

MEMORANDUM

Date: June 1, 2023

To: City of Toronto Planning and Housing Committee

From: The Biglieri Group Ltd.

Re: 2023.PH4.5 - Our Plan Toronto: Recommendations on Forty-Five Employment Area Conversion Requests - Final Report

INTRODUCTION

The Biglieri Group Ltd. (“TBG”) has been retained to represent Nova Construction Company Ltd., the owner of 1.14 hectares of land, municipally known as 1530 – 1536 Midland Avenue (“the Subject Site” or “Site”) in the City of Toronto. Nova Construction Company Ltd. is seeking approval of an Employment Land Conversion (“ELC”) of the Subject Site through the City’s Municipal Comprehensive Review (“MCR”) process.

On March 10th, 2022, City of Toronto Staff released a staff report entitled “*Our Plan Toronto: Employment Area Conversion Requests – Preliminary Assessments Group 3*”. The report undertook a preliminary assessment for 56 requests to convert Employment Areas lands to nonemployment uses as part of the current A Place to Grow: Growth Plan for the Greater Golden Horseshoe (APTG), 2020 conformity exercise and Municipal Comprehensive Review (MCR). The report provided initial commentary on the proposed conversion of the Subject Site. Further, on October 21st, 2022, a peer review of the Land Use Compatibility/Mitigation Study was provided by RJ Burnside.

In response to the Staff Report and Peer Review, TBG submitted a response with accompanying supporting documentation to the City of Toronto on January 4, 2023. This letter serves as a summary of our responses, as submitted in January of 2023, for the benefit of members of the Planning and Housing Committee.

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 9,617m² of space for employment opportunities, inclusive of 4,617m² of space for commercial uses within Block 1 (eastern portion of the site) and 5,000m² of space for employment uses within Block 2 (western portion of the site), as indicated in the draft Site Plan Concept (**Figure 1**). Conversely, the Site currently houses approximately 5,100 m² of employment GFA).

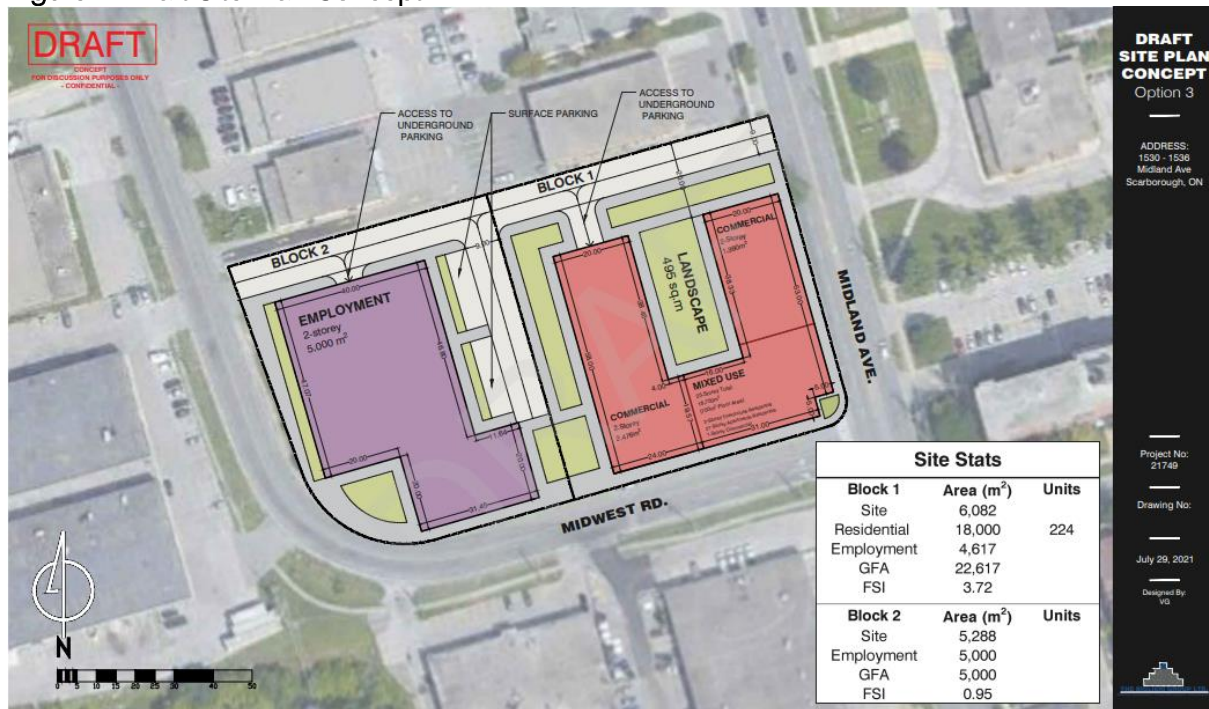
Additionally, the Owner is committed to relocating existing employment tenants within the redevelopment, based on tenant preference and appropriate land use compatibility considerations.

