

July 4, 2023

Project No. 17117

City Clerk
Attention: Nancy Martins, Administrator
Planning and Housing Committee
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Ms. Martins,

Re: PH5.2 Official Plan Amendment (OPA 668) for Bill 97 Transition

On April 6, 2023, the Province introduced Bill 97, Helping Homebuyers, Protecting Tenants Act, 2023, which proposes to replace the Planning Act definition for an “area of employment” to exclude institutional and commercial uses, including retail and office uses that are not associated with manufacturing, research and development, warehousing and goods movements. The City of Toronto is proposing a City-Initiated Official Plan Amendment (OPA 668) in response to Bill 97, which would permit the continuation of the excluded uses, as proposed by Bill 97, in the City’s *Employment Areas*, provided they were lawfully established by a prescribed date.

We are concerned with the impact that OPA 668 would have on the Subject Properties municipally known as 4711-4751 Steeles Avenue East (hereafter referred to as “the Site”). The Site consists of a 0.97-hectare parcel of land fronting Steeles Avenue, west of Silver Star Boulevard, and 0.31-hectare parcel on the east side. The Site is currently improved by existing one- and two-storey commercial buildings, built around 2003, occupied by financial institutions, restaurants, a medical office and related uses. The recently constructed Steeles Avenue East rail underpass makes the bulk of the Site less desirable for retail uses, and the Site’s immediate proximity to existing and planned residential uses make it inappropriate for industrial uses. Additionally, the Site is part of an emerging mixed-use node spanning both the Toronto and Markham sides of Steeles Avenue and is the only quadrant surrounding the Milliken GO station not designated for a mix of uses supportive of the current and future transit infrastructure.

Currently the Site is designated *General Employment*. A request to convert the lands to *Mixed Use Area* was submitted as part of the recent municipal comprehensive review.

In our opinion, the Site should be exempted from OPA 668 for the following key reasons:

- Provincial direction is explicit that lands with uses such as those that exist today on the Site should be made productive to support the need for housing.
- The Site has immediate proximity to the Milliken GO station and ability to support transit-oriented mixed-use development that integrates employment uses (office and/or retail).
- Residential development is planned and permitted immediately to the west, on the Splendid China Mall site, in addition to being planned on the north side of Steeles Avenue, and therefore the Site is not appropriate for the types of noxious uses the new “area of employment” definition seeks to protect.

In response to the draft policies, we wish to express objections to the Draft OPA 668. Specifically, we ask that:

- 1) The City reconsider adopting OPA 668 to authorize the continuation of institutional and commercial uses excluded from the new definition of Employment Areas as proposed by Bill 97, including retail and office uses that are not associated with manufacturing, research and development in connection with manufacturing, warehousing, and goods movement from; and/or
- 2) The City exempt the Site from OPA 668.

Thank you.

Yours very truly,
URBAN STRATEGIES INC.



Emily Reisman, RPP, MCIP
Partner



Tim Smith, RPP, MCIP
Principal