

July 4, 2023

Project No. 17117

City Clerk
Attention: Nancy Martins, Administrator
Planning and Housing Committee
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Ms. Martins,

Re: PH5.3 Final Assessment of Employment Area Conversion Request for 4711 - 4751 Steeles Avenue East (No. 026)

On July 5, 2021, Urban Strategies Inc. submitted a conversion request, on behalf of the owner, to re-designate the lands known municipally as 4711-4751 Steeles Avenue East from *General Employment* to *Mixed Use Areas*. We were disappointed to learn that Staff's final assessment concluded these lands should continue to be designated as *General Employment Areas*.

Staff have identified a list of issues with this conversion request, including the cumulative impact of multiple conversion requests on the overall viability of the Employment Area and its planned function, as well as the ability to provide a stable and productive operating environment for existing and new businesses and their economic activities. Staff also indicated that conversion of the properties may present compatibility issues with surrounding existing and permitted uses. Additionally, staff pointed out the need for convenient access to community facilities and services required for complete communities. Staff have evaluated the subject properties as part of a cluster of conversion requests in the same general employment area.

In response to the preliminary assessment, we wish to highlight the following:

- **The properties are part of an emerging mixed-use node.** The subject properties are at the edge of the employment area fronting onto Steeles Ave West and are the only quadrant surrounding the Milliken GO station not designated for a mix of uses supportive of the current and future transit infrastructure. Conversion would also be consistent with the outcome of the Steeles Redlea Regeneration Area Study, which

resulted in the conversion of the Global Fortune lands immediately west of the subject properties. Technical studies demonstrated that on-site measures would adequately mitigate impacts from industrial uses to the south to achieve compatibility.

- **The site has characteristics that further differentiate it from others in the cluster.** We appreciate the need to consider the potential cumulative impact of multiple requests in an employment area. However, the subject properties are distinct from the others. They have immediate adjacency to Milliken GO Station (indeed lands were expropriated to facilitate track widening and other upgrades related to pedestrian access) and front onto Steeles Ave West. Notably, unlike 3447 Kennedy Road, 29 Redlea Avenue and 681 Silver Star Boulevard, they are not adjacent to active industrial uses and instead are adjacent to commercial lands that provide a buffer to industrial uses.
- **The site is less suitable for commercial uses and not appropriate for industrial uses.** The recently constructed Steeles rail underpass makes the bulk of the site less desirable for retail uses that rely on visibility from passing vehicular traffic, and the site's proximity to existing and planned residential uses immediately to the west, resulting from the Steeles/Redlea Regeneration Study, make it inappropriate for industrial uses.
- **Compatibility concerns can be addressed.** The findings of the compatibility study indicated that adverse emissions are not anticipated, and noise and vibration impacts can be adequately mitigated through the design of future mixed-use buildings. These findings are consistent with those for the Global Fortune mixed-use site, which has the same relationship to active industrial uses. The findings of the submitted transportation study indicated that access to the employment lands to the south also will not be affected.
- **There is infrastructure in the area to support future residential development.** A range of community services and facilities exist near the site, and future development would provide opportunities to enhance these facilities with additional open space and other amenities. Furthermore, introduction of residential uses in this location would support the creation of a community on the south side of Steeles, whereas now the Global Fortune site is an isolated pocket.

Additionally, the conversion of the Subject Properties would align with provincial directions, introduced through Bill 97, which amends the Planning Act definition of "area of employment" to expressly exclude institutional uses and commercial uses, including

retail and office uses that are not associated with manufacturing, research and development in connection with manufacturing, warehousing, and goods movement. Under the new definition, which received Royal Assent on June 8, 2023, and will come into force on a day to be named by proclamation of the Lieutenant Governor, the subject properties would no longer be considered an “area of employment”.

We would ask that staff reconsider their decision to retain these lands as employment, and we kindly request a meeting with staff to discuss their concerns.

Yours very truly,
URBAN STRATEGIES INC.



Emily Reisman, RPP, MCIP
Partner



Tim Smith, RPP, MCIP
Principal

c: Councillor Nick Mantas