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May 20, 2025

Via Email (councilmeeting@toronto.ca)

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

Attention: **Sylwia Przewdziecki**

Dear Sirs/Mesdames:

**Re: Item PH21.1
Proposed Official Plan Amendment No. 804
Official Plan Amendments to Align with Provincial Legislative and Policy
Changes Related to Employment Areas**

We are writing on behalf of Wyndon Properties Ltd., the registered owners of lands municipally known as 885 Don Mills Road (the “**Subject Property**”), located within the City of Toronto (the “**City**”).

We are writing to express our client’s concerns with the proposed OPA 804, as noted above (“the **Proposed OPA**”), and kindly request that consideration of this matter be deferred.

The Subject Property is proposed to be converted from *General Employment Areas* to *Regeneration Areas* as noted in Policy 32 of the Proposed OPA. While we are appreciative of the City’s proposed conversion, we have several concerns with the Proposed OPA which includes the following:

- The Proposed OPA would unduly delay efforts to fulfill residential housing potential on the Subject Property as Policy 32(b) states that “no form of residential uses” would be permitted before new or updated Secondary Plan policies are completed, including lengthy local area study processes. It is our opinion that the Subject Property should not be precluded from filing a site-specific development application prior to the adoption of a secondary plan as there is a need to meet the ever-growing demands for residential housing.
- Policy 32(c) contains a minimum requirement for non-residential gross floor area (“**GFA**”) of at least 15% (or 1.0 times the site area excluding lands conveyed to the City), of which a minimum of 51% will be comprised of a) general employment uses; and/or b) office, medical office, cultural industries, incubator and/or co-working uses, with all non

residential GFA to be uses compatible with residential uses; and be developed prior to or concurrent with any residential uses on the land. Other policies also speak to required non-residential GFA. In our opinion, these requirements in the Proposed OPA:

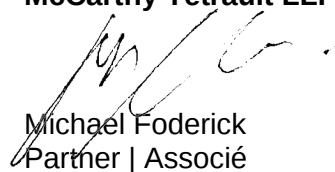
- do not allow for sufficient flexibility to provide more limited non-residential uses based on changing market demands; and
- are not consistent with the City's emerging approach to non-residential GFA replacement, and could even result in *more* office uses being required in any new development than what currently exists on the Subject Property.
- The Proposed OPA Policy 32(f) – (i) directs the preparation of a “Housing Plan” that would ultimately require the provision of a yet-to-be determined amount of affordable housing, to be secured through one or more agreements with the City with holding provisions potentially being used until such affordable housing is secured. It is our opinion that any policy relating to affordable housing should be consistent with Provincial direction as indicated through recent modifications made on ministerial approvals of other OPAs within the City, such as OPA 644, and OPA 653, where the policy wording was amended from affordable housing being *required* to instead being *encouraged*.

It is our position that this matter should be deferred to allow for additional consultation with our client on the concerns raised herein.

Should you wish to discuss further, have any questions or require any supplementary information, please do not hesitate to contact the undersigned. Additionally, we formally request that the undersigned be provided with notice of any City meetings where reports related to the above noted matter are to be considered. Finally, we request that the undersigned be notified of any decision respecting the above noted matter.

Yours truly,

McCarthy Tétrault LLP



Michael Foderick
Partner | Associé

MF/rp/ds



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Attention: Sylwia Przewdziecki

Dear Sirs/Mesdames:

**Re: Item PH21.1
Proposed Official Plan Amendment No. 804
Official Plan Amendments to Align with Provincial Legislative and Policy
Changes Related to Employment Areas**

We are writing on behalf of Prince Andrew Place Portfolio Inc. and Prince Andrew Place (II) Portfolio Inc. (corporate entities controlled by H&R REIT), the registered owners of lands municipally known as 1-31 Prince Andrew Place (the “**Subject Property**”), located within the City of Toronto (the “**City**”).

We are writing to express our client’s concerns with the proposed OPA 804, as noted above (“the **Proposed OPA**”), and kindly request that consideration of this matter be deferred.

