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By Email to phc@toronto.ca

Nancy Martins
City Clerk
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Committee Members and Council:

**Re: Planning and Housing Committee Item PH21.1
1455-1457 McCowan Road and 41-47 Milner Avenue
Desjardins Financial Security Life Assurance Company**

We represent Desjardins Financial Security Life Assurance Company ("**Desjardins**") in connection with lands municipally known as 1455-1457 McCowan Road and 41-47 Milner Avenue in the City of Toronto (the "**Site**"). The Site is improved with a shopping centre known as the Town Centre Plaza.

The Site is subject to Official Plan Amendment No. 653 ("**OPA 653**"), which redesignates the western portion of the Site from *General Employment Areas* to *Regeneration Areas*. OPA 653 also adds a new Site and Area Specific Policy, numbered 850, to Chapter 7 of the Official Plan, which provides a comprehensive set of policies respecting the future redevelopment of the Site (the "**SASP**"). The SASP identifies the western portion of the Site that has been redesignated to *Regeneration Areas* as "Area A".

On behalf of our client, we write to request that, through Official Plan Amendment 804 ("**OPA 804**"), the balance of Site be similarly redesignated to *Regeneration Areas*, together with related amendments detailed below.

OPA 804

We have been following the City's Official Plan Amendments in response to Provincial legislative and policy changes impacting *Employment Areas*, including OPA 804, which we understand is scheduled for consideration by the Planning and Housing Committee on May 8, 2025.

We note that OPA 804 proposes redesignating 255 hectares of *Employment Areas* to *Regeneration* and *Institutional Areas*, while retaining 7,339 hectares as *Employment Areas*. Among the areas recommended for redesignation from *General Employment* to

Regeneration Areas are Don Mills Employment Area, Duncan Mills Employment Area, and Consumers Road Business Park.

It is our client's submission that it would be appropriate to include the balance of the Site within those lands being redesignated to *Regeneration Area*.

Reasons for Request

There does not appear to be any rationale for redesignating only a portion of the Site to *Regeneration Area*, as was done in OPA 653. Our client's request to the City to convert the Site was based on a comprehensive master plan for the entire Site, which blends the proposed residential uses with employment uses, within a broader public realm scheme. Respectfully, the approach in OPA 653 of drawing a line down the centre of the Site is not only unnecessary, but significantly restricts the ability to optimize the future redevelopment of the Site.

The Site is currently occupied by extensive surface parking and primarily low-rise large format retail uses. As such, it is not a significant generator of jobs. The redesignation of the entire Site to *Regeneration Areas* would not only allow for the introduction of residential uses, but also create an opportunity to further intensify the Site with additional retail spaces as well as potential commercial office space. The residential component could include new purpose-built rental units and affordable housing to address the housing needs of the City.

Planning and preliminary compatibility reports filed by our client in connection with OPA 653 concluded that there are no industrial sites near the Site that would impact air quality at the proposed development. Compatibility could be confirmed based on further land use compatibility and mitigation studies and traffic studies when development is proposed.

As such, redesignating the entirety of the Site as *Regeneration Areas* will allow for a more comprehensive plan for the Site, with additional opportunities to add more residential population density in proximity to the Scarborough Centre Urban Growth Centre and the two planned subway stations. A comprehensive *Regeneration Areas* approach to the Site will also provide more flexibility in locating parks, streets and land uses, without compromising the ability to include any buffer to the east that may be deemed appropriate.

Request

On behalf of Desjardins, we respectfully request that the entirety of the Site be redesignated to *Regeneration Areas*. In particular, for the reasons noted above, we request the City:

- remove the entirety of the Site from *Employment Areas* in Map 2;
- redesignate the entirety of the Site from *General Employment Areas* to *Regeneration Areas* in Map 19; and

- within the SASP:
 - remove references to sub-Area A in the policies and maps,
 - clarify that future amendments for the Site will be in the form of an updated site and area specific policy and not a secondary plan,
 - clarify that there is no requirement for affordable rental housing where purpose-built rental development is proposed; and
 - amend the date by which a zoning by-law amendment application must be submitted before the affordable housing requirements for the Site increases.

This redesignation would unlock the Site's full potential and contribute to the City's growth and development goals.

We trust that this letter will be forwarded to the Planning and Housing Committee and City Council for its consideration, and ask that we be provided with a copy of Council's decision regarding OPA 804.

Thank you for your consideration of these submissions.

Yours very truly,

WOOD BULL LLP

A handwritten signature in black ink, appearing to read "JS" or "JSh", written in a cursive style.

Johanna Shapira
JRS/MM

c. M Bissett
Client