

May 7, 2025

Our Project: NE.NY

VIA EMAIL: phc@toronto.ca

Attn: Nancy Martins
Planning and Housing Committee
Toronto City Hall, 10th Floor, West Tower
100 Queen Street West
Toronto, ON M5H 2N2

Re: Comments on Proposed OPA 804 – Employment Areas and the Redesignation of Certain Employment Areas (285 Yorkland Boulevard – ConsumersNext Secondary Plan Area)

SGL Planning & Design Inc. (SGL) would like to thank the Planning and Housing Committee for the opportunity to provide comments on proposed Official Plan Amendment 804, including changes to Land Use Designations, Employment Areas policies and related Secondary Plans and Maps. SGL represents the tenants of 285 Yorkland Boulevard, located in North York (the “subject site”), just south east of Sheppard Avenue East and Yorkland Road. The subject site is approximately 6,200 square metres in size and is within the City’s ConsumersNext Secondary Plan Area and is currently designated “General Employment Areas” in the City’s Official Plan and Secondary Plan Area. The building on the subject site is currently being used as a Private School. It is the intention of the tenants of the building to maintain and continue the existing Private School use on the subject site.

We understand that the City is currently undertaking a conformity exercise to ensure certain employment area policies have regard for recent changes to the Planning Act, as amended, as well as being consistent with the Provincial Planning Statement (PPS) 2024. The proposed OPA 804 seeks to amend the Official Plan and redesignate certain “General Employment Areas” and repeal OPAs 668 and 680.

The ConsumersNext Employment Area is one of the employment areas where OPA 804 proposes changes. OPA 804 proposes that the “General Employment Areas” designation within the ConsumersNext area be changed to the “Regeneration Areas” designation. OPA 804 also proposes to add Site and Area Specific Policy 10.4 to the ConsumersNext Secondary Plan. “Regeneration Areas” permit a wide range and mix of uses, including commercial, residential, light industrial, parks and open space, institutional, live/work and utility uses. We are generally supportive of this designation change, recognizing that the City’s Official Plan must align with the recent PPS 2024 changes as well as the Planning Act and that the ConsumersNext Secondary Plan Area is envisioned to become a vibrant community that is transit oriented and well connected to a complete, walkable, mixed use community. The designation change

reflects the evolving character of the area as a mixed use community, including residential uses, which are immediately adjacent to the subject site. According to proposed policy 10.4 a), *“all uses permitted by the General Employment Areas and Regeneration Areas designations, including interim uses, with the exception of residential uses, overnight accommodations and live-work uses, are permitted on the lands prior to the completion of a local area study...”*. Accordingly, the existing Private School use on the subject property would be permitted under this proposed policy.

We are supportive of proposed policy 10.4 a), and while we are generally supportive of OPA 804 as a whole, we would like to provide some additional comments and seek clarification on a few policies:

- Policy 10.4 c) requires a minimum 15% *“of the total gross floor area on the lands, or 1.0 times the site area...”* to be non-residential gross floor area, and further, that a minimum of 51% of that minimum required non-residential gross floor area be comprised of uses permitted in General Employment Areas, and or *“office, medical office, cultural industry spaces, incubator and/or co-working uses”*.
 - We seek clarification about whether this policy applies to the whole of the ConsumersNext Regeneration Area, or to each individual site. We recommend that it be specified within this policy.
 - We also seek clarification as to whether this policy applies to uses developed prior to the completion of the local area study contemplated in policy 10.4 a), or after. We recommend that it be specified that this policy only applies to sites where residential uses are proposed and thereby referring to development proposed after the completion of the local area study.
 - Further, policy 10.4 a) permits institutional uses (which are permitted within Regeneration Areas). However, policy 10.4 c) does not consider stand-alone institutional uses on a site, which may not meet the minimum requirement of at least half of the minimum required gross floor area to be a use permitted within the General Employment Areas designation (where institutional uses are currently not permitted). As noted above, we recommend that this policy only apply to sites where residential uses are proposed.
- Policy 10.4 d) proposes a framework for the creation of a future local area study leading to a new or updated Secondary Plan, including a requirement for the future identification of maximum percentages of various land uses that contribute to the non-residential gross floor area, among other requirements. We are concerned that this policy may lead to a Land Use Plan and/or Secondary Plan that is too prescriptive, and we recommend that the City revise the policy to remove requirements tied to quantifiable land areas to allow for greater flexibility.

- Policies 10.4 j) and 10.4 k) require the submission of Compatibility/Mitigation studies for development within the area, and require that *“sensitive land uses be designed and buffered to mitigate impacts from, be compatible with, and not impeded the continuation of and the expansion of existing employment uses, and any new employment uses within the surrounding Regeneration Areas”*. Since these policies relate to residential development, we seek clarification on whether these policies would apply in the context of non-residential uses proposed prior to the creation of the required local area study and/or updated/new Secondary Plan for the area.

We provide these comments at this time, on the basis that we may provide additional comments as we continue to review the proposed policies, and as the proposed policies continue to evolve.

Should you have any additional questions or clarifications, please do not hesitate to reach out. Please also consider this letter as a request to be kept informed of any further meetings, decisions, or next steps associated with OPA 804.

Yours very truly,

SGL PLANNING & DESIGN INC.



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Principal



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