

July 23, 2024

## **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**

We write on behalf of 419799 Ontario Limited (O/A Boothshore Investments), the registered owner of 21 – 35 Booth Avenue, which also has an interest in 12 – 32 Logan Avenue, 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

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