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May 23, 2017
File No.: 130514.1002
130514.1003

City Council
c/o City Clerk's Office
Toronto City Hall
13th Floor West Tower
100 Queen Street West
Toronto ON M5H 2N2

Attention: Ulli S. Watkiss, City Clerk

Dear Sirs/Mesdames:

**Re: PG20.1 - Technical Amendments to By-law 569-2013
Accessible Parking Regulations**

We are solicitors for RioCan Management Inc. and related companies (the "Clients"), with respect to the properties attached in Appendix "A". Our Clients also have broad land interests in the City of Toronto and acquire additional interest in lands in the City from time to time.

We have reviewed the recommendations of the Planning and Growth Management Committee ("PGMC"), adopted at its meeting held on May 3, 2017. We are pleased that transitional regulations are now proposed to phase in the new accessible parking standards and to ensure that existing applications for building permit, zoning certificate or complete site plan applications, need only comply with the accessible parking standards as they existed on May 3, 2017.

However, we remain concerned that the proposed transitional regulations do not grandfather:

1. complete zoning by-law amendment applications still under review or appeal; and
2. approved zoning by-law amendment applications that have yet to apply for site plan approval and/or building permits.

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As a result, (1) for complete zoning by-law amendment applications still under review or appeal, an owner must obtain relief from the new standards or redesign its parking layouts to accommodate the new standards; and (2) for approved zoning by-law amendment applications that have yet to apply for site plan approval and/or building permits, an owner will need to obtain relief through another rezoning application or a minor variance. However, as a result of the Bill 73 changes to the *Planning Act*, an owner is prohibited from filing a minor variance application for two years after the passing of a site-specific zoning by-law amendment unless Council permits otherwise.

It is unreasonable, unfair and prejudicial to impose the new accessible parking standards on such classes of applications. Significant resources are spent to prepare, submit and process a zoning by-law amendment application—all of which is based on a set of standards known and applicable at that time—and it is prejudicial to later impose new standards on such applications. Accordingly, the proposed transitional regulations should also allow the two above-noted classes of applications to be exempt from the new accessible parking standards for the duration of the transitional regulations.

We also note that, as of the date of this letter, the draft zoning by-law amendment implementing the recommendations of the PGMC has not been released and we reserve the right to raise further issues and concerns with respect to the proposed amendments.

Please continue to provide us with notice of all upcoming meetings of Council and Committees of Council at which the proposed amendments will be considered, and any notice of Council's decision with respect thereto.

If you have any questions or require further information, please contact the undersigned. Thank you for your attention to this matter.

Yours truly,


Calvin Lantz
Partner

CL/mb

cc. Melissa Bruzzese

APPENDIX "A"
List of Properties

1. 1293 Bloor Street West
2. 1860 Bayview Avenue
3. 2955 Bloor Street West
4. 2990 Eglinton Avenue East
5. 549-555 College Street West
6. 600 University Avenue
7. 649 Queen Street West
8. 740 Dupont
9. 85 Bloor Street West
10. 410-446 Bathurst Street
11. Dufferin Plaza - 3150 Dufferin Street
12. Empress Walk - 5095 Yonge Street
13. Kennedy Commons - 2021 Kennedy Road
14. Lawrence Square - 700 Lawrence Avenue West
15. Queensway Cineplex - 1025 The Queensway
16. RioCan Hall - 126 John Street
17. RioCan Leaside Centre - 815-845 Eglinton Avenue East
18. RioCan Marketplace - 2061-2215 Steeles Ave & 81 Gerry Fitzgerald Drive
19. RioCan Yonge Eglinton Centre - 2300 Yonge Street
20. Shoppers World Danforth - 3003 Danforth Ave
21. Shoppes on Queen West - 585 Queen Street West
22. Stock Yard Village - 1980 St Clair Ave West
23. Sunnybrook Plaza - 660 Eglinton Avenue East
24. The Shops at Summerhill - 1099 Yonge Street
25. White Shield Plaza - 2300 Lawrence Avenue East
26. Yonge Sheppard Centre - 2 Sheppard Avenue East
27. Yonge Street & Eglinton Avenue, North East Corner
 - Previously known as 2263, 2283, 2275, 2281 Yonge Street, 10 Eglinton Ave East, 25, 25R Roehampton Avenue
 - New municipal address is 8 Eglinton Ave East, 15 Roehampton Ave, 2267 Yonge Street, 2263 Yonge Street
28. 602 King Street
29. 491 College Street & 289 Palmerston Avenue
30. RioCan Scarborough Centre - 1970 - 2040 Eglinton Avenue East
31. Markington Square - 3201 - 3227 Eglinton Avenue East
32. Albion Centre - 1530 Albion Road
33. Victoria Crossing - 2480-2490 Gerrard St East
34. RioCan Warden - 800 warden Ave
35. 85 Bloor Street
36. 2453-2457 Yonge Street
37. RioCan Shoppes on Avenue - 1745 Avenue Road