



BOUSFIELDS INC.

May 6, 2025

Project No. 20352

Planning and Housing Committee
City Hall, 10th Floor, West Tower
100 Queen Street West
Toronto, Ontario
M5H 2N2

Dear Members of the Planning and Housing Committee,

Re: PH21.1 Official Plan Amendments to align with Provincial Legislative and Policy Changes Related to Employment Areas - Decision Report Regarding 25-49 Coldwater Road, Toronto

As you are aware, we are the planning consultants to Northbridge Capital Inc. ("Northbridge"), the owner of 25-49 Coldwater Road (the "subject site").

We have reviewed the PH21.1 Official Plan Amendments to align with Provincial Legislative and Policy Changes Related to Employment Areas – Decision Report including Attachment 1: Official Plan Amendment ("OPA") 804" and Attachment 2: Map of proposed Employment Areas Redesignations. We are generally supportive of the proposed redesignation of the subject site to *Regeneration Areas* and the site's inclusion within the proposed Duncan Mills Regeneration Area (proposed Site and Area Specific Policy ("SASP") 912), however we are requesting two modifications to the proposed policies, as discussed below.

1. SASP 912 c) – Minimum Non-Residential

This policy requires a minimum of 15 percent of the total gross floor area on the lands or 1.0 times the site area excluding lands conveyed to the City or other public body for parks, open spaces, natural areas, street or lanes will be non-residential gross floor area.

We request that this policy be modified to allow for flexibility in the amount of non-residential gross floor area ("GFA") given there will be further studies completed through the local area study, as required through the SASP. In particular, a Commercial Demand Analysis is required to be completed as per draft Policy 912 d) v. and it is our opinion that flexibility should be provided within the SASP policy for the amount of non-residential GFA to be confirmed through the detailed work on the future local area study and accompanying studies.

Requested modification:

- a) A minimum of ~~15 per cent~~ **amount** of the total gross floor area on the lands, or ~~4.0 times~~ **of** the site area excluding lands conveyed to the City or other public body for new parks, open spaces, natural areas, streets and/or lanes, ~~whichever is greater,~~ **to be determined through the local area study**, will be non-residential gross floor area, and:
 - i. A minimum of ~~54 per cent~~ of the minimum required non-residential gross floor area, **which is to be determined through the local area study**, will be comprised of:
 - A) Uses permitted in *General Employment Areas* such as lab, research and development facilities, media, and information and technology facilities; and/or
 - B) Office, medical office, cultural industries, incubator and/or co-working uses;
 - ii. will be comprised of uses that are compatible with residential uses; and
 - iii. be developed prior to or concurrent with any residential uses on the lands.

2. Policy 912 f) – Affordable Housing

Because proposed SASP 912 is not within a Protected Major Transit Station Area (“PMTSA”) and there is no planning framework for requiring a minimum amount of affordable housing to be provided in this area, we request that draft Policy 912 f) be modified to be consistent with the Minister of Municipal Affairs and Housing’s decisions on the City of Toronto OPA’s 644, 653, 692, and 742 on this.

Requested modification:

- f) The Housing Plan will be considered as part of the Secondary Plan Study and will guide the provision of affordable housing in the Secondary Plan area. The Housing Plan will identify an affordable housing strategy, the affordable housing **recommendations** ~~requirements~~, and the range of mechanisms for the delivery of required affordable housing on the lands, through one or more of the following, or other affordable housing approaches which achieve the objectives of the Housing Plan, to the satisfaction of the City:
 - i. a minimum of 7% percent of the total new residential gross floor area **is encouraged to be provided** ~~shall be secured~~ as affordable ownership housing for a period of at least 99 years from the date of first residential occupancy of the unit; or
 - ii. a minimum of 5% percent of the total new residential gross floor area **is encouraged to be provided** ~~shall be secured~~ as affordable rental

- housing for a period of at least 99 years from the date of first residential occupancy of the unit; and
- iii. there is no minimum requirement for affordable housing within purpose built rental buildings or the portions of a development containing student residences, retirement homes, nursing homes and residential case homes.

We look forward to participating in the future local area study and ask that we be circulated any future notices related to this matter.

If there are any questions with respect to this submission, please do not hesitate to contact the undersigned at 416-947-9744.

Yours truly,

Bousfields Inc.



Emma West, MCIP, RPP



Ashley Paton, MCIP, RPP

cc: *Michael Lazier, Northbridge Capital Inc.*