



BOUSFIELDS INC.

Project No. 2175

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
12-50 Drummond Street & 1, 1A and 1B Harold Street
Conversion Request 124***

We are planning consultants to Drummond/Harold Group with respect to an assembly of properties on the north side of Drummond Street, east and west of and Harold Street, west of Royal York Road. The lands are approximately 1.07 hectares in size and are municipally known as 12, 14, 16, 20, 30 and 50 Drummond Street and 1, 1A and 1B Harold Street (the “subject site”).

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 *Core Employment Areas* to *Mixed Use Areas*, or another appropriate designation that includes permission for non-employment uses, through the ongoing Municipal Comprehensive Review process.

On July 26, 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. Based on the letter submitted in support of the employment land conversion request, the conversion would result in an appropriate and more consistent land use pattern and provide increased housing and employment opportunities in a revitalized urban form with proximity to Mimico 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 *Core Employment Areas* to *Mixed Use Areas*, or another appropriate designation that includes permission for non-employment uses would be appropriate in land use planning terms. In summary, the planning rationale for the request is as follows:

- The subject site is located in the Mimico neighbourhood which is characterized by a mix of low and mid-rise residential uses, with residential, commercial, automotive, and institutional uses fronting both sides of Royal York Road, and pockets of industrial/ commercial buildings on either side of the CNR/ GO Lakeshore West rail corridor.
- The subject site and lands to the immediate north, west and southwest are designated *Core Employment Areas* while the lands to the northeast, east and southeast are designated *Mixed Use Areas*, with lands to the immediate south designated *Parks*. The requested conversion from *Core Employment Areas* to *Mixed Use Areas* would implement a more consistent land use pattern along the Royal York Road frontage and is appropriate in order to explore a comprehensive redevelopment in this area of Mimico. The conversion would allow for a more compatible land use with the adjacent residential uses.
- The subject site is not designated as a Provincially Significant Employment Zone (PSEZ).
- The subject site is well served by hard services, including existing surface transit routes, proximity to a priority transit segment and soft services including schools, childcare facilities, libraries, places of worship, parks and other community facilities and amenities.
- The subject site has good access to transit given their location approximately 400 metres southwest of the entrance to the Mimico GO Station which is located on the Metrolinx Lakeshore West rail line. There are also a number of TTC Bus Routes in proximity to the subject site. The requested conversion to permit non-employment uses would facilitate transit-supportive intensification and contribute to “the achievement of the minimum intensification and density targets” of the Growth Plan.
- A mixed-use development, including a broader mix and range of uses, including residential and commercial uses, would make more efficient use of the subject site and be well positioned to optimize both transit ridership and community amenities in the surrounding area such as parks and schools. A future development could also facilitate non-residential uses such as commercial or retail to support the adjacent residential community as these amenities are not in abundance in the immediate vicinity.
- The requested conversion of the lands will have the ability to accommodate more jobs than exist on the site today through the inclusion of retail, commercial space, live-work units, office space and/or residents working from home.
- In our opinion, the lands are not required to be reserved over the long term solely for employment purposes as the small-scale industrial uses are not a major

contributor to the broader employment area. A redesignation which permits a broader range of uses would not only allow for the introduction of residential uses, but also broaden the range of permitted uses and create an opportunity to further intensify the subject site with employment uses, such as small-scale professional offices or commercial/retail uses. These types of uses would provide a net-benefit for the adjacent community and increase the overall employment on the site in comparison to current estimates.

- In our opinion, the requested conversion will not adversely affect the overall viability of the Employment Area and the maintenance of a stable operating environment for business and economic activities due to the subject sites location within an area with a mix of uses including *Mixed Use Areas*, *Parks*, *Neighbourhoods* and *Apartment Neighbourhoods*, as well as the uses, specifically south of the site which are not anticipated to produce adverse noise, vibration or other emissions such as dust and odor.
- A portion of the subject site is adjacent to the CNR/ GO Lakeshore West rail corridor however, it is not anticipated that the corridor will be negatively impacted by the proposed conversion. Detailed supporting studies would be undertaken and provided a future development application stage in support of development applications.

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 *Core Employment Areas* to *Mixed Use Areas* or another appropriate designation that includes permission for non-employment uses.

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

c.c. Mr. Brad Daniels, Drummond/Harold Group
Mr. Gordon Sproule, Drummond/Harold Group