

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

October 9, 2024

Dear Council,

RE: City Council Meeting: October 9, 2024
Letter of Concern Regarding the Enactment of OPA 668 & 680
ITEM CC22.7 - Amending Item 2024.PH14.1 in response to Bill 97
Proclamation - Employment Area Land Use Permissions - Official Plan
Amendment 680
Public Storage Canada

Johnston Litavski Ltd. are the planners for Public Storage Canada who operate numerous public storage facilities across Canada, and within the City of Toronto in particular. Several of these properties fall within the *Core Employment* and *General Employment* designation of the City of Toronto Official Plan (the "OP"). We wish to express our client's concerns regarding OPA 668 and OPA 680.

Our client aims to continue, and potentially expand as necessary, its existing self-storage uses within the City's employment areas. Our client's concerns are three-fold:

1. It is not clear that OPA 680 & OPA 668, as adopted by City Council, offers sufficient protection for "lawfully established" uses within Core Employment and General Employment areas as intended by the Province in Bill 97 and within the new 2024 Provincial Policy Statement.
2. It is uncertain whether public self-storage uses would be considered permitted uses within either the *Core Employment* or *General Employment* designations under OPA 680. However, in our opinion, OPA 680 will work to remove this permission creating significant uncertainty for the future operation and potential expansion of our client's facilities.

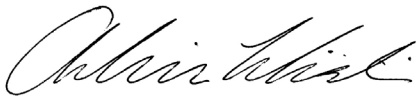
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3. In establishing a new and more limited definition for Areas of Employment, it was the Province's clear intent to limit the protection of employment lands to more traditional heavier industrial areas, and to make more lands available for redevelopment for new housing. In our opinion, OPA 668 and OPA 680 do not reflect this new Provincial direction.

Our client is concerned that OPA 668 and OPA 680 will work to remove (or at least call into question) our client's land use permissions and may threaten their ability to operate and expand their business, while at the same time blocking any future ability to redevelop their land as the Province has intended, should they choose to do so.

Please also accept this letter as our request to be provided notice for all further decisions, meetings, reports, etc. related to OPA 668 and OPA 680.

Yours very truly,



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