

May 6, 2025

By E-Mail to: clerk@toronto.ca

Matter No. 172872

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

Attention: John D. Elvidge, Clerk

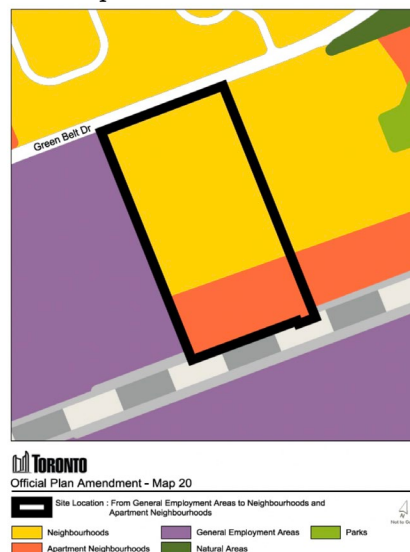
Dear Mr. Elvidge:

**Re: Toronto Proposed Official Plan Amendment 804
Proposed Regeneration Area Designation
Request for Designation as Neighbourhoods and Apartment Neighbourhoods
OTT Properties - 33 Green Belt Drive
Planning and Housing Committee Meeting Thursday May 8, 2025
Item PH 21.1**

We act for 33 Green Belt Drive Limited Partnership, owner of the lands at 33 Green Belt Drive in the City of Toronto, with respect to this matter. The subject lands are proposed to be redesignated as regeneration area in proposed Official Plan Amendment 804.

We generally support the direction proposed in Toronto Official Plan Amendment 804 to remove the Employment Areas designation from the 33 Green Belt Drive lands.

Requested Modification



However, rather than redesignating the lands as regeneration area, we are instead asking the City to designate them as Neighbourhoods and Apartment Neighbourhoods.

The regeneration area designation will result in a significant delay in building housing on the subject lands. The proposed residential development is a straightforward extension of the existing abutting neighbouring development form. There is no need for an extensive study and delay to arrive at an obvious ultimate outcome. The lands should be redesignated now to facilitate the ultimate housing development in Official Plan Amendment 804.

Lands at 33 Green Belt Drive in Don Mills Should be Redesignated to Neighbourhood and Apartment Neighbourhood By Revision to proposed the Official Plan Amendment 804

The subject lands are on the south side of Green Belt Drive, about 300 metres east of Don Mills Road, in Toronto. The site is approximately 2.97 hectares in size. The lands are currently designated as General Employment Areas.

The lands in question were previously occupied by a combined office and distribution centre for Grand & Toy, formerly a chain of office supply stores, which now operates exclusively on-line. Grand & Toy closed the operation on site in 2017. The site has been vacant, and actively offered for lease since then - now for eight years - but remains vacant. The lands to the north are an established residential neighbourhood.

The lands to the east were previously employment, but have been converted and are now developed as a residential neighbourhood.

The lands to the north are part of the long-established residential Don Mills community, which was constructed almost 70 years ago.

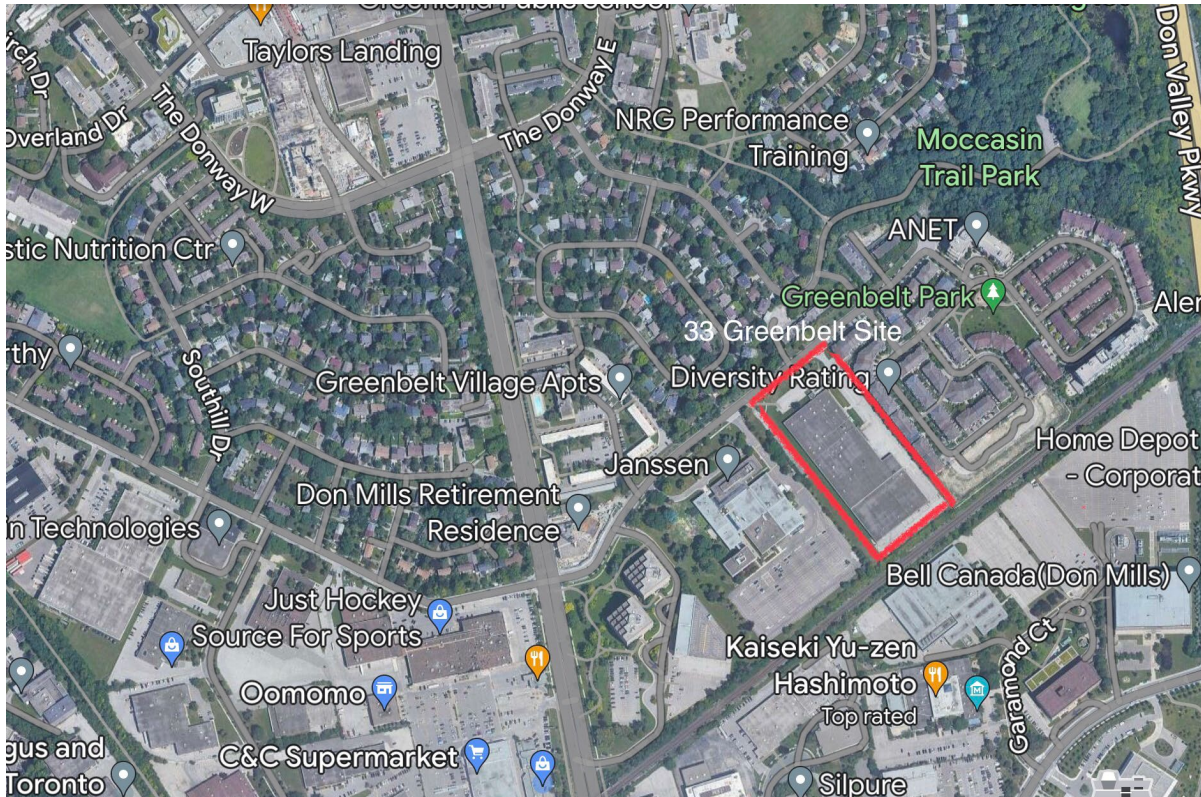
The owners propose to establish residential uses on the lot.

