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June 14, 2014

Via Email and Courier

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

c/o Rosalind Dyers
Committee Administrator
Toronto and East York Community Council
City of Toronto
Toronto City Hall, 2nd Floor
100 Queen Street West
Toronto, Ontario M4H 2N2

**Re: Proposed City-Initiated TOcore Official Plan Amendment and Zoning By-law
Amendments (the "Proposed Amendments")
Toronto and East York Community Council Item TE17.14 for June 14, 2016**

We are the solicitors for Widmer Residences Corp. and Widmer-Adelaide Corp., the registered owners (collectively the "Owner") of the properties municipally known as 309-315 Adelaide Street West and 30 Widmer Street respectively (collectively the "Property"). The Property is located within the area subject to the City-initiated proposed Official Plan and Zoning By-law amendments with respect to tower distance separation with the Downtown in association with the on-going TOcore study (the "Amendments").

The Owner is concerned that the Amendments will impose inappropriate restrictions on the development of the Property and on the development of lands generally within the boundaries of the proposed Amendments.

Under cover letter dated October 9, 2014 the Owner filed a combined zoning by-law amendment and site plan approval application to permit a mixed-use, high-rise building on the Property (the "Application"). The Application is active and under consideration by the City, including the determination of appropriate tower separation distances and setbacks on the Property as informed by the guidelines established under the City's Tall Building Design Guidelines. Given that the Application is still under consideration, we respectfully suggest that the implementation of the proposed instruments is premature insofar as they would apply to the Property.

As currently proposed, the Amendments do not provide for sufficient flexibility to adequately respond to various site-specific considerations, which vary greatly within the study area. 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, including the Property.

Finally, the transition clause in the proposed Amendments fails to account for development applications that are still in the "pipeline".

Given that the proposed by-laws were only released on Friday, June 10th, we suggest that this matter be postponed to a future TEYCC meeting date in order to allow interested parