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Our File No.: 193217

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 5395-5409 Eglinton Avenue West – Conversion Request No. 100

We are solicitors for CR4 Centennial Centre Inc., who is the owner of the property known municipally in the City of Toronto (the "**City**") as 5395-5409 Eglinton Avenue West (the "**Property**"), which is part of Conversion Request No. 100 regarding the Property (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, and for the reasons set out below, we are writing to request that City Council approve the Request and redesignate the Property from *Core Employment Area* to *Mixed Use Areas*.

Background

The Property is located on the south side of Eglinton Avenue West at the boundary between the City of Toronto and the City of Mississauga. The Property is opposite Renforth Station, which is a major transit interchange for nine routes from four different transit services and a stop on the western portion of the Eglinton Crosstown currently under construction. Adjacent uses include the 189-hectare Centennial Park, a wide hydro corridor and low-rise residential buildings across the hydro corridor that form part of the Centennial-Eringate neighbourhood. Although the Mississauga Airport Corporate Centre is located on the other side of Eglinton Avenue West, the Property is isolated from this area by the 100-metre right-of-way width for Eglinton Avenue West.

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On August 3, 2021, our client filed the Request with a detailed planning analysis from SvN Architects + Planners. The Request outlined our client's vision to transform the Property from an automobile-oriented, low-density, dated suburban office park into a vibrant mixed-use community delivering jobs and condominium residence (a missing component of the Etobicoke housing stock) in proximity to a major transit hub. In particular, the Request proposed two buildings with approximately 22,000 square metres of contemporary office space, in addition to new residential buildings organized around a network of courtyards, paths, community spaces and open spaces.

On February 27, 2023, our client filed a response to the preliminary assessment from City staff regarding the Request. In particular, our client provided a planning letter from SvN Architects + Planners, an updated land use compatibility study responding to the peer review, and an employment conversion market analysis. All of the materials provided to the City clearly support approval of the Request and the delivery of a mixed-use intensification of the Property. It is disappointing that this material has not been made available to Planning and Housing Committee or City Council so that a clear understanding of the vision behind the Request can be assessed when the Staff Report is considered.

The Request is Appropriate and Represents Good Planning

As detailed in the extensive materials submitted in support of the Request, the recommendation in the Staff Report is without merit. In particular:

- 1. <u>Alleged Impact of the Pearson International Airport Operating Area</u>: The proposed development is designed and would be constructed to meet the applicable guidelines. The land use compatibility assessment confirmed that any airport noise levels would be acceptable and mitigated through standard construction practices with no negative impacts on the long-term functioning of the airport.
- 2. <u>Compatibility</u>: More generally, the land use compatibility assessment otherwise confirmed that the 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.
- 3. <u>Complete Community</u>: A mixed-use redevelopment of the Property would contribute to the provision of a complete community in this area. The Property is well-served by existing community services and facilities to the south and east, including one of the City's largest parks, an extensive selection of sports and recreational facilities, and several elementary and secondary schools in walking distance. The Property clearly has a closer relationship with the established residential neighbourhood than the employment area across Eglinton Avenue West.

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- 4. <u>Good Access to Higher Order Transit</u>: As noted above, the Property is located opposite Renforth Station, which is a major transit interchange for nine routes from four different transit services (see above).
- 5. <u>Opportunity for Mixed-Use Development</u>: 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.
- 6. <u>No Impact on Existing Employment Uses</u>: The conversion market analysis confirmed that the Property is not desirable for traditional industrial employment uses and that the Airport Corporate Centre has a significant supply of vacant office land. The Request would have no impact on the overall potential office supply in the market area.

Conclusions

For all of the reasons outlined above, the Request clearly should be approved by the City. Our client is 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. The Property is an obsolete office park with no meaningful connection to the employment area across Eglinton Avenue West. In any event, the Request would deliver <u>a mix of jobs and housing</u> in close proximity to higher-order transit while invigorating a site with expected decline of future employment potential.

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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