



DELIVERED VIA EMAIL

April 25, 2022

City of Toronto
100 Queen Street West
10th Floor, West Tower, City Hall
Toronto, Ontario M5H 2N2

ATTENTION: PLANNING AND HOUSING COMMITTEE

RE: DUNPAR HOMES' REQUEST TO CONVERT THE NORTHERLY PORTION OF 35 CAWTHRA AVE FROM A CORE EMPLOYMENT AREAS DESIGNATION TO A MIXED USE AREAS DESIGNATION TO PROMOTE THE CREATION OF BUSINESS-FRIENDLY AND COMPATIBLE RETAIL, COMMERCIAL, AND OFFICE USES

As you are aware, we are legal counsel to 2530507 Ontario Inc. ("**Dunpar Homes**"), the owner of the lands municipally known as 35 Cawthra Ave, in the City of Toronto (the "**Subject Lands**").

As a prominent landowner within the Junction, Dunpar Homes has been involved throughout the City of Toronto's (the "**City**") Keele-St. Clair Local Area Study. What began as a series of recommendations to create a new, transit-supportive mixed-use community has culminated into Official Plan Amendment No. 537, more particularly known as the "Keele-St. Clair Local Area Secondary Plan." (the "**Secondary Plan**"). The Secondary Plan includes a number of policies which – among other city-building objectives – will create an improved public realm; promote jobs and economic development; and create a framework which will facilitate mixed-use intensification around the planned location of the new SmartTrack Station.

In general, Dunpar Homes supports the City's commitment to creating the conditions which will enable this area of the Junction to transition from a low-density employment area surrounded by low-rise residential dwellings and more recent mixed use, mid-rise condominium developments along the St. Clair Ave W. Avenue into a more complete, 15-minute community. Compared to its existing condition, this new 15-minute community will feature much improved transportation infrastructure; community facilities and services; parkland and open green space; and the delivery of affordable housing units vis-à-vis expanded height and density permissions. For 35 Cawthra in particular, Dunpar Homes has striven to provide a range of community benefits, including:

- (a) The redevelopment of the Subject Lands will create a sense of place through an increased provision of community amenities, parkland, and improved connectivity;



- (b) The redevelopment of the Subject Lands will provide no less than 10% affordable ownership or rental housing as a percentage of its residential gross floor area; and,
- (c) The redevelopment of the Subject Lands will replace existing heavy industrial employment gross floor area with more compatible retail, commercial, and office gross floor area.

With this said, and while Dunpar Homes generally agrees with the City's proposed redesignation of the Subject Lands from a Core Employment Areas designation to Core Employment Areas, Parks and Open Space, and Mixed Use Areas designations, it is our respectful submission that the northern portion of the Subject Lands should also be redesignated to a Mixed Use Areas designation. This refinement of the proposed Land Use Plan Map would be preferable because:

- (a) Compared to the existing Core Employment Areas designation, a Mixed Use Areas designation at the northern portion of the Subject Lands, i.e., the intersection of Cawthra Ave and Hirons Street, would permit Dunpar Homes to develop a range of compatible retail, commercial, and office uses within the podium of a mixed use building; and,
- (b) A Core Employment Areas designation would prevent the development of business-friendly and affordable retail, commercial, and offices uses at the intersection of Cawthra Ave and Hirons Street and would also be contrary to the recent trend in this area towards the inclusion of live-work units within nearby mixed use developments; and,
- (c) At a minimum, Dunpar Homes fully intends to provide a 1-to-1 replacement of all existing employment gross floor area within the retained Core Employment Areas designation lands at the intersection of Cawthra Ave and Junction Road, which will either be equivalent to 1.0 times the site area or 15% of the proposed development's gross floor area.

For all these reasons, we believe that Mixed-Use Areas designation is a more appropriate designation for the northern portion of the Subject Lands, while retaining Core Employment on the southwest corner, which is the more appropriate location. Thank you for reviewing this correspondence. Please contact the undersigned if you have any comments about this letter.

Sincerely,

Luke Johnston
Executive Vice President of Development and General Counsel

cc. Michael Nemanic, Legal Counsel and Development Management, m.nemanic@dunpar.ca
Councillor Nunziata, councillor_nunziata@toronto.ca

105 Six Point Rd.	Tel: 416 236 9800
Etobicoke, Ontario	Fax: 416 236 9889
Canada M8Z 2G3	dunparhomes.com