

May 30, 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
33 Green Belt Drive
Conversion Request 017**

OTT Properties - 33 Green Belt Drive

We act for 33 Green Belt Drive Limited Partnership, owner of the lands at 33 Greenbelt Drive in the City of Toronto, with respect to this matter.

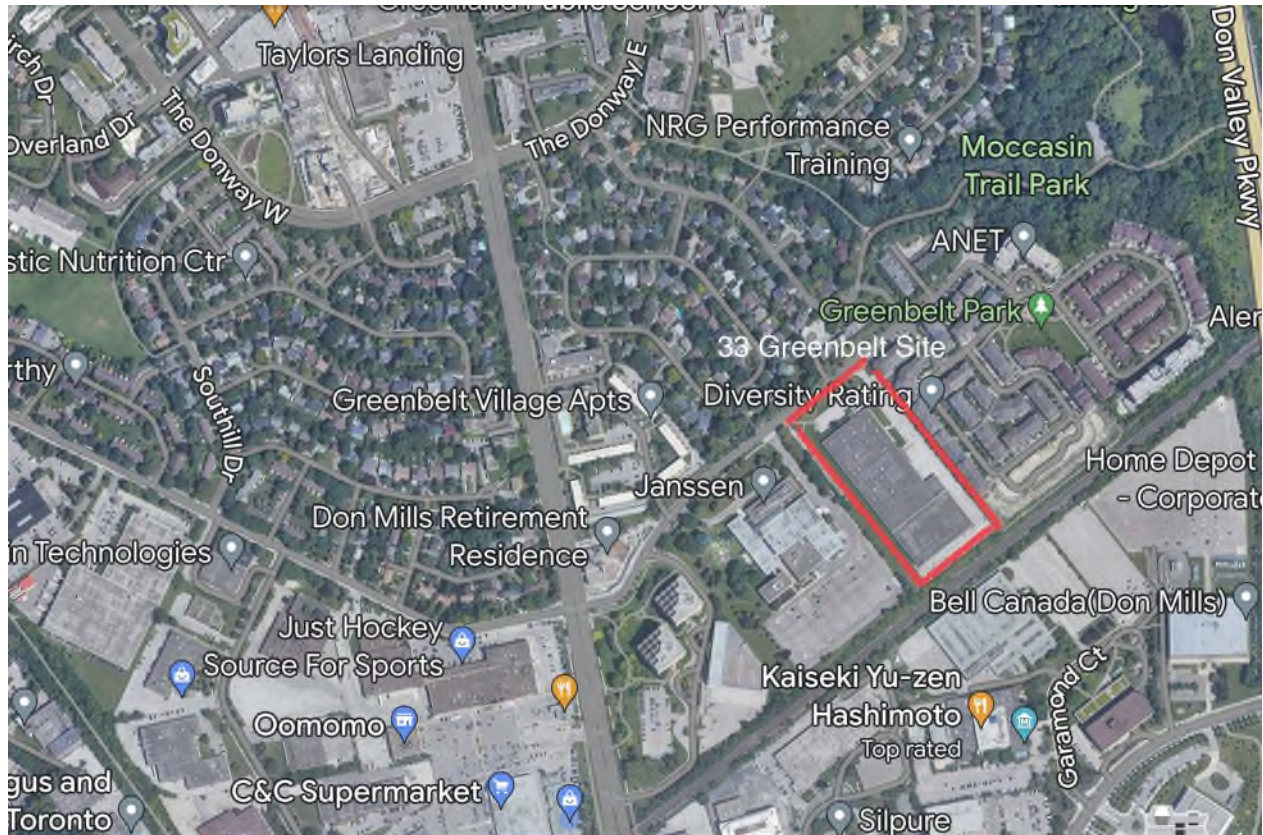
We are writing to request that the Committee recommend the conversion of the site, and recommend its designation as Neighbourhoods and Apartment Neighbourhoods.

Site is in a Residential Neighbourhood, Adjacent to Previously Converted Properties

The subject lands are on the south side of Greenbelt Drive, about 300 metres east of Don Mills Road, in Toronto. They are currently designated as general employment.