The three hectare parcel represents the next logical extension of residential development as the community continues to undergo transition. Based on its size, location, and surrounding uses, conversion for residential development mirroring the approvals to the east is appropriate.

The site is part of a small and shrinking island of employment designated land on the south side of Green Belt Drive - with the overwhelming majority of existing job-creating uses in this area located either south of the railway which marks the southern boundary of 33 Green Belt, or west of Don Mills Road.

The demonstrated unsuccessful efforts to lease the site for the past seven years demonstrate that it is no longer appealing to potential tenants for warehousing or manufacturing (the uses for which employment designation protects land). As such, its continued designation as employment makes little sense from a planning perspective. Proposed Official Plan Amendment 804 recognizes this through a regeneration area designation. However, this will still result in a requirement for a major secondary plan study, that will consume considerable time before housing can be delivered.

It is highly unlikely that the study will result in an outcome different than the designations proposed here. The only result will be that the study will delay the delivery of the housing at 33 Green Belt, while delivering no discernible benefit in terms of proposed uses or design of the site.



Thus, it is in the public interest that the subject site be designated as neighbourhoods and apartment neighbourhoods in Official Plan Amendment 804.

Neighbourhoods and Apartment Neighbourhoods Designation of 33 Green Belt Drive Would Reflect Market Realities, Changing Area Character and Surrounding Planning Context

The subject lands are in an area that has been undergoing transition for some time, with a series of planning decisions delivering conversions from employment to residential uses, and gentle residential intensification in the neighbourhood.

The properties on the north side of Green Belt Drive (40 Moccasin Trail and 50 Green Belt Drive) were approved for residential intensification by way of a settlement at the Ontario Municipal Board in 2017. The approved development consists of one eight storey building, and one four storey building. Together, the approval is for 294 residential units.

The lands to the east were once the home of the 200,000 square foot Dominion Blue Envelope facility. It was demolished in 1993, and the lands to the east are now developed for a mix of townhouses and apartments.

There is a new ten story residential building at the north east corner of Green Belt Drive and Don Mills Road, reflecting the intensification trend.

