

July 10, 2024

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

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

Attention: Nancy Martins, Administrator

Dear Chair and Committee:

**Re: Planning and Housing Committee Meeting – July 11, 2024  
Agenda Item PH14.9 – Official Plan Review - Office Replacement Policies -  
Proposals Report – Comments**

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Aird & Berlis LLP acts on behalf of the landowners of the properties listed in Schedule “A” (collectively known as “**Kingsett**”).

We have reviewed the Official Plan Review – Office Replacement Policies – Proposals Report and Attachments from Interim Chief Planner and Executive Director, City Planning, including the proposed policy directions that will form the basis of stakeholder consultation. We have identified concerns and comments with the proposed policy directions, including but not limited to the following:

- **Percentage Replacement:** While Kingsett acknowledges and appreciates the proposed reduction of office replacement from 100% to 25%, and the flexibility of allowing replacement by identified alternative uses, in its view this proposed policy direction is still overly prescriptive. Office (or identified alternative) uses may not be economically viable in certain locations or in such sizes and such a policy would not allow the creation of a balance of residential and non-residential uses based on the market’s ability to support new commercial space in the area; and
- **On/off Switch:** Kingsett supports the proposed direction of the ‘on/off switch’ approach whereby the City removes the office replacement policies in their entirety and monitors the effect for a period of years prior to coming forward with any alternative. Such an approach introduces flexibility and the ability to respond to the market needs of the area.

Kingsett welcomes the opportunity to engage with the City with respect to the proposed policy directions and to address those comments outlined above and any additional comments which may arise through further review.

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We ask to be provided with notice of any future meetings and decisions related to these matters.

Thank you for your consideration of this request.

Yours truly,

AIRD & BERLIS LLP



Naomi Mares  
NM

cc: Client

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AIRD BERLIS

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## SCHEDULE A

750 Yonge St - 2495381 Ontario Inc.  
752-754 Yonge St - 2485629 Ontario Inc.  
758 Yonge St - 2489873 Ontario Inc.  
760-762 Yonge St - 760 Yonge Street Investments Inc.  
577 Yonge St - 577 Yonge Street Holdings Inc.  
530 Yonge – 2470324 Ontario Inc.  
538 Yonge – 1000316303 Ontario Inc.  
540 Yonge – 1000889845 Ontario Inc.  
542 Yonge – 1000894384 Ontario Inc.  
544 Yonge – 2706920 Ontario Inc.  
546 Yonge – YOSCAN HOLDCO INC.  
548 Yonge – 548 Yonge Street Investments Inc.  
550 Yonge – 1000316300 Ontario Inc.  
145 St. Luke Lane – 2567597 Ontario Inc.  
556 Yonge – 2553872 Ontario Inc. / 2553308 Ontario Inc.  
564 Yonge – 2553309 Ontario Inc.  
566 Yonge -1000735415 Ontario Inc.  
568 Yonge - Ultra Convenience Properties Inc.  
60 Yonge – Yonge Melinda Realty Inc.  
429 Spadina - 429 Spadina Holdings Inc.  
700 Bay St - KS 700 Bay Street Inc.  
1235 Bay St - KS 1235 Bay Street Inc.  
101 Bloor St W - 101 Bloor CREIF Inc.  
130 Bloor St W - 130 Bloor CREIF Inc.

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700 University - 700 University Inc.