

June 30, 2022

Chair and Members of
Planning & Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

**Attention: Ms. Nancy Martins
Committee Secretariat**

**Re: PH 35.15 Our Plan Toronto:
Recommended Official Plan Amendment for City-wide Employment
Policies and Conversion Requests – Final Report
3400-3422 Dundas Street West – Preliminary Assessment #118**

Hunter & Associates Ltd. is the planning consultant retained by Tilzen Holdings Limited and V.J. Benedetto Limited, registered owners (“Owners”) of a property municipally known as 3400-3422 Dundas Street West (“Site”) between Runnymede Road and Jane Street.

On August 3, 2021, on behalf of the Owners, we formally submitted a conversion request for the Site as part of the City’s Municipal Comprehensive Review (MCR). The request was to redesignate the lands from *General Employment Area* to *Mixed Use Areas* or *Regeneration Areas* to permit residential and non-residential use. The request is identified as property #118 out of the 140 plus conversion requests being considered by the City, within Group 3.

City Planning has prepared its Preliminary Assessment and is recommending that the lands should be retained as *Employment Areas* and continue to be designated *General Employment Areas*. We understand that City Planning’s Preliminary Assessment still represents a “draft direction for consultation” recognizing that the MCR has not been completed (phased) including the land needs assessment, the peer review of the submitted compatibility/mitigation study and full stakeholder consultation.

Unfortunately, we note that since our original August 3rd conversion request submission, there has been no meeting or correspondence with City Planning or the City’s Peer Reviewer about the Site or conversion request. Other than the recent public meeting notice circulated by Planning & Housing Committee, and broad engagement through the Official Plan (TOP) Review, there has been no specific engagement on this Site and request.

On behalf of the Owner, we trust and request that City Planning and the Peer Review consultant be directed to meet with us prior to finalizing its recommendation and further special public meeting in the next phase of the City's MCR targeted for the first half of 2023.

The balance of this letter provides Planning & Housing Committee with some relevant summary background about the Site, and key conclusions from the Planning Rationale Report and the Compatibility/Mitigation Study completed and still under review as part of the MCR.

The Site & Development Context

The 1.27-hectare (ha) site is located on the north side of Dundas Street West just west of Runnymede Road and has been developed and used as a commercial shopping plaza by the Owners for decades (*see Figure 1*). The Site has a substantial 122 metres (m) of frontage on Dundas Street West and a variable depth of approximately 91 to 103 metres (m) north to an existing railway corridor.

The Site has been developed and used as a local shopping plaza for decades with approximately 5,721 square metres (m²) of commercial gross floor area in a predominantly single-storey building with a partial second floor used for offices and a partial basement. The shopping centre has two driveways providing vehicle access to and from Dundas Street West and is considerably setback from the street. There is surface parking surrounding much of the plaza on the south, north and east sides. The shopping plaza is anchored by a FreshCo grocery store located on the east side (*see Figure 2*).

Lands immediately adjacent to the Site are used as follows:

- North – rail corridor followed by a large-format shopping centre anchored by Walmart on the southwest corner of St. Clair Avenue West and Runnymede Road;
- South – Dundas Street West, a major arterial road, with a new 7-storey residential building with commercial retail at grade finishing construction (*see Figure 3*);
- West – a commercial plaza with various retail stores, restaurant, daycare, private school and services;
- East – an industrial business owned and operated by Cintas which provides a variety of facility maintenance services and parts (such as mats, restroom, towels, cleaning) and uniform manufacturing and distribution.

The Site is located within a local area bounded by Dundas Street West and St. Clair Avenue West between Runnymede Road and Jane Street that is today predominantly occupied by and used for commercial retail and services (*see Figure 4*). Most lands have

extensive surface parking and retail and services catering to automobiles, and the area has a relatively limited pedestrian environment with few trees and amenities.

The north side of Dundas Street West between Runnymede Road and Jane Street (“Dundas West Block”) consists of a number of individual properties. This block is decidedly commercial in use with just two industrial business at either end of the block – Cintas (northeast corner of Runnymede Road) and Canadian Iron and Metal Recycling (auto/parts yard and recycling) on the northwest corner of Jane Street. Of the entire Dundas West Block, these two industrial businesses represent approximately 1.8 ha of land “book-ending” a predominantly commercial Block. The subject Site, a commercial shopping plaza, is the largest property in the Dundas West Block. Existing properties and businesses in the Dundas West Block are shown in *Figure 5 and Figure 6*.

