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July 23, 2024

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 registered owners with landholdings in the City of Toronto (the “City”). We write on behalf of our clients listed in Schedule “A” to this letter with respect to Official Plan Amendment No. 668 (“OPA 668”), which has not yet been adopted by City Council through enactment of a bill.

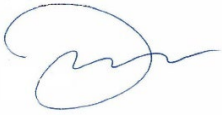
Our clients are concerned that OPA 668, and City staff’s proposed interpretation of it as outlined in consultations and certain staff reports including the report dated June 24, 2024, undermine the intent of the amendments made to the *Planning Act* through Bill 97, the *Helping Homebuyers, Protecting 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. However, City staff have indicated the intention is instead for OPA 668 to transition existing permissions.

More generally, our clients are concerned with the City’s approach of attempting to use OPA 668 to maintain the status quo with respect to its designated employment areas, rather than responding to the direction in Bill 97 and the proposed Provincial Planning Statement to narrow the scope of employment areas to those areas not appropriate for uses excluded from the definition of areas of employment under the *Planning Act*.

Please include us on any notices in connection with this matter.

Yours truly,

Goodmans LLP

A handwritten signature in blue ink, appearing to read 'Joe Hoffman', with a stylized flourish at the end.

Joe Hoffman
JBH/
encl.

cc. Ian Andres, Anne Benedetti, David Bronskill, Rodney Gill, Roslyn Houser, Max Laskin

SCHEDULE A

Client	Properties of Interest
105 Bentworth Inc. for and on behalf of 105 Bentworth LP	105 Bentworth Avenue
15 Gervais Drive Limited	15 Gervais Drive
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
419799 Ontario Limited O/A Boothshore Investments	21-35 Booth Avenue and 12-32 Logan Avenue.
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
DIR Industrial Properties Inc.	255 Wicksteed Ave
DIR Properties Limited Partnership	274 Humberline Drive 45 Progress Ave 2 Lone Oak Court
Downing Street (1125 Leslie St) Inc.	1125 Leslie Street
Dream Industrial LP	279 Humberline Drive 400 Norris Glen Rd 1995 Markham Road 480 Tapscott Road
Dream Industrial (55 Carrier Drive) Inc.	65 Carrier Drive
Dream Industrial Twofer LP	290 Humberline Drive 750 Barmac Drive
Dream Summit Industrial (Ontario) Inc.	13 Bethridge Road 330 Humberline Drive 335 Carlingview Drive 345 Carlingview Drive 355 Carlingview Drive 65 Carrier Drive 50 Dynamic Drive 125 Nashdene Road 21 Finchdene Square 1361 Huntingwood Drive 20 Commander Boulevard 10 Commander Boulevard
Dream Summit Industrial (326 Humber College Blvd) Inc.	326 Humber College Boulevard
Dream Summit Industrial (40 Commander Blvd) Inc.	40 Commander Boulevard
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
Fiera Real Estate Core Fund LLP (by its nominee, 125 The Queensway Inc.)	125 The Queensway
2396927 Ontario Inc.	100 Liberty Street, 1179-1189 King Street W., 67-87 Mowat Avenue, 70-74 and 92 Fraser Avenue
Hullmark Sun Life (Atlantic) Ltd.	60-80 Atlantic Avenue
Hullmark (250 Bowie) Ltd. & 12723603 Canada Inc.	250 Bowie Avenue and 640-682 Caledonia Road
HM RK (450 Dufferin) Ltd.	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 1250 Castlefield Avenue 1260 Castlefield Avenue 1275 Castlefield Avenue 1381 Castlefield Avenue 100 Miranda Avenue 80 Montcalm Avenue 80 Ronald Avenue 95 Ronald Avenue 2532 Yonge Street
Metrick Realty Inc.	105 Wingold Avenue
PSPiB Downsview Investments Inc.	Downsview Airport Lands (123 Garratt Boulevard)
RioCan Holdings Inc.	800 – 836 Warden Avenue
RioCan Living LP	740 – 750 Dupont Street

Riotrin Properties (Steeles) Inc.	2181 Steeles Avenue West 2061 – 2081 Steeles Avenue West 100 Gerry Fitzgerald Drive
Riotrin Properties (Weston)	30 Weston Road and 1980 St Clair Avenue West
Symesbridge Inc. for and on behalf of Symesbridge LP and Symesbridge Phase 2 LP	150 Symes Road
EHL (21 Don Roadway) Holdings Inc., EHL (30 Booth Ave) Holdings Inc., EHL (385 Eastern Ave) Holdings Inc., and EHL (375 Eastern Ave) Holdings Inc.	East Harbour Lands (21 Don Roadway, 30 Booth Avenue, 375 Eastern Avenue and 385 Eastern Avenue)
Velar Developments Corp.	43 - 47 Booth Street
Vine Avenue Holdings Limited	36 - 162 Vine Avenue