From:	Bill Dalton
To:	Planning and Housing
Subject:	116R and 126-142 Ryding Avenue Employment Land Conversion Request (City Conv File #59): PHC Item No.32.8 (134638/2022.03.24)
Date:	March 24, 2022 3:39:30 PM

Deputy Mayor Bailão and Committee Members

IBI Group Professional Services Inc. has been retained by A.C.D. Wholesale Meats the owner of the lands municipally known as 116R and 126-142 Ryding Avenue (the site). On **February 14, 2022** we submitted comments to the Planning & Housing Committee (PHC) on the City of Toronto report entitled *Our Plan Toronto: Employment Area Conversion Requests – Preliminary Assessments Group 2*, dated **January 31, 2022** as well as Attachment 1 being item No. PH31.7 (the **February** documents). The **February** documents contained Preliminary Assessments of 37 requests to convert lands designated *Core Employment Areas* and *General Employment Areas* to non-employments uses, including the site. With regards to the site, a review of the **February** documents noted City staff's:

Preliminary Assessment

Based on staff's preliminary assessment, the lands should be retained as *Employment Areas* and continue to be designated as *Core Employment Areas*.

On **February 15, 2022**, the Planning & Housing Committee adopted a motion to amend the **February** documents by deleting the Preliminary Assessments for the site as well as lands south of it (109 Ryding avenue) along with another parcel; and requested City staff to include these Preliminary Assessments in the conversion request report to be considered at the **March 25, 2022** PHC meeting.

To that end, we have now reviewed the report entitled *Our Plan Toronto: Employment Area Conversion Requests – Preliminary Assessments Group 3* dated **March 10, 2022**, along with Attachment No.1 being Item No.PH32.8 (the **March** report). A review of the **March** report indicates City staff's Preliminary Assessment as contained in the **February** documents remains unchanged as it re-states:

Preliminary Assessment

Based on staff's preliminary assessment, the lands should be retained as *Employment Areas* and continue to be designated as *Core Employment Areas*.

In addition, a review of the March report notes the following:

- (*i*) The site and the other parcels that were deferred from the **February 15, 2022** PHC meeting are outside of Keele-St. Clair Local Area Study;
- (ii) An active freight rail (shunting) yard is located south of these lands, and also south of the two conversion request sites located on Ryding Avenue. CPR operates the freight rail yard on a 24/7 basis for 365 days per year, except for six hours on **December 25**; and
- (iii) As a preliminary assessment and for the basis of consultation, staff indicate that the site and other deferred parcels should be retained as Employment Areas. The review of the conversion requests will include consideration of how a transition to other Employment Areas uses can be encouraged should existing businesses cease operations.

Based on their review of the **February** documents and the **March** report, our client continues to disagree with City staff's Preliminary Assessment of the site and its surroundings; and respectfully request that staff continue to examine this area and its mixed use potential particularly when the Preliminary Assessments for the two (2) parcels immediately north of the site being:

- (i) 2221-2231 St. Clair Avenue West (Conversion Request #117); and
- (ii) 2237-2283 St. Clair Avenue West (Conversion Request #116).

Is recommending the following for the aforementioned parcels:

Preliminary Assessment

Based on staff's preliminary assessment, the lands could be converted to *Mixed Use Areas* upon the completion of the MCR and provided that the above issues and any other identified issues are resolved to the City's satisfaction.

Further, a review of the **March** report indicates that City staff's Preliminary Assessments of the following parcels:

- (iii) 2129-2161 St. Clair avenue West and 10 Old Stock Yards Road {Conversion Request #106 (PART)}; and
- (iv) 2121 St. Clair Avenue West, 542 and 620-630 Keele Street (Conversion Request in Keele St. Clair Local Area Study*.

*Note: The Preliminary Assessment for 2121 St. Clair Avenue West et al. is contained in the Keele St. Clair Local Area Study reports states:

Staff have determined that a conversion of some of the lands through re-designation to Mixed Use Areas and Parks may be appropriate, provided a Site and Area Specific Policy for all of the lands gives direction on and secures with a level of certainty minimum requirements for employment and other non-residential uses, affordable housing, community amenities, permitted uses, and built form and public realm objectives".

Is recommending the following specifically for Conversion Request #106 (PART):

Preliminary Assessment

Based on staff's preliminary assessment, a portion of the lands could be converted to *Mixed Use Areas* and *Parks* upon the completion of the MCR and provided that the above issues and any other identified issues are resolved to the City's satisfaction.

We respectfully request City staff to reconsider their decision to retain the *Core Employment Areas* designation on the site; and look forward to further discussing the conversion of the site with City staff.

Best regards

Bill.

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