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Via Email (catherine.mackinnon@ontario.ca)

Ms. Catherine MacKinnon
Municipal Services Ontario- Central Ontario
16th Floor, 777 Bay Street
Toronto, Ontario M7A 2J3

Dear Ms. MacKinnon:

**RE: City of Toronto Official Plan Amendment No. 644 ("OPA 644")
City of Toronto Employment Area Conversion Request
505 and 515 Consumers Road, Toronto
Bleeman Holdings Limited
ERO Number: 019-7441
Ministry Reference Number: 20-OP-232096**

This submission is being made on behalf of our client, Bleeman Holdings Limited, being the owner of 505 and 515 Consumers Road, Toronto (the "**Property**"). The letter relates to an underutilized Property in a stagnant area of Toronto, known locally as the ConsumersNext "Officer Park". It is located east of Highway 400 and north of Highway 401.

The purpose of this letter is twofold. The first is to highlight the suitability of this Property for mixed-use which unfortunately was not addressed by the City given its failure to include it in City of Toronto OPA 644. To demonstrate, we attach our client's submission to the City that details the potential benefits of the resignation (copy attached). The second purpose is to formally request a meeting with Provincial staff to provide further details of what could be achieved with our client's mixed-use redevelopment.

With the Province's support of the redesignation, our client can provide Bill 97 desired housing (and jobs) through the redesignation of the Property. The requested redesignation recognizes that over supplied (vacant) office space does not need protection from conversion which the Province recognizes (and the City doesn't) through its 2023/2024 "Review of proposed policies adapted from A Place to Grow and Provincial Planning Statement". What is even more galling is the City's determination to sterilize "a sea of surface parking" in lieu of permitting the natural evolution of this part of the City (see figure 2 below).

