

July 4, 2022

Planning and Housing Committee  
c/o Nancy Martins  
Toronto City Hall  
100 Queen Street West  
Toronto, Ontario M5H 2N2

Dear Councillor Bailao and Members of the Committee:

**Re: *Planning and Housing Committee Item PH35.15***  
***Our Plan Toronto: Recommended Official Plan Amendment for City-wide***  
***Employment Policies and Conversion Requests***  
***Comments on Proposed Official Plan Amendment No. 591***  
***Toronto Stockyards Land Development Board***

We are the planning consultants for the Toronto Stockyards Land Development Board ("TSYLDB"), the owners of approximately 13 hectares of land in the southwest quadrant of St. Clair Avenue West and Keele Street, municipally known as 2121-2161 St. Clair Avenue West, 542 and 620-630 Keele Street, and 10 Old Stock Yards Road (the "subject lands").

The portion of the subject lands west of Old Stock Yards Road is the subject of Conversion Request No. 106 (2129-2161 St. Clair Avenue West and 10 Old Stock Yards Road), which is recommended for approval through proposed Official Plan Amendment No. 591. OPA 591 would redesignate the lands to *Mixed Use Areas* and *Parks*, with the exception of the southerly 50 metres of the lands fronting on West Toronto Street and Ethel Avenue, and would apply Site and Area Specific Policy 785 (SASP 785) to the lands.

The purpose of this letter is to seek clarification regarding two aspects of the affordable housing policies included in SASP 785:

1. In paragraph (h)(i), the policy provides that, if a condominium development is proposed, a minimum of 10 percent of the total new residential gross floor area will be secured as affordable ownership housing or a minimum of 7 percent of the total new residential gross floor area will be secured as affordable rental housing i.e. in accordance with the percentages specified for Inclusionary Zoning Market Area 1 (IZ1) in OPA 557 and By-law 941-2021.

However, the subject site is located in Inclusionary Zoning Market Area 2 (IZ2) and it is clear from a review of the other SASP's being recommended in OPA 591 that the IZ2 and IZ3 rates have been applied in other SASP's. It is not clear why staff

have applied the higher IZ1 rate to the subject lands, and we would respectfully request clarification in this regard.

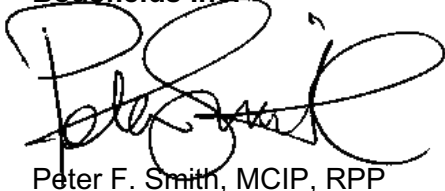
2. Proposed paragraph (i) states that, where a complete application for a Zoning By-law Amendment has not been filed prior to January 1, 2025, the affordable rental housing required in Policy (h)(i) will increase by 1.5 percent per year. As proposed, the 1.5 percent increase is open-ended and would over time increase to 100% of the units, and beyond.

In contrast, both OPA 557 and By-law 941-2021 provide for a 1.5 percent per year increase only up to the year 2030. If the intention is that the annual increases should generally track those for inclusionary zoning, we would suggest that similar clarification regarding a timeframe (i.e. until 2030) would be beneficial.

Thanks you for your consideration of these comments.

Yours very truly,

**Bousfields Inc.**



Peter F. Smith, MCIP, RPP

cc: *Jeff Cantos/Jessica Tam, SIPA*  
*Brad Adams, Toronto Stockyards Land Development Board*  
*Scott Walker, NBLC*  
*David Bronskill, Goodmans LLP*