

May 7, 2025

By E-Mail

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

Email: phc@toronto.ca

Dear Members of the Planning and Housing Committee:

**Re: Item 2025.PH21.1 - Official Plan Amendments to align with Provincial Legislative and Policy changes related to Employment Areas - Decision Report – OPA 804
Planning and Housing Committee consideration on May 8, 2025**

We represent Rowbry Holdings Limited in connection with the lands municipally known as 1125A, 1131 and 1131A Leslie Street, Toronto ("**Property**"). We write to express our concerns with proposed OPA 804.

Property Description

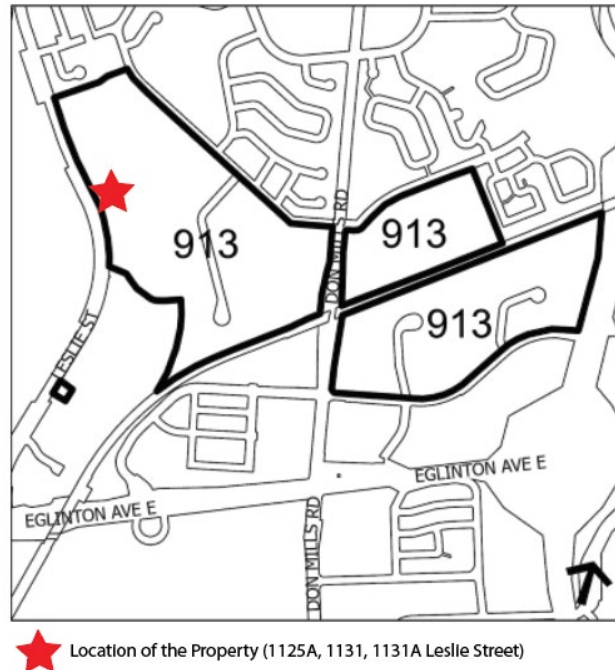
The Property is approximately 4.8 acres with significant frontage along Leslie Street. The Property has exceptional access to higher order transit as it is located within 800 metres of the Sunnybrook Park Crosstown station and the Science Centre Crosstown/Ontario Line station.

The Property is part of a larger remnant employment area where a number of conversions have been approved and is currently under utilized with a 1-storey service commercial building and 6-storey office building. Constructed about 40 years ago, the existing buildings no longer meet today's office space standards, including with respect to layout, design, ceiling heights, and efficiency, which contributes to the declining function of the employment area along Leslie Street.

The Property is well positioned for a mixed-use redevelopment to help revitalize the area in support of transit infrastructure investment.

Concerns with respect to OPA 804

The Property is proposed to be redesignated from *General Employment Areas to Regeneration Areas* on Map 20, and within the Don Mills employment area proposed to be subject to the new Site and Area Specific Policy 913 (see map below).



★ Location of the Property (1125A, 1131, 1131A Leslie Street)

While we generally support the redesignation of the Property from *General Employment Areas* to a non-employment designation, we are concerned with the proposed *Regeneration Areas* designation.

The *Regeneration Areas* designation would require a lengthy local area study process, which staff have identified requires twelve different studies, and would further delay the delivery of much needed housing. At this time, there has been no indication from City staff as to when these studies would be completed before a Secondary Plan or SASP could be brought forward for consideration. It could be years before such studies are completed and, even then, such resulting Secondary Plans and SASPs could be appealed by landowners.

Given that the location of the lands fronting on Leslie Street included in SASP 913 (including the Property) is on the periphery of the SASP 913 area and isolated from the rest of the Don Mills employment area by the Don Mills Trail, a local area study is not necessary before such lands can be redeveloped.

Rather, the City should redesignate the identified areas to *Mixed Use Areas* to allow for a broad mix of residential, commercial and institutional uses. The *Mixed Use Areas* designation would provide the necessary certainty to landowners to move forward with zoning by-law amendment (“**ZBA**”) and site plan (“**SPA**”) applications. Through site-specific ZBA and SPA applications, the necessary studies can be completed to ensure that servicing, transportation and all other matters are satisfactorily addressed.

With respect to specific policies in draft SASP 913 of OPA 804:

- Policy (c) prescribes the amount of non-residential gross floor area that is required, being a minimum of 15% of the total gross floor area, or 1.0 times the site area excludes lands to be conveyed to the City or other public bodies. This policy does not allow for flexibility with changing market conditions and for new developments to respond to the need for commercial or other non-residential uses. It also does not allow for a site-by-site analysis, and is rather applying a “one-size-fits-all” approach to sites in challenging market conditions.
- Policy (f) requires a Housing Plan to guide the provision of affordable housing in the Secondary Plan/SASP area, and prescribes rates at which affordable ownership and rental housing will be provided. This is not consistent with the modifications made by the Minister to OPAs 644, 653 and 692, as adopted by the City that similarly required Housing Plans which secured affordable housing. The Minister modified these OPAs to remove the requirement for affordable housing and instead encourages affordable housing to be included in an amount agreed upon by the City and the landowner.

The intention of the new definition of “Areas of Employment” under Bill 97 is to limit employment areas to traditional manufacturing, warehousing or related uses. Office, retail and institutional uses are no longer included in this definition for the purposes of exempting lands with such uses from employment protection policies and to allow for the introduction of residential uses to encourage mixed-use development and complete communities. OPA 804 undermines this objective.

For the reasons set out above, we request that this Committee direct this matter back to staff before this matter is brought forward to City Council for consideration.

We ask to be added to the City’s mailing list in connection with this matter and be notified of any further decisions made by this Committee or Council.

Yours truly,

AIRD & BERLIS LLP



Maggie Bassani

MB/nh