

November 19, 2013

Our File No.: 132053

Planning and Growth Management Committee  
10<sup>th</sup> Floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

**Attention: Nancy Martins, Secretariat**

Dear Ms. Martins:

**Re: Item Number PG28.2 - Official Plan and Municipal Comprehensive Reviews:  
Amendments to the Official Plan for Economic Health and Employment Lands  
Policies**

We are the solicitors for the owners of the property known municipally as 35 Cawthra Avenue in the City of Toronto (the "Subject Property"). We are writing to express our client's concerns with the proposed Official Plan Amendment No. 231 with respect to the Economic Health Policies and the Policies, Designations and Mapping for Employment Areas.

The Subject Property is proposed to be designated as *Core Employment Areas*, which designation permits uses which are described as "primary employment uses" but only permits other vital business uses such as retail stores, service uses and restaurants as secondary uses and to a limited maximum size.

Our view is that the slightly more permissive *General Employment Areas* designation would be more appropriate for the Subject Property. The *Core Employment Area* designation is intended for properties located in the interior of employment areas, whereas the Subject Property is surrounded by a mix of residential, retail, service, office and some industrial uses.

This wide variety of uses can be found within the area bounded by Junction Road to the south, Keele Street to the west and the CN Rail tracks to the east and south. The area between Mulock Avenue and Keele Street is made up primarily of single-family homes. The strip of non-residential buildings fronting on the west side of Cawthra Avenue contains a mix of automotive repair shops and parts stores, offices and small specialty retail stores. The two smaller buildings located on the northeast and southeast corners of Hiron Street and Mulock Avenue contain factory outlets for specialty food manufacturers. Most notably, the owner of 43 Junction Road recently obtained a minor variance to permit a supermarket with a gross floor area of 2,643 square metres on the site formerly occupied by Lafarge Concrete (43 Junction Road).

Furthermore, two properties located a short distance to the east of this block, 290 Old Weston Road and 404 Old Weston Road are proposed to be designated as *General Employment Areas*, which as noted above would permit stand-alone retail and service uses. This mix of current and future uses is indicative of a neighbourhood in transition.

While we recognize the planning objective of protecting employment uses on properties in the interior of employment areas, our respectful submission is that the Subject Property does not meet this criterion. Additional permissions on the Subject Property for primary retail and service uses would allow a mix of development which could more effectively service the immediate neighbourhood.

Please accept this letter as our request for notice of any meeting or decision made in respect of the above-noted matter.

If you have any questions please do not hesitate to contact the undersigned.

Yours truly,

**Goodmans LLP**



David Bronskill

DB/pc

cc: Cawthra Properties

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