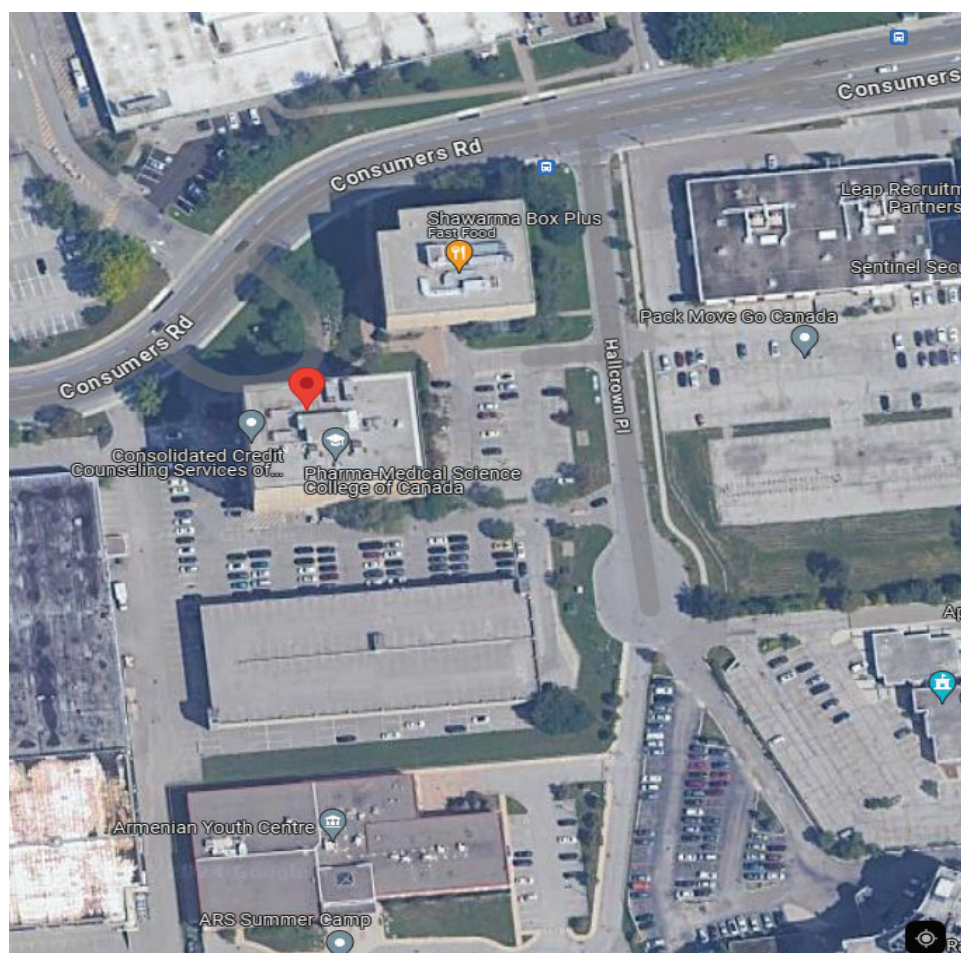
City of Toronto OPA 644

On June 18, 2023, the City of Toronto adopted OPA 644 pursuant to sections 17 and 26 of the *Planning Act*. This amendment is now before the Minister of Municipal Affairs and Housing for a decision under the *Planning Act*.

OPA 644 proposes new and updated policies and mapping related to employment land conversions. The amendment applies to Map 2 Urban Structure, Land Use Maps, and adds site and area specific policies to Chapter 7 of the City of Toronto Official Plan. **However, the City's "process to comprehensively consider" employment land conversions failed to consider and/or approve an appropriate redesignation from "General Employment" for the Property.** We attach our client's May 31st, 2022, submission to City Planning which explains in detail why this was an oversight.

Also relevant to our client's request is that OPA 644 does not appropriately consider the Province's intentions respecting truly protecting "areas of employment" that require protection and allowing more lands to become flexible land uses to meet the needs of the community. The City of Toronto has confirmed that they did not review OPA 644 in light of the Province's progressive planning strategy respecting providing shovel ready residential proposals.

Figure 1: Air Photo of Property



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As shown in Figure 1., the Property is well served by roads. It is close to schools and recreation. It is just south of the Sheppard Subway line and its neighbours include hotel space, a cultural centre, a church and low density office space. It is at best a mixed-use area comprising retail, institutional and office space with residential to the north and east.

Also shown on Figure 2. the greater area can “absorb change” as it is so heavily dominated by surface parking. Change will occur once the Province permits it.

Figure 2. Neighbourhood and the sea of parking



Conversion Request

As you are aware, on April 6, 2023, the Province introduced new policy and legislative changes as part of its ongoing effort to address both housing supply and affordability. The Province introduced two key components:

- 1) Bill 97 – An Act to amend various statutes with respect to housing and development; and
- 2) the proposed PPS 2023.

This new definition for "areas of employment" is a logical recognition that industrial and other specialized economic lands have different requirements and needs than office, retail, and institutional lands. The Province has recognized that maintaining areas that are primarily office are different than industry and do not need "protection" as exists today – in fact, the most successful areas for non-residential uses in the City of Toronto (the Downtown) are not employment lands, but rather mixed-use lands. This request relates directly to this fact. **Therefore, on behalf of our client we are requesting the Minister redesignate the Properties to provide housing (and jobs) in line with a “Mixed Use” designation.**

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Neither the Property, nor the immediate area, are appropriate for reverting to a heavy industrial style use. The Property is ripe for conversion to become a modern complete community.

The highest and best use of the Property would be better served as mixed-use development. Converting the Property to a mixed-use development will allow the site to maximize its potential and the use of the extensive municipal infrastructure in the area, in sharp contrast to the existing state of the Property (and the area). A vibrant mixed-use district will, in turn, further support the intensification of the employment uses in the area – employment, retail and institutional uses thrive in vibrant complete communities.

As detailed in Figure 3, our neighbour immediately to the east has a vision for how this neighbourhood can evolve. If the Province supports our redesignation request our client would aim to achieve the same goals.

Figure 3. Rendering of Mixed-Use approval immediately east of Property (2450 Victoria Park)

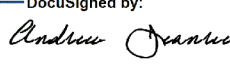


Please be advised that our client welcomes further discussion with Provincial (and City staff) and formally request a meeting to discuss our client's proposal. We thank you for the opportunity to comment on this important matter.

Yours truly,

BENNETT JONES LLP

Per:

DocuSigned by:

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Andrew Jeanrie

c.c.: Client