North of the rail corridor and on the south side of St. Clair Avenue West between Runnymede Road and Jane Street (“St. Clair West Block”). This block has been redeveloped over the past ten to fifteen years with larger-format retail including a Walmart supercentre (southwest corner of Runnymede Road) and an automobile dealership (Old Mill GM/Cadillac) on the southeast corner of Jane Street.

More broadly, east of Runnymede Road, Dundas Street West extends east through the Junction community to Keele Street. It has a more traditional mixed-use, low-rise main-street character that has recently witnessed a number of new predominantly mid-rise residential buildings.

The Site and local area have frequent bus service along Dundas Street West and most of the major north-south streets including Runnymede Road and Jane Street (*see Figure 7*). These buses provide relatively convenient access and service to the Bloor-Danforth subway line (Line 2) along Bloor Street West with subway stations at Runnymede and Jane Streets. St. Clair Avenue West has been the focus of recent higher-order public transit investment with a new dedicated light rail transit (St. Clair West LRT) which presently extends from just west of Keele Street (Gunns Road) and connects to the Yonge-University-Spadina (Line 1) subway system. The City has potential long-term plans to extend the St Clair West LRT west to Runnymede Road and potential long-term plans to extend priority transit on Jane Street north from the Bloor subway.

The Site’s context represents a strategic growth area as defined by the Provincial Growth Plan (2020), providing an appropriate and reasonable opportunity to accommodate mixed-use intensification on under-utilized lands along a major street with frequent transit service proximate to potential higher-order transit. The Site is not identified as a Provincially Significant Employment Zone (PSEZ).

Over the past decade, St. Clair West has also been the subject of comprehensive planning that led to changes to the Toronto Official Plan and related zoning by-laws to facilitate and allow more intensive mid-rise, mixed-use redevelopment west of Keele Street to Jane Street, much of which was previously Employment Area like this Site and local block.

To the south of Dundas Street West, along and in the vicinity of Runnymede Road and Jane Street, are the well-established and predominantly low-rise High Park and Baby Point residential neighbourhoods with an array of public parks, schools and other community services.

Employment Area Conversion Request

We prepared a Planning Rationale Report (August 2021) in support of the Owner's conversion request and submitted the required conversion application fee. City Planning acknowledged receipt on August 3, 2021.

As part of the TOP and MCR, our client is requesting that the City redesignate (convert) the Site from "General Employment Area" (Employment Area) to "Mixed Use Area" or "Regeneration Area" subject to specific policy and study, and future rezoning.

During previous comprehensive planning studies along St. Clair Avenue West, the block of lands adjacent to and north of the Site between Runnymede Road and Jane Street were similarly redesignated from Employment Area to Mixed Use Area subject to a Site and Area Specific Policy (SASP 356).

Also, in a similar context, the City during its last MCR (Official Plan Amendment 231 (OPA 231)), redesignated certain Employment Areas on the north side of Dupont Street west of Spadina Avenue used for a mix of older industry and commercial retail and services through comprehensive planning study. In our opinion, this Site and local area is comparable and suitable for a potential mixed-use conversion.

Our Planning Rationale Report described the Site and existing development context in detail. It reviewed the relevant provincial planning context including the *Planning Act*, the Provincial Policy Statement (2020) and the Growth Plan for the Greater Golden Horseshoe (2020). It reviewed the municipal planning context (Toronto Official Plan and Zoning By-law) focusing on matters relevant to City's consideration – growth, employment areas, economic and employment policy, land use compatibility and conversion requests. We reviewed and provided our analysis and evaluation against all City employment area conversion criteria.

Preliminary Redevelopment Concept

Our Planning Rationale Report also provided an initial mid-rise, mixed-use concept plan for the City's consideration and review and provided our initial assessment of the City's policies for considering requests to convert employment areas, together with preliminary policy suggestions.

To assist with the City's initial consideration of this conversion request, the Owner has prepared a conceptual site plan (Graziani + Corazza Architects) which illustrates a

proposed mixed-use redevelopment of the Site (*see Figure 8*). The concept plan includes the following elements and principles:

- Mixed-use, mid-rise buildings ranging from 4 to 12-storeys with an interior landscaped courtyard buffered from surrounding areas, providing appropriate transition and street wall scale along Dundas Street West with slightly taller elements further north providing transition from the major street and low-rise neighbourhoods to the south;
- A setback from rail corridor (which would include an above-grade parking structure/crash wall) to ensure no residential units are located (horizontal/vertical) within 30m of rail corridor (combined horizontal and vertical separation);
- Non-residential uses – local and community servicing street-related retail and services along Dundas West grade and possibly second floor (retail, office/commercial and/or community space) to replace and possibly expand the uses and functions currently existing on Site;
- Predominantly underground parking accessed from one driveway on the east side of the Site, with no surface parking and partial above grade parking (along rail corridor away from significant public view);
- A new public park on the southwest corner of the Site along Dundas Street West (15% of the Site area);
- New public streetscape and publicly accessible space (POPS) along Dundas Street West (4%) with active commercial uses, a residential lobby and reasonable building setbacks;
- A total of approximately 44,000 m² total building area including residential, non-residential and above-grade parking with just over 400 residential units (Site 2.6 FSI without parking/3.5 FSI with parking).

