

May 14, 2025

Our File No.: 211846

Delivered Via E-mail

City Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Sylwia Przedziecki (councilmeeting@toronto.ca)

Dear Sirs/Mesdames:

Re: Item 2025.PH21.1 – Official Plan Amendments to align with Provincial Legislative and Policy changes related to Employment Areas – Decision Report

We are solicitors for Tigra Vista Inc., who is the registered owner of the three parcels of land in the City of Toronto (the “**City**”) known municipally as 229-241 Consumers Road & 14 William Sylvester Drive, 243-255 Consumers Road, and 260 Consumers Road (the “**Lands**”), which are consolidated parcels of land located around the intersection of Consumers Road and William Sylvester Drive.

We are writing on behalf of our client to express concerns with the above-noted item and draft Official Plan Amendment No. 804 (“**Draft OPA 804**”). Given the evolving policy direction for the area, it is clear that mixed-use redevelopment of the Lands would contribute to the provision of a complete community in this area and facilitate the delivery of much-needed housing. While our client appreciates that City staff recognize the Lands are not an area of employment, our client is concerned that the proposed designation of the Property as *Regeneration Areas* will result in a study process that will be too slow and inappropriately constrained by Draft OPA 804. Consideration should be given to designating the Lands and the surrounding area as *Mixed Use Areas*.

The Property and surrounding area clearly do not meet the new definition of “area of employment”. As such, appropriate reinvestment in and redevelopment of the Property can and should occur. However, Draft OPA 804 would not facilitate the delivery of housing but is likely to be an impediment to the Province’s specific direction as set out in amendments to the *Planning Act* and the Provincial Planning Statement (2024).



In particular:

- No form of residential uses are permitted prior to completion of a local area study, with no timeline provided for completion of such a local study. This area does not require a local area study because it is not an area which includes uses incompatible with residential uses. Similarly, a land use plan, and other suggested plans/studies, for the entire area should not be required prior to residential development proceeding on the Lands. Any review and consultation as part of such processes could be achieved through a rezoning process.
- Draft OPA 804 would mandate a minimum amount of non-residential gross floor area without regard for the nature of the Lands or the office market. The City's own study has confirmed the nature of the current office market, with a resulting and emerging policy direction that would only require replacement of existing non-residential gross floor area on certain lands within the Downtown Secondary Plan and the Yonge-Eglinton Secondary Plan. This emerging policy direction would not apply to the Lands, or the surrounding area, meaning that Draft OPA 804 is at odds with the City's own approach.
- Draft OPA 804 would require affordable housing gross floor area as part of any redevelopment of the Property, when any requirement for affordable housing can only be secured through an inclusionary zoning by-law and/or as an in-kind contribution agreement pursuant to Section 37 of the *Planning Act*. The Minister of Municipal Affairs and Housing recently amended similar policies proposed by the City. These policies should be deleted from Draft OPA 804.

Given these concerns, as noted above, the most appropriate approach for the Lands would be to redesignate them as *Mixed Use Areas* to enable a rezoning application to proceed for the Lands on a timely basis. Such an approach could be applied to the entire area as a means of expediting appropriate redevelopment in the area.

We would appreciate being included on the City notice list on behalf of our client for any City Council decision regarding Draft OPA 804.

Yours truly,

Goodmans LLP

A handwritten signature in blue ink, appearing to read "D. Bronskill", written over a light blue horizontal line.

David Bronskill
DJB/

cc. Client