

July 18, 2023

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

**Attention: Brad Bradford, Planning and Housing Committee (Chair)**

Dear Mr. Chair and Members of Committee,

**RE: Employment Area Conversion Request for 1530 – 1536 Midland Avenue, Toronto, ON**

The Biglieri Group Ltd. (“TBG”) represents Nova Construction Company Ltd. (“Owner”), who owns 1.14 hectares of land, municipally known as 1530-1536 Midland Avenue (“Subject Site” or “Site”). In 2021, TBG submitted a request for an Employment Land Conversion (“ELC”) on the Subject Site through the City of Toronto’s Municipal Comprehensive Review (“MCR”) process.

On behalf of the Owner, we are writing to express our concerns with the outcome of the MCR process and the City’s decision to adopt draft Official Plan Amendment No. 644 (the “Draft OPA”) without the ELC applied to the Subject Site. TBG would like to take the opportunity to address the recommendation made by Staff and request that Council reconsider their June 14, 2023 decision to adopt OPA 644 in its current form, and approve the proposed ELC with the addition of a Site and Area Specific Policy (SASP).

## **SUMMARY OF MCR PROCESS**

To date, the following work has been undertaken in support of the ELC request:

- August 3, 2021: Submission of ELC request to the City of Toronto.
- March 10, 2022: City of Toronto Staff Report (“*Our Plan Toronto: Employment Area Conversion Requests – Preliminary Assessments Group 3*”), provided initial commentary on the proposed conversion of the Subject Site.
- October 21, 2022: Peer Review of the Land Use Compatibility/Mitigation Study for the Site was undertaken by RJ Burnside.
- December 5, 2022: Response to Peer Review of Land Use Compatibility/Mitigation Study by RJ Burnside, provided by SONAIR Environmental Inc on behalf of the City of Toronto.
- January 4, 2023: TBG submission of response to concerns in Staff Report and Peer Review with supporting documentation.
- April 27, 2023: Correspondence submitted in advance of May 17, 2023 Open House.
- June 1, 2023: Correspondence and deputation in support of the ELC request for the Subject Site was submitted to the Planning and Housing Committee (PHC).
- June 14, 2023: *Our Plan Toronto: Recommendations on Forty-Five Employment Area Conversion Requests - Final Report* submitted to City Council for consideration.
  - City Council Adopted OPA 644

## SUMMARY OF PROPOSED DEVELOPMENT

The ELC request proposes to re-designate Block 1 (the eastern portion of the Site) from “General Employment Area” to “Mixed Use Area” while Block 2 (the western portion of the Site) would be re-designated from “Core Employment Area” to “General Employment Area”. The proposed development provides for 9,617m<sup>2</sup> of space for employment opportunities, inclusive of 4,617m<sup>2</sup> of space for commercial uses within Block 1 (eastern portion of the Site) and 5,000m<sup>2</sup> of space for employment uses within Block 2 (western portion of the Site), as indicated in the draft Site Plan Concept (**Appendix A**). Conversely, the Site currently houses approximately 5,100 m<sup>2</sup> of employment GFA. The proposed development seeks to facilitate employment intensification on the Site and introduce a range of affordable housing types, built near higher-order transit and in close proximity to public services and community amenities.

## SUMMARY OF PLANNING OPINION

It is TBG’s opinion that the proposed ELC represents good planning, is consistent with the Provincial Policy Statement, conforms to the Growth Plan and should as a result be reconsidered:

- Employment Protection and Creation
  - The proposed development would generate triple the expected employment opportunities of the Site, producing approximately 316 jobs in comparison to the 108 jobs per the existing permitted uses, based on an *Employment Area Impact Study* prepared by Urban Metrics.
  - Staff were in receipt of the *Employment Area Impact Study* as part of the January 4, 2023 submission, however, no comments were received from City of Toronto Staff with respect to the same and the increase in employment was not acknowledged.
  - The Owner is also committed to relocating existing employment tenants within the redevelopment, based on tenant preference and appropriate land use compatibility considerations.
- Affordable Housing
  - The Owner is committed to providing 100% rental housing (224 purpose-built rental apartment units) as well as a minimum of 5% affordable rental housing in support of stimulating the production rental housing supply in Toronto.
  - Additionally, the Owner has existing working relationships with three non-profit housing groups, with whom he is consulting to determine the most effective options for affordable housing on the Site.
- Land Use Compatibility and Transition
  - Mixed-use and residential land uses already occur directly east and south of the Site, comprising of high-rise residential apartment buildings, townhouses, single-detached dwellings, and mid-rise apartment buildings.
  - SONAIR Environmental Inc. provided a line-by-line response to items presented in the Peer Review of the Land Use Compatibility/Mitigation Study, thereby addressing staff concerns on the potential for compatibility issues. Staff were in receipt of this memo as part of the January 4, 2023 submission, however, no comments were received from City of Toronto Staff with respect to the same and the mitigation measures were not acknowledged.

- The Land Use Compatibility Study undertaken by SONAIR Environmental Inc. concluded the proposed ELC is not expected to adversely impact the operations of neighbouring employment land uses, nor be impacted by these uses.

## RECOMMENDATION

It is TBG's planning opinion that a conversion from the "Core Employment Area" and "General Employment Area" to "Mixed-Use Area" and "General Employment Area" with a SASP that protects for affordability and the rental tenure of the proposed development can provide an opportunity to plan for a complete community and manage the proposed conversion (or the future development of the lands) in the local context while still protecting and preserving nearby lands designated for strictly employment uses.

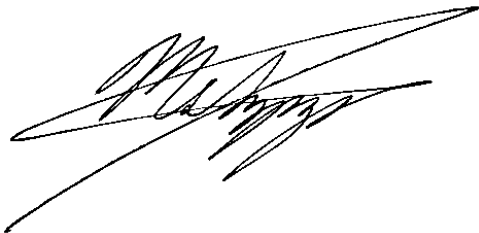
## CLOSING

This Site represents a logical area for employment lands conversion as Mixed-use and Residential land uses already occur directly east and south of the Site. The Site therefore proposes to provide for an on-site transition between these uses and the existing employment area and would clearly establish the Site as the limit of conversions on the southern end of the employment area. Furthermore, it supports the development of a complete community that affords residents the opportunity to live close to work and community amenities.

It remains TBG's professional planning opinion that the proposed ELC represents good planning, the addition of the SASP would ensure future land uses are compatible with existing and planned uses and is appropriate for approval. Should you have any questions, or require further clarity, do not hesitate to contact the undersigned.

Respectfully Submitted,

THE BIGLIERI GROUP LTD.



Michael Testaguzza, MCIP, RPP  
Partner



Shilpi Saraf-Uiterlinden, M.E.S., Pl.  
Planner

