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July 10, 2024

via email (phc@toronto.ca)

City of Toronto
Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Nancy Martins

Dear Planning and Housing Committee:

**Re: Item PH14.1
Proposed Official Plan Amendment No. 680
Employment Area Land Use Permissions**

We are the solicitors for 2-8 St. Thomas Street GP Inc. and 2-8 St. Thomas Street LP, the registered owners of lands located within the City of Toronto (the "City"), which are corporate entities controlled by BentallGreenOak. We are writing to inform you that our client objects to the proposed amendment noted above (the "Proposed OPA"), as currently proposed.

The reasons for the objection include, but are not limited to, the following:

- The Proposed OPA would unduly restrict and frustrate efforts to promote a wide range and mix of uses on underutilized sites throughout the City. Owners of properties containing retail or office uses would be forced to continue engaging a slow and inefficient employment conversion process, even though the Provincial government has provided clear direction that these types of sites should generally no longer be included as an "area of employment". The effect of OPA 668 combined with OPA 680 will continue to force property owners into the conversion process, and the City will continue to struggle to meet the ever-growing demands for residential housing. The effect that OPA 668 and OPA 680 will have is contrary to the intent of Bill 97, *Helping Homebuyers, Protecting Tenants Act* ("Bill 97"). While Bill 97 was intended to facilitate more flexible development opportunities on office and retail sites, OPA 668 and OPA 680 will only serve to heavily restrict such opportunities, further exacerbating the housing crisis facing the City.
- The Proposed OPA would impose increased land use planning constraints without proper planning rationale. The Proposed OPA does not represent good planning and is not an appropriate approach to ensuring a true mix of uses on lands throughout the City.

Additionally, we formally request that the undersigned be provided with notice of any City meetings where reports related to the above noted matter are to be considered. Finally, we request that the undersigned be notified of any decision respecting the above noted matter.

Sincerely,

McCarthy Tétrault LLP

A handwritten signature in black ink, appearing to read "M. Foderick", written in a cursive style.

Michael Foderick