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July 18, 2023

**Via E-mail**

Toronto City Council  
100 Queen Street West  
City Hall, 12th Floor, West Tower  
Toronto, ON M5V 3C6

**Attention: John Elvidge, City Clerk**

Dear Sirs/Mesdames:

**Re: PH5.2 – Official Plan Amendment for Bill 97 Transition – Authorizing the Continuation of Institutional and Commercial Uses in Employment Areas – Final Report**

We are counsel to a number of owners with landholdings in the City of Toronto (the “City”). We write on behalf of our clients listed in Schedule “A” to this letter to provide comments on draft Official Plan Amendment No. 668 (“OPA 668”).

We understand that OPA 668 is intended to be the first of two City-initiated Official Plan Amendments to address changes to the definition of “areas of employment” in the *Planning Act* made through Bill 97, the *Helping Homebuyers, Protecting Tenants Act* (“**Bill 97**”). OPA 668 purports to respond to the transition provisions introduced in Bill 97 to authorize the continuation of existing commercial and institutional uses in *Core Employment Areas* and *General Employment Areas* in the City. City staff have indicated that a related City-initiated Official Plan Amendment is targeted for the Fall of 2023 to update the permitted uses in the *Core Employment Areas* and *General Employment Areas* designations (the “**Related OPA**”).

OPA 668 is premature at this time. OPA 668 should be considered in conjunction with the Related OPA to ensure a comprehensive and coordinated approach to implementing the legislative amendments introduced by Bill 97. The City’s approach to the Related OPA will impact the application and effect of OPA 668. Without the Related OPA being considered in conjunction with OPA 668, it is not possible to understand the implications of OPA 668 and, accordingly, OPA 668 does not represent good planning. Given that Bill 97 will not receive Royal Assent until the Fall of 2023, there is also no need to move forward with OPA 668 at this time.

For the reasons stated above, we request that City Council: (1) defer a decision on OPA 668 at this time, (2) direct City staff to review and reconsider OPA 668 in conjunction with the Related OPA targeted for the Fall of 2023, and (3) direct staff to report back on OPA 668 and the Related OPA

only at such time when both OPA 668 and the Related OPA can be considered concurrently, either as separate Official Plan amendments or as one comprehensive Official Plan amendment.

We ask to be notified of any decisions made by City Council, or Committee of Council, in connection with this matter.

Yours truly,

**Goodmans LLP**

A handwritten signature in blue ink, appearing to be 'Joe Hoffman', written in a cursive style.

Joe Hoffman  
JBH/  
encl.

cc. Anne Benedetti, David Bronskill, Roslyn Houser, Max Laskin

**SCHEDULE A**

<b>Client</b>	<b>Properties of Interest</b>
105 Bentworth Inc. for and on behalf of 105 Bentworth LP	105 Bentworth Avenue
117 Tycos Inc.	117 Tycos Drive
125 Tycos Inc.	125 Tycos Drive
126 Tycos Inc. for and on behalf of 126 Tycos LP	126 Tycos Drive
1453970 Ontario Limited	1341 Castlefield Avenue
18 Hook Inc. as general partner for and on behalf of 18 Hook LP	18 Hook Avenue
21 Randolph Inc. as general partner for and on behalf of 21 Randolph LP	21 Randolph Avenue
225 Yorkland Blvd. Inc.	225 Yorkland Boulevard
2396927 Ontario Inc. (operating as The Toronto Carpet Factory) and 2125980 Ontario Ltd. (representing York Heritage Properties and Adgar Investments & Development)	Area 3 of Liberty Village
2797896 Ontario Ltd.	45-49 Cranfield Road
89 Bentworth Inc. for and on behalf of 89 Bentworth LP	89 Bentworth Avenue
Banigan Holdings Inc.	14 – 20 Banigan Drive
Bradgate Investments Limited	3115 Markham Road

Dream Impact Trust, Dream Office REIT, Dream Unlimited	Various properties across the City of Toronto
Dream Industrial REIT	255 Wicksteed Avenue 161 The West Mall 400 Norris Glen Road
Dufferin Business Centre Inc.	2700 Dufferin Street
EBM (90 Tycos) Inc. as general partner for and on behalf of EBM (90 Tycos) LP	90 Tycos Drive
Ehrlich (128 Sterling) Inc. as general partner for and on behalf of 128 Sterling LP and Family Service Toronto	128 Sterling Road
Hullmark	100 Liberty Street, 1179-1189 King Street W., 67-87 Mowat Avenue, 70-74 and 92 Fraser Avenue 60-80 Atlantic Avenue 102 Atlantic Avenue 250 Bowie Avenue and 640-682 Caledonia Road 450-458 Dufferin Street
M&R Commercial Properties Inc.	5230 – 5250 Finch Avenue East 3477 – 3497 Kennedy Road
Markham Steeles Realty Inc.	5975 – 6025 Steeles Avenue East
Metcorp Holdings Limited	35 Clarkson Avenue 1260 Castlefield Avenue 1275 Castlefield Avenue 1381 Castlefield Avenue 100 Miranda Avenue 80 Ronald Avenue 95 Ronald Avenue
Metrick Realty Inc.	105 Wingold Avenue
Northcrest Developments	Downsview Airport Lands (123 Garratt Boulevard)

Symesbridge Inc. for and on behalf of Symesbridge LP and Symesbridge Phase 2 LP	150 Symes Road
The Cadillac Fairview Corporation Limited	East Harbour Lands (21 Don Roadway, 30 Booth Avenue, 375 Eastern Avenue and 385 Eastern Avenue)
Vine Avenue Holdings Limited	36 - 162 Vine Avenue