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Via Email (pgmc@toronto.ca)

Planning and Growth Management Committee
 City of Toronto
 Toronto City Hall
 100 Queen Street West
 Toronto ON M5H 2N2

Attention: **Nancy Martins**
Administrator, Planning and
Growth Management
Committee, 10th Floor

Dear Mr. Chairman and Members of Committee:

Re: Neighbourhoods and Apartment Neighbourhoods Draft Policies
Planning and Growth Management Committee Item PG8.5

We are the solicitors acting on behalf of Minto Communities Canada Inc. and Minto Properties Inc. (collectively "Minto") which have interest in numerous landholdings throughout the City of Toronto, including but not limited to, M Park Place Corp., 2463588 Ontario Inc., MLYM Inc., M Richgrove Corp., Minto Richgrove Seniors Inc., Minto Richgrove Land Corp., and Minto 19 Glen Agar Inc., as well as Minto's subsidiaries (collectively the "Companies").

We are writing to express the Companies' 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, the Companies want to ensure that the proposed changes do not limit its ability to appropriately develop lands over the long-term.

The Companies are concerned, among other things, that the current drafting of certain policies may lead to unintended confusion with respect to the scope of the proposed changes. In our view, further discussion and refinement of the policies is warranted to avoid unnecessary uncertainty going forward.

For example, of concern to the Companies is the proposed language which 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.

The Companies are also concerned that certain proposed changes would not allow sufficient flexibility to respond to site specific considerations. For instance, a new restriction is proposed which would prohibit any high-rise addition to existing apartment buildings within Apartment Neighbourhoods. In our view, however, there are contexts in which high-rise additions can be accommodated as a sensitive and desirable form of intensification and regeneration on existing apartment sites. The proposed policies should allow applications to be considered in their entire context and not place hard or inflexible limits on new development.

Similarly, the Companies are concerned with the addition of a new policy which would require infill development within Neighbourhoods to “replicate” prevailing lot patterns. Again, flexibility is needed to respond to the context of the broader neighbourhood while appropriately balancing between competing planning objectives.

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 the Companies’ concerns and to clarify the intention of a number of the proposed changes to the extent it is unclear from the current drafting. We would, therefore, request that Committee defer consideration of this item to allow for further consultations to take place.

Please feel free to contact the undersigned should you have any questions or require further information.

Yours truly,



Cynthia A. MacDougall

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