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July 18, 2023

Email: [councilmeeting@toronto.ca](mailto:councilmeeting@toronto.ca)

Toronto City Council  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Dear Members of Toronto City Council:

**Re: PH5.2 - Official Plan Amendment for Bill 97 Transition - Authorizing the Continuation of Institutional and Commercial Uses in Employment Areas - Final Report**

We are writing with respect to our property on the east side of Arrow Road, south of Finch Avenue West, in the City of Toronto, municipally known as 1111 Arrow Road, Toronto.

We have reviewed the Final Staff Report, dated June 19, 2023, with respect to the proposed Official Plan Amendment for Bill 97 Transition – Authorizing the Continuation of Institutional and Commercial Uses in Employment Areas (“Draft OPA 668”), to be considered by the Toronto City Council at its meeting on July 19, 2023. We write to communicate our concerns with Draft OPA 668.

Draft OPA 668 is premature in its implementation given that the new proposed Provincial Planning Statement (“New PPS”) and the applicable sections of Bill 97 (including Subsection 1(1) regarding the new definition of “Area of Employment” and Subsections 1(1.1) and (1.2) authorizing the proposed transition provisions) are not yet in force and in effect.

Until Bill 97 and PPS 2023 are fully in force, additional amendments to the *Planning Act* and the New PPS could be introduced. Draft OPA 668 will not assist the City in bringing its official plan into conformity and/or consistency with Provincial Policy as the City’s

draft amendment will entirely precede that policy and may be incongruent with future policy when it is announced. Rushing to enact Draft OPA 668 before a comprehensive understanding of the implications is obtained may lead to unintended consequences.

Draft OPA 668 provides for what is, in effect, legal non-conforming recognition of existing uses. This therefore significantly restricts the options available for the future use of land and limits the expansion of existing business operations. This limits the ability of businesses who choose to locate within the City of Toronto to respond to changing market dynamics and economic opportunities.

Draft OPA 668 is contrary to the intention of Bill 97. The legislation introduced by the province allows for the strengthened protection of defined employment areas and the separation of incompatible land uses while allowing for the greater flexibility and adaptation in land use for new developments and operations not captured under the new definition of "areas of employment". However, City staff's sweeping, all-inclusive approach to Draft OPA 668, which does not account for area-specific factors, would frustrate the province's intentions and simply maintain a rigid status quo across the City's employment lands.

### Conclusion

We request that Council not approve Draft OPA 668, refer this matter back to staff, direct staff to reconsider its sweeping, all-inclusive approach to applying the amendment and direct staff to bring forward a recommendation report only once the new definition of "area of employment" and the New PPS are in force.

We ask to be notified of any decisions made by City Council, or Committee of Council, in connection with this matter.

Regards,

THE PRAYER PALACE  
per: **Names of Director**



.Mr. Michael Ball




Mr. George Forrest



Mr. Ralston Williams



Mr. Marlon Knight



Mr. Samuel Coronado

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