



November 18, 2013

VIA EMAIL pgmc@toronto.ca

Ms. Nancy Martins, Administrator
Planning and Growth Management Committee
Toronto City Hall
100 Queen Street West
10th Floor, West Tower
Toronto, ON M5H 2N2

Dear Ms. Martins:

RE: Toronto Official Plan Amendment No. 231 – 100 Dundas Street West/600 Bay Street

We are the land use planners for Sarika Investments Limited, the owners of the property located at 100 Dundas Street West/600 Bay Street in the City of Toronto. The subject property contains a 5 storey office building with over 1,000 sq.m. of gross floor area associated with office uses. The subject lands are designated as a *Mixed Use Area* within the *Downtown and Central Waterfront Area* of the Official Plan and are located within 500 metres of the Dundas Subway Station.

We have reviewed the draft Official Plan Amendment No. 231 and wish to provide the following initial comments/concerns in advance of its consideration on November 21, 2013 by the City's Planning and Growth Management Committee.

MAINTAINING EXISTING OFFICE SPACE ON RAPID TRANSIT THROUGH REDEVELOPMENT

Section 3.5.1 of the Official Plan is proposed to be amended with the inclusion of policy 9, which states the following:

New development that includes residential units on a property with at least 1,000 square metres of existing non-residential gross floor area used for offices is required to increase the non-residential gross floor area used for office purposes where the property is located in a Mixed Use Area or Regeneration Area within:

- a) The Downtown and Central Waterfront;*
- b) A Centre; or,*
- c) 500 metres of an existing or an approved and funded subway, light rapid transit or GO train station.*

Where site conditions and context do not permit an increase in non-residential office gross floor area on the same site, the required replacement of office floor space may be constructed on a second site, prior to or concurrent with the residential redevelopment. The second site will be within a Mixed Use Area or Regeneration Area in the Downtown and Central Waterfront; within a Mixed Use Area or



Employment Area in the same Centre; or, within 500 metres of the same existing or approved and funded subway, light rapid transit or GO train station.

Although our client does not have an immediate redevelopment plan for their lands, the above proposed policy would be applicable to the subject lands as they meet criteria (a) and (c). Given that the subject lands are currently underdeveloped relative to the surrounding area and in the context of their proximity to the Dundas Subway Station, redevelopment with residential uses or a mix of uses is foreseeable.

We have a concern with the proposed Official Plan policy as it will detrimentally impact the redevelopment potential of the subject lands, their overall value, and, unnecessarily fetter the selection of the appropriate mix of uses when redevelopment is to be initiated. A blanket requirement to replace and increase office gross floor area on the site should it be redeveloped with residential uses is inappropriate from a land use planning standpoint. This is particularly so as both the residential and office space markets fluctuate not only City-wide, but also on a sub-area basis. As such, we suggest that the policy be recast in such a manner that an office space inclusion in a redevelopment scheme for the lands is not mandatory, but rather encouraged by some form of incentive (eg. greater overall mixed use density).

We are available at any time to meet or to provide any additional information you may require regarding this submission. Kindly advise us in writing how you intend to address the issues raised herein and keep us informed of all future changes to the proposed Official Plan Amendment. In addition, please notify us of all future public meetings and Council's decision regarding the adoption of the Official Plan Amendment.

Should you have any questions, please feel free to call me at (416) 364-5926.

Sincerely,
THE LAKESHORE GROUP

Nima Kia, M.C.I.P., R.P.P.
MANAGER

c.c
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