In support of stimulating the production rental housing supply in Toronto, approximately 224 purpose-built rental apartment units are proposed in a 25-storey tower located at the south-east corner of the Site (Block 1). At a minimum, the Owner is committed to providing 5% of said units as affordable rental units, in support of the City of Toronto Housing Action Plan, and the goal to increase the supply of housing to achieve or exceed the provincial housing target of 285,000 new Toronto homes by 2031.

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 a public services and community amenities.

Special policies and design features would be incorporated such that the Site facilitates appropriate transition between the existing employment area to the north/west (Dorset Park Employment Area) and the existing sensitive land uses to the east/south (Mixed-Use Areas, Neighbourhoods, Apartment Neighbourhoods).

Figure 1: Draft Site Plan Concept



SUMMARY OF PLANNING OPINION

Based on our review of the comments provided, it is TBG's opinion that the proposed ELC represents good planning, is consistent with the PPS, and conforms to APTG for the following reasons:

- Rental Apartments
 - The City of Toronto Official Plan emphasizes the need for both affordable and rental housing that is close to public transit and located in areas where people can work and live (per Official Plan Policy 2.2.2.). The applicant is committed to providing 100% rental housing as well as a minimum of 5% affordable rental housing (despite not being located within an Inclusionary Zoning Area).

- Employment Protection and Creation
 - The applicant is committed to the relocation of existing tenants to the appropriate blocks on the Site, based on their respective use, and in accordance with their preferences.
 - The proposed development supports the creation of more than triple the employment opportunities through the "Mixed Use" and "General Employment Area" designations proposed on the Site, according to the Employment Area Impact Study prepared by Urban Metrics.

- 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. The Site therefore proposes to provide for an on-site transition between these uses and the existing employment area. Therefore, if approved based on the current proposal, it would clearly establish the Site as the limit of conversions on the southern end of the employment area (rather than setting a precedent for further conversions).

 - Western portion of the Site:
The proposed ELC from "Core Employment Area" to "General Employment Area" on the western portion of the Site is necessary to ensure consistency with the PPS per the policies in section 1.2.6 respecting major facilities and sensitive land uses. The Site is directly across the street from lands designated "Mixed Use Area". It is therefore not appropriate for the western portion of the Site to be designated "Core Employment Area", as permitted land uses in this designation could include Category 3 industrial uses. Accordingly, "General Employment Area" is a more appropriate land use designation that will allow for a broader range of appropriate and transitional land uses on the western portion of the Subject Lands. Ultimately, an ELC to the "General Employment Area" designation will provide a buffer between the balance of the "Core Employment Area" located to the north and "Mixed Use Areas" located to the south.

 - Eastern portion of the Site:
The eastern portion of the Site is designated "General Employment Area" which permits retail and office uses. The ELC proposes redesignation of this portion of the Site to "Mixed Use Areas"; which also permits residential uses. As such, nothing is lost, but something is gained through the conversion. Furthermore, the proposed "Mixed Use Area" is an appropriate designation as the lands directly south of the Site are also designated "Mixed Use Area" and lands on the east side of Midland Ave. are designated

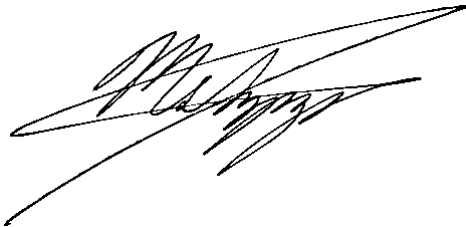
“Apartment Neighbourhood” and “Neighbourhood”. The Subject Site is unique in its location and context and would not set a precedent for conversion of other employment lands to the north and west. It is unique in its located adjacent to:

- “Mixed Use Area”, “Apartment Neighbourhood” and “Neighbourhood” lands; and,
 - An intersection, making it a corner lot (where-as other “General Employment” lands to the north along Midland are interior lots); and,
 - Proximity to higher-order transit, being 800m from Lawrence East Station.
- Lastly, per the Land Use Compatibility Study undertaken by SONAIR Environmental Inc., the proposed ELC is not expected to adversely impact the operations of neighbouring employment land uses, nor be impacted by these uses.

CLOSING

TBG thanks staff for their careful review of these responses and additional policy considerations. It remains TBG's professional planning opinion that the proposed ELC represents good planning and is appropriate for approval. Should you have any questions, or require further clarity, do not hesitate to contact the undersigned.

Respectfully,
THE BIGLIERI GROUP LTD.



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