

June 30, 2023

Nancy Martins
Planning & Housing Committee Secretariat
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Chair Bradford and Members of the Planning and Housing Committee:

**Re: Planning and Housing Committee, July 5th, 2023
Agenda Item PH5.2, Official Plan Amendment for Bill 97 Transition – Authorizing the Continuation of Institutional and Commercial Uses in Employment Areas – Final Report**

Toronto Lands Corporation (TLC) acts on behalf of the Toronto District School Board (TDSB) in all land use planning, real estate and leasing matters. In this capacity, TLC is writing to express its concerns with the proposed City-wide OPA 668, given that such an action is premature in relation to certain impacted properties in commercial or institutional use.

TDSB owns several sites across the City that are located within 'Employment' designations that would be impacted by the proposed OPA 668, including a school and child care facility at 38 Orfus Road. TLC submitted a conversion request for 38 Orfus Road, which is being addressed at Planning and Housing Committee in Agenda Item PH5.3.

Subsections 1 (1.1) and (1.2) of the *Planning Act* (awaiting proclamation) provide a transition provision so that municipalities might maintain existing "clusters of business and economic uses" as "areas of employment" under the proposed new definition, thereby avoiding their fragmentation and risks to their viability. However, in revising the definition of "areas of employment" to explicitly exclude institutional and commercial uses, it suggests that the Province does not consider it appropriate to maintain the 'Employment' area designation in all situations. Properties in institutional or commercial use which satisfy one or both of the following criteria warrant further consideration prior to being subject to an Official Plan Amendment which maintains their 'Employment' designation:

- Properties on the periphery of employment areas which do not abut 'Core Employment Areas', particularly those which abut sensitive uses (e.g. residential), where most employment uses would not be permitted;
- Properties in institutional use (defined as a "sensitive use" within the PPS 2023) which have been operating without adverse impacts on the viability of an employment area.

Such areas do not actively contribute to the City's employment land inventory, with their ability to do so in the future severely restricted where proximity to existing sensitive uses are a consideration. In these cases, an 'Employment' designation may not be appropriate and may severely limit a property's opportunities for redevelopment and renewal, resulting in potential under-utilized and/or neglected sites within the City.

Further assessment needs to be given to properties on a site-by-site basis, including those which fit the above criteria, prior to a City-wide Official Plan Amendment being adopted. I would like to thank you for your consideration of this matter and I hope that a positive outcome can be achieved.

Sincerely,



Daryl Sage
CEO
Toronto Lands Corporation

- c. Gregg Lintern, Chief Planner and Executive Director, City of Toronto
- Jeff Cantos, City Planning, SIPA
- Bianca MV Bielski, Director of Planning, TLC
- Yvonne Choi, Manager, Land Use Planning, TLC
- Matt Bagnall, Senior Planner, TLC