



ZELINKA PRIAMO LTD
A Professional Planning Practice

VIA EMAIL

April 10, 2015

Planning and Growth Management Committee
c/o Nancy Martins
City Hall, 100 Queen Street West, 10th Floor
Toronto, ON
M5H 2N2

Attention: Ms. Nancy Martins, Administrator

Dear Members of the Committee:

**Re: PG3.2 Sign By-law Enforcement: Potential Amendments to the City of Toronto Act, 2006
Preliminary Comments on Behalf of Loblaw Properties Limited (LPL)
Toronto, ON**

Our File: LPG/LPL/94-01

We are the planning consultants for Loblaw Properties Limited ('LPL'), who is the leaseholder of substantial land holdings within the City of Toronto.

On behalf of LPL, we provide the following preliminary comments for the proposed changes to the City of Toronto Act and Sign By-law contained within the above-mentioned item to be considered at the Planning and Growth Management Committee on April 13, 2015:

- LPL is strongly opposed to Staff's Recommendation No. 1 to request the Province to amend the City of Toronto Act 2006 by removing the limitation in Subsection 110(1);
- If approved, this request would remove "grandfathering" rights for signs and billboards erected lawfully prior to April 2010. Any sign erected prior to April 2010 could need to conform to the in-effect Sign By-law;
- This request would potentially impact a large portion of LPL's existing signage, which was lawfully erected in accordance with the City By-laws in force when those signs were erected;
- Some lawfully erected signage could require modification and incur significant expense to conform to the in-effect Sign By-law;

- It appears that a major reason for the request is to achieve administrative simplicity for City Staff. However, in seeking simplicity on cost savings for the City, the request imposes unnecessary and unreasonable costs on businesses which have legal and approved signage; and
- City Staff have not clearly disclosed how they propose to deal with grandfathered signs if Subsection 110(1) were repealed. Staff's Recommendation No. 2, to engage in stakeholder consultation regarding what regulations should be applied to existing non-conforming signs is essential and welcome. However, the stakeholder consultation should take place prior to City Council requesting that the Province amend Subsection 110(1) of the City of Toronto Act.

Therefore, LPL strongly opposes the City Staff's recommendation to request the Province to amend Subsection 110(1) of the City of Toronto Act.

We appreciate your consideration of our comments, and we will continue to participate in matters pertaining to Sign By-law enforcement and potential amendments to the City of Toronto Act, 2006. We may provide additional comments as required in the future. We would welcome the opportunity to meet with Staff to discuss our preliminary comments.

Lastly, would you please kindly add the undersigned for notification of any meetings/decisions with respect to this matter. Should you have any questions, or require further information, please do not hesitate to call.

Yours very truly,

ZELINKA PRIAMO LTD.



Dave Hannam, BRP
Senior Planner

Cc. Mario Fatica, LPL (Via Email)