Such a mid-rise, mixed-use redevelopment concept with similar elements has been similarly pursued and permitted along parts of St. Clair Avenue West and Dupont Street in former Employment Areas along major rail corridors. Of course, such a concept would require more detailed planning, design and technical study including being informed by and responding to the required Compatibility/Mitigation Study and rail corridor safety studies. If the conversion request is permitted, the development concept would, in our opinion, otherwise conform with the City's Official Plan and would not create any adverse impacts on the surrounding properties including lands designated Neighbourhoods.

Compatibility/Mitigation Study & Peer Review

As required, our client retained Valcoustics Canada Ltd. (“Valcoustics”) to prepare a Land Use Compatibility/Mitigation Study to assess and address existing and potential environmental issues, including noise and air quality related to the Site’s proposed conversion. We submitted Valcoustics study (dated August 31, 2021) to City Planning which was acknowledged as formally received.

As noted in Valcoustic’s Executive Summary:

A change to the permitted land use to redevelop 3400-3422 Dundas Street West for Mixed Use is proposed. The owner of the lands has requested the City of Toronto consider a conversion from Employment Area. At present, a detailed development design is not available. A preliminary conceptual site plan has been presented in the conversion request. This report addresses the acoustical and air quality issues relating to ensuring land use compatibility with existing neighbouring uses. It presents the relevant mitigation measures that can be incorporated into the proposed development design to achieve and maintain land use compatibility, comply with MECP environmental requirements, comply with City of Toronto Official Plan (TOP) and Provincial policies in the PPS 2020, and not jeopardize the existing environmental approvals of the neighbouring land uses.

On February 25, 2022 our client received a request from City Planning requesting it pay a required fee and provided a scope of work for the City’s Peer Reviewer (Cambium) to review and assess Valcoustics study and the conversion request. Our client subsequently paid the City’s fee on March 4, 2022 and we were advised by City Planning that they would let the Peer Reviewer commence work.

Since then, neither we, our client or Valcoustics have heard feedback or issues raised by the City’s Peer Reviewer about their request or the submitted Compatibility/Mitigation Study. We trust this will be forthcoming.

Conclusion & Recommendation

In our opinion, this Site and the existing shopping plaza, which has been owned and operated for decades, in a local area predominantly used for commercial retail and service uses, is and remains an appropriate candidate for an employment land conversion.

We have considered this request in relation to the City’s Request for Conversion Policies, more broadly the Toronto Official Plan (TOP) and relevant Provincial planning policy including the Planning Act, the PPS (2020) and Growth Plan (2020). In our opinion, this request addresses in-force employment land conversion policies.

As illustrated in **Figures 9 and 10**, in our opinion, changing the City’s Urban Structure from “*Employment Area*” to “*Avenue*” and changing the Site and local block’s land use

from Runnymede Road to Jane Street to “*Mixed Use Areas*” subject to a SASP is appropriate and reasonable for the many reasons set out in our Planning Rationale Report.

While this Site and local block was once part of a broader Employment Area on both sides of the rail corridor, that context has changed with previous City support. This Site and the relatively isolated and small Employment Area remaining on the north side of Dundas Street West, if redesignated to Mixed Use Area (or Regeneration Area subject to future study/SASP) would represent a compatible and good land use planning strategy for Toronto’s growing population and employment needs through 2051.

Employment Area conversions in similarly located and comparable areas including St. Clair West Block (SASP 356), Corsetti Meats (SASP 357) and along the north side of Dupont between Spadina Road and Dufferin Street are reasonable recent examples that the City should consider. These were previously Employment Areas similar to this Site and local context, and occurred in the past 5 to 10 years as part of the previous MCR (OPA 231) and local area planning studies (St. Clair West).

Just last month (May 2022), City Council approved the Keele-St. Clair Local Area Study leading to a new Secondary Plan to guide significant mixed-use intensification through mid-rise and tall buildings involving substantial areas designated and proximate to even larger Employment Areas through conversion.

