



McCarthy Tétrault LLP  
PO Box 48, Suite 5300  
Toronto-Dominion Bank Tower  
Toronto ON M5K 1E6  
Canada  
Tel: 416-362-1812  
Fax: 416-868-0673

**Michael Foderick**  
Partner  
Direct Line: (416) 601-7783  
Direct Fax: (416) 868-0673  
Email: mfoderick@mccarthy.ca

February 3, 2023

Hon. Steve Clark, Minister  
Municipal Affairs and Housing  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, ON M7A 2J3

Dear Minister Clark:

**Re: City of Toronto Official Plan Amendment 591  
Economic Health Policies and Policies for Employment Areas**

We act for H&R REIT, who together with Kwan and Kwan are the owners of the properties municipally known as 1, 4, 7-21, 8, 23-31 & 55 Prince Andrew Place and 888, 890, 898, 900 & 900A Don Mills Road (the “**Subject Lands**”) in the City of Toronto (the “**City**”). Official Plan Amendment 591 (“**OPA 591**”) was adopted by City Council on July 22, 2022 and has been sent to the Minister of Municipal Affairs and Housing for approval pursuant to the *Planning Act*. OPA 591 is intended to permit new density in areas in the City designated Employment Areas to conform with minimum provincial Growth Plan targets.

The Subject Lands are located in direct proximity to several TTC transit stations, including the Science Centre Station on Line 5 and the terminus station of the planned Ontario Line. A site study for the Subject Lands has been prepared by BDP Quadrangle Architects Limited, dated December 6, 2022, which is attached to provide a further overview. The Subject Lands are also a prominent site located immediately north of the Celestica site, located at the Eglinton Avenue West and Don Mills Road intersection, which is one of the most well-regarded conversion projects in the City, and which this proposed conversion will resemble. The Subject Lands are not designated a Core Employment Area or designated a Provincially Significant Employment Zone.

H&R REIT requests to convert the Subject Lands to a *Mixed Use Areas* designation in the City’s Official Plan but it has not made a formal employment conversion request due to the City’s reluctance to entertain such a proposal after their internal City-imposed deadline for formally considering such requests. As a result, H&R REIT is going directly to the Minister of Municipal Affairs and Housing with its request to convert the Subject Lands which, in our view, is an excellent opportunity for conversion and a good candidate site under the Housing Supply Action Plan (HSAP) commitment to significantly and quickly increase high quality housing supply.

As part of preliminary conversion discussions with the City, a letter from Bousfields Inc., dated November 17, 2022, was submitted to the City to express our client’s intent to convert the Subject Lands. A copy of that submission is attached to provide further background which provides a robust planning justification for the proposed change.

## **1. Redesignation**

### Requested Change:

Modify Section k) in OPA 591 by adding the Subject Lands to the redesignation lands chart and converting it from *General Employment Areas* to *Mixed Use Areas*.

### Rationale:

This requested change is an opportunity to convert a large employment designated parcel to a mixed use designation which will allow for much needed additional residential density in direct proximity to several TTC transit stations. This modification is also to ensure consistency with other residential land use permissions approved in the general vicinity of the Subject Lands.

## **2. Amended Mapping**

### Requested Changes:

Modify Appendix 1 by removing the Subject Lands labeled as *Employment Areas* on Map 2 Urban Structure.

Modify Appendix 2 by inserting new Map 21.

### Rationale:

These requested mapping changes merely implement the requested change outlined in 1. above.

Thank you for your consideration of these requested changes. Should you have any questions or require any additional information, please do not hesitate to contact the writer.

Sincerely,

McCarthy Tétrault LLP



Michael Foderick

cc Ryan Amato, Chief of Staff (ryan.amato@ontario.ca)