



May 29, 2023

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

Attention: Nancy Martins

Dear Committee Members,

Re: Item PH4.5

***Our Plan Toronto: Recommendations on Forty-Five Employment Area
Conversion Requests – Final Report
105-109 Vanderhoof Avenue and 10 Brentcliffe Road, Toronto
Conversion Request 042***

We are the planning consultants for Rockport Holdings Limited, the owner of the lands known as 105 and 109 Vanderhoof Avenue and 10 Brentcliffe Road.

We are writing to express our disagreement with the staff recommendation to refuse the requested employment land conversion. Instead, we request that the Committee support approval of the requested conversion and, in particular, recommend to Council that the subject site be redesignated from *Core Employment Areas* to *Mixed Use Areas*.

On July 26, 2021, we submitted a letter to the City of Toronto on behalf of our client requesting an employment land conversion. The letter set out detailed planning reasons in support of our request. The conversion request was also supported by a Compatibility & Mitigation Study prepared by SLR Consulting (Canada) Ltd., dated June 2021 (the “SLR Compatibility/Mitigation Study”).

In our opinion, the redesignation of the subject site 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 currently being used for retail and service commercial uses, not industrial (manufacturing or warehousing) uses. Notwithstanding its *Core Employment Areas* designation, the commercial use of the site is recognized and permitted through Site and Area Specific Policy 393, which was approved as part of Official Plan Amendment No. 231.

- The subject site is located within an area bounded by Eglinton Avenue East, Laird Drive, Commercial Road and Brentcliffe Road that has an existing and planned mixed use character, consisting of high-rise residential development along Eglinton Avenue and predominantly large format retail development to the south between Laird and Brentcliffe, with no industrial (manufacturing or warehousing) uses.
- The subject site is located within a major transit station area associated with the Laird station on the Eglinton Crosstown LRT line, and therefore is targeted for transit-supportive intensification.

We take issue with staff's Final Assessment, which fails to note a number of important planning considerations, which we believe should have been brought to the Committee's attention. In particular:

- While the staff report expresses concern regarding access to community services and facilities and the need to cross major streets, the site is located immediately south of significant mixed-use intensification projects that have been approved as part of the Laird Focus Area in conjunction with the transit investment that has been made in the Eglinton Crosstown LRT.
- While the staff report describes the larger Leaside-Thorncliffe area of employment as being generally characterized by smaller industrial buildings, with a few large users with land extensive facilities and Environmental Compliance Approvals that require separation from sensitive and residential uses, the lands surrounding the subject site to the south and west, extending south to Commercial Road and west to Laird Drive, are primarily developed for, or have approvals in place for, large format retail developments.
- The staff report fails to note that, under Bill 97 and the proposed Provincial Planning Statement, such large format retail areas would no longer be defined as an "area of employment".
- Even more concerning, the staff report devotes an entire paragraph to alleged deficiencies identified through the Peer Review of the SLR Compatibility/Mitigation Study but includes no mention of the fact that SLR submitted a detailed response to the Peer Review.

With respect to the latter point, our client submitted a letter to the City on December 8, 2022 from SLR Consulting (Canada) Ltd. dated November 29, 2022, which responded to the May 31, 2022 Burnside Peer Review and addressed each of the five items identified by Burnside (the "SLR Response Letter"). The letter concluded as follows:

“Based on the SLR response to the peer review comments, and the additional information provided, SLR acknowledges that additional compatibility studies may be required as part of future ZBA and SPA applications. The proposed Project site design and location of potential sensitive receptors will provide the additional detail requested by Burnside in the above noted comments. However, for the purposes of the land use conversion request under the MCR, the information provided to date should be considered adequate to allow for the land use conversion to be advanced.”

No response was ever received from City staff to the November 29, 2022 SLR Response Letter.

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
PFS/kah:jobs

*cc: Jack Winberg, Rockport Holdings Limited
David Bronskill, Goodmans*