We believe that a similar local area study (Dundas West Runnymede-Jane Block) and/or SASP could be used to further assess this particular request and establish appropriate policies to guide the introduction of sensitive uses, such as residential and public parkland on this Site and broader block similar to SASP 356 to the north. The actual introduction of the sensitive use (i.e. residential use) would be subject to site and area specific policy, prior to a zoning by-law amendment being enacted.

Finally, we also note that 2400-2440 Dundas Street West, a similarly-large site used for shopping and a grocery store, has been recommended by City Planning to be converted from Employment Area to Mixed Use Areas subject to a new SASP (with conditions). In our opinion, the Site shares a similar existing and planned context and should be reconsidered by City Planning.

We look forward to further review and discussion with City Planning prior to Planning & Housing Committee and City Council’s final MCR decision on the Site.

Yours truly,
HUNTER & Associates Ltd.

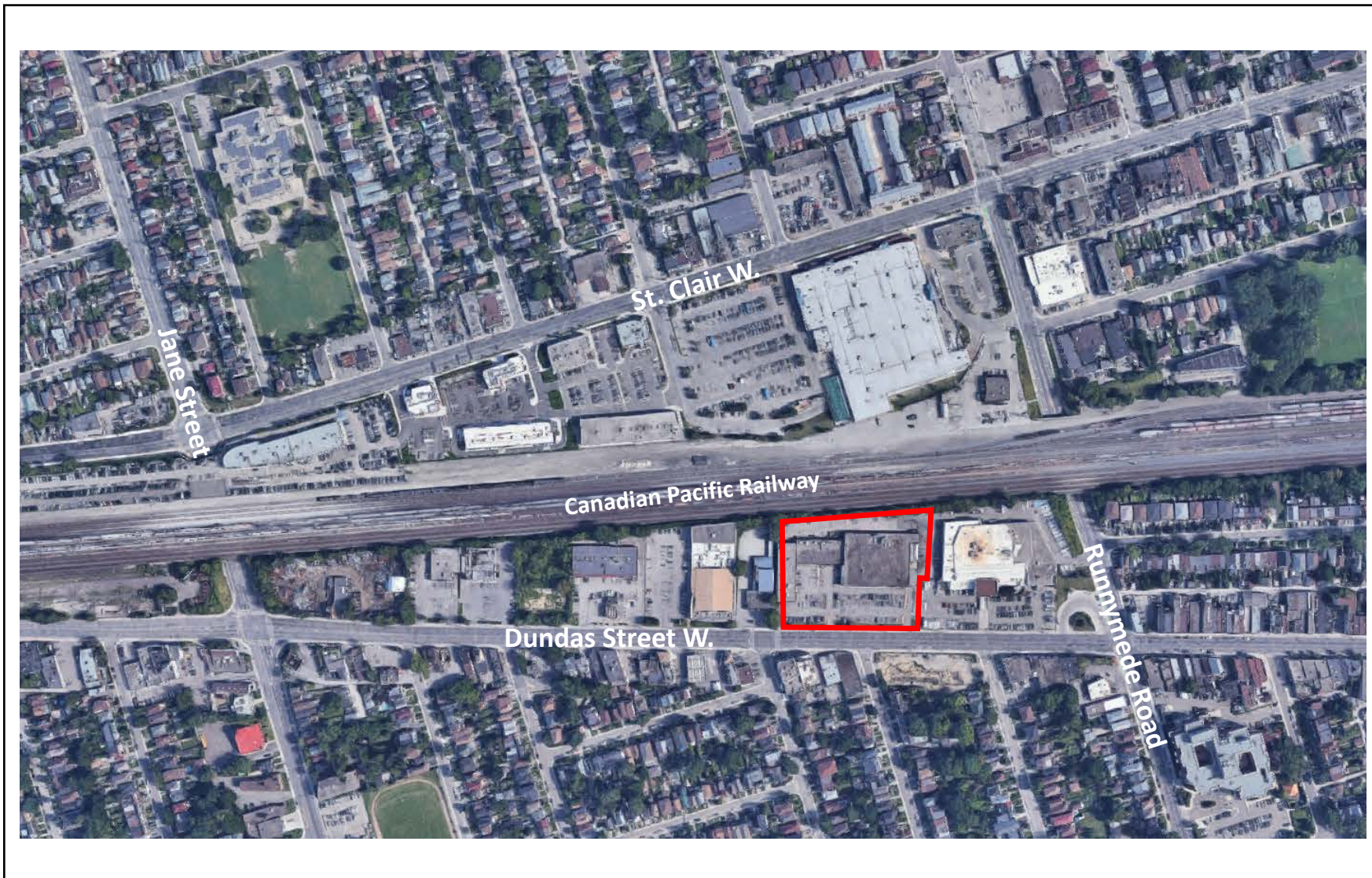


J. Craig Hunter, MCIP, RPP

President

c. A. Benedetto, J. Zentil, Tilzen/Benedetto (Owner)
J. Park, Devine Park LLP
M. Levkoe, Valcoustics

FIGURE 1: SITE CONTEXT



Subject Site (3400-3422 Dundas Street W.)

