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**Re: Main Street Planning Study - City-Initiated Official Plan Amendment - Final Report
Proposed Draft Official Plan Amendment 478
Item #TE11.4 – City Council, December 17, 2019**

We represent the owners of 2721 Danforth Avenue, Tri-Metro Investments Inc. (“Tri-Metro”), which comprises a portion of the lands occupied by a long-standing Canadian Tire Store. The lands comprising the existing Canadian Tire Store and associated garden centre and parking are 2681, 2701, 2721 and part of 2575 Danforth Avenue, City of Toronto.

These lands currently form part of the Main Street Planning Study proposed to be adopted as Official Plan Amendment 478 to the City of Toronto Official Plan. These lands also form part of the Danforth Avenue “Avenues” Study, Official Plan Amendment 420, which is not yet in full force and effect.

The current Official Plan Land Use Designation as outlined in the City of Toronto Official Plan is “Mixed-Use”, allowing for a range of combined commercial-residential uses either alone or in combination.

The underlying in-force zoning for the lands is subject to Section 12(2) 328 of Zoning By-law 438-86, as amended, allowing for the existing Canadian Tire Store. The Canadian Tire Store was introduced by Official Plan Amendment No. 161, By-law 248-2000, of the former City of Toronto Official Plan and implementing Zoning By-law 249-2000. The Official Plan Amendment and Zoning Amendment respecting the existing Canadian Tire Store were introduced by way of a recommendation by the Director of Community Planning in a Report dated March 2, 2000.

While we are cognizant of the future planning for the Danforth Avenue and Main Street area, we also recognize and stress that the current in-force zoning permissions mentioned above respecting the Tri-Metro lands and the other lands forming part of the Canadian Tire Store, must be acknowledged by the City of Toronto.

With respect to the Main Street proposed Official Plan Amendment, we oppose the following as it affects the development interests of Tri-Metro.

1. The proposed “preferred park location” for a future park that conflicts with the current operation of the existing retail store and its loading requirements.
2. The location of the “preferred park location” because it does not appear to conform to the Danforth Avenue “Avenues” Study and does not have any cogent planning rationale.
3. The proposed road system which involves both public and private “streets”, ignores the existing land use in the area as well as the existing zoning permissions applicable to the Tri-Metro lands. The proposed “private road” bisects the exiting Canadian Tire store and Tri-Metro lands.
4. It is our understanding that the existing Canadian Tire Store comprises approximately 4,447 m² of non-residential gross floor area. The existing zoning, pursuant to Section 12(2) 328 of Zoning By-law 438-86, as amended, allows for a total of 7,402 m² of non-residential gross floor area. This provides for considerable expansion as recognized in the underlying zoning permissions.
5. With respect to proposed Official Plan Amendment No. 478, Tri-Metro is opposed to and has concerns respecting the following:
 - a. Section 2 Public Realm policies and related Maps as they affect the Tri-Metro’s lands, particularly Section 2.1.1 (Streets and Block Network), Section 2.3 (Parks and Open Space); Section 2.3.2 and referenced Maps, and Section 2.3.3 (Character Area C park); and,
 - b. Section 7 Character Area A and Character Area C policies as they affect the Tri-Metro lands. The proposed Amendment splits the Tri-Metro lands without considering the site as a whole. There is no scale on Map 5 to determine the boundaries of Character Area A and Character Area C. In addition, the policies associated with OPA 420 appear to treat the Tri-Metro lands as single site rather than dividing the lands into two Character Areas, as proposed by Official Plan Amendment No. 478. In our opinion, any future development of the Tri-Metro lands must be assessed on a comprehensive basis.

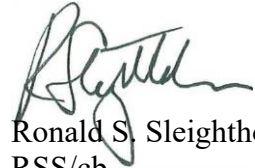
It should also be noted that Toronto and East York Community Council, by Resolution, requested further reports respecting the width of the proposed streets and private laneways and amendments to the “Parks and Public Realm Plan” outlined in the draft Official Plan Amendment. These reports,

which may affect the Tri-Metro lands, have not been available for either public nor our client's review. As such, it is our position that Council adoption of the Proposed Official Plan Amendment No. 478, is premature due to the fact that it does not take into consideration Tri-Metro's concerns as outlined above.

We require Notice of any further consideration or decision respecting this matter in order to ensure that the interests and property rights of our client Tri-Metro Investments Inc. are protected.

Yours truly,

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