



May 21, 2025

Email: councilmeeting@toronto.ca

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

Attention: Sylwia Przewdzicki

Signe Leisk
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file #000001-01434

Dear Ms. Przewdzicki:

**Re: Agenda Item: 2025.PH21.1 – Official Plan Amendments to align with Provincial Legislative and Policy changes related to Employment Areas | OPA 804
City Council Meeting, May 21, 2025**

We are the lawyers for The Governing Council of the University of Toronto, the registered owner of a 12.08-hectare site located generally southeast of Steeles Avenue West and Dufferin Street, municipally known as 4925, 4961, and 5201 Dufferin Street (the “**University Lands**”). The University Lands are developed and used for institutional purposes including the University of Toronto Institute for Aerospace Studies, a University of Toronto Libraries facility, and the University of Toronto Press. Office and institutional uses are currently permitted and existing on the Property.

On behalf of the University, we provide the following comments on Official Plan Amendment 804 (“**OPA 804**”), the City’s latest response to Bill 97, the *Helping Homebuyers, Protecting Tenants Act, 2023* (“**Bill 97**”) and the new Provincial Planning Policy, 2024 (“**PPS**”). Bill 97 and the PPS revised areas of employment to traditional manufacturing, warehouse, and related industrial uses. Through the proposed adoption by-law, the City intends to repeal Official Plan Amendment 668 (“**OPA 668**”) and Official Plan Amendment 680 (“**OPA 680**”), its prior response to the new Provincial direction, to which the Province previously intervened by Regulation 396/24, and replace these with nearly identical policies in OPA 804. The University maintains the same concerns with this instrument as outlined in our prior correspondence respecting OPA 668 and 680.

OPA 804 continues to broadly restrict redevelopment of non-traditional employment areas in a manner inconsistent with provincial policy, while eliminating existing permissions for commercial and other non-employment uses. OPA 804 should be refused, subject to staff conducting further analysis, consultation, and refinement of the City’s employment designations to ensure that the City achieves the Province’s policy directions and objectives.

OPA 804 is Contrary to Provincial Legislation and Policy Direction

OPA 804 is inconsistent with the Province's clear policy direction for employment lands implemented through the PPS and the Bill 97 *Planning Act* amendments. Like OPAs 668 and 680, OPA 804 purports to include largely all designated employment areas as "areas of employment", despite clear provincial direction to limit areas of employment to sites featuring heavy industrial uses to make more land available for mixed-use development.

While OPA 804 proposes to redesignate four of the City's employment areas, the City's analysis appears limited to certain office parks and criteria not consistent with Provincial policy. Many additional areas across the City, including the University's Lands, already include a broader range of uses beyond that of an "area of employment". OPA 804 would continue to limit development of these lands, despite their commercial, mixed-use, and institutional characters.

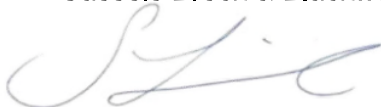
OPA 804 Does Not Represent Good Planning

OPA 804's policy direction does not represent good planning. The Province has provided clear direction to limit areas of employment to sites featuring heavy industrial uses. In imposing those limits, the Province intends to make more land available for housing and complete communities. The City's broader policies also support these goals. OPA 804 risks impeding such goals, by imposing additional barriers to the expansion of existing non-employment uses across the City. A more nuanced and comprehensive approach to redesignating the City's employment lands would be consistent with the PPS and *Planning Act* and represent good planning.

We thank you for the opportunity to comment on OPA 804 and ask that our office be provided with notice of any meetings and decisions related to this matter.

Yours truly,

Cassels Brock & Blackwell LLP



Signe Leisk

SL/AP/nv

cc: Adrianna Pilkington, Cassels (apilkington@cassels.com)
Clerk, City of Toronto (clerk@toronto.ca)