The Subject Property is proposed to be converted from *General Employment Areas* to *Regeneration Areas* as noted in Policy 32 of the Proposed OPA. While we are fully supportive of the City’s proposed conversion, we have several concerns with the Proposed OPA which includes the following:

- The Proposed OPA would unduly delay efforts to fulfill residential housing potential on the Subject Property as Policy 32(b) states that “no form of residential uses” would be permitted before new or updated Secondary Plan policies are completed, including lengthy local area study processes. It is our opinion that the Subject Property should not be precluded from filing a site-specific development application prior to the adoption of a secondary plan as there is a need to meet the ever-growing demands for residential housing.
- Policy 32(c) contains a minimum requirement for non-residential gross floor area (“**GFA**”) of at least 15% (or 1.0 times the site area excluding lands conveyed to the City), of which a minimum of 51% will be comprised of a) general employment uses; and/or b) office, medical office, cultural industries, incubator and/or co-working uses, with all non

residential GFA to be uses compatible with residential uses; and be developed prior to or concurrent with any residential uses on the land. Other policies also speak to required non-residential GFA. In our opinion, these requirements in the Proposed OPA:

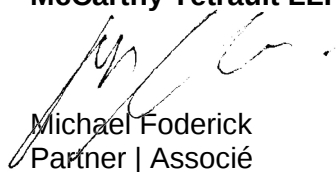
- do not allow for sufficient flexibility to provide more limited non-residential uses based on changing market demands; and
- are not consistent with the City's emerging approach to non-residential GFA replacement, and could even result in *more* office uses being required in any new development than what currently exists on the Subject Property.
- The Proposed OPA Policy 32(f) – (i) directs the preparation of a “Housing Plan” that would ultimately require the provision of a yet-to-be determined amount of affordable housing, to be secured through one or more agreements with the City with holding provisions potentially being used until such affordable housing is secured. It is our opinion that any policy relating to affordable housing should be consistent with Provincial direction as indicated through recent modifications made on ministerial approvals of other OPAs within the City, such as OPA 644, and OPA 653, where the policy wording was amended from affordable housing being *required* to instead being *encouraged*.

It is our position that this matter should be deferred to allow for additional consultation with our client on the concerns raised herein.

Should you wish to discuss further, have any questions or require any supplementary information, please do not hesitate to contact the undersigned. Additionally, we formally request that the undersigned be provided with notice of any City meetings where reports related to the above noted matter are to be considered. Finally, we request that the undersigned be notified of any decision respecting the above noted matter.

Yours truly,

McCarthy Tétrault LLP



Michael Foderick
Partner | Associé

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100 Queen Street West
Toronto, ON M5H 2N2

Attention: Sylwia Przewdziecki

Dear Sirs/Mesdames:

**Re: Item PH21.1
Proposed Official Plan Amendment No. 804
Official Plan Amendments to Align with Provincial Legislative and Policy
Changes Related to Employment Areas**

We are writing on behalf of Urros Investments Inc., the registered owner of the property municipally known as 110 Industry Street (the “**Subject Property**”) in the City of Toronto (the “**City**”). We are writing to inform you that our client objects to the proposed amendment noted above (the “**Proposed OPA**”), as currently proposed, and kindly requests that consideration of this matter be deferred.

Background

The Subject Property, which is approximately 1.62 hectares in size and is currently used for an outdoor storage facility, is situated on the north side of Industry Street, west of Ray Avenue, and is positioned northwest of the intersection of Eglinton Avenue West and Black Creek Drive. Further, the Subject Property is located in close proximity to the Mount Dennis GO/TTC Station.

The Subject Property is situated within the employment area known as the Black Creek Business Area that is generally bounded by Trethewey Drive to the north, the CP/Metrolinx rail corridor to the west, Black Creek Drive to the east and Eglinton Avenue West to the south. The Subject Property is also located in proximity to residential areas located to the west and south which makes this a good shovel ready candidate for development consistent with the Province’s Housing Supply Action Plan (HSAP) commitment to significantly increase housing supply. Further, the Subject Property is located just north of a number of approved and planned residential tower developments along the Weston Road corridor adjacent to the Mount Dennis Station GO/TTC Station.

Objection to the Proposed OPA

In our opinion, the Proposed OPA should have included the Subject Property (and all or part of the Black Creek Business Area) in the list of redesignated lands as we believe that the area is appropriate for conversion from *Employment Areas* to *Mixed Use Areas* or at least to *Regeneration Areas* on an interim basis. In our view, a *Mixed-Use Areas* designation for the area would contribute to the creation of a complete community and will allow for residential uses and new housing opportunities in the Mount Dennis neighbourhood.

