

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
1681-1725 Eglinton Avenue East, 20-32 Mobile Drive, 1 Credit Union Drive
Conversion Request 105***

We are the planning consultants for Weins Canada Inc. and PAG Realty 2 Inc., the owners of the lands known as 1681 and 1695 Eglinton Avenue East and 24 and 30 Mobile Drive, which comprise the majority of the subject block as described above.

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 lands be redesignated from *General Employment Areas* and *Core Employment Areas* to *Mixed Use Areas*.

On August 3, 2021, 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 a Compatibility & Mitigation Study prepared by SLR Consulting (Canada) Ltd., dated July 2021 (the "SLR Compatibility/Mitigation Study").

In our opinion, the redesignation of the subject lands from *General Employment Areas* and *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 lands are located within a pocket of *Employment Areas* lands on the south side of Eglinton Avenue East that extends south to the hydro corridor and west to the Don Valley. They are not designated as a Provincially Significant Employment Zone (PSEZ). Lands to the north of the subject lands on the north

side of Eglinton Avenue East are designated *Apartment Neighbourhoods* and *Neighbourhoods*.

- The subject lands are located diagonally opposite the Sloane stop and are within walking distance of the Wynford stop on the Eglinton Crosstown LRT. They are currently served by bus stops offering frequent transit service.
- Given the existing and planned transit service, the subject lands are considerably underutilized, consisting of single-storey buildings occupied by automotive, commercial and institutional uses, surrounded by large expanses of surface parking and vehicle display and storage areas associated with the motor vehicle sales establishments.
- Intensified mixed-use redevelopment on the subject lands, including residential uses, would optimize the use of land and infrastructure along the Eglinton Avenue frontage and establish a compatible land use relationship with the residential neighbourhood to the north of Eglinton Avenue. 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.

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

- While the staff report describes the larger Bermondsey-Railside area of employment at length, it fails to focus on the specific characteristics of the lands north of the hydro corridor and the East Don River tributary, which primarily consist of automotive sales and service uses, offices and self-storage uses.
- While the staff report states that "major roads help create a predominant and physical boundary for planned business and economic activities in the area", it fails to acknowledge that arterial roads, particularly ones with higher order transit services, should be planned as two-sided intensification corridors to optimize the investment in transit infrastructure. In this regard, the staff report recommends approval of the requested conversion of lands at 1941-2201 Eglinton Avenue East and east of 1891 Eglinton Avenue through redesignation to *Regeneration Areas*, notwithstanding their location on the south side of Eglinton Avenue opposite a *Mixed Use Areas* on the north side of Eglinton (i.e. similar to the subject lands). In the case of the subject site, the hydro corridor and the East Don River tributary would form a better and more predominant physical boundary than Eglinton Avenue.

- The staff report incorrectly states that Mobile Drive provides access for traffic and deliveries to the Bermondsey Collections Yard and Bermondsey Waste Transfer Station. Access to those facilities is provided by way of a dedicated driveway entrance from Bermondsey Road to the south of the East Don River tributary.
- While the staff report states that “lands located directly south of the site are zoned Employment Heavy-Industrial (EH)”, such zoning does not in fact apply to the lands south of Mobile Drive. Instead, it applies to lands south of Old Eglinton Avenue, which are used for the Victoria Village Arena and a fire station.
- While the staff report expresses concerns with the proximity of the lands to the Bermondsey Waste Transfer Station (stated to be 245 metres away), the SLR Compatibility/Mitigation Study noted that the lands are located 320 metres from the Waste Transfer facility, which is inside the Potential Area of Influence (1000m) but outside of the Recommended Minimum Setback Distance (300 m) for a Class III industry. It concluded that the Bermondsey Waste Transfer Station is not expected to present a concern on the lands from an air quality perspective and mitigation measures are not warranted, given the site visit observations and presence of existing residences in the same proximity as the subject lands. The City’s Peer Review did not challenge the conclusions of the SLR Compatibility/Mitigation Study in that respect.

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: *Amin Tejani, Weins Canada Inc.*
Steven Alizadeh, PAG Realty 2 Inc.
Mark Flowers, Davies Howe LLP