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PG28.2.205

November 20, 2013

BY EMAIL (pgmc@toronto.ca)

Our File No. 117672

Councillor Peter Milczyn, Chair
c/o Nancy Martins,
Secretarial Contact, Planning and Growth Management Committee
City of Toronto
10th Floor, West Tower, City Hall
100 Queen Street West
Toronto ON M5H 2N2

Dear Chair Milczyn,

**Re: City of Toronto - Municipal Comprehensive Review
Official Plan Amendment No. 231 (Item PG28.2)
Planning & Growth Management Committee Meeting – November 21, 2013**

We act on behalf of Lamb Development Corp., the owner of a number of properties in the City of Toronto. Our client has built and is in the process of developing a number of residential and mixed use projects in the *Downtown*, many of which are located in the *King Spadina Secondary Plan Area*. In addition, our client owns a number of other properties in the Mixed Use Areas and Regeneration Areas in the Downtown for which development applications have yet to be submitted. Many of these properties contain buildings which include office components of various sizes.

Our client has had an opportunity to review the policies in proposed OPA 231. This letter is to advise that the owner has concerns with policies 3.5.1.9 and 3.5.2.6 in particular.

While new development on these various lands may incorporate some office uses, the owner is opposed to policies which would require 1:1 replacement of existing office space. Were this policy is to be applied, applications would be assessed differently based on the pre-existing use of the lands in question, and not necessarily on an assessment of the most appropriate use for the site in question. The policy would result in inequitable and inconsistent rules being applied to future development approvals on lands located in the same planning area. The same concern applies to policy 3.5.2.6.

In addition, in our submission policy 3.5.1.9 as drafted does not appear to meet the intent as expressed in the Staff Report of November 5, 2013 of securing affordable Class 'C' office space to be used as an incubator for cultural industries, etc in any event. Accordingly, we would ask that policies 3.5.1.9 and 3.5.2.6 be deleted from proposed OPA 231.

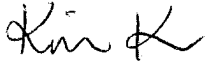
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Kindly provide the undersigned with notice of any further public meetings and any decision of City Council in respect of this matter.

Yours truly,

AIRD & BERLIS LLP



Kim M. Kovar
KMK/SM

c. client

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