

8 October 2024

Sent via E-mail

Toronto City Council
100 Queen Street West
City Hall, 12th Floor, West Tower
Toronto, ON M5V 3C6

Attn: John Elvidge, City Clerk

Dear Members of Council:

**Re: Item CC22.7 Amending Item 2024.PH14.1 in response to Bill 97 Proclamation
- Employment Area Land Use Permissions - Official Plan Amendment 680
and Official Plan Amendment 668**

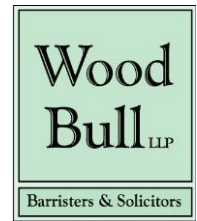
We represent the registered owners of each of the following properties in the City of Toronto (the “City”), as well as Morguard Corporation as agent to each of the registered owners:

1. 1875 Leslie Street (**registered owner:** Morguard Realty Holdings Inc.)
2. 200 Yorkland (**registered owner:** Morguard Realty Holdings Inc.)
3. 279 Yorkland (**registered owner:** Morguard Realty Holdings Inc.)
4. 285 Yorkland (**registered owner:** Morguard Realty Holdings Inc.)
5. 2041-2051 McCowan Road (**registered owner:** Morguard Realty Holdings Inc.)
6. 2101-2111 McCowan Road (**registered owner:** Morguard Realty Holdings Inc.)
7. 2121-2151 McCowan Road (**registered owner:** Morguard Realty Holdings Inc.)
8. 951 Milner Ave (PINs 06192-0140, 06192-0041 and 06192-0042) & PIN 06192-0228 (**registered owner:** Scarborough Automotive Centre Limited)
9. 945 Wilson Avenue (**registered owner:** Markglen Investments Limited.)

The above-noted properties will herein be referred to as the “Sites”. The Sites are subject to *Employment Area* designations in the Toronto Official Plan (the “OP”), and contain a mix of industrial, office, retail, service commercial and automotive uses, all of which are currently permitted by the Official Plan.

On behalf of Morguard Corporation and the above-noted registered owners, we provided submissions to the Planning and Housing Committee (the “Committee”) dated 10 July 2024 stating our concerns with Official Plan Amendment No. 680 (“OPA 680”). We understand that the City Solicitor intends to bring forward a recommendation to City Council that, if approved, would allow the necessary Bills for OPA 680 to be submitted to Council at its meetings on October 9, 10 and 11th. This will result in OPA 680

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coming into force and effect prior to the Provincial Planning Statement, the amended Planning Act definition for “area of employment”, and Official Plan Amendment 668 (“OPA 668”). We write to express our clients’ concerns with OPA 668 and with OPA 680.

Our client is concerned with City staff’s view 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. We believe this interpretation is incorrect and may result in our clients’ need to appeal OPA 668.

With respect to OPA 680, our client is concerned that it misses the intent of the changes in provincial legislation and policy by unnecessarily adding further development restrictions. Rather than simply deleting permitted uses in existing Employment Areas, consideration should be given to which Employment Areas should continue to have permission for a broader range of uses and therefore potentially attract a new land use designation such as Mixed-Use Areas.

We request that Council defer this matter for further review and consultation.

We request notice of any further Community Council, Committee or Council meeting regarding this matter.

Yours very truly,

Wood Bull LLP

A handwritten signature in blue ink, appearing to read "Jshapira", is located below the firm name.

Johanna R. Shapira

JRS/as

Encls.

c. client