



Reply Attention of    Mary Flynn-Guglietti  
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Our File No.          212523  
  
Date                    July 11, 2024

**DELIVERED VIA EMAIL** ([phc@toronto.ca](mailto:phc@toronto.ca))

Planning and Housing Committee  
10<sup>th</sup> Floor, West Tower  
City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

**Attention:**    Nancy Martins

Dear Chair Perks & Members of the Planning and Housing Committee:

**Re:    Item – 2024.PH14.1**  
**Planning & Housing Committee Meeting of Thursday, July 11, 2024**  
**Employment Area Land Use Permissions – Decision Report -Approval**

We act on behalf of Amexon Real Estate Investment Syndicate Inc., (the “**Client/Amexon**”) the owner of lands municipally known as 1000 Finch Ave & 4580 Dufferin Street, and Amexon Capital Corporation (“**Client/Amexon**”), owners lands municipally known as 1177, 1179, 1181 and 1183A Finch Avenue West, which lands are located in the City of Toronto (the “**City**”).

On behalf of our Client, we write to express strong concerns related to OPA 680 and OPA 668 which are intended to amend the City’s Official Plan in response to the new Provincial Planning Statement (“**PPS 2024**”) and *Bill 97 (Helping Homebuyers, Protecting Tenants Act, 2023)* that will amend the definition of an “area of employment”.

As outlined in the June 24, 2024 Staff Report PPS 2024 and Bill 97 modifies the definition of an “area of employment” to traditional manufacturing, warehousing, research & development and related uses. Bill 97 and PPS 2024 specifically states that institutional and commercial uses, including retail and office uses not associated with a primary industrial use, are no longer to be considered permitted uses in an “area of employment”. Residential uses are encouraged to be located outside of employment areas to support residential housing needs and to create complete communities.

OPA 680 as presently drafted would remove institutional and commercial land use permissions, including office uses, from all of the City's employment lands whether designated *Core Employment* or *General Employment* in the City's Official Plan. OPA 680 would seriously impact the existing planned function of many areas of employment in the City. The transition provisions found in subsection 1(1.1) and (1.2) of the *Planning Act* and the City's OPA 668 would only permit the continuation of an existing commercial and/or institutional uses and would not allow for commercial and/or institutional uses to be permitted generally in an "area of employment" or permit expansion of existing commercial and/or institutional uses where such lands uses have been removed through OPA 680.

On behalf of our Client we respectfully request that the 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 what areas should appropriately remain "areas of employment" under the new definition of an area of employment or whether certain areas would more appropriately be redesignated *Mixed Use Areas* that would commercial (such as office uses) and/or institutional uses to continue and thrive. In addition a site by site review would also assist in determining that in addition to continuing to allow commercial and/or institutional uses under a *Mixed Use Area* designation appropriate residential uses would also be permitted to meet the current residential housing needs and the creation of complete communities as is encouraged in Bill 97.

Kindly ensure that we are provided with any notice of any meetings at which OPA 680 and OPA 688 are being considered and any decisions related to these matters.

Yours truly,



Mary Flynn-Guglietti

Cc: Joe Azouri, Amexon Properties Inc.  
Rickard Domes, Gagnon Walker Domes Ltd.