Site area – 1.27 ha

FIGURE 2: SITE PHOTO



3400-3422 Dundas Street W.

FIGURE 3: 3385 DUNDAS STREET WEST



3385 Dundas St. W. looking south from FreshCo.



3385 Dundas St. W. looking southwest from Cintas.

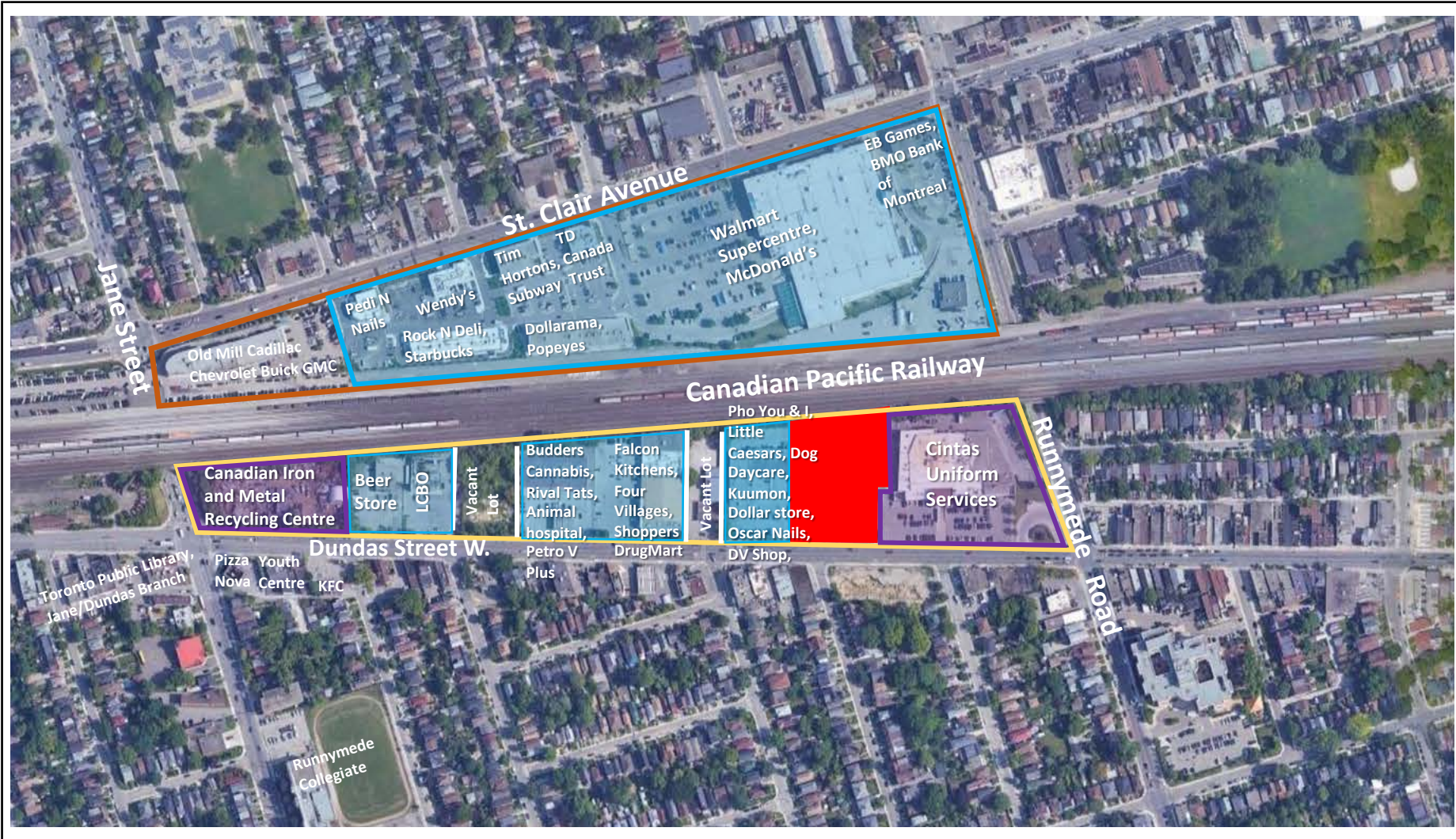


3385 Dundas St. W. looking northwest.



3385 Dundas St. W. looking east.

FIGURE 4: PREDOMINANTLY COMMERCIAL LAND USE



Source: Google Maps, City of Toronto Development Activity, 2021

FIGURE 5: EXISTING USES ALONG DUNDAS STREET NORTH – RUNNYMEDE TO JANE BLOCK



3400-3422 Dundas and Runnymede Shopping Plaza.



