

November 20, 2013

Our File No.: 12-0372

**Via Email**

Planning and Growth Management Committee  
Toronto City Hall, 10th Floor, West Tower  
Toronto, ON  
M5H 2N2

**Attention: Nancy Martins, Committee Secretariat**

Dear Sirs/Mesdames:

**Re: Planning and Growth Management Committee Item  
Municipal Comprehensive Review – Employment Lands**

We are solicitors for 299 CA Development Inc., the owner of the property located at the southeast corner of Campbell Avenue and Dupont Street, which is known municipally as 299 Campbell Street (the “Property”). The Property, which is slightly over a half acre in area, is designated as Employment Area but is **not located** within an Employment District.

We have reviewed the proposed official plan amendment resulting from the City’s municipal comprehensive review (the “Draft OPA”) and we are writing to express our client’s concerns regarding the proposed treatment of the Property in the Draft OPA.

As we understand it, the Draft OPA would designate the lands as *General Employment* but would then apply an area-specific policy for the Property that would limit employment uses to those compatible with the nearby low scale residential dwellings fronting onto Campbell Avenue. This proposed policy direction is not appropriate and does not reflect the mix of uses in the area, including the townhomes to the south of the Property, or address the opportunity afforded by our client’s applications to increase non-residential uses on the Property.

On August 28, 2012, our client submitted official plan amendment and rezoning applications to permit the construction of a new mixed use building on the Property. The official plan amendment application would redesignate the property from Employment Area to Mixed Use Area and enable the redevelopment of the property as a mixed use building, including residential units, live-work units and almost 3,300 square metres (~35,500 square feet) of non-residential floor area.

While our client’s official plan amendment application would permit residential uses on the Subject Property, the proposed redevelopment would actually **increase** the overall non-residential gross floor

area (by 1.5 times) and the number of jobs on the Property, while providing an opportunity for live-work units. By contrast, the proposed policy direction in the Draft OPA would stifle employment opportunities on the Property, which is currently occupied by a one-storey commercial building (approximately 20,000 square feet) in need of significant upgrades for long-term viable use. Our client's official plan amendment application, therefore, is in better keeping with the City's goals of stimulating new employment growth in the City and mixing uses on certain lands and is a preferred policy direction for the Property than the Draft OPA.

It should be noted that our client has had numerous meeting with the local councillor and members of the local community. Feedback from the community is in support of the official plan amendment application.

For all of these reasons, the policy direction in the Draft OPA for the Property is not appropriate. Instead, it is our submission that the area-specific policy should be amended to indicate that new development on the Property should be planned to provide a variety of uses, including employment uses in combination with residential units, provided that a net gain of employment floor area is provided on the Property and that it can be demonstrated that any residential uses will have a satisfactory living environment compatible with newly developed and existing employment uses in the immediately adjacent area.

We would appreciate receiving notice of any decision or public meetings regarding the above-noted matter. Please do not hesitate to contact us if any additional information is required.

Yours very truly,

**Goodmans LLP**



*for* David Bronskill  
DJB/  
cc: Client

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