

July 10, 2024

Our File No.: 241431

Via Email: phc@toronto.ca

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

Attention: Chair Perks and Members of the Planning and Housing Committee

Re: PH14.1 - Employment Area Land Use Permissions - Decision Report - Approval

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 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 the Planning and Housing Committee

We request that Planning and Housing Committee refer 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

cc. Anne Benedetti, David Bronskill, Roslyn Houser, Max Laskin

SCHEDULE A

Client	Land Holdings
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
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

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
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
Leaside Junction Inc.	815 – 845 Eglinton Avenue East
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/ Metcorp 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 Real Estate Inc.	105 Wingold Avenue
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