



Bennett Jones

Bennett Jones LLP

3400 One First Canadian Place, PO Box 130

Toronto, Ontario, Canada M5X 1A4

Tel: 416.863.1200 Fax: 416.863.1716

Andrew L. Jeanrie

Partner

Direct Line: 416.777.4814

e-mail: jeanriea@bennettjones.com

Our File No.: 093365.00014

May 16, 2025

Via E-Mail – councilmeeting@toronto.ca

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

Attention: Sylwia Przewdziecki

Dear Mayor Chow and Members of City Council:

Re: Proposed Official Plan Amendment 804 ("OPA 804")

Item – 2025.PH21.1

**Official Plan Amendment to align Provincial Legislative and Policy changes related to
Employment Areas**

No.: 1677 Wilson Avenue (North York)

We represent 2656049 Ontario Inc., the owner of 1677 Wilson Avenue (the **"Property"**) which is improved with the former Toronto Plaza Hotel, now operating as a municipal shelter (depicted in red).



May 16, 2025

Page 2

The purpose of this letter is both to request that OPA 804 reflect both the existing and planned future for the property, and also to highlight the potential for redevelopment of the Property.

FAILINGS OF OPA 804

On behalf of our client, we have reviewed the City's proposed OPA 804 and monitored the May 8th, 2025 Planning and Housing Committee meeting (**"P+H Committee"**). Our client had hoped that the P+H Committee would have directed City staff to "review lands" beyond the four office parks that it did. As Planning staff have noted, the Province directed the City to evaluate lands that in fact needed to be protected from conversion in order to protect manufacturing and warehousing areas. The Property does not require protection (it is a former hotel presently being used as a municipal shelter) and would greatly benefit from an expanded list of employment uses including office space, and places for locals and workers to eat (to name two). Limiting the site to manufacturing and warehousing is not what the Province contemplated when it directed the City to truly consider what needed protection and what lands would benefit from an expanded list of use permissions.

We request City Council take this opportunity to redesignate the Property from "General Employment" to "Regeneration Areas" with the full list of non-residential use permissions it provides. We highlight that our client is not asking for residential permissions as part of the redesignation request. A fulsome list of employment and commercial uses should be permitted in order to provide the opportunity for this Property to more fulsomely contribute to the neighborhood, including the potential of a new hotel.

The Property is located on the south side of Wilson Avenue, just east of Highway 400 and north of Highway 401. The Property is an under-utilized site which is an excellent candidate for redevelopment for considerably higher density for a mix of non-residential uses beyond those permitted by the existing "General Employment" designation. Given its size and location and

- a) the fact the hotel use is no longer even permitted in the "General Employment" designation nor is the municipal shelter; and
- b) the fact that the City is already in the process of evaluating future residential permissions (which will be a number of years off) through the Wilson/Jane Visioning exercise;

it would at least be appropriate for the City to formally recognize now that this Property is not appropriate or feasible to convert this hotel/municipal shelter into warehousing or manufacturing, but is certainly appropriate for a wider range of non-residential uses than are permitted today. A redesignation to "Regeneration Area" without corresponding residential permissions until studied further by the City takes place is logical and beneficial to the City and neighbourhood in general.

With respect to the long term we note that our client has met with City staff respecting an eventual build out with mixed use residential and residential permissions which will be part of the City led Wilson/Jane Visioning exercise.

Also, an issue to our client is that OPA 804 is the policy phrasing of "continuation of lawfully established uses". The City has taken the approach of using non-defined terminology which leads to an inconsistent interpretation on go forward basis. What does "lawfully established" mean in the context of "provided

May 16, 2025

Page 3

that the use was lawfully established on the parcel of land before October 20, 2024". The failure to add any specification surrounding this policy leaves a considerable window of uncertainty and potential for inconsistent interpretations. As currently written, there is no clarity as to what "lawfully established" means in practice.

For example, if the current use is both a hotel and a municipal shelter (neither of which are permitted in the "General Employment" designation), is this lawfully established if either closes for a period of time? If a use is existing, but temporarily shutters, can a different tenant of the same use then occupy the space under a "lawfully established" pretense? If so, what is the maximum length of time for this transition to occur?

Lastly, to support the Province's initiatives, our client supports OPA 804's intentions with respect to repealing both OPA 668 and OPA 680, both of which our client objected to.

OPA 804 provides a timely opportunity to ensure the City's latest attempt at an employment lands review is fair and complete as it relates to this Property.

We request on behalf of our client to be notified of any future meetings respecting employment lands and OPA 804, and of the Council's eventual decision respecting the same. If you have any questions, please reach out.

Yours truly,

BENNETT JONES LLP

DocuSigned by:

G51975944F4A4D7...
Andrew L. Jeanrie

c.c.: Client