

August 19, 2014

Our File No.: 141295

Mayor and Members of Council
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Sirs/Madames:

Re: Item TE34.92 - King-Spadina East Precinct Built Form Study

We are solicitors for Seagate Investments Ltd., the owner of the properties known municipally as 350, 352, 352R and 354 Adelaide Street West and 102, 108, 114 Peter Street in the City of Toronto. We are writing to provide our client's comments directly to City Council regarding the above-noted matter. We note that the matter was considered by Toronto and East York Community Council on August 12, 2014, but that the City staff report regarding this matter is dated only a week before this meeting. Further, our client only received notice of the item in the mail the day before the meeting.

Our client's overall concern is that this matter appears to propose a Public Realm Strategy and certain "directions" for the King-Spadina East Precinct, without an official plan amendment or any similar document that would require approval pursuant to the *Planning Act*. Further, the report notes that Official Plan Amendment 231 should be applied to development applications, even though this amendment has been appealed to the Ontario Municipal Board and is not in force and effect.

As you may know, redevelopment proposals are to be evaluated in the context of official plan policies, and other provincial direction, that are in force at the time an application is made. While the City also prepares guidelines to be applied to development applications, the strategy and "directions" outlined in the above-noted staff report do not appear even to have the status of a guideline, and yet City staff are seeking direction to apply them to *Planning Act* applications.

We would urge the City to reconsider this approach. However, if City Council does endorse the staff recommendations, we wanted to have our client's concerns on the record so there can be no doubt that our client is objecting to the application of unapproved or non-statutory planning documents to any future development application.

Yours truly,

Goodmans LLP

A handwritten signature in black ink, appearing to read "DBronskill". The signature is written in a cursive, flowing style.

David Bronskill
DJB/mr
6360771