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**BY E-MAIL AND COURIER**  
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December 7, 2015  
File No.: 130514.1002

13<sup>th</sup> Floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Attention: Members of City of Toronto Council

Dear Sirs/Mesdames:

**Re:** Item PG8.5  
Official Plan Five Year Review: Final Recommendation Report –  
Amendments to the Healthy Neighbourhoods, Neighbourhoods and  
Apartment Neighbourhoods Policies of the Official Plan  
**OPA No:** Proposed Official Plan Amendment No. 320  
**Client:** RioCan Real Estate Investment Trust, RioCan Holdings Inc.,  
RioCan Management Inc., and its Related Entities  
**Property:** Various, City of Toronto

We are the solicitors for RioCan Real Estate Investment Trust, RioCan Holdings Inc., RioCan Management Inc., and any related entities (collectively, “RioCan”). RioCan has broad land holdings in the City of Toronto and acquires additional lands in the City from time to time.

We are writing to provide comments on proposed Official Plan Amendment No. 320, as contained in the Final Recommendation Report, dated October 15, 2015, in the context of the proposed modifications recommended by the Planning and Growth Management Committee at its meeting held on November 16, 2015 (“OPA 320”). Our client has concerns with the policy changes proposed in OPA 320. For example, our client is concerned with Policy 2.3.1.3 under OPA 320, which would impose additional criteria on developments in *Mixed Use Areas*, *Regeneration Areas*, and *Apartment Neighbourhoods* that are adjacent or close to *Neighbourhoods*. These additional criteria, which speak to issues of site configuration and screening, are more appropriately addressed through the site plan approval process, and are unduly prescriptive for a broad policy document like the Official Plan.

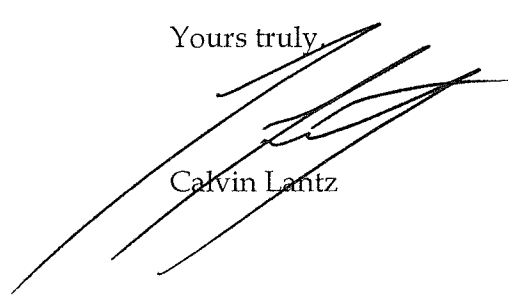
Please note that the concerns with OPA 320 mentioned above are not exhaustive and we reserve the right to raise further issues with OPA 320.

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Additionally, please provide us with notice of all upcoming meetings of Council and Committees of Council at which OPA 320 will be considered as well as notice of any Council or Committee decisions.

If you have any questions or require further information, please contact the undersigned. Thank you for your attention to this matter.

Yours truly,



Calvin Lantz

CWL/mb

cc. Melissa Cristofoli, *RioCan Management Inc.*