Overall, in our opinion, the Proposed OPA has not provided a sufficiently comprehensive assessment of employment lands within the City and of those properties appropriate for redesignation to support residential uses. In our view, a more complete approach to redesignating the City's employment lands would have regard to the *Planning Act*, be consistent with the Provincial Planning Statement as well as represent good planning.

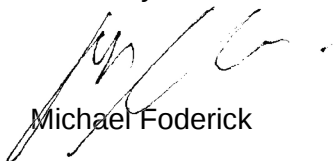
Conclusion

We therefore request that the Proposed OPA be modified to include the removal of the Subject Property from *Core Employment Areas* and to redesignate it to *Mixed Use Areas* or at least to *Regeneration Areas* on an interim basis. Further, this request is to ensure consistency with other residential land use permissions approved in the general vicinity of the Subject Property. Additionally, in our view, a City employment conversion study for the entire Black Creek Business Area would be appropriate. It is our position that this matter should be deferred to allow additional consultation with our client on the concerns raised herein.

Should you wish to discuss further, have any questions or require any supplementary information, please do not hesitate to contact the undersigned. Additionally, we formally request that the undersigned be provided with notice of any City meetings where reports related to the above noted matter are to be considered. Finally, we request that the undersigned be notified of any decision respecting the above noted matter.

Sincerely,

McCarthy Tétrault LLP



Michael Foderick

MF/JC/rj



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Toronto, ON M5H 2N2

Attention: Sylwia Przewdziecki

Dear Sirs/Mesdames:

**Re: Item PH21.1
Proposed Official Plan Amendment No. 804
Official Plan Amendments to Align with Provincial Legislative and Policy
Changes Related to Employment Areas**

We are writing on behalf of HTC Sterling Road Property 4 Ltd. (a corporate entity controlled by Hines Canada), the registered owner of the property municipally known as 175 Sterling Road (the “**Subject Property**”) in the City of Toronto (the “**City**”). We are writing to inform you that our client objects to the proposed amendment noted above (the “**Proposed OPA**”), as currently proposed, and kindly requests that consideration of this matter be deferred.

Background

The Subject Property, which is currently vacant, is situated on the east side of Sterling Road generally between Bloor Street West to the north and Dundas Street West to the south, in the Lower Junction neighborhood. The Subject Property is located directly adjacent to the planned Bloor-Lansdowne GO Station and where the secondary entrance to it is to be situated, and is therefore in the Bloor-Lansdowne GO Protected Major Transit Station Area (“**PMTSA**”). Further, the Subject Property is located close to multiple other PMTSAs, including the Lansdowne TTC Station (approx. 450 metres), the Bloor GO Station (approx. 450 metres) and the Dundas West TTC Station (approx. 675 metres), as well as to the College and Dundas TTC streetcar lines.

The Subject Property is also located in direct proximity to residential areas located immediately to the north which makes this a good shovel ready candidate for development consistent with the Province’s Housing Supply Action Plan (HSAP) commitment to significantly increase housing supply.

The Subject Property is a prominent site (Block 4A) located within the area of existing Site and Area Specific Policy 480 - Sterling Road Regeneration (“**SASP 480**”) in the City’s Official Plan.

Objection to the Proposed OPA

In our opinion, the Proposed OPA should have included the Subject Property in the list of redesignated lands as we believe strongly that the Subject Property is appropriate for conversion from *General Employment Areas* to *Mixed Use Areas* or at least to *Regeneration Areas* on an interim basis. The Subject Property does not contain any of the primary employment uses identified under the *Planning Act* and in fact is permitted for an office building (which is not viable due to market conditions) in the existing SASP 480. Further, the Subject Property does not abut and is not contiguous with any heavy employment uses. In our view, a *Mixed-Use Areas* designation for the Subject Property is a logical extension to the existing *Mixed-Use Areas* located directly to the north (Block 4B), and will allow for residential uses and new housing opportunities in a highly desired area. The redesignation will also provide appropriate transition with the abutting employment lands to remain located to the south.

Overall, in our opinion, the Proposed OPA has not provided a sufficiently comprehensive assessment of employment lands within the City and of those properties appropriate for redesignation to support residential uses. In our view, a more complete approach to redesignating the City's employment lands would have regard to the *Planning Act*, be consistent with the Provincial Planning Statement as well as represent good planning.

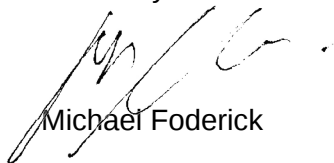
Conclusion

We therefore request that the Proposed OPA be modified to include the removal of the Subject Property from *General Employment Areas* and to redesignate it to *Mixed Use Areas* or at least to *Regeneration Areas* on an interim basis. We also understand from recent discussions that City staff have indicated that they are open to considering a redesignation request for the Subject Property. Further, this request is to ensure consistency with other residential land use permissions approved in the general vicinity of the Subject Property. It is our position that this matter should be deferred to allow additional consultation with our client on the concerns raised herein.

Should you wish to discuss further, have any questions or require any supplementary information, please do not hesitate to contact the undersigned. Additionally, we formally request that the undersigned be provided with notice of any City meetings where reports related to the above noted matter are to be considered. Finally, we request that the undersigned be notified of any decision respecting the above noted matter.

Sincerely,

McCarthy Tétrault LLP



Michael Foderick

MF/JC/rj



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May 20, 2025

Via Email (councilmeeting@toronto.ca)

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

Attention: Sylwia Przewdziecki

Dear Sirs/Mesdames:

**Re: Item PH21.1
Proposed Official Plan Amendment No. 804
Official Plan Amendments to Align with Provincial Legislative and Policy
Changes Related to Employment Areas**

We are writing on behalf of 301 Rockcliffe Inc. (a corporate entity controlled by St. Helen's Meat Packers Limited), the registered owner of the property municipally known as 301 Rockcliffe Boulevard (the "**Subject Property**") in the City of Toronto (the "**City**"). We are writing to inform you that our client objects to the proposed amendment noted above (the "**Proposed OPA**"), as currently proposed, and kindly requests that consideration of this matter be deferred.

Background

The Subject Property, which is approximately 3.22 hectares in size and is currently used for outdoor storage, is situated on the east side of Rockcliffe Boulevard, north of Terry Drive, and is positioned northwest of the intersection of St. Clair Avenue West and Keele Street. Further, the Subject Property is located in close proximity to the St. Clair West TTC streetcar line and the Jane TTC bus route as well as located near the planned St. Clair-Old Weston GO Station.

The Subject Property is situated at the outer edge of the employment area generally bounded by Black Creek to the north, Terry Drive to the south, Rockcliffe Boulevard to the west and Symes Road to the east. The Subject Property is also located in very close proximity to residential areas located to the south and west which makes this a good shovel ready candidate for development consistent with the Province's Housing Supply Action Plan (HSAP) commitment to significantly increase housing supply.

Objection to the Proposed OPA

In our opinion, the Proposed OPA should have included the Subject Property in the list of redesignated lands as we believe strongly that the Subject Property is appropriate for

conversion from *Core Employment Areas* to *Mixed Use Areas* or at least to *Regeneration Areas* on an interim basis. The Subject Property does not abut and is not contiguous with any heavy employment uses. In our view, a *Mixed-Use Areas* designation for the Subject Property would contribute to the creation of a complete community and will allow for residential uses and new housing opportunities in the Rockcliffe-Smythe neighbourhood. The redesignation will also provide appropriate transition with the abutting employment lands to remain located to the east.

Overall, in our opinion, the Proposed OPA has not provided a sufficiently comprehensive assessment of employment lands within the City and of those properties appropriate for redesignation to support residential uses. In our view, a more complete approach to redesignating the City's employment lands would have regard to the *Planning Act*, be consistent with the Provincial Planning Statement as well as represent good planning.

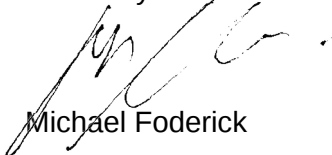
Conclusion

We therefore request that the Proposed OPA be modified to include the removal of the Subject Property from *Core Employment Areas* and to redesignate it to *Mixed Use Areas* or at least to *Regeneration Areas* on an interim basis. As a condition to this redesignation, we would agree to a (H) holding provision being imposed for the Subject Property to only allow residential development to proceed once the Rockcliffe Riverine Flood Mitigation Project is completed. It is our position that this matter should be deferred to allow additional consultation with our client on the concerns raised herein.

Should you wish to discuss further, have any questions or require any supplementary information, please do not hesitate to contact the undersigned. Additionally, we formally request that the undersigned be provided with notice of any City meetings where reports related to the above noted matter are to be considered. Finally, we request that the undersigned be notified of any decision respecting the above noted matter.

Sincerely,

McCarthy Tétrault LLP



Michael Foderick

MF/JC/rj



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May 20, 2025

Via Email (councilmeeting@toronto.ca)

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

Attention: Sylwia Przewdziecki

Dear Sirs/Mesdames:

**Re: Item PH21.1
Proposed Official Plan Amendment No. 804
Official Plan Amendments to Align with Provincial Legislative and Policy
Changes Related to Employment Areas**

We are writing on behalf of Wolfecorp Queensway Inc. (a corporate entity controlled by WolfeCorp), the registered owner of the property municipally known as 1425 The Queensway (the “**Subject Property**”) in the City of Toronto (the “**City**”). We are writing to inform you that our client objects to the proposed amendment noted above (the “**Proposed OPA**”), as currently proposed, and kindly requests that consideration of this matter be deferred.

Background

The Subject Property is located on the southside of The Queensway, west of Wickman Road, and is positioned just west of Kipling Avenue. The Subject Property, approximately 2.47 hectares in size, is currently occupied by a 3-storey office building and a freestanding garage. The Subject Property is situated within the employment area located on the southside of The Queensway that generally extends from Highway 427 to just west of Kipling Avenue. The Subject Property is also located in close proximity to residential areas located to the east which makes this a good shovel ready candidate for development consistent with the Province’s Housing Supply Action Plan (HSAP) commitment to significantly increase housing supply. Further, the Subject Property is located just west of the approved mixed-use redevelopment of 1325-1365 The Queensway, which includes 2 residential towers, and just east of the proposed mixed-use employment conversion and redevelopment of 1549-1551 The Queensway, which includes 4 residential towers.

Objection to the Proposed OPA

In our opinion, the Proposed OPA should have included the Subject Property in the list of redesignated lands as we believe strongly that the Subject Property is appropriate for

conversion from *Core Employment Areas* to *Mixed Use Areas* or at least to *Regeneration Areas* on an interim basis. The Subject Property does not abut and is not contiguous with any heavy employment uses. In our view, a *Mixed-Use Areas* designation for the Subject Property is a logical extension to the existing *Mixed-Use Areas* located to the east, and will allow for residential uses and new housing opportunities in a dynamic changing area. The redesignation will also provide appropriate transition with the abutting employment lands to remain.

Overall, in our opinion, the Proposed OPA has not provided a sufficiently comprehensive assessment of employment lands within the City and of those properties appropriate for redesignation to support residential uses. In our view, a more complete approach to redesignating the City's employment lands would have regard to the *Planning Act*, be consistent with the Provincial Planning Statement as well as represent good planning.

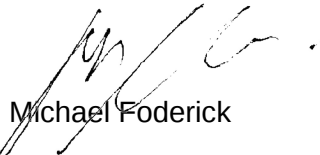
Conclusion

We therefore request that the Proposed OPA be modified to include the removal of the Subject Property from *Core Employment Areas* and to redesignate it to *Mixed Use Areas* or at least to *Regeneration Areas* on an interim basis. Further, this request is to ensure consistency with other residential land use permissions approved in the general vicinity of the Subject Property. Additionally, in our view, a City employment conversion study for the entire employment area located on the southside of The Queensway would be appropriate. It is our position that this matter should be deferred to allow additional consultation with our client on the concerns raised herein.

Should you wish to discuss further, have any questions or require any supplementary information, please do not hesitate to contact the undersigned. Additionally, we formally request that the undersigned be provided with notice of any City meetings where reports related to the above noted matter are to be considered. Finally, we request that the undersigned be notified of any decision respecting the above noted matter.

Sincerely,

McCarthy Tétrault LLP



Michael Foderick

MF/JC/rj