



BOUSFIELDS INC.

Project No. 21185

January 30, 2023

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Dear Minister Clark,

Re: *ERO Posting 019-5868*
City of Toronto Official Plan Amendment No. 591
560 Evans Avenue, Toronto

We are the planning consultants to Stay Inn Hospitality, the owners of the property municipally known as 560 Evans Avenue in the City of Toronto (the “subject site”).

The subject site is 0.48 hectares in size and is located at the northwest corner of Evans Avenue and The East Mall, with frontages of approximately 94 metres along The East Mall and approximately 52 metres along Evans Avenue. It is currently developed with a commercial use (a 2-storey motel).

The purpose of this letter is to request that Official Plan Amendment No. 591 be modified by amending proposed Site and Area Specific Policy 787 (SASP 787) as set out below:

1. Modify Policy (a) by adding a new Policy (iv) as follows:

“(iv) for the purpose of (ii) above, hotel uses are a permitted employment use, and will count toward the minimum 51 percent requirement in (iii) above”.

2. Delete or modify Policies (b) to (f) regarding affordable housing in light of the proposed new Provincial regulation regarding Inclusionary Zoning.

The planning rationale for these requests is set out below.

Background

On July 22, 2022, Toronto City Council adopted Official Plan Amendment No. 591 (“OPA 591”), which amended the Official Plan with respect to Economic Health Policies and Policies for Employment Areas. OPA 591 has been forwarded to the Province for approval pursuant to Section 26 of the Planning Act.

Among other matters, OPA 591 redesignated the subject site from *Core Employment Areas* to *Mixed Use Areas* and introduced Site and Area Specific Policy 787 (SASP 787) applying to the site. Paragraph (a) of SASP 787 included requirements with respect to the minimum size of a non-residential component as part of a future mixed-use development. Paragraphs (b) through (f) set out provisions for affordable housing, which generally reflected the set-aside rates and affordable term set out in the City's Inclusionary Zoning Official Plan Amendment and Zoning By-law, as adopted in November 2021.

Planning Rationale

The subject site has historically been used for a hotel and hotels are generally recognized as an employment use (i.e. one which generates employment). As well, hotels are permitted by the *Mixed Use Areas* designation that will now apply to the site by virtue of OPA 591. However, Policy (a) refers only to employment uses permitted by the *Core Employment Areas* and *General Employment Areas* designations; in this regard, the applicable policies in OPA 231 were modified by the Ontario Municipal Board to delete the permission for hotels generally throughout the City's employment areas.

Given the *Mixed Use Areas* designation and the current use of the site, hotels should be explicitly recognized as a permitted employment use and should be counted toward the 51% requirement for non-retail and service commercial employment uses.

With respect to the proposed affordable housing policies in SASP 787, they would be more onerous than the set-aside rate and affordable term in the proposed new Provincial Inclusionary Zoning regulation. As well, the subject site is not located within a PMTSA and would therefore not be subject to Inclusionary Zoning. As part of the Province's consideration of OPA 591 and the new IZ regulation, we would respectfully request the Province to modify or delete paragraphs (b) through (f) so that there is a consistent approach to the provision of affordable housing across the City.

If you have any questions with respect to this letter or wish to discuss this matter in detail, please do not hesitate to contact the undersigned or Ryan Doherty (Senior Planner) of our office.

Yours very truly,

Bousfields Inc.



Peter F. Smith, B.E.S., MCIP, RPP