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Our File No.: 173376

Via Email and Courier

City Council
100 Queen Street West
City Hall, 12th Floor
Toronto, ON M5H 2N2

Attention: Marilyn Toft, Secretariat

Dear Sirs/Mesdames:

**Re: Item PG29.4 – TOcore: Downtown Official Plan Amendment
BPG Holdings Group Inc.**

We are solicitors for BPG Holdings Group Inc., which has property interests in the City of Toronto's downtown, including the Financial District. We are writing to express our client's concerns with the draft Downtown Official Plan Amendment (the "**Draft OPA**") that Council is scheduled to consider at its meeting commencing on May 22, 2018.

Our client does not oppose the Draft OPA's high-level vision of ensuring that the downtown remains a vibrant and thriving economic and cultural centre of the City, complete with robust commercial activity and walkable, amenity-rich communities. Moreover, our client does not oppose the objective of promoting the economic competitiveness of the Financial District through increases in non-residential space. However, certain policies in the Draft OPA may have the effect of restricting redevelopment in certain locations where such restrictions are not warranted.

Specifically, Section 6.2 of the Draft OPA limits residential development in the Financial District based on existing zoning permissions. In our view, this restriction is not well-suited to large, prominent parcels that serve broader city-building objectives. Such sites may be capable of accommodating an expansion of non-residential uses while also providing complementary residential uses that support the Financial District's vibrancy. In our submission, the Draft OPA should have particular regard for these large sites and permit such residential uses.

Goodmans^{LLP}

Thank you for your consideration of these comments. Please provide us with notice regarding any decision made in respect of this matter.

Yours truly,

Goodmans LLP

A handwritten signature in black ink that reads "Roslyn Houser". The signature is written in a cursive, flowing style.

Roslyn Houser
RH/ML

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