3434 Dundas St. W. – Vacant lot.



3446 Dundas St. W. – Shoppers Drug Mart.



3466 Dundas St. W. – Vplus Petro, Plaza with retail mix.

FIGURE 6: EXISTING USES ALONG DUNDAS STREET NORTH – RUNNYMEDE TO JANE BLOCK



3486 Dundas St. W. – Vacant



3524 and 3520 Dundas St. W. – Beer Store and LCBO (source Google).

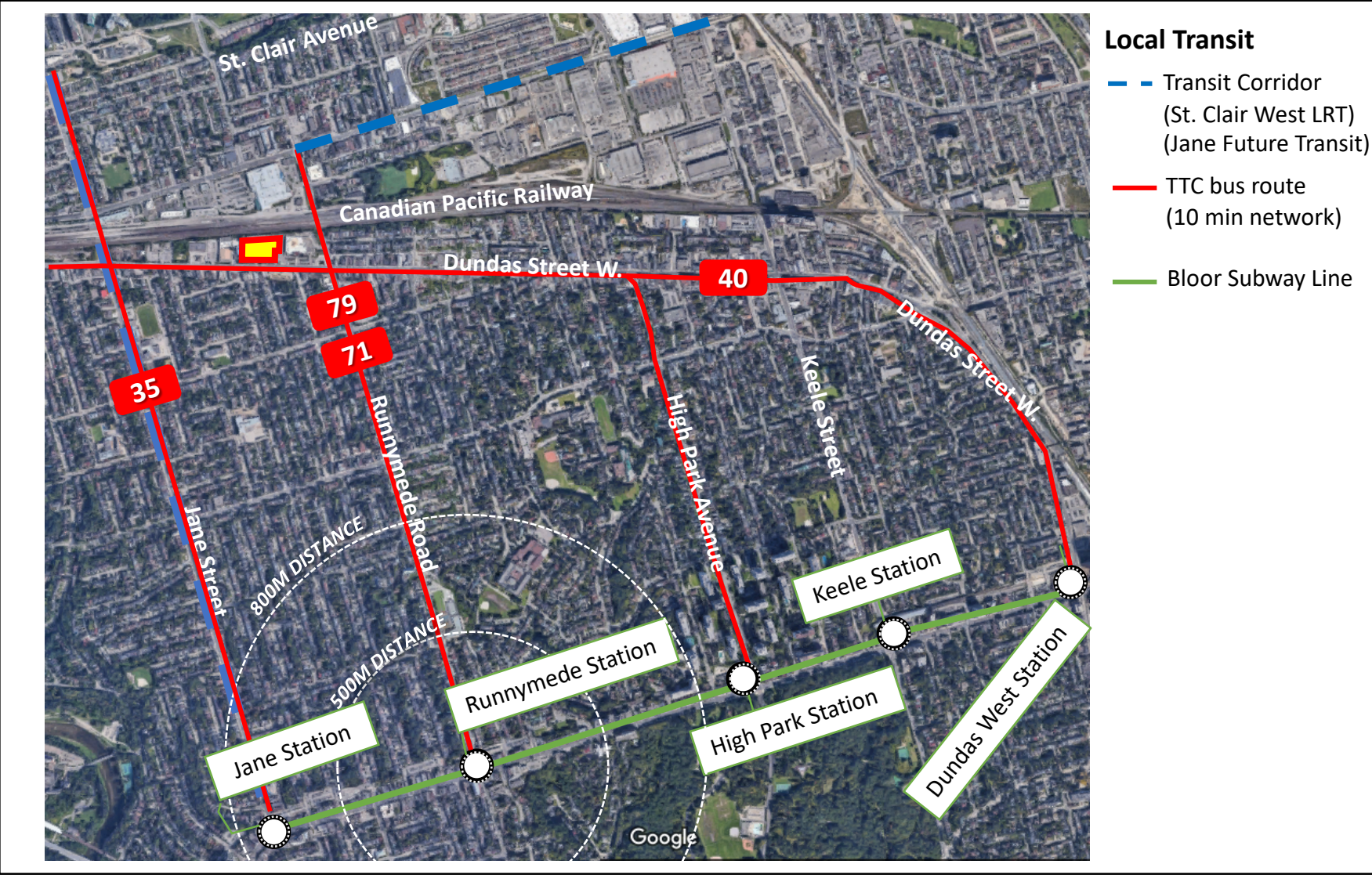


3534 Dundas St. W. – Canada Iron and Metal.



3370 Dundas St. W. – Cintas.

FIGURE 7: TRANSIT



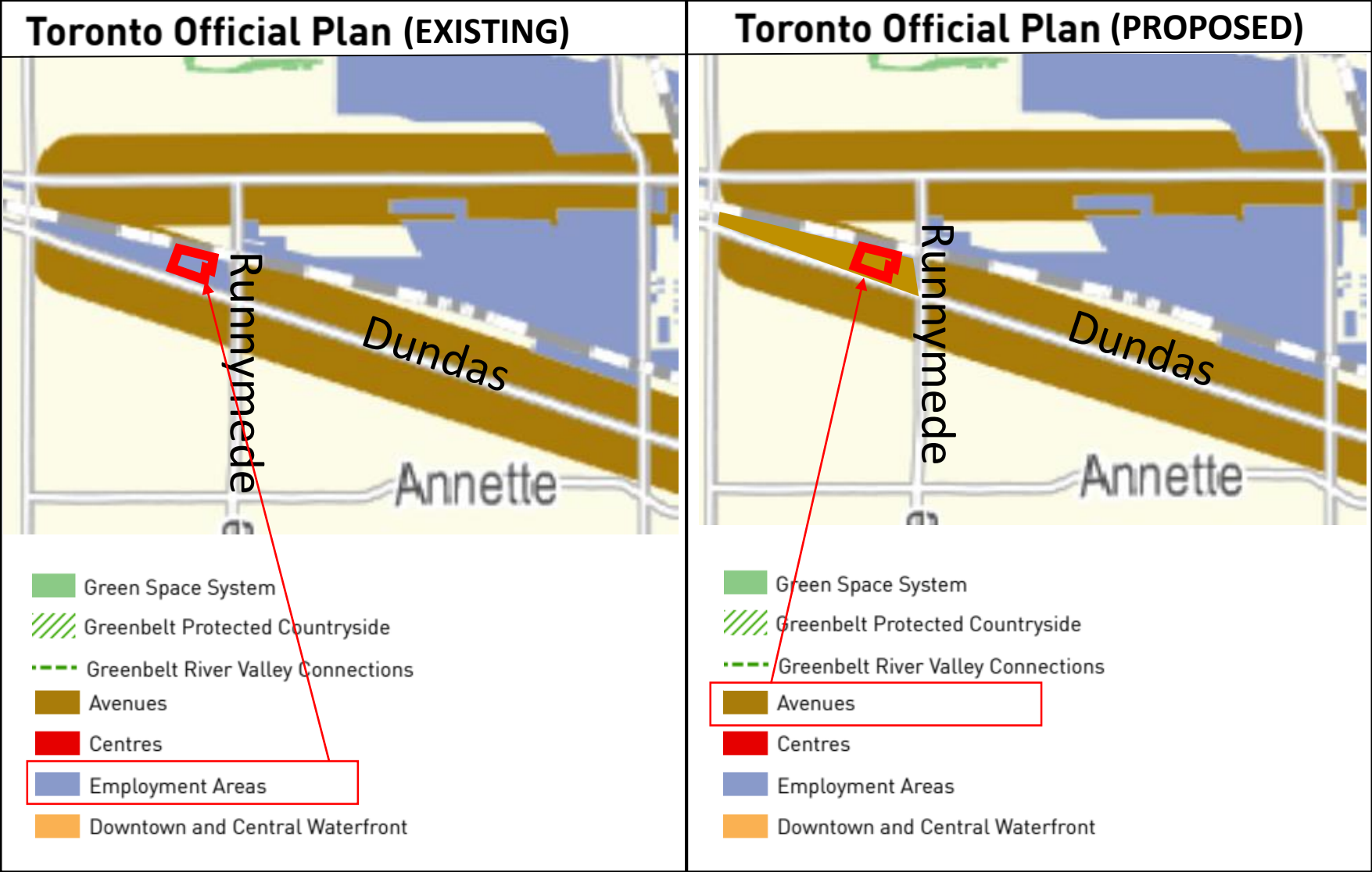
Subject Site (3400-3422 Dundas Street W.)

FIGURE 8: POTENTIAL REDEVELOPMENT CONCEPT



Subject Site: 3400-3422 Dundas Street W.

FIGURE 9: CITY OF TORONTO OFFICIAL PLAN – URBAN STRUCTURE




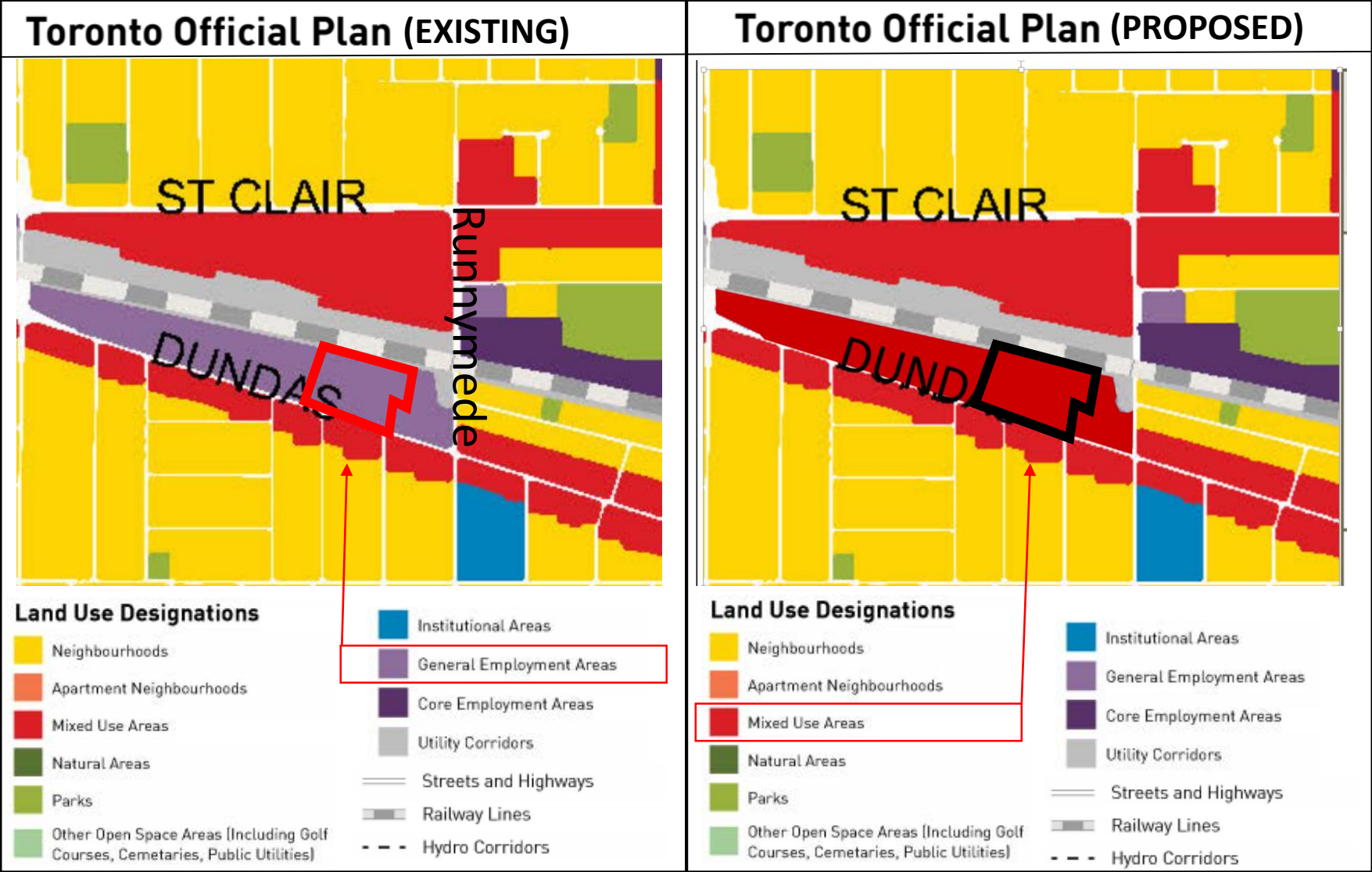
 **Subject Site (3400 Dundas Street W.)**
Potential conversion from Employment Areas to Avenues

FIGURE 10: CITY OF TORONTO OFFICIAL PLAN – LAND USE DESIGNATION



 **Subject Site (3400 Dundas Street W.)**
Potential conversion from General Employment Areas to Mixed Use Areas