

May 31, 2023

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

**Attention: Ms. Nancy Martins**  
**Planning and Housing Committee Secretariat**

**Re: PH 4.5 Our Plan Toronto: Recommendations on Forty-Five  
Employment Land Conversion Requests – Final Report  
3400-3422 Dundas Street West – Preliminary Assessment #118**

Hunter & Associates Ltd. is the planning consultant retained by Tilzen Holdings Limited and V.J. Benedetto Limited, registered owners (“Owners”) of a property municipally known as 3400-3422 Dundas Street West (“Site”) between Runnymede Road and Jane Street.

The 1.27 hectare (ha) Site has been owned by our client for decades and consists of a local shopping plaza anchored by a FreshCo grocery store.

We are writing to express our disagreement with the City Planning staff recommendation to refuse the requested employment land conversion. Rather, we request that your Committee support the requested conversion and recommend to City Council that the Site be redesignated from *General Employment Area* to either a *Mixed Use Areas* or *Regeneration Areas* designation.

This letter provides a brief summary and highlights the request and review process for Committee’s consideration.

On August 3, 2021, on behalf of the Owners, we formally submitted a conversion request for the Site as part of the City’s Municipal Comprehensive Review (MCR). The request was to redesignate the lands from *General Employment Area* to *Mixed Use Areas* or *Regeneration Areas* to permit residential and non-residential use. The request is identified as property #118 out of the original 150 plus conversion requests being considered by the City. The original conversion request was considered complete and accompanied by the required fee, a Planning Rationale Report (Hunter) and a Land Use Compatibility/Mitigation Study (Valcoustics/Vooren).

On June 30, 2022, we submitted a letter to Planning and Housing Committee (PHC) with respect to City Planning’s initial Preliminary Assessment. We disagreed with staff’s preliminary conclusion that the lands should be retained as *General Employment Areas*.

However, staff noted that the City's Peer Review had not been completed and we indicated that we were open to further discussions prior to a final recommendation being made.

Cambium, the City's Peer Reviewer, completed its peer reviewing findings and reported to City Planning in its letter dated October 14, 2022. We were pleased with Cambium's overall conclusion:

*“that it is possible that the conversion (ie. the Site request) will be compatible with the surrounding land use and that the proposed mitigation methods and further detailed studies (ie. recommended by Valcoustics/Vooren) will likely be able to demonstrate compliance. However, those detailed reports are required to determine the precise mitigation requirements and fully confirm compatibility”.*

In reviewing Cambium's peer review with Valcoustics/Vooren, they felt Cambium's conclusion professionally supported their own and that the additional information sought was best addressed through a future planning mechanism and prior to the Site being rezoned.

We subsequently met on December 5, 2023 with City Planning staff to review the conversion request, Cambium's peer review findings, confirm next steps and whether any additional information was needed for staff to complete its final evaluation.

At that meeting, we reiterated our professional opinion as expressed in our original planning rationale in August 2021 and summarized to your Committee in June 2022. In our opinion, the conversion request should be supported and there is a feasible and viable planning mechanism available that would protect and advance public interests and align with Cambium and Valcoustics/Vooren's recommendations.

Our suggested planning mechanism was to establish a new Site and Area Specific Policy (SASP) for the Owner's Site in the context of the broader block on the north side of Dundas Street West between Runnymede and Jane Street. Such a planning mechanism has already been implemented to the immediate north (across the rail corridor) with City Council support. There is an existing SASP 356 which redesignated the lands on the south side of St. Clair Avenue West between Runnymede and Jane Streets from Employment to Mixed Use Areas with area-specific policies that recognize more detailed planning and technical study is needed through future rezoning applications.

Notably, this area to the north, like this Site and block to the south, is predominantly commercial with various sized retailers and services (including a Walmart). It would also engage the same rail corridor activities and Lambton Yard and existing industry (such as Cintas) in such future planning and study. Simply put, there would be nothing precedent setting here should the City follow the same planning mechanism and process that Council recently supported to the north and allowed the conversion of the Owner's shopping plaza Site.

We continued to engage with City Planning staff into February. Staff acknowledged receipt of our email correspondence and indicated they would continue to review the conversion request for the Site and that they were targeting April 27<sup>th</sup> PHC for its final report on the remaining conversion requests.

On March 1<sup>st</sup>, staff advised that the timing of the final report was being extended to allow staff to complete its reviews and reporting. Staff indicated that they would be sure to reach out to us should they require something additional as a requestor/applicant and if we did not hear from staff, that they had everything needed to finalize their review and staff report to PHC.

Since then, we were asked for nothing further.

We were kept apprised of upcoming update report (April 27<sup>th</sup>) and special open house and statutory public meetings. We monitored the May 17<sup>th</sup> public open house. At that open house, staff presented their findings and recommendations, notably that only a limited number of conversion requests were being supported. This Site (#118), like most others, was not one of them.

We have reviewed City Planning's Final Report and its recommendations including the draft OPA 644 (implementing very select land use redesignations). We note staff reinforce just how only limited opportunities were recommended for employment land conversion where "unique" city building opportunities arise. By definition, it would appear that Planning staff have inherently taken a select policy lens to support only such conversion opportunities that would be one-of-a-kind, remarkable or unusual.

This despite an existing commercial area and SASP with a *Mixed Use Areas* immediately north and a Cambium peer review on behalf of the City which concludes that it is likely that this Site's conversion would be able to demonstrate land use compatibility through an appropriate planning mechanism (such as a SASP and future rezoning with detailed study). Cambium's conclusion is also supported by our original planning and land use compatibility study.

In our opinion, there is nothing remarkable or precedent setting about supporting the conversion of this Site, a decades-old shopping plaza, and that many city building goals and objectives could be achieved as set out in our original planning rationale report and request.

We appreciate your Committee's consideration of our request to support the conversion of this Site and its land use redesignation.

Please continue to keep us apprised of Committee's decision and let us know if there is anything further needed.

Yours truly,  
**HUNTER & Associates Ltd.**



J. Craig Hunter, MCIP, RPP  
President

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