



July 17, 2024

Mayor Olivia Chow & Council

c/o Sylwia Przewdziecki
Toronto City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

Dear Mr. Chow & Council:

**RE: PH14.1 – CITY OF TORONTO OFFICIAL PLAN AMENDMENT 680
136 WESTMORE DRIVE, ETOBICOKE**

On behalf of our client, 5048942 Ontario Inc. ("the Owner"), we are providing comments on the proposed Official Plan Amendment 680 ("OPA 680") as it affects their property municipally addressed as 136 Westmore Drive in Etobicoke.

The Owner's Property is approximately 0.63 ha in size and is located at generally at the northeast corner of Finch Avenue West and Highway 27. The Subject Lands are designated General Employment Areas and have been developed as per site specific permissions for a senior citizen's apartment building.

On behalf of the Owner, we have been following the development of OPA 680 and are disappointed by the continued direction which City staff are proceeding with in regards to Areas of Employment. The intention of the new definition of Areas of Employment is to limit Areas of Employment to traditional manufacturing, warehousing or related uses. Commercial uses, including office, retail and institutional uses are not included in the definition of Areas of Employment, such that they are not subject to employment protection policies and further can allow for the introduction of appropriate uses. In this case the Owner's Property has been developed for a senior citizen's apartment building. In all cases, in our opinion, the intent of the Provincial Policy direction per the Planning Act, was for lands, such as the Owner's, not to be designated as an Area of Employment. OPA 680 (along with OPA 668) undermine this objective in our opinion.

OPA 680 removes uses which can and should remain permitted on the Owner's property. While not currently proposed, flexibility to meet market demands and provide necessary retail and commercial services should remain an option for this property. We do not believe that this was the intent of the Planning Act changes and instead the City should have undertaken detailed studies to determine what areas should remain as Areas of Employment and which should not (such as the case of the Owner's property).

We therefore request that the Council reject OPA 680 as proposed by City staff and instead direct City staff to conduct detailed reviews of existing designated Employment Areas to determine which meet the new definition of Areas of Employment and which do not (i.e. the Subject Lands) such that the intent of the Planning Act changes is implemented appropriately and without undue and unintended consequences to existing businesses and landowners.

We ask for notification of any decisions by the Council on this matter and notification of adoption of OPA 680 should it occur.

Thank you.

Yours truly,

MHBC



David A. McKay MSc, MLAI, MCIP, RPP
Vice President & Partner

cc: Clients