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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**

We writing on behalf of HTC Sterling Road Property 4 Ltd., the owner of the property municipally known as 175 Sterling Road (the “**Subject Lands**”) in the City of Toronto (the “**City**”). The Subject Lands are a prominent site located within the area of Site and Area Specific Policy 480 (“**SASP 480**”). Official Plan Amendment 591 (“**OPA 591**”), which modifies the existing SASP 480, 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 in the City designated Employment Areas to conform with minimum provincial Growth Plan targets.

The Subject Lands are located directly adjacent to the planned Bloor-Lansdowne GO Transit/SmartTrack Station and where the secondary entrance to it is planned to be situated. Further, the Subject Lands are located close to multiple other Major Transit Station Areas (MTSAs), including the Lansdowne TTC Station, Dundas West TTC Station and the Bloor GO/UP Bloor Station, as well as to the College and Dundas TTC streetcar lines. The Subject Lands and also located in direct proximity to residential areas located immediately to the north which makes this a good shovel ready candidate for development consistent with the Province’s Housing Supply Action Plan (HSAP) commitment to significantly increase housing supply.

1. Redesignation and Amended Mapping

Requested Change:

Modify Section k) in OPA 591 by adding the Subject Lands to the redesignation lands chart and converting it from *General Employment Areas* to *Mixed Use Areas*.

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

Modify SASP 480 in OPA 591 by redesignating the parcel known as Block 4A in SASP 480 Map 2, Land Use as Mixed Use Area as shown on the attached map.

Rationale:

This requested change is an opportunity to convert a small employment designated parcel to a mixed use designation which will allow for much needed additional residential density within the area of OPA 480 that is in direct proximity to multiple MTSA's and other existing/planned residential.

2. Non-Residential Gross Floor Area

Requested Change:

Insert new SASP 480 Policy m) C. viii. as: "Block 4A shall not count toward the maximum residential GFA set out in policy a) i. a."

Rationale:

This requested change is an opportunity to allow for much needed additional residential density within the area of OPA 480 on a small orphaned employment designated parcel.

3. Consistency

Requested Change:

Modify SASP 480 in OPA 591 by adding a new policy to delete "4A" in the last paragraph of section a).

Rationale:

The modifying of this policy is to ensure consistency with other residential land use permissions approved in the general vicinity of the Subject Lands.

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

cc Ryan Amato, Chief of Staff (ryan.amato@ontario.ca)