

May 8, 2025

Chair & Members of
Planning & Development Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: **Nancy Martins, Committee Administrator**

Re: **PH 21.1 – Official Plan Amendment 804**

Elevate Planning and Project Management Inc. (“Elevate”) is retained by the Zentil and Benedetto Group of companies (“Zentil/Benedetto”) which through various corporate entities own many non-residential commercial (retail and office), institutional, recreational and industrial properties across the City of Toronto within Employment Areas variously designated as *Core and General Employment* in the Official Plan. They also own other residential properties in *Mixed Use Areas*. Their corporate real estate portfolio is extensive and diverse.

We are writing to provide comments on behalf of the various Zentil/Benedetto companies owning non-residential properties in the City’s Employment Areas that would be impacted by draft Official Plan Amendment No. 804 (“OPA 804”).

OPA 804 proposes to align Provincial legislative, definitional and policy changes under the Planning Act and 2024 Provincial Planning Statement (PPS 2024) for Employment Areas in the Toronto Official Plan.

Previously in 2023, through Hunter & Associates Ltd., we have written to Planning & Development Committee and Council expressing our concerns with the City’s previous transition policies in Official Plan Amendments 668 and 680. Those OPAs were adopted by Council and sent to the Province for approval and no decision has been made by the Minister of Municipal Affairs and Housing.

Our client is pleased and supportive of staff’s recommendation through OPA 804 to repeal OPA 668 and 680 as they were hastily formulated and for the reasons outlined in our previous submissions.

We also understand that OPA 804, among other policy changes, is proposing to redesignate select areas designated General Employment to mostly Regeneration Areas with local Site and Area Specific Policies (SASPs) within four larger Employment Areas - Downsview, Consumers Next, Duncan Mills and Don Mills – all in the North York community of Toronto.

We participated in the City’s public open house on May 6th. We understand that staff have focused on these larger areas, typically former office parks, with more substantial office and retail commercial or institutional uses and with more limited land use compatibility buffer issues. Although large areas, staff indicated that the proposed redesignations represented approximately 3% of the City’s total Employment Area designated lands.

In our opinion, alignment with the Province’s new definition of Areas of Employment and the PPS 2024 (Employment Area) could and should result in more General Employment properties in Toronto being captured for redesignation through OPA 804.

By way of one specific example, through V.J. Benedetto Limited and Tilzen Holdings Limited, our clients have owned and operated a local commercial retail plaza anchored by a FreshCo grocery store for decades at 3400-3402 Dundas Street West. That site is located within a relatively limited Employment Area designated General Employment between Runnymede Road and Jane Street. Most of this area is occupied by commercial and retail uses. The area immediately north of it on the south side of St. Clair Avenue West from Runnymede to Jane Streets, with similar land use characteristics and relationships, was redesignated by the City over 10 years ago to Mixed Use Areas with a SASP to guide future rezoning and redevelopment.

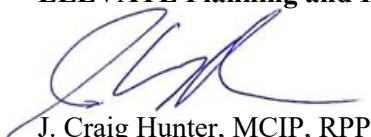
On August 3, 2021, we submitted a formal conversion request for that shopping plaza at 3400-3402 Dundas Street West and participated throughout the City review process. Despite a supportive Planning Rationale Report (Hunter), Compatibility/Mitigation Study (Valcoustics) and City Peer Review (Cambium) indicating it would be appropriate to consider a conversion provided certain planning considerations and criteria were addressed through future detailed applications, City Planning did not support the request and recommended maintaining the site as General Employment. Council adopted staff's recommendation and OPA 644 at its meeting on June 18, 2023.

In our opinion, this older local shopping plaza, which could be readily found in many locations across the City designated *Mixed Use Area*, is exactly the kind of land use that the Province's "area of employment" definition specifically exclude.

On behalf of our client, we would ask that City Council (1) defer a decision on OPA 804 (2) direct staff to take a more comprehensive review of the City's Employment Areas where many other standalone retail, office and institutional uses exist that would not meet the Province's area of employment definition and (3) report back to Planning & Housing Committee and Council when that more comprehensive consideration has taken place.

We appreciate Planning and Housing Committee and staff's consideration of our request and please ensure we are notified of any decisions on this matter.

Yours truly,
ELEVATE Planning and Project Management Inc.


J. Craig Hunter, MCIP, RPP
President

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