

May 7, 2025

City of Toronto
Planning and Housing Committee
City Hall, 10th Floor, West Tower
100 Queen Street West
Toronto, Ontario M5H 2N2

Dear Members of the Planning and Housing Committee,

Re: Item PH21.1
Proposed Official Plan Amendment No. 804
675 Caledonia Road, Toronto

We are the planning consultants for Maple Corp Investments, the owners of 675 Caledonia Road, located at the southeast corner of Caledonia Road and Schell Avenue. The site is located in an evolving residential and mixed-use context, within convenient walking distance of the interchange Caledonia LRT/GO station, and is immediately opposite the proposed Bellline Yards redevelopment on the west side of Caledonia Road.

We are writing on behalf of our client to express our concerns with proposed Official Plan Amendment No. 804. This letter outlines the basis for our concerns, and based thereon, we respectfully request that OPA 804 be amended by **redesignating the subject site at 675 Caledonia Road from General Employment Areas to Mixed Use Areas**. Failing that, we request that **OPA 804 be referred back to staff**, in whole or in part, for further review and consultation with affected property owners.

Despite the proposed redesignation of the four North York office park areas to *Regeneration Areas*, OPA 804 has not fundamentally changed the overall policy direction that had been put forward in OPA's 668 and 680. Accordingly, it is our opinion that OPA 804 is clearly not consistent with the Provincial Planning Statement.

Further, City staff have failed to discharge the obligation imposed on them by Bill 97 and the new PPS to fairly and carefully evaluate whether individual properties across the City continue to meet the revised definition of "employment area". Pursuant to that revised definition, it is our opinion that there is no reasonable planning basis on which it could fairly be concluded that the 675 Caledonia Road property constitutes part of an "employment area".

Subject Site and Background

The subject site is located on the southern edge of the Castlefield Caledonia Design and Décor District, which is centred on the Castlefield Avenue and Caledonia Road intersection to the north of the site and has historically consisted of a mix of employment uses within the design and décor industry. More recently, the character and land use of the area is evolving into a higher-density mixed-use node as a result of significant public investment in higher-order transit. In this regard, the subject site is located within the Council-adopted Caledonia Protected Major Transit Station Area in OPA 570 (SASP 674) and is within walking distance (less than 450 metres) of both the new Eglinton Crosstown LRT Caledonia Station and the Caledonia GO Station (currently under construction).

The subject site is an isolated 0.25 hectare parcel that does not form part of a broader employment area. It is the only property south of Schell Avenue and east of Caledonia Road with an *Employment Areas* designation. Existing and planned mixed-use and residential uses surround the site on all four sides. Significantly, across Caledonia Road and directly opposite the site is the Beltline Yards site (previously the Canada Goose headquarters), which is now designated *Mixed Use Areas* and approved for 2,390 new residential units with tower heights of up to 55 storeys.

The subject site is occupied by a single-storey commercial building currently used as a trade school and showroom for architectural surfaces, and was formerly the Caledonia Design Centre. It is a standalone commercial use, not a manufacturing or warehousing use. Based on the revised definitions for an “employment area” in the Provincial Policy Statement and an “area of employment” in the Planning Act, it is clear that the subject site does not comply with those definitions. On that basis, the property no longer requires protection as an “employment area”.

It can and should be considered for residential intensification, which would optimize the use of the significant public investment in higher order transit infrastructure in the area. Part of the intent of Bill 97 and the new PPS was to unlock the potential for such sites to create new housing. By failing to seriously engage with that fundamental policy and legislative intent, staff are wilfully blocking the development of new housing in an otherwise ideal location, contrary to the City’s Housing Pledge.

Commentary on Draft OPA 804

Our main concerns with OPA 804 are that proposed amendments reduce the land use potential of the subject site and ignore the intent of Provincial legislation, which ought to have led to a City-wide evaluation, including consultations with affected property owners, to assess whether lands currently designated *General Employment Areas* or *Core Employment Areas* remain consistent with the new employment area definitions. This does not appear to have happened in any comprehensive way.

Four main points summarize the negative impacts of Proposed OPA 804 on the subject site:

1. **No increased permissions or land use flexibility:** Outside of the four office parks that were identified by City staff in OPA 804 for study and future residential consideration, we understand that all other properties with existing *Employment Areas* designations would not be eligible for redesignation outside of current City policies (i.e. only at the time of a Municipal Comprehensive Review). In this regard, no changes are being proposed to the “Conversion and Removal Policies for Employment Areas” in Policies 2.2.4(14) to 2.2.4(19) and part of OPA 804. This significantly limits the potential for increased housing and mixed-use development on appropriate sites in key growth areas where significant public resources have been invested to create favourable development conditions, in particular sites within major transit station areas such as the subject site.
2. **Reduced permissions and land use flexibility:** In an attempt to achieve consistency with the revised Provincial definition without fundamentally addressing its overall policy intent, OPA 804 proposes to remove any existing permissions for office, retail, service and institutional uses that are not associated with a manufacturing or warehousing use from each and every property that would remain within an *Employment Areas* designation. This is doubly negative for the subject site, and others like it, where not only has the site been excluded from consideration of expanded uses, it now also has reduced land use permissions, significantly limiting the site’s redevelopment potential. This is fundamentally in conflict with all the site’s neighbouring properties, which include long-standing residential uses and significant new mixed-use developments (e.g. Beltline Yards).
3. **Redesignation and/or conversion uncertainty:** OPA 804 does not address Official Plan policies which currently preclude land use changes on sites designated *Employment Areas* outside of a Municipal Comprehensive Review. There is no understood timeline for undertaking a future MCR and the outcome of requests for conversion of sites to non-employment uses has been unpredictable in the past. This results in significant uncertainty and underutilization of properties that no longer meet the revised definitions for employment areas. The new PPS has opened the door to removal of MCR requirement for redesignation of properties in *Employment Areas*, however OPA 804 does nothing to address this.
4. **No appeal rights:** As detailed on the Notice of Special Public Meeting, OPA 804 is proposed to be subject to Ministerial approval, meaning that there would be no ability to appeal the Minister’s decision to the Ontario Land Tribunal. As a matter of principle, landowners subject to OPA 804 should have the ability to appeal and work with City staff to address their concerns. There is a fundamental issue with

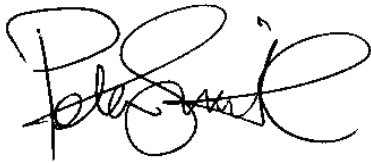
removing that appeal right, particularly when the reasons for such an approach are unclear.

We believe that the approach being recommended by City staff ignores the clear intent of the Province's legislative and policy changes and would have an unwarranted and unnecessary negative impact on the range of permitted uses for all *Employment Area* lands outside the four "office park" employment areas, including our client's property.

Thank you for your consideration of these comments. If you have any questions or would like to discuss these matters further, please do not hesitate to contact the undersigned or Adam Harrison of our office.

Yours truly,

Bousfields Inc.



Peter F. Smith, MCIP, RPP

cc: *Domenic Mariani, Maple Corp Investments*
Fred Rossi, Maple Corp Investments