The lands in question were previously occupied by a combined office and distribution centre for Grand & Toy, formerly a chain of office supply stores, which now operates exclusively on-line. Grand & Toy closed the operation on site in 2017. **The site has been vacant, and actively offered for lease since then - now for six years - but remains vacant.** The lands to the north are an established residential neighbourhood.

The lands to the east were previously employment, but have been converted and are now developed as a residential neighbourhood.



The owners propose to establish residential uses on the lot.

The overall lands are 3 hectares in size. Based on its size, location, and surrounding uses, conversion for residential development mirroring the approvals to the east is appropriate.

The demonstrated unsuccessful efforts to lease the site for the past six years suggest that it is no longer appealing to potential tenants for warehousing or manufacturing (the uses for which employment designation protects land). As such, its continued designation as employment makes little sense from a planning perspective. The only result is that, without a conversion now, the lands will remain underutilized (likely vacant) for a decade or more awaiting the next municipal comprehensive review.

Planning Staff Arguments Against Conversion Do Not Match the Planning or Market Realities of this Area

We disagree with the recommendation of planning staff to refuse the conversion. Staff optimism regarding the potential to find employment users for the site does not match the demonstrated market experience of the owners.

Staff suggest that approval of the conversion would represent a precedent. Such precedents for residential conversion, development and intensification already exist in quantity in the neighbourhood - including the previous conversion of the property abutting the site to the east. The proposal from the owners is to essentially duplicate the type of development on the next door property.

The prevailing character of the neighbourhood is already residential.

Planning staff comments state in one location, that “the lands do not have good transit accessibility” and that the “nearest high order transit station is Pape Station, which is approximately 6.4 km from the lands”. This presumably makes the site poorly suited for residential intensification. Yet elsewhere in the analysis, the same staff observe that the area “will benefit from the introduction of the Eglinton Crosstown LRT and Ontario Line subway”. In fact, the Science Centre station on both lines will be a short walking distance away for future residents.

It Appears Unlikely that this Site Will Develop or Be Used for Manufacturing or Warehousing - The Purpose of the Employment Area Protection

It appears unlikely that this site will be developed or used for manufacturing or warehousing in the foreseeable future. The surrounding area has been transitioning away from employment for some time. The approved and existing community context makes it an increasingly inappropriate location for the heavy truck traffic, and the associated effects that would result from such an employment use.

There are No Land Use Compatibility Concerns if Conversion Is Approved and Residential Development Takes Place

There are no nearby manufacturing uses that would have their operation constrained under provincial land use compatibility guidelines, should residential development take place on the lands at 33 Green Belt Drive. Lands to the west, which are designated employment, feature the Janssen Pharmaceuticals, an arm of Johnson & Johnson. Little activity or track traffic originates from this site currently. It appears that no manufacturing takes place on site. There are no Environmental Compliance Approvals for the Janssen site - one would anticipate such approvals applicable to the site if it was used for manufacturing.

The south boundary of the site is an active railway line. There are employment uses to the south of the tracks,

A land use compatibility study was conducted by RWDI dated March 16, 2021 examined the potential for any sensitive (residential) land use at 33 Green Belt Drive to give rise issues with respect to the Ministry of Environment Land Use Compatibility Guideline.

The RWDI study concluded that, “The proposed development is not expected to cause any noise or air quality compatibility issues with respect to major industrial facilities... In addition, no future facilities are anticipated to cause adverse effects on the proposed development under the current zoning designation considering the currently permitted uses and the current character of the surrounding area”.

In conclusion, there are no issues arising from residential development limiting the ongoing operation of area businesses, related to the provincial land use compatibility guidelines from the Ministry of the Environment.

Conclusion: 33 Green Belt Drive is Well-Suited for Conversion to Residential Uses, and the Site is No Longer Viable for Employment

The development of the site for residential purposes will meet an urgent need for housing, and deliver approximately 500 units of new housing in an already well-served and designed complete community.

Re-establishment of manufacturing or warehousing on this site, in what is a neighbourhood with an existing prevailing residential character is highly unlikely.

As a result, we encourage the Planning and Housing Committee to recommend the conversion of the 33 Green Belt Drive site.

Yours sincerely,



AIRD & BERLIS LLP

Hon. Peter Van Loan
Partner

HV

AIRD BERLIS