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Our File No.: 085128.00004

July 4, 2022

Via E-Mail (phc@toronto.ca)

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

Attention: Nancy Martins, Administrator

Dear Ms. Martins:

**Re: Our Plan Toronto: Recommended Official Plan Amendment for City-wide
Employment Policies and Conversion Requests
Draft Official Plan Amendment No. 591
Agenda Item PH35.15
City Conversion Request Nos. 123, 125 and 126**

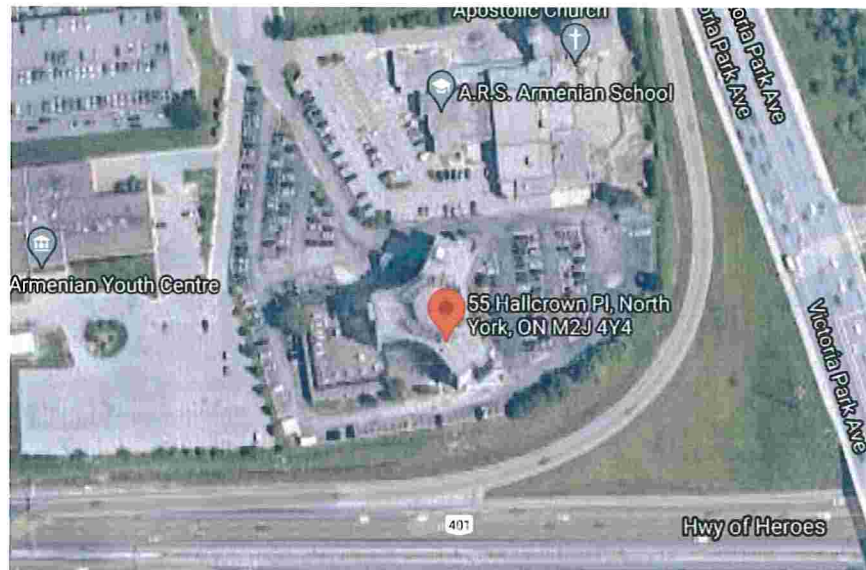
We are the solicitors for 2608838 Ontario Inc., 2447496 Ontario Inc. and 2656049 Ontario Inc., being the owners of 185 Yorkland Blvd., 55 Hallcrown Place and 1677 Wilson Avenue, respectively, (collectively the "**Properties**"). The Properties are formally before the City for consideration of employment land conversion.

The purpose of this letter is to express our clients' concerns about the proposed deferral of consideration of a large number of the employment land conversion requests including for the Properties noted above. It is our respectful opinion that this may jeopardize our clients' proposals to intensify the sites. As detailed in the submissions already before City Planning, the three Properties are ideally situated to allow for residential intensification as the "existing" hotel uses with their expansive surface parking lots have proven to be an inefficient use of lands well served by municipal infrastructure in areas of the City not being used for industry.

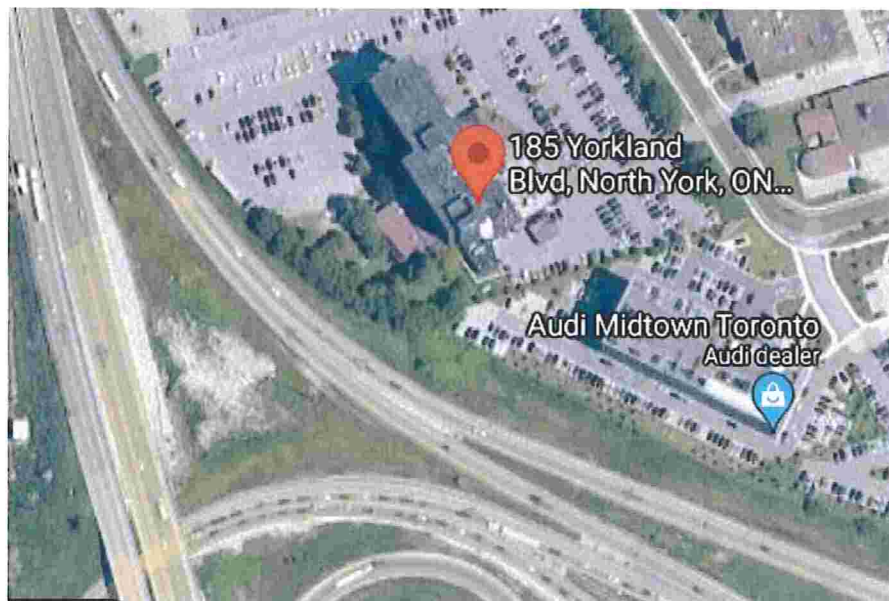
BACKGROUND

To assist the Committee we are providing the following background information regarding the Properties:

- a) Conversion Request No. 123 is a site generally located north of Highway 401 and west of Victoria Park, and municipally known as 55 Hallcrown Place ("**Hallcrown**"). The Hallcrown property houses the former Radisson Hotel Toronto East;



- b) Conversion Request No. 125 is a site generally located east of Highway 404 and north of Highway 400, and municipally known as 185 Yorkland Boulevard ("**Yorkland**"). The Yorkland property houses the former Edward Village Hotel and is identified below.



- c) Conversion Request No. 126 is a site located on the south side of Wilson Avenue, just east of Highway 400 and north of Highway 401 ("**Wilson**"). The Wilson property houses the former Toronto Plaza Hotel and is depicted in red below.



CONCERN WITH PROCESS BEING FOLLOWED

On behalf of our clients, we submitted the three employment area conversion requests in the summer of 2021, through the City-initiated Municipal Comprehensive Review (“**MCR**”). Earlier this year we had very fruitful discussions with City staff regarding all three requests, but with no formal decision being made by the City in terms of refusal or support of the requests. At the time, it was an appropriate response by City staff. Since then our clients and their consultants have continued to move the requests forward through further examination of the outstanding matters needed to justify the conversions.

While the City has not dismissed our clients' requests to redesignate the Properties, the City is proposing to delay further consideration of the conversion requests until further recommendation report(s) from City Planning staff can be considered by Planning and Housing Committee and subsequently by City Council in early 2023.

We understand that the intention is to have these further considerations completed as a continuation of the MCR process, but it is not clear to us exactly what legal process would be followed for these additional reviews, the exact timing relating to the same, and the impact of trying to break a comprehensive review of employment conversion requests into separate time periods – what if it is determined by the Minister that the City has excess employment lands, but then the extent of the lands that are in excess are allocated in the initial batch of properties, effectively pre-determining the result for the deferred properties?

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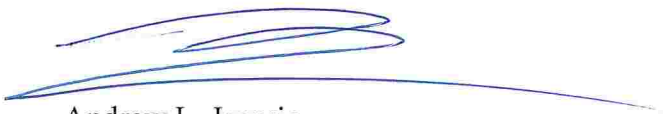
Given such uncertainty as to process and timing, we believe that the best approach is for the City to delay the review of all properties so that all sites can be addressed at the same time.

We request notice of the decision of the Committee on this matter. Our clients are committed to continuing our ongoing dialogue with City Planning staff and request further meetings with the Strategic Initiatives, Policy and Analysis Official Plan team to discuss this letter and the next steps in the MCR process.

Should you have any questions or require additional information, please contact the undersigned.

Yours truly,

BENNETT JONES LLP

A handwritten signature in blue ink, appearing to read "Andrew L. Jeanrie", with a long horizontal flourish extending to the right.

Andrew L. Jeanrie

ALJ/RB

cc: Clients