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July 19, 2024

Email: councilmeeting@toronto.ca

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

Attention: John D. Elvidge, City Clerk
Sylwia Przewdziecki

Dear Members of Toronto City Council:

**Re: Item No. PH14.1 – Employment Land Use Permissions – Decision Report
Approval
Proposed Official Plan Amendment No. 680
Council Meeting: July 24, 2024**

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 Report For Action, dated June 24, 2024, titled *Employment Area Land Use Permissions – Decision Report - Approval* recommending that Council adopt Official Plan Amendment 680 ("Draft OPA 680"), to be considered by the Toronto City Council at its meeting on July 24, 2024. We write to communicate our concerns with Draft OPA 680 which should be considered in tandem with our letter to City Council regarding Draft OPA 668 on July 18, 2023, herein attached for reference.

Draft OPA 680 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 680 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 680 before a comprehensive understanding of the implications is obtained may lead to unintended consequences.

Together with Draft OPA 668, Draft OPA 680 provides for what is, in effect, legal non-conforming recognition of existing uses.

Draft OPA 680 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". Instead, Draft OPA 680, removes existing land use permissions from all of the City's employment areas without conducting due examination into the appropriateness of this policy direction. Contrary to the intent of Bill 97, Draft OPA 680 effectively prevents consideration of expanded development opportunities while negatively impacting the existing planning function of many of those areas. This sweeping, all-inclusive approach to Draft OPA 680, which does not account for area-specific factors and removes existing land use permissions, 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 680, 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**

Respectfully,



Mr. Frank Fernandes



Mr. Marlin Knight



Mr. Ralston Williams



Mr. Micheal Ball



Mr. George Forrest

cc. clerk@toronto.ca
phc@toronto.ca