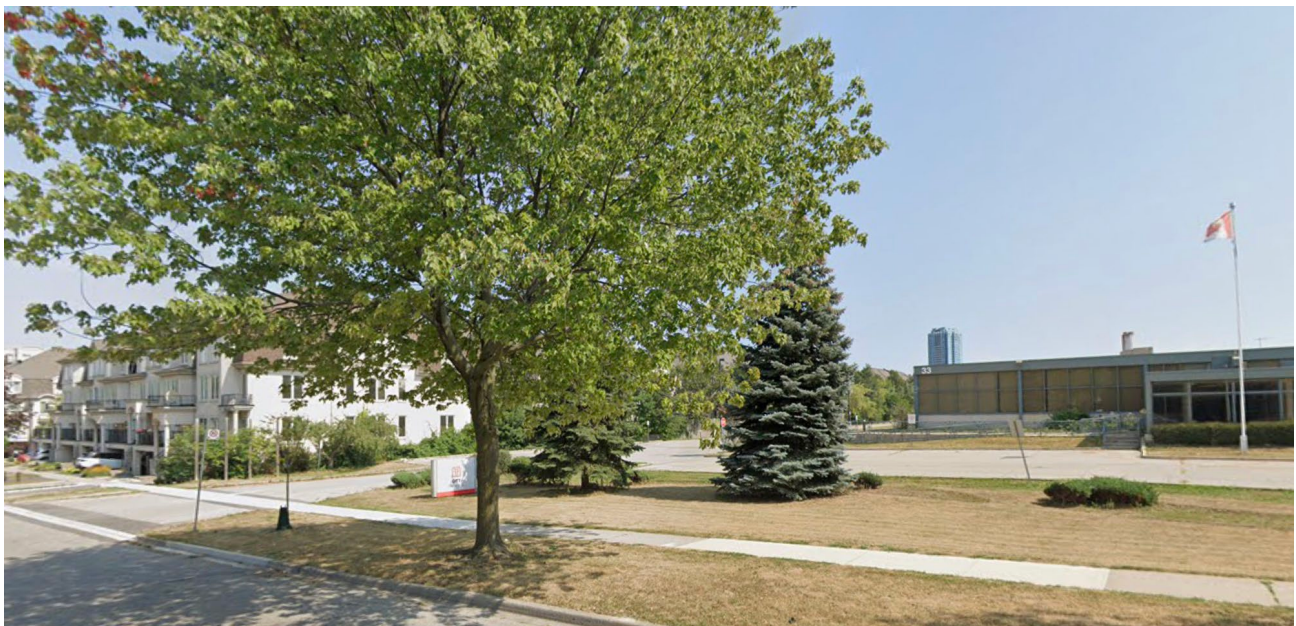
The broader context to the north is a residential neighbourhood dating to the original development of the Don Mills community.

As a result, the Green Belt Drive site is already bordered on the north and east by an established residential neighbourhood. This fundamental residential neighbourhood character makes this site an appropriate location for residential development and intensification.

It Appears Unlikely that this Site Will Develop or Be Used for Manufacturing or Warehousing - The Purpose of the Employment Area Protection

It appears unlikely that this site will be developed or used for manufacturing or warehousing in the foreseeable future. The surrounding area has been transitioning away from employment for some time. The approved and existing community context makes it an increasingly inappropriate location for the heavy truck traffic, and the associated effects that would result from such an employment use.

The images below show the relationship of the vacant 33 Green Belt Drive site to the new residential development next door to the east.



If this site was being approached as a blank canvas today, it is unlikely that a planner would recommend an initial designation to provide for manufacturing or warehousing.



Almost certainly, the proposed designation would be to identify the lands for residential uses through a Neighbourhoods and Apartment Neighbourhoods designation. For the same reason, it is not appropriate to maintain the employment designation on this site.

The Existing Approvals, and the Community Context, Make Conversion the Right Planning Choice for 33 Green Belt Drive

The lands to the north and the east represent stable residential neighbourhoods, which are undergoing gradual change and residential intensification. That includes the approvals for four and eight storey apartment buildings on the north side of Green Belt Drive, across from the subject site.

The proposed introduction of a residential use on the site would be far more appropriate for, and compatible with, the existing community context than warehousing or manufacturing.

There Are No Land Use Compatibility Concerns if Designation to Residential Is Approved as Part of Official Plan Amendment 804 and Residential Development Takes Place

There are no nearby manufacturing uses that would have their operation constrained under provincial land use compatibility guidelines, should residential development take place on the lands at 33 Green Belt Drive. Lands to the west, which are designated employment, feature the Janssen Pharmaceuticals, an arm of Johnson & Johnson. Little activity or track traffic originates from this site currently. It appears that no manufacturing takes place on site. There are no Environmental Compliance Approvals for the Janssen site - one would anticipate such approvals applicable to the site if it was used for manufacturing.

To the west of Janssen, fronting on Don Mills Road, is the Morneau Shepell office building. Morneau Shepell was a provider of employee benefits to employers. It was rebranded in recent years as “Lifeworks”, and has since been acquired by Telus Health, and is now headquartered at 25 York Street in the financial core. There still appears to be considerable office activity at Don Mills Road, however space in the Morneau Shepell building is now being actively marketed for lease.

The south boundary of the site is an active railway line. There are employment uses to the south of the tracks.

A land use compatibility study was conducted by RWDI dated March 16, 2021 examined the potential for any sensitive (residential) land use at 33 Green Belt Drive to give rise issues with respect to the Ministry of Environment Land Use Compatibility Guideline.

The RWDI study concluded that, “The proposed development is not expected to cause any noise or air quality compatibility issues with respect to major industrial facilities. In addition, no future facilities are anticipated to cause adverse effects on the proposed development under the current zoning designation considering the currently permitted uses and the current character of the surrounding area”.

