

May 7, 2025

Via Email: phc@toronto.ca

City of Toronto
Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Chair Perks and Members of the Planning and Housing Committee

Re: PH21.1 - Official Plan Amendments to align with Provincial Legislative and Policy changes related to Employment Areas - Decision Report

We are counsel to a number of landowners in the City of Toronto (the “**City**”). We write on behalf of our clients listed in Schedule “A” to this letter to provide comments on Official Plan Amendment No. 804 (“**OPA 804**”).

Concerns with OPA 804

The proposed policy direction for OPA 804 is contrary to the legislative intent of Bill 97 (the Helping Homebuyers, Protecting Tenants Act, 2023) (“**Bill 97**”) and the new Provincial Planning Statement (2024) (the “**New PPS**”) that amend the definition of an “area of employment”. In particular, Bill 97 and the New PPS narrow the definition of an “area of employment” to traditional manufacturing, warehousing, R&D and related uses. Where institutional and commercial uses are permitted those areas are no longer to be considered an “area of employment”.

The intent of Bill 97 and the New PPS is clear. Areas of employment are defined to be those areas devoted to traditional manufacturing, warehousing, R&D and related uses. Residential permissions should be available in all other designations other than areas of employment to support residential housing needs and the creation of complete communities. Despite this clear intent, OPA 804 would remove institutional and commercial land use permissions from all of the City’s employment areas, with the exception of four areas that are proposed to be redesignated to Regeneration or Institutional Areas. Effectively, OPA 804 would prevent further consideration of residential development opportunities throughout most of the City’s existing areas of employment, contrary to Bill 97 and the New PPS.

In identifying the four areas to redesignate to Regeneration or Institutional Areas, the City looked at “office parks... that do not act as a buffer to more sensitive uses.” Not only are there other lands in the City of Toronto that meet this criteria that are proposed to remain Employment, but the

City's analysis fails to truly consider which lands within the City meet the new definition of "area of employment", including areas that include significant retail. Rather than consider which office parks in Toronto should be redesignated, the City should take a more robust approach. The City should review its Employment lands to identify areas with traditional manufacturing, warehousing and R&D uses, for these lands to be classified as an area of employment. Outside of these areas, residential uses should be permitted to address the City's housing crisis. This approach would be in keeping with the intent and purpose of Bill 97 and the New PPS. It would ensure traditional employment areas continue to be areas of employment while appropriately creating new opportunity for residential development.

Further, OPA 804 would negatively impact the existing planning function of many areas of employment within Toronto. By removing commercial and institutional permissions across all areas of employment within the City without examining whether it is appropriate to do so on a case-by-case basis, commercial and institutional permissions will be removed in areas where those uses are appropriate.

We understand that City staff's view is that OPA 804 would allow institutional and commercial permissions to continue generally in all existing employment areas despite OPA 804's removal of those permissions, but we believe this interpretation is incorrect.

Request to the Planning and Housing Committee

We request that Planning and Housing Committee refer this report back to City staff to review the City's Employment lands on a case-by-case basis. This review should determine which Employment lands should be limited to traditional manufacturing, warehousing and R&D uses and City staff should be directed to classify only these areas as areas of employment to meet the new definition of area of employment in Bill 97 and the New PPS.

We ask to included on the City notice list related to this matter.

Yours truly,

Goodmans LLP



Joe Hoffman
JH/rr

cc. Anne Benedetti, David Bronskill, Roslyn Houser, Max Laskin, Ian Andres

SCHEDULE A

Client	Land Holdings
15 Gervais Drive Limited	15 Gervais Drive
2797896 Ontario Ltd.	45-49 Cranfield Road
Bradgate Investments Limited	3115 Markham Road
Hullmark (250 Bowie) Ltd. & 12723603 Canada Inc.	250 Bowie Avenue and 640-682 Caledonia Road
Leaside Junction Inc.	815 – 845 Eglinton Avenue East
M&R Commercial Properties Inc.	5230 – 5250 Finch Avenue East 3477 – 3497 Kennedy Road
Markham Steeles Realty Inc.	5975 – 6025 Steeles Avenue East
Metcorp Holdings Limited/ Metcorp Limited	35 Clarkson Avenue 1250 Castlefield Avenue 1260 Castlefield Avenue 1275 Castlefield Avenue 1381 Castlefield Avenue 100 Miranda Avenue 80 Montcalm Avenue 80 Ronald Avenue 95 Ronald Avenue 2532 Yonge Street
Metrick Real Estate Inc.	105 Wingold Avenue
RioCan Holdings Inc.	800 – 836 Warden Avenue
RioCan Living LP	740 – 750 Dupont Street
Riotrin Properties (Steeles) Inc.	2181 Steeles Avenue West 2061 – 2081 Steeles Avenue West 100 Gerry Fitzgerald Drive
Riotrin Properties (Weston)	30 Weston Road and 1980 St Clair Avenue West

Velar Developments Corp.	43 - 47 Booth Street
Vine Avenue Holdings Limited	36 - 162 Vine Avenue