



BOUSFIELDS INC.

Project No. 11180-3

July 4, 2023

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

Attention: Nancy Martins

Dear Committee Members,

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 29 Redlea Avenue, Conversion Request 75

We are planning consultants to LeBanc Development (“LeBanc”) with respect to a 1.47 hectare (3.6 acre) property located at the current terminus of Redlea Avenue, immediately south of the commuter parking lot for the Milliken GO Transit Station. The property is known municipally as 29 Redlea Avenue (formerly known as 3447 Kennedy Road Rear).

We are writing to express our disagreement with the staff recommendation to refuse the requested employment land conversion. Instead, we request that the Committee support approval of the requested conversion and, in particular, recommend to Council that the subject lands be redesignated from *General Employment Areas* to *Mixed Use Areas*.

On July 30, 2021, we submitted a letter to the City of Toronto on behalf of our clients requesting an employment land conversion. The letter set out detailed planning reasons in support of our request. The conversion request was also supported by a Compatibility/Mitigation Study Letter Report – Air Quality and Noise prepared by SLR Consulting (Canada) Ltd., dated July 30, 2021 (the “SLR Compatibility/Mitigation Study”).

Based on the materials submitted in support of the employment land conversion request, including all the supporting reports and studies, the conversion would result in a significant amount of new housing and increased employment opportunities in a revitalized urban form adjacent to Milliken GO Transit Station.

Rationale to support the requested employment land conversion:

In our opinion, and for the specific reasons set out below, the redesignation of the subject lands from *General Employment Areas* to *Mixed Use Areas* would be appropriate in land use planning terms. In summary, the planning rationale for the request is as follows:

- The subject lands are not designated as a Provincially Significant Employment Zone (PSEZ). Within this area are lands that have been redesignated to *Mixed Use Areas* which have been approved for a mixed-use development with high density residential uses.

- The subject lands are located immediately south of, and abutting, the Milliken GO Station and associated commuter parking lot (39 Redlea Avenue). To the immediate north of the GO Station is an approved mixed-use development at 4665 Steeles Avenue East, which was the culmination of a lengthy planning process which resulted in SASP 395 and OPA 321. At the outset of this process the subject lands were designated Regeneration Areas in the City Official Plan, further enforcing the argument that it is appropriate for non-employment uses.
- Lands to the west of Kennedy Road comprise an established residential community (the Heathwood Heights Steeles Residential Community) and lands to the north of Steeles Avenue, in the City of Markham, are a mix of residential and mixed-use areas.
- Given the existing transit service, the subject lands are considerably underutilized, consisting of a landscape materials storage yard.
- Intensified mixed-use redevelopment on the subject lands, including residential uses, would optimize the use of land and infrastructure on a site immediately adjacent to a GO Station and establish a compatible land use relationship with the residential neighbourhood east of Kennedy Road. In addition, the requested conversion would allow for transit-supportive mixed-use intensification within walking distance of existing higher-order transit.
- The proposed conversion would facilitate increased residential and employment densities in proximity to existing transit routes and higher order transit (Milliken GO Station) and would therefore be positioned to contribute to the City's 2051 population and jobs forecasts as well as the minimum target densities for the future MTSA designation.
- The subject site is well served by hard services, including existing surface transit routes, higher order transit and soft services including schools, childcare facilities, libraries, places of worship, parks and other community facilities and amenities. The subject site is located within an area well served by existing and planned transportation, water, and sewer infrastructure.
- A mixed-use redevelopment of the subject site would allow for a revitalized public realm along Redlea Avenue, in proximity to a GO Station.
- The future development could facilitate non-residential uses such as commercial or retail and would mitigate any potential land use conflicts with adjacent employment uses. Higher density forms of residential and employment uses, including small-scale offices such as personal service; medical; dentist, etc., would also be well-suited to this location given its existing and planned context and its access to existing surface transit and higher order transit.
- Given the subject lands location and its size, a future mixed use development would not impact the overall viability of the employment area. It is intended that more jobs would be generated through a redevelopment than what currently exists.

- The proposed conversion would not remove a large or key location for employment uses but would provide the potential for an increase in jobs on site as part of an overall mixed use development.
- A redevelopment would not preclude the retention of similar uses on the site, subject to the proper zoning conditions, and could pursue more intensive forms of employment uses that would generate an overall net-gain for jobs.
- The use of the subject site as a mixed-use development that includes residential uses, would not reduce, or eliminate the visibility or accessibility of the surrounding employment lands compared to how the subject site functions today. The subject site is located adjacent to the GO Station, with an expansive surface parking lot immediately north and the rail corridor is located to the east. The redevelopment of the subject site does not reduce visibility or accessibility to the remaining adjacent employment areas which either have a Kennedy Road or Passmore frontage or will be accessed/visible from the future Redlea Avenue extension.
- The conversion of the existing uses to a greater form of mixed-use intensification will help maintain a diverse economic base in the Steeles Redlea Regeneration Area and explore opportunities for new employment uses. The introduction of residential, together with retail, commercial or small-scale office space as part of a mixed-use development on the subject site, could generate a greater number of jobs compared to those generated on-site today.
- The Final Assessment in the staff report devotes an entire paragraph to alleged deficiencies identified through the Peer Review of the SLR Compatibility/Mitigation Study but includes no mention of the fact that SLR submitted a detailed response to the Peer Review.

For all the aforementioned reasons, we request that the Committee support approval of the requested conversion and, in particular, recommend to Council that the subject lands be redesignated from *General Employment Areas* to *Mixed Use Areas*.

Thank you for your consideration of this request. If you have any questions with respect to this letter or require additional information, please do not hesitate to contact the undersigned.

Yours very truly,
Bousfields Inc.



Kate Cooper, B.E.S., MCIP, RPP

cc: Adam Liu, LeBanc Development