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Our File No.: 143228

**Via Email**

Planning and Growth Management Committee  
10<sup>th</sup> Floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

**Attention: Nancy Martins, Secretariat**

Dear Sirs/Mesdames:

**Re: Item PG9.2 – Mimico-Judson Regeneration Area Study – Directions Report**

We are the solicitors for the owner of approximately 1.5 acres of land at the southwest corner of Audley Street and Portland Street (the "Subject Property") within the Mimico-Judson Regeneration Area.

We have reviewed the draft Official Plan Amendment attached to the Directions Report dated October 28, 2015 (the "Draft OPA") and are writing to provide our client's comments regarding the Draft OPA. While our client overall is supportive of the general direction for the Area, including the opportunity for mixed-use intensification of the Subject Property, our client has a number of concerns with certain policies in the Draft OPA.

These comments are preliminary and based on the current staff recommendations:

- The minimum non-residential density requirements in Policy 3.3, and the overall emphasis on a "net gain of employment uses", may not be the appropriate mechanism to ensure the development of non-residential uses in the Area.
- The built form policies, including the maximum building heights on Map 35-6, are overly rigid and should be revised.
- The requirement for a minimum of 50% of all new residential units to have three or more bedrooms is inappropriate and excessive.
- Policy language to require conformity with non-statutory documents (such as urban design guidelines), especially when they have not yet been released, does not represent good planning.

- Further clarification is required regarding the mechanisms to secure parkland in the Area and whether it should be provided as shown on Map 35-2.
- The proximity of potential core employment uses to residential uses and the proposed environmental policies in Section 8 may dissuade desired residential intensification.
- The proposed Block Plan process is overly cumbersome for the Area and would inappropriately require an unnecessary and non-statutory approval process prior to otherwise desirable intensification proceeding in the Area.
- Policies 9.6 and 9.7 are unnecessary and potentially conflict with Policy 6.7. These policies should be deleted.

We would welcome the opportunity for our client and its planning consultant (Hunter & Associates Ltd.) to meet with staff to discuss these concerns. We suspect that there may not be sufficient opportunity for meaningful discussions before the statutory public meeting proposed for February 24, 2016, and would respectfully request that this meeting be deferred to a later date.

Please also accept this letter as our formal request to receive notice of any Committee or Council decision regarding this matter.

Yours truly,

**Goodmans LLP**



David Bronskill

DJB/

cc: Client

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