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PG8.5.33

Via Email (clerk@toronto.ca)

Toronto City Council
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto ON M5H 2N2

Attention: **Ms. Ulli S. Watkiss**
City Clerk

Dear Mr. Mayor and Members of Council:

Re: Neighbourhoods and Apartment Neighbourhoods Draft Policies
Planning and Growth Management Committee Item PG8.5
On behalf of bclMC Realty Corporation

We are the solicitors acting on behalf of bclMC Realty Corporation, including all of its subsidiaries, (collectively, "BRC") which has interest in numerous landholdings throughout the City of Toronto, and lands on which it is acting as a partner in redevelopment, including but not limited to 33 Rosehill Avenue, 44 Jackes Avenue, and 2911 Bayview Avenue.

We are writing to express BRC's concern with respect to the proposed amendments to the Neighbourhood and Apartment Neighbourhoods policies as proposed in draft Official Plan Amendment No. 320 which is the subject of the above referenced item.

In general terms, BRC wants to ensure that the proposed changes do not limit its ability to appropriately develop lands over the long-term. BRC is concerned, among other things, that the current drafting of certain policies may lead to unintended confusion that may limit BRC's ability to achieve appropriate intensification and revitalization of certain lands which currently are significantly underutilized. In our view, further discussion and refinement of the policies is warranted to avoid unnecessary uncertainty going forward.

For example, BRC is concerned that the proposed language provides that infill development may be permitted on existing apartment sites "for the purpose of" improving existing site conditions. It is unclear whether this is intended to serve as a strict requirement for all infill development within Apartment Neighbourhoods, how this objective is meant to be weighed against other general planning objectives such as the intensification of underutilized sites, or even what constitutes "existing site conditions" for the purpose of applying this policy.

BRC is also concerned that certain proposed changes would not allow sufficient flexibility to respond to site specific considerations. For instance, simply maintaining sunlight and privacy for residential units may be inappropriate in an urban context, rather than to provide for appropriate light and privacy. Requirements to extend the life of, and make other improvements to, the other existing buildings; as well as the stated policy that significant growth is not intended within Apartment Neighbourhoods are also of concern. We note that the above is not meant as an exhaustive list of the concerns.

We would welcome an opportunity to meet with Planning Staff to discuss BRC's concerns. Please feel free to contact the undersigned should you have any questions or require further information.

Yours truly,



Cynthia A. MacDougall