This type of land use compatibility study is part or what one might expect to be considered in the study of a regeneration area. However, from the perspective of 33 Green Belt Drive, this work has already been completed, and can be relied upon to approved residential development (a Neighbourhoods and Apartment Neighbourhoods designation) at the Official Plan Amendment 804 stage. There is no benefit to be obtained by delaying the inevitable residential designations through the secondary plan study. It will only further delay the delivery of the housing potential on this site.

In conclusion, there are no issues arising from residential development limiting the ongoing operation of area businesses, related to the provincial land use compatibility guidelines from the Ministry of the Environment.

Housing is an Important Provincial Priority - The Subject Site has The Ability to Deliver Close to 500 New Residential Units

As reflected in the Provincial Housing Supply Action Plan, the delivery of additional housing supply is an important policy objective of the province, in order to meet the significant and growing demand for such housing.

While there is no specific development application on the site, (as it had not yet been converted), it is anticipated that it would develop with a mix of townhouse and apartment housing similar to the lands abutting to the east. The number of units that this will produce will depend on the unit mix, and detailed design. However, it is reasonable to conclude that, using typical current unit sizes, such a development would approximately 500 units of new housing.

This site offers the opportunity to deliver a significant increase in housing supply, in an appropriate location, well-served by amenities.

New Planning Act Definition of “Areas of Employment” Limits Permitted Uses to Manufacturing and Warehousing - Which the Market has Demonstrated are No Longer Viable or Desirable for Users at this Location - OPA 804 Direction to Convert Lands is Appropriate

Proposed Official Plan Amendment 804 responds to recent changes in the *Provincial Planning Act* and Policy requirements. Under the recent amendments to the *Planning Act*, the definition of Area of Employment is being more narrowly defined to focus protection on manufacturing and warehousing uses. Of note, office uses are no longer permitted uses in employment areas (with the exception of the offices that are part of the principal manufacturing or warehousing on site).

There is no evidence - despite active marketing efforts for seven years now - that there are any prospective manufacturing or warehousing uses interested in locating at this site. As such, in view of the *Planning Act* definition of Areas of Employment, maintaining the site as employment means that the subject site should be maintained for manufacturing or warehousing - uses which are not going to locate here.

The City conclusion that it is now appropriate to convert the site from employment is appropriate, and will permit residential development to proceed. However, there no reason on this site to delay that residential development for a lengthy secondary plan study, that is unlikely to arrive at any conclusion other than to extend the existing abutting residential fabric onto the site.

Provincial Policy Also Supports Conversion of the 33 Green Belt Site

Similarly, the Provincial Planning Statement tests for conversion are clearly satisfied by this proposal:

NEED - The need for housing is clear, and especially so at this location close to two major transit stations. The lands are not required for employment over the long term, as they already do not perform that function, and the location is not suitable for the type of employment contemplated by the new Employment Area definition.

IMPACT ON EXISTING EMPLOYMENT AREA AND LAND USE COMPATIBILITY - The proposed conversion will not affect the viability of the broader employment area. The new proposed provincial direction leans heavily on questions of land use compatibility. The attached land use compatibility study confirms that there are no issues of this nature related to the site.

INFRASTRUCTURE AND SERVICES - As noted above, the site is ideal for residential development and infill. It represents the incremental expansion of the existing residential community, with appropriately scaled development. This location is close to the terminus interchange of the Ontario Subway Line now under construction, and the Eglinton Crosstown. As an established complete community, the area has an abundance of services available for future residents.

The proposal for this site clearly satisfies the proposed new tests for a conversion under the emerging provincial policy framework.

Council Should Recognize the Existing Planning and Community Context, Approve the Conversion of 33 Green Belt Drive, and Amend Proposed OPA 804 to designate the Site as Neighbourhoods and Apartment Neighbourhoods

The dominant character of the immediate neighbourhood of 33 Green Belt Drive, and most of the neighbouring lands, is residential in nature. Their conversion to Regeneration Area is a step in the right direction.

However, this particular site is appropriate to be fully converted to residential uses now, rather than delaying such designation for a lengthy secondary plan study that will arrive at the same conclusion - that residential development at 33 Green Belt is compatible with the existing character and should proceed.

This will allow much-needed housing to be delivered on this site. This housing would be delivered in an ideal community context, where there is a demonstrated market need for such housing.

The change, if approved, will likely result in about 500 new housing units on site.

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Council should amend proposed Toronto Official Plan Amendment 804, approving the conversion of the site, and ensuring that the lands at 33 Green Belt Drive are designated as neighbourhood, and Apartment Neighbourhood.

Yours truly,

AIRD & BERLIS LLP



Hon. Peter Van Loan, P.C., K.C.
Partner

Enclosure

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