaptive reuse while eliminating restrictive zoning and designating the areas as Regeneration Areas.<sup>28</sup> In 1996, City Council adopted the King-Spadina Secondary Plan and the King-Parliament Secondary Plan, following which the King-Spadina and the King-Parliament Community Improvement Plans were adopted in 1998 with the goal to encourage reinvestment.

Brought into force in 1996, the existing King-Spadina Secondary Plan was a response to the de-industrialization of the area and set in place a series of policies that encouraged the protection and adaptive re-use of the heritage buildings that characterized the area and added permissions for a full range of permitted uses.

The King-Spadina Secondary Plan (2019) follows up on the success of the 1996 King-Spadina Secondary Plan. As an area targeted for growth and new investment, the Secondary Plan recommends that development provide a full mix of uses that are designed to be compatible with their existing and planned context, conserve cultural heritage resources, and improve and expand the public realm. Today, King-Spadina and King-Parliament are vibrant mixed-use areas of the downtown with several examples of heritage conservation integrated with development. Since 1996 the number of employees within the King-Spadina area has increased from 21,403 to 45,940 by 2018. In addition, the residential population has increased from 945 residents in 1996 to an estimated population of just under 22,000. Based on current development proposals, a further 30,000 people could reside in the area if all of the proposed units are built and occupied.

The King-Spadina and King-Parliament Secondary Plan areas are both located within the area of the Downtown Plan. The Downtown Plan area contains the largest number of active development projects of all Secondary Plan areas in the city, 449 projects or 52.6% of the total (see Table 10a on page 19) and has 6,398 properties on the Heritage Register or 44% of all properties on the Register. Of these 6,398 properties, 2,384 are Listed, 1,447 are Designated under Part IV and 2,567 are Designated under Part V of the Act.

#### Table 16: Heritage Properties in Secondary Plans

Heritage Properties in Secondary Plans						
	Listed	Part IV	Part V	Total Heritage Properties		
Secondary Plans						
Downtown Plan	2,384	1,447	2,567	6,398		
King-Parliament	167	103	0	270		
King-Spadina	325	172	230	727		
Total	2,876	1,722	2,797	7,395		

Source: Toronto City Planning, Heritage Register

Note: "Property" here represents an interest in land represented by municipal addresses.

Within the King-Spadina Secondary Plan boundary there are currently 727 properties on the Register. Of those 727 properties, 325 are Listed, 172 are Designated under Part IV of the Act and 230 are Designated under Part V of the Act (see Table 16 on page 41). The King-Spadina Secondary Plan also intersects with the King-Spadina Heritage Conservation District (under appeal) and the in-force Queen Street West and Draper Street Heritage Conservation Districts (see Map 9 on page 43).

The King-Spadina Secondary Plan area continues to attract a significant amount of development activity in the current Pipeline with 26,364 residential units and 700,270 m<sup>2</sup> of non-residential GFA proposed (see Table 10a on page 19). This Secondary Plan area contains the largest number of active development projects second to the entirety of the Downtown Plan area. The major objectives of the Plan, in keeping with the intent of previous 'Two Kings' initiatives, are to attract new investment with a mixture of compatible land uses, while recognizing the importance of maintaining employment uses and protecting heritage buildings.<sup>29</sup>

The King-Parliament Secondary Plan also falls within the Downtown Plan area. This Secondary Plan is currently undergoing a review with a targeted completion for Council adoption by the end of 2020. The King-Parliament Secondary Plan Review will build on the Downtown Plan, and provide specific direction on built form, the public realm and heritage conservation. As it is, the Secondary Plan contains 43 active development projects which propose 16,370 residential units and 339,219 m<sup>2</sup> of non-residential GFA (see Table 10a on page 19). In the King-Parliament Secondary Plan area, there are 270 properties on the Heritage Register with 167 Listed and 103 Designated properties under Part IV of the Act (see Table 16 on page 41). The King-Parliament Secondary Plan also intersects with the Distillery **District Heritage Conservation District** (under study) and the St. Lawrence Neighbourhood Heritage Conservation District (under appeal). With the recent decision of the LPAT, the St. Lawrence Neighbourhood HCD will soon be protected under the Ontario Heritage Act as the first mixed-use HCD located within a high-growth area in Toronto guided by the City Council-adopted Heritage Conservation Districts in Toronto: Procedures, Policies and Terms of Reference (2012). City Planning is moving ahead with necessary revisions to the HCD Plan so that the City of Toronto can continue to support redevelopment while protecting the cultural heritage of the St. Lawrence neighbourhood and the original ten blocks of the Town of York.

