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September 20, 2016

Via Email and Courier

Mayor and Members of Council
City of Toronto
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Sirs/Mesdames:

**Re: Proposed City-Initiated Official Plan Amendment and Zoning By-law Amendments
Toronto and East York Community Council Item TE18.7**

We are the solicitors acting on behalf of Church 18 Holdings Inc., Clement Court Limited, Church Street Properties Ltd., Church 600 Properties Ltd., Promocentives Inc. and Church & Charles Limited Partnership (collectively, the "Companies").

Collectively, the Companies have an interest in numerous landholdings within the area subject to the City-initiated Official Plan and Zoning By-law amendments in association with the ongoing TOcore study (the "Amendments"), including the properties municipally as 580, 582, 584, 592-596 Church Street & 67-71 Gloucester Street and 600 Church Street (collectively, the "Gloucester Site") as well as the properties known municipally as 628, 634, 636 and 638 Church Street (collectively, the "Charles Site").

The Companies are concerned that the proposed Amendments will impose inappropriate restrictions on the development of both the Gloucester Site and the Charles Site (collectively, the "Properties") and on the development of lands generally within the boundaries of the proposed Amendments. In our view, the proposed Amendments, if approved in their current form, would inappropriately impact future opportunities for intensification of the Properties and other underutilized sites within the *Downtown and Central Waterfront*.

The Charles Site was recently approved in principle for a 47-storey mixed-use building which includes the provision of rental replacement units on site and the conservation of the listed heritage buildings at 628, 634 and 636 Church Street. In this respect, the Companies are concerned that the proposed Amendments will impose inappropriate restrictions on the development of the Charles Site that are not consistent with the approvals endorsed by Council.

In order to ensure the appropriate implementation of the approvals for the Charles Site, we would respectfully request that the Charles Site be exempted from the proposed Amendments. Note that we are requesting that the Charles Site be exempted from the Amendments, rather than exempting the proposed site-specific Zoning By-law amendment which is the subject of the

above-referenced approval, as Council's enactment of the implementing Bills may occur after Council's enactment of the proposed Amendments.

In addition, the transition clauses in the proposed Amendments fails to account for development applications that are still in the "pipeline" such as the Gloucester Site which is the subject of an active Zoning By-law Amendment application. In this regard, we would also respectfully request that the Gloucester Site be exempted from the proposed Amendments.

More generally, the Companies are concerned, among other things, that the proposed Amendments do not provide for sufficient flexibility to adequately respond to various site-specific considerations, which vary greatly across the *Downtown and Central Waterfront*. In our view, determining appropriate building setbacks for a given location is not amenable to a one-size-fits-all approach and requires consideration to be given to the context of each site.

We would be pleased to discuss these and other concerns of the Owner with respect to the Amendments with City Staff. Please provide us with notice of Council's decision in this matter or of any future consideration by Council, Community Council, or any Committee.

Yours truly,



Cynthia A. MacDougall

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