



May 16, 2026

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

SENT VIA E-MAIL

Dear Members of the Planning and Housing Committee,

**Re: PH21.1 Official Plan Amendments to align with Provincial Legislative and Policy Changes Related to Employment Areas - Decision Report
5395-5409 Eglinton Avenue West ("Centennial Centre")**

SvN Architects + Planners are the planning consultants for Crown Property Management Inc ("Crown") on behalf of CR4 Centennial Centre Inc. (the "Owner"), the owner of an office park known as Centennial Centre with the municipal addresses 5395-5409 Eglinton Avenue West ("the site").

SvN has been engaged in discussions with City Staff regarding the future of the site since early 2020. We submitted a formal request to convert the site to *Mixed Use Areas* in August 2021, however the conversion was not advanced due to concerns from the Airport Authority.

Despite being unsuccessful with the conversion request, our client continues to explore opportunities for increasing the economic output and number of jobs on the site in accordance with its current planning permissions. The lack of clarity on how those permissions will continue in an OPA 804 environment is a significant concern as it introduces risk for business continuity, leasing, and investment.

We have reviewed the April 23, 2025 Staff Report related to Item PH21.1, Official Plan Amendments to align with Provincial Legislative and Policy Changes Related to Employment Areas – Decision Report, including Official Plan Amendment ("OPA") 804, and have concerns about the impacts of OPA 804 on our clients' property.

We recommend that City Council refer OPA 804 back to Staff with direction to:

1. Provide a clear definition of "lawfully established" in order to clearly identify uses that are currently lawfully "permitted" to be "lawfully established" and a process for obtaining permissions for other compatible uses; and,
2. Undertake a comprehensive review of all office parks, including Centennial Centre, for potential redesignation to *Regeneration Areas*.



I. The Site

Centennial Centre is located at the Toronto-Mississauga boundary on the south side of the approximately 100-metre-wide right-of-way that contains Eglinton Avenue West and the Mississauga Transitway. The site is opposite Renforth Station, recognized in the Growth Plan as a Major Transit Station, that provides transfers between nine routes from four different transit services, including the Mississauga Transitway BRT and various TTC buses. It will also be serviced by the future Eglinton Crosstown West LRT extension.

Across Eglinton Avenue is the southern edge of the Mississauga Airport Corporate Centre (“ACC”), a concentration of primarily office employment, which extends north up to Highway 401. The Pearson International Airport runways are approximately 1.5 kilometres to the north of the subject site.

The triangle-shaped site is bordered on the west by the 189-hectare Centennial Park and to the south by a wide hydro corridor. Beyond the hydro corridor is a low-rise residential neighbourhood known as Centennial-Eringate.

II. Concerns with Draft OPA 804

OPA 804 has been prepared in response to the revised definition of “area of employment” in the Planning Act and “employment area” PPS 2024, as amended through Bill 97. The uses considered include manufacturing, research and development in connection with manufacturing, and warehousing, including uses related to goods movement. Retail and office uses that are associated with manufacturing, warehousing, and goods movement are also permitted. Institutional and commercial uses, including standalone offices, are not considered to be “area of employment” uses.

OPA 804 aligns land use permissions in the Official Plan with the new definition, which effectively removes existing use permissions and eliminates any distinction between lands designated as *Core Employment Areas* and *General Employment Areas*. This is a significant constraint on productivity, innovation, and landowner’s ability to respond to changing economic conditions.

Perhaps in an attempt to address this concern, OPA 804 introduces new policies 4.6.9 and 4.6.10 which provide for the continuation of “lawfully established uses” on lands designated *Core* or *General Employment*. However, there is no definition or explanatory text as to how such will be interpreted. Further, it is unclear whether “lawfully established” uses can be expanded, or how new uses may be introduced. This lack of clarity is of particular concern given that OPA 804 would be approved as Section 24 amendment, and thus would not be appealable. The Staff Report also does not convey whether and how the zoning by-law will be amended to conform to the new policies.



In our opinion Draft OPA 804 neither implements the new *Planning Act* definition nor is consistent with the PPS 2024 and adds undue complexity to the regulatory environment for businesses, hampering economic growth.

When the Minister of Municipal Affairs filed O. Reg. 396/24, the Ministry directed the City to consider removing certain lands from *Employment Areas*, in alignment with the new definition. The Staff Report suggests that Staff reviewed office parks, as well as areas that do not act as a buffer to more sensitive uses, which are two criteria that apply to Centennial Centre. To our knowledge a comprehensive study was not done, as we would have recommended that our client's lands be considered. Only 4 sites were recommended for redesignation to *Regeneration Areas*. Centennial Centre is an office park, and is proximate to sensitive uses, where traditional employment uses would not be permitted. The site location next to a regional transit hub and public open space make it an ideal candidate for a *Regeneration Area*.

III. Conclusion

OPA 804 is a significant city-wide amendment that will shape the future of Employment Areas for years to come. As it stands, it introduces considerable legal and administrative uncertainty, particularly for landowners and businesses that do not fall under traditional manufacturing or warehousing uses.

We respectfully request that the City take further steps to clarify its intent and implementation approach, to avoid unintended disruptions to business continuity and to support a stable and adaptable planning framework.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kelly Graham', with a stylized, flowing script.

Kelly Graham, MCIP, RPP
Senior Associate, Planning
SvN Architects + Planners

cc: Crown Property Management Inc