Development is continuing apace in Toronto while the city's diverse collection of cultural heritage resources are being conserved. City Planning continues to identify cultural heritage resources through planning studies that include the identification of heritage properties and context-sensitive areaspecific policies and guidelines that guide development and manage change. In consideration of the significant cultural heritage fabric of King-Spadina and King-Parliament, development activity over the past 25 years has continued to thrive while additional cultural heritage resources are added to the Register.



Map 9: Heritage Properties in King-Spadina and King-Parliament



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### Appendix





Source: Canada Mortgage and Housing Corporation, Housing Now - Ontario Reports

	A	Average Number of Residential Units per Project					Average Non-Residential Gross Floor Area per Project (m <sup>2</sup> )			
	Built	Active	Under Review	Total in Pipeline	2018 Q4	Built	Active	Under Review	Total in Pipeline	2018 Q4
City of Toronto	130	204	286	206	181	3,230	7,146	6,815	5,722	5,089
Growth Areas	219	292	364	295	265	3,937	5,708	7,286	5,737	5,166
Downtown and Central Waterfront	304	351	333	331	321	7,543	10,394	12,192	10,193	9,657
Centres	330	557	499	453	423	2,287	3,890	3,847	3,281	3,638
Avenues	149	154	279	198	168	1,364	1,302	2,909	1,899	1,537
Other Mixed Use Areas	129	384	576	368	302	2,726	6,624	8,325	5,972	4,992
All Other Areas	31	56	144	71	67	2,434	9,552	5,944	5,700	4,984

Source: City of Toronto, City Planning: Land Use Information System II

Proposed units in development projects with activity between January 1, 2015 and December 31, 2019. Built projects are those which became ready for occupancy and/or were completed. Active projects are those which have been approved, for which Building Permits have been applied or have been issued, and/or those which are under construction. Projects under review are those which have not yet been approved or refused and those which are under appeal.

### Appendix

# Table A.2: Dwelling Unit Completions and Absorptions by Type,City of Toronto

#### Freeholds

	Completions	Absorptions	Net Completions	"Unabsorbed" Percentage
2015	1,374	1,342	32	2.4
2016	1,513	1,464	49	3.3
2017	1,849	1,813	36	2.0
2018	1,798	1,797	1	0.1
2019	1,559	1,506	53	3.5
Total	8,093	7,922	171	2.2

#### Condominiums

	Completions	Absorptions	Net Completions	"Unabsorbed" Percentage
2015	28,013	27,082	931	3.4
2016	13,426	14,137	-711	-5.0
2017	11,507	12,257	-750	-6.1
2018	11,816	11,947	-131	-1.1
2019	9,724	9,556	168	1.8
Total	74,486	74,979	-493	-0.7

#### Purpose-Built

Rental

	Completions	Absorptions	Net Completions	"Unabsorbed" Percentage
2015	1,362	1,027	335	32.6
2016	1,088	1,028	60	5.8
2017	815	595	220	37.0
2018	2,472	2,111	361	17.1
2019	3,310	2,788	522	18.7
Total	9,047	7,549	1,498	19.8

#### Endnotes

- 1. For the purposes of this bulletin, any reference to Downtown includes the Central Waterfront Area unless otherwise specified.
- 2. The Official Plan states "Employment Areas are places of business and economic activities vital to Toronto's economy and future economic prospects." The policies for Employment Areas were replaced by new policies as part of the Municipal Comprehensive Review of employment lands. These new policies are currently under partial appeal at the Local Planning Appeal Tribunal (LPAT). For more information on the status of the appeals and to access interim Board Orders, please visit the LPAT's website: https://www. omb.gov.on.ca/ecs/CaseDetail. aspx?n=PL140860.
- Canada Mortgage and Housing Corporation, Housing Now – Greater Toronto Area Reports.
- 4. City Council enacted a bylaw to adopt the Downtown Plan Official Plan Amendment on July 27, 2018. OPA 406 includes amendments to Section 2.2.1 and Map 6 of the Toronto Official Plan, a new Downtown and future updates to the existing planning framework for Downtown. Accompanying infrastructure strategies are also available. OPA 406 has been submitted to the Ministry of Municipal Affairs and Housing for review and approval pursuant to Section 26 of the Planning Act. More information about the Downtown Plan is available at www.toronto.ca/ tocore.
- 5. City of Toronto, City Planning, Official Plan, Downtown Plan Secondary Plan, Policy 2, 2018. <u>https://www.toronto.ca/wp-</u> <u>content/uploads/2018/08/966f-</u>

city-planning-tocore-opa406attachment-1-schedule-5downtown-plan.pdf.

