

July 23, 2024

Our File No.: 223180

Via Email:

Toronto City Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: John Elvidge, City Clerk

Re: PH14.1 - Employment Area Land Use Permissions - Decision Report - Approval

On behalf of the Dream group of companies, we write on behalf of those registered owners of land listed in Schedule “A” to this letter to provide comments on Official Plan Amendment No. 680 (“**OPA 680**”).

Concerns with OPA 680

The proposed policy direction for OPA 680 is contrary to the legislative intent of Bill 97 (the Helping Homebuyers, Protecting Tenants Act, 2023) (“**Bill 97**”) and the new Provincial Planning Statement (2024) (the “**New PPS**”) that amend the definition of an “area of employment”. In particular, Bill 97 and the New PPS narrow the definition of an “area of employment” to traditional manufacturing, warehousing, R&D and related uses. Where institutional and commercial uses are permitted those areas are no longer to be considered an “area of employment”.

The intent of Bill 97 and the New PPS is clear. Areas of employment where residential uses are prohibited are limited to areas with traditional manufacturing, warehousing, R&D and related uses. Residential development is to be encouraged outside of these areas to support residential housing needs and the creation of complete communities. Despite this clear intent, OPA 680 would remove institutional and commercial land use permissions from all of the City’s employment areas without examining whether it is appropriate to do so on a case-by-case basis. Effectively, OPA 680 would prevent further consideration of residential development opportunities throughout all of the City’s existing areas of employment, contrary to Bill 97 and the New PPS.

Further, OPA 680 would negatively impact the existing planning function of many areas of employment within Toronto. By removing commercial and institutional permissions across all areas of employment within the City without examining whether it is appropriate to do so on a case-by-case basis, commercial and institutional permissions will be removed in areas where those uses are appropriate.

We understand that City staff's view is that OPA 668 would allow institutional and commercial permissions to continue generally in all existing employment areas despite OPA 680's removal of those permissions, but we believe this interpretation is incorrect.

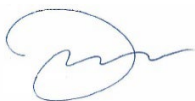
Request to City Council

We request that City Council this report back to City staff to review all existing lands designated as areas of employment on a case-by-case basis to determine which of these areas should meet the new definition of area of employment and what are the appropriate land use permissions for these areas.

We would appreciate being included on the City notice list related to this matter.

Yours truly,

Goodmans LLP



Joe Hoffman
JH/rr

cc. Anne Benedetti

SCHEDULE A

Property Address	Registered Owner
13 Bethridge Road, Etobicoke, ON	Dream Summit Industrial (Ontario) Inc.
330 Humberline Drive, Etobicoke, ON	Dream Summit Industrial (Ontario) Inc.
335 Carlingview Drive, Etobicoke, ON	Dream Summit Industrial (Ontario) Inc.
345 Carlingview Drive, Etobicoke, ON	Dream Summit Industrial (Ontario) Inc.
355 Carlingview Drive, Etobicoke, ON	Dream Summit Industrial (Ontario) Inc.
55 Carrier Drive, Etobicoke, ON	Dream Summit Industrial (55 Carrier Drive) Inc.
65 Carrier Drive, Etobicoke, ON	Dream Summit Industrial (Ontario) Inc.
326 Humber College Boulevard, Etobicoke, ON	Dream Summit Industrial (326 Humber College Blvd) Inc.
50 Dynamic Drive, Scarborough, ON	Dream Summit Industrial (Ontario) Inc.
125 Nashdene Road, Scarborough, ON	Dream Summit Industrial (Ontario) Inc.
21 Finchdene Square, Scarborough, ON	Dream Summit Industrial (Ontario) Inc.
1361 Huntingwood Drive, Scarborough, ON	Dream Summit Industrial (Ontario) Inc.
20 Commander Boulevard, Scarborough, ON	Dream Summit Industrial (Ontario) Inc.
40 Commander Boulevard, Scarborough, ON	Dream Summit Industrial (40 Commander Blvd) Inc.
10 Commander Boulevard, Scarborough, ON	Dream Summit Industrial (Ontario) Inc.
274 Humberline Drive, Etobicoke, ON	DIR Properties Limited Partnership
290 Humberline Drive, Etobicoke, ON	Dream Industrial Twofer LP.

279 Humberline Drive, Etobicoke, ON	Dream Industrial LP
400 Norris Glen Rd, Etobicoke, ON	Dream Industrial LP
750 Barmac Drive, North York, ON	Dream Industrial Twofer LP
45 Progress Ave, Scarborough, ON	DIR Properties Limited Partnership
1995 Markham Road, Scarborough, ON	Dream Industrial LP
2 Lone Oak Court, Toronto, ON	DIR Properties Limited Partnership
255 Wicksteed Ave, Toronto, ON	DIR Industrial Properties Inc.
480 Tapscott Road, Toronto, ON	Dream Industrial LP