



ZELINKA PRIAMO LTD
A Professional Planning Practice

VIA EMAIL AND REGULAR MAIL

November 12, 2015

Planning & Growth Management Committee
 City Clerk's Office
 City of Toronto
 100 Queen Street West, 10th Floor, West Tower
 Toronto, ON M5H 2N2

Attention: Ms. Nancy Martins, Administrator

Dear Ms. Martins:

**Re: November 16, 2015 Planning & Growth Management Committee
 Item PG 8.5 City of Toronto Official Plan Review – OPA 320
 Draft Policies for Healthy Neighbourhoods, Neighbourhoods and
 Apartment Neighbourhoods
 Preliminary Comments on Behalf of Loblaw Properties Limited and
 Choice Properties Ontario Properties Limited
 Toronto, ON**

Our File: LPL/TOR/11-03

We are the planning consultants for Loblaw Properties Limited (Loblaw) and Choice Properties Ontario Properties Limited (CP REIT) for the City of Toronto Official Plan Review. Loblaw is the owner or lease holder of a considerable number of land holdings within the City of Toronto. Choice Properties Ontario Properties Limited (CP REIT) is the owner of a considerable number of land holdings in the City of Toronto.

Loblaw and CP REIT have been participating in the ongoing Official Plan Review process and provided preliminary comments to the City dated September 28, 2015.

On November 9, 2015 Loblaw and CP REIT were made aware of the October 15, 2015 Staff Report with draft OPA 320 Policies for Healthy Neighbourhoods, Neighbourhoods and Apartment Neighbourhoods for the November 16, 2015 Public Meeting.

At this time, our preliminary comments on behalf of Loblaw and CP REIT for the October 15, 2015 draft OPA 320 policies are as follows:

- Proposed New Policy 2.3.1.3(e) states “Developments in Mixed Use Areas, Regeneration Areas and Apartment Neighbourhoods that are adjacent or close to Neighbourhoods will: ... e) locate, enclose and screen service areas, access to underground parking, and locate and screen any surface parking so as to minimize impacts on adjacent properties in those Neighbourhoods”.

The Staff Report notes that the new policy 2.3.1.3(e) was “added to *require* that service areas, surface parking and parking ramps will be located, enclosed and

screened to minimize impacts on *adjacent* properties in a Neighbourhood" [emphasis added]. Based upon the Staff Report, the intention of the policy is to minimize impacts only on adjacent properties in a Neighbourhood as opposed to properties that are "close to" neighbourhoods. In our submission, such distinction should be made clearer in policy 2.3.1.3(e).

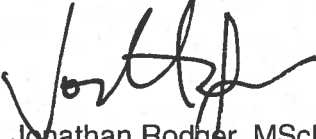
In addition, in order to maintain flexibility for adjacent developments in Mixed Use Areas, Regeneration Areas and Apartment Neighbourhoods that are adjacent or close to Neighbourhoods, a range of strategies should be contemplated as opposed to requiring enclosed service areas, which is not always desirable or needed. We are particularly concerned that trash compactors and loading areas for food stores will be required to be enclosed with four walls and a roof, which creates operational issues.

We would welcome the opportunity to meet with Staff to discuss our preliminary comments.

We trust that the enclosed information is satisfactory. Should you have any questions, or require further information, please do not hesitate to call.

Yours very truly,

ZELINKA PRIAMO LTD.



Jonathan Rodger, MScPI, MCIP, RPP
Senior Associate

cc. Mario Fatica, Loblaw Properties Limited (via email)
Kathy Kakish, Choice Properties Ontario Properties Limited (via email)
Eileen Costello, Aird & Berlis LLP (via email)
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Paul Bain, City of Toronto (via email)