- City of Toronto, City Planning, Official Plan, Railway Lands East Secondary Plan, Policy 2 2006.
- 7. City Council adopted the Yonge-Eglinton Official Plan Amendment (OPA 405) with amendments on July 23-27, 2018. City Council also endorsed a Parks and Public Realm Plan and Community Services and Facilities Strategy for Midtown. OPA 405 has been submitted to the Ministry of Municipal Affairs and Housing for review and approval pursuant to Section 26 of the Planning Act. More information about the Downtown Plan is available at www.toronto.ca/planning/ yongeeglinton.
- City of Toronto, City Planning, Official Plan, Etobicoke Centre Secondary Plan, 2006.
- 9. City of Toronto, City Planning, Six Points Interchange Reconfiguration Common Questions. <u>https://www.toronto.ca/</u> <u>community-people/get-involved/</u> <u>public-consultations/infrastructure-</u> <u>projects/etobicokecentre/commonquestions/</u>.
- Toronto City Council adopted Official Plan Amendment (OPA) 231 on December 18, 2013 which contains new economic policies and new policies and designations for Employment Areas. See City of Toronto, By-Law No. 1714-2013. Updated to Board order issued December 20, 2016, <u>https://www.toronto.ca/ legdocs/bylaws/2013/law1714.pdf</u>.
- 11. Ontario Ministry of Infrastructure, Growth Plan for the Greater Golden Horseshoe, 2006: Office Consolidation, June 2013, Policy 2.2.6.5.

- 12. For more information about OPA 231, please visit <u>http://www.toronto.ca/opreview</u>.
- 13. Kneebone, Elizabeth (2013) Job Sprawl Stalls: The Great Recession and Metropolitan Employment Location, Brookings Institution.
- City of Toronto, City Planning, Toronto Employment Survey, 2016.
- 15. City of Toronto, City Planning, Profile Toronto: Toronto Employment Survey, 2019.
- City of Toronto, By-Law No. 1714-2013. Updated to Board order issued December 20, 2016. See: <u>https://www.toronto.ca/legdocs/ bylaws/2013/law1714.pdf</u>. The permission for all types of retail uses in General Employment Areas is under appeal.
- 17. 'Downtown' as defined by CBRE in CBRE Marketview, Toronto Office, Q4 2019 does not correlate to the geography of the Downtown and Central Waterfront as defined by the City of Toronto's Official Plan.
- 18. CBRE Marketview, Toronto Office, Q4 2019.
- 19. CBRE Marketview, Toronto Office, Q4 2019.
- 20. A Place to Grow: Growth Plan for the Greater Golden Horseshoe. May 16, 2019, <u>https://www.ontario.</u> <u>ca/document/place-grow-growthplan-greater-golden-horseshoe</u>.
- 21. Statistics Canada, Annual Demographic Estimates, 91-214-X.
- 22. Hemson Consulting Ltd, Greater Golden Horseshoe Growth Forecasts to 2051, Technical Report, 2020.

- 23. Hemson Consulting Ltd, Greater Golden Horseshoe Growth Forecasts to 2041, Technical Report, 2012
- 24. Canada Mortgage and Housing Corporation, Housing Now – Greater Toronto Area Reports.
- 25. City of Toronto, City Planning, Official Plan, p. 2-5, Policy 2d, 2006.
- 26. City of Toronto, Toronto Employment Survey Bulletin, 2016.
- 27. Profile Toronto: How Does the City Grow? April 2017, Table 4, page 7 presented to Planning and Growth Management Committee on May 31, 2017.See: <u>https://www. toronto.ca/legdocs/mmis/2017/ pg/bgrd/backgroundfile-103953</u> pdf and <u>http://app.toronto.ca/ tmmis/viewAgendaltemHistory.</u> <u>do?item=2017.PG21.2</u>
- 28. Yarhi, Eli (2016), Tale of Two Kings, 401 Richmond: <u>http://</u> <u>www.401richmond.com/wp-</u> <u>content/uploads/2016/12/A-Tale-</u> <u>of-Two-Kings.pdf</u>
- 29. City of Toronto, City Planning, Official Plan, King-Spadina Secondary Plan, Policy 2, 2006.

Please direct information inquiries and publication orders to:

City Planning Division Strategic Initiatives, Policy & Analysis Planning Research and Analytics Metro Hall, 22nd Floor Toronto, Ontario M5V 3C6

tel: 416-392-8343 fax: 416-392-3821

e-mail: cityplanning@toronto.ca