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Our File No.: 211846

**Delivered**

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

**Attention: Nancy Martins, Secretariat**

Dear Sirs/Mesdames:

**Re: Item PH5.3 – Our Plan Toronto: Recommendations on Seventy Employment Area Conversion Requests and Chapter 7 Site and Area Specific Policy Review – Final Report  
1125 Leslie Street – Conversion Request No. 68**

We are solicitors for Downing Street Realty Partners, who is the owner of the property known municipally in the City of Toronto (the “City”) as 1125 Leslie Street (the “Property”), which is part of Conversion Request No. 68 regarding the Property and the adjacent lands known municipally as 1125 to 1165 Leslie Street (the “Request”). We are writing on behalf of our client to provide comments regarding the Final Report, dated June 16, 2023 (the “Staff Report”), regarding Employment Area Conversion Requests, including the Request, which is to be considered by the Planning and Housing Committee at its meeting on July 5, 2023.

In particular, we are writing to request that City Council approve the Request and redesignate the Property from *General Employment Area* to *Mixed Use Areas*. For the reasons set out below, it is clear that the Staff Report is internally inconsistent and fails to recognize the planning merits of the Request.

**Background**

The Property is located on the east side of Leslie Street with excellent access to higher order transit, including being located an approximate 10 to 15 minute walk from the Science Centre subway station and the LRT station at Leslie Street/Eglinton Avenue East through a direct sidewalk connection. The Property is part of a larger remnant employment area where a number of conversions have been approved. For example, a conversion request for the lands directly to the south is recommended for approval by City staff.

On July 30, 2021, our client and an adjacent landowner filed the Request, which would redesignate the Property from *General Employment Area* to *Regeneration Area*. By letter dated January 27, 2022, our client's planning consultant confirmed that the Request would only apply to the Property and the lands known municipally as 1125A to 1131A Leslie Street, which significantly reduced the area of land being requested for conversion as part of the Request.

Despite this confirmation over seventeen (17) months ago, City staff are inaccurately and inappropriately reporting to City Council on the basis of the original land area in the Request. This represents a fundamental flaw in the Staff Report, meaning the staff recommendation regarding the Request is inaccurate and unreliable.

On January 12, 2022, the Planning and Housing Committee received a report from City staff that included the preliminary assessments for "Group 1" of Employment Area Conversion Requests. Attachment 1 of the staff report included a preliminary assessment of the conversion request for the Property, which identified a number of issues to be considered and a preliminary assessment that the Property (and other lands) should be retained as *Employment Area* and continue to be designated as *General Employment Area*.

On May 16, 2022, on behalf of our client, we wrote to City staff to indicate that the City is not approaching conversion requests in a consistent manner. At that time, and as part of reviewing certain preliminary assessments of the City, we noted that the City received conversion requests regarding the properties known municipally as 1121-1123 Leslie Street ("**1123 Leslie**"). As acknowledged by City staff, 1123 Leslie is "geographically related" to the Property (directly adjacent to the Property) and shares many of the same characteristics.

### **The Request is Appropriate and Represents Good Planning**

Further, and as detailed in the letter from our client's planning consultant dated January 27, 2022, the basis for this conclusion is also unsubstantiated. In particular:

1. Compatibility: The Compatibility/Mitigation Study submitted by our client concluded that the proposed conversion of the Property and introduction of mixed uses would be compatible with the surrounding land uses from an air quality and noise perspective with the implementation of standard mitigation measures. There would be no negative impacts on surrounding industries. Despite provision of this study, the Staff Report indicates that this study was not provided to the City's peer review consultant, meaning that the City's peer review process is incomplete and flawed.
2. Complete Community: A mixed-use redevelopment of the Property would contribute to the provision of a complete community in this area. Contrary to the staff report, the Property is not isolated from community services but has good proximity to local services, stores and public service facilities with opportunities for connections to the surrounding parks and open space system.

3. Good Access to Higher Order Transit: The Property is located an approximate 10 to 15 minute walk from the Science Centre subway station and the LRT station at Leslie Street/Eglinton Avenue East through a direct sidewalk connection. The Route 51 and Route 54 bus service also provide direct connections to higher order transit.
4. Lack of Transportation Impact on Existing/Future Employment Uses: The existing employment area to the east is separated from the Property by the Don Mills Trail and utilizes Prince Andrew Place, Barber Greene Road and Don Mills Road for access. Leslie Street is not utilized to service or access this employment area.
5. Opportunity for Mixed-Use Development: As identified in the July 30, 2021 submission, and confirmed in the January 27, 2022 letter, the mixed-use vision for the Property will retain employment uses at the same amount of gross floor area as existing today, with the potential to increase the amount of employment in the area through modern built form and flexible design. The Property is neither large nor a key location for employment uses, but the conversion request would secure office uses and deliver jobs as part of any redevelopment.

### **Inconsistent Approach of City Staff to Conversion Request**

As noted above, City staff are recommending approval of the conversion request regarding 1123 Leslie. There is no reason to take a different approach to 1123 Leslie than the Property (and the adjacent property).

1123 Leslie has the same creek feature as the Property, but this feature did not impact City staff's review of the conversion request for 1123 Leslie. Instead, despite having the same location attributes, policy framework and characteristics, the City did not recommend that 1123 Leslie be retained as *Employment Areas*. (Another conversion request in the area regarding the property known municipally as 1121 Leslie Street is also being recommended by staff for approval.)

In summary, 1123 Leslie, the Property, and the adjacent lands all share similar characteristics:

- located within walking distance to higher order transit;
- appropriate separation from potentially sensitive uses with attainable mitigation measures, as required;
- good access to the public street network;
- good and similar distances from community services and facilities;

- proposed mixed-use development with employment and residential uses to assist in delivering a complete community;
- opportunities for inclusion of pedestrian and cycling connections to existing and future trail connections.

## **Conclusions**

For all of the reasons outlined above, the Request clearly should be approved by the City. Our client and the owner of the adjacent property are committed to the delivery of a mixed-use, complete community that would assist the City in achieving housing and employment targets set by the Province and realize the development potential of underutilized lands with excellent access to higher order transit. This request is also consistent with staff advice regarding the conversion request filed in respect of 1123 Leslie.

We would appreciate receiving notice of any decision made by City Council in connection with this matter. Please do not hesitate to contact us if any further information is required.

Yours truly,

**Goodmans LLP**



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