



# BOUSFIELDS INC.

Project No. 20278

July 17, 2023

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

Attention: Sylwia Przewdziecki

Dear Mayor and Members of Council,

**Re: *Planning and Housing Committee Item PH5.3***  
***Our Plan Toronto: Recommendations on Seventy Employment Area Conversion***  
***Requests and Chapter 7 Site and Area Specific Policy Review***  
***30 and 44 Milner Avenue (Conversion Request No. 24)***

We are the planning consultants for TFI Foods Ltd., the owners of the lands known as 30 and 44 Milner Avenue (the “subject site”).

We are writing to express our disagreement with the staff recommendation as adopted by Planning and Housing Committee on July 5, 2023 to refuse the requested employment land conversion with respect to the above-noted site. Instead, we request that Council support approval of the requested conversion and, in particular, redesignate the from *Core Employment Areas* to *Mixed Use Areas*.

On December 17, 2020, we submitted a letter to the City of Toronto on behalf of our clients requesting an employment land conversion. The letter set out detailed planning reasons in support of our request. The conversion request was also supported by an Air Quality and Land Use Compatibility Assessment prepared by Gradient Wind Engineering Inc., dated March 11, 2021 (the “Gradient Compatibility Study”). The Gradient Compatibility Study was peer reviewed by R.J. Burnside & Associates Limited upon request of the City.

In our opinion, the redesignation of the subject lands from *Core Employment Areas* to *Mixed Use Areas* would be appropriate in land use planning terms. In summary, the planning rationale for the request is as follows:

- The subject site is located at the westerly periphery of the *Employment Areas* lands situated along the north side of Highway 401 between McCowan Road and Markham Road. These *Employment Areas* are not designated as a Provincially Significant Employment Zone (“PSEZ”). Lands to the immediate north of the subject site are designated *Neighbourhoods* and lands to the immediate northeast are designated a

mix of *Natural Areas, Parks and Neighbourhoods*. Lands to the west, on the opposite side of McCowan Road, are also designated *Neighbourhoods*.

- The subject site is located within an approximate 470 metre radius from the proposed Sheppard/McCowan subway station. Accordingly, the subject site is located within the Council-adopted McCowan Major Transit Station Area. The site is currently served by way of the existing McCowan and Scarborough Centre RT stations, as well as numerous existing bus routes which offer frequent transit service.
- Given the existing and planned transit service, the subject site is considerably underutilized, consisting of a vacant property (30 Milner Avenue) and a 2-storey food service building with outdoor storage and surface parking (44 Milner Avenue).
- Intensified mixed-use redevelopment on the subject site, including residential uses, would better optimize the use of available land and infrastructure and establish a compatible land use relationship with the surrounding residential neighbourhoods to the north and northeast. In addition, the requested conversion would allow for transit-supportive mixed-use intensification within walking distance of existing public transit and future higher-order transit.
- Redevelopment of the subject site and the adjacent Town Centre Plaza lands (i.e. 1455-1457 McCowan Road and 41-47 Milner Avenue), which is subject to Employment Conversion Request No. 12, would create a transit-supportive mixed-use node along the McCowan Road frontage, together with the existing commercial uses at 8-12 Milner Avenue. In this respect, the Planning and Housing Committee recommended that the westerly portion of the lands at 1455-1457 McCowan Road and 41-47 Milner Avenue be redesignated from *General Employment Areas* to *Regeneration Areas*, subject to Site and Area Specific Policy 580, and be removed from Official Plan Map 2, Urban Structure.
- The remainder of employment area, predominantly to the west of the natural boundary formed by the East Highland Creek channel, would continue to be viable, given its frontage on Highway 401 and its continued ability to co-exist with the residential neighbourhood immediately to the north.
- The conclusions of the Gradient Compatibility Study state that residential uses are feasible on the site and would meet the minimum setback distance from established industries operating with a valid Environmental Compliance Approval.

We take issue with staff's Final Assessment in the following respects:

- While the staff report describes the larger Scarborough-Highway 401 employment area at length, it does not fully consider the East Highland Creek channel to the east, which

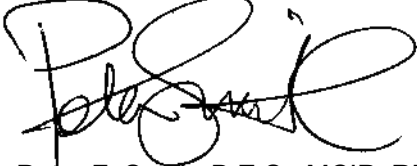
effectively severs the site and immediate surrounding properties from the larger, contiguous *Employment Areas* further to the east.

- The staff report states that “*the existing supply of Employment Areas is sufficient to meet the 2051 Provincial employment forecasts in Toronto and it is anticipated that the City will meet the employment forecasts allocated to the municipality pursuant to the Growth Plan 2020. It should be noted however that while no single conversion request would affect this outcome, multiple conversions could impact Toronto’s ability to meet the Provincial employment forecast. There is no need to convert the employment lands at 1455-1457 McCowan Road, 41-47 Milner Avenue and 30 and 44 Milner Avenue*”. In this regard, the staff report fails to consider other key municipal objectives beyond protecting employment lands (i.e. housing).
- The staff report notes that approximately 33% of workers in the *Employment Area* use transit or active modes of transportation to get to work, and notes that “*providing convenient access to jobs contributes to the achievement of a complete community*”. Replacing the existing vacant/low-intensity employment use with a mix of new housing and non-sensitive commercial uses would offer additional opportunities for individuals to live close to where they work.
- The staff report states that the Scarborough-Highway 401 employment area is thriving, emphasizing its low vacancy rates and the provision of traditional manufacturing and transportation services employers. However, the report fails to note that the area west of East Highland Creek channel is already occupied by numerous non-sensitive commercial uses (i.e. retail and service commercial). In this regard, the proposed conversion to *Mixed Use Areas* would co-exist with a mix of non-sensitive commercial uses, including retail, service commercial and office, that can contribute to a broader mix of employment and jobs within the area.

Thank you for your consideration of this request. If you have any questions with respect to this letter or require additional information, please do not hesitate to contact the undersigned.

Yours very truly,

**Bousfields Inc.**



Peter F. Smith, B.E.S., MCIP, RPP

cc: David Lam, TFI Foods Ltd.  
Chester Lew, CManage Ltd.