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November 24, 2021

via email (phc@toronto.ca)

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

Attention: Nancy Martins, Secretariat Contact

**Re: PH29.10: Keele-St. Clair Local Area Study - Draft Official Plan Amendments**

We act for a large group of landowners who represent some of the most prominent sites located in the Keele-St. Clair Secondary Plan Area including:

- i2Developments (Old Weston) Inc. (290 Old Weston Road);
- Limen Developments Ltd. (189-195 Old Weston Road);
- St. Helen's Meat Packers Limited (2-4 Union Street);
- 578602 Ontario Inc. (100 Union Street);
- 1573416 Ontario Inc. (126 Union Street); and
- Greenline Renovations Plus Ltd. (65-81 McCormack Street).

We are writing to firstly thank City Planning Staff, including Steven Dixon, Allison Reid, Dan Nicholson and many others, for meeting with us and genuinely attempting to work collaboratively in formulating the Draft Keele-St. Clair Local Area Secondary Plan ("Draft Secondary Plan") which reflects some of the frank and very productive discussions that we had over the past year.

At this time we must remind the City that we object to some of the policies in the Draft Secondary Plan, including but not limited to the current formulation of Policy 6.1 which we believe is counterproductive to, and will frustrate, all the other goals and aspirations of the Draft Secondary Plan. Our clients are concerned that the proposed minimum non-residential gross floor area requirements for new development are not appropriate or based on a sound and thorough land economics analysis. This requirement will severely hamper all efforts to meet the required Growth Plan targets in the immediate vicinity of the proposed Major Transit Station. The numbers in this proposed policy appear to have been set arbitrarily without a publicly disclosed or self-evident calculation that underlies the specific round numbers proposed (1.0x

FSI; 25% of GFA). These numbers are also inconsistent with other recently approved "Employment Priority Areas" throughout the City. The proposed minimum non-residential gross floor area requirements for new development neither represent good planning or an appropriate approach to ensuring a suitable mix of uses in the Keele-St. Clair Local Area. There are also remain several modest, but important, outstanding built form policy issues which we continue to discuss with Staff, and issues in respect of SASP 437 and the Draft PMTSA.

We continue to be hopeful that good faith discussions with City Staff and the local Councillors may yet result in a reasonable compromise on these final important points of disagreement and result in a final report which as landowners our clients can fully support.

Sincerely,

McCarthy Tétrault LLP

A handwritten signature in black ink, appearing to read "M. Foderick", written in a cursive style.

Michael Foderick