



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, 17th Floor
Toronto, ON M7A 2J3

Dear Minister Clark:

**Re: City of Toronto Official Plan Amendment 591
Economic Health Policies and Policies for Employment Areas
ERO Number: 019-5868
Ministry Reference Number: 20-OP-222176**

We act for Urros Investments Inc. and also are writing on behalf of all the landowners in the immediate area of Ryding Avenue and Ethel Avenue (116R Ryding Avenue, 126-142 Ryding Avenue, 90 Ethel Avenue, 99 Ryding Avenue and 109 Ryding Avenue) (collectively the “**Ryding/Ethel Lands**”) in the City of Toronto (the “**City**”). We are writing to request that the Ryding/Ethel Lands be converted to mixed-use areas from employment. 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 through conversions in the City designated Employment Areas to conform to minimum provincial Growth Plan targets.

The Ryding/Ethel Lands are a cluster of several properties in the Keele-St. Clair area of the City which is a small area of underused employment lands located close to the new St. Clair-Old Weston Station GO Transit/SmartTrack Station. This remnant employment block, left over from when the larger ‘Stockyards’ properties to the east were converted to retail and mixed use, is currently occupied by vacant lots, open storage and industrial uses. In a short period of time all of the existing industrial operations in the area will be ceasing operations, most notably the largest one Maple Leaf Foods which will be moving and leaving in the very near future.

The owners of the above noted land took part in the City’s consultation process for OPA 591, however the version adopted by City Council does not contain the conversion of the Ryding/Ethel Lands for mixed-use development. Some of the landowners have submitted conversion requests through the City MCR process, some have not, and therefore the City is not expected to necessarily make recommendations with respect to all of the Ryding/Ethel Lands even though they should be converted as a block. As a result, the owners of the above noted lands are requesting that the Minister modify OPA 591 to convert all of the Ryding/Ethel Lands to a *Mixed Use Areas* designation which, in our view, are clearly suitable candidates for conversion and appropriate residential and mixed-use development sites consistent with the Province’s Housing Supply Action Plan (HSAP) commitment to significantly increase housing supply.

Notably, OPA 591 already converts the abutting lands to the immediate east of the area (labeled as “Metro” in the attached document). This conversion request is to simply expand that

conversion, which is already part of OPA 591, to include the above Ryding/Ethel Lands which are to the immediate west of the Metro lands. The City has also converted the lands to the immediate north (St. Clair Avenue West conversions took place 5 years ago) and to the south (87 Ethel Avenue converted recently by way of an approval by the Ontario Land Tribunal resulting from a settlement with the City). The Ryding/Ethel Lands are essentially the final parcels in the area not yet converted and will otherwise be surrounded by *Mixed Use Areas* and *Neighbourhoods* designated lands.

1. Redesignation

Requested Changes:

Modify Section k) in OPA 591 by adding the Ryding/Ethel Lands to the redesignation lands chart and converting them from *Core Employment Areas* to *Mixed Use Areas*.

Rationale:

These requested changes are an opportunity to convert a small group of underutilized and isolated employment designated parcels to a mixed use designation which will allow for much needed additional residential density in close proximity to the new St. Clair-Old Weston Station GO Transit/SmartTrack Station, together with permission for additional commercial development. These modifications also ensure consistency with other mixed-use and residential land use permissions approved in the general vicinity of the Ryding/Ethel Lands.

2. Amended Mapping

Requested Changes:

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

Modify Appendix 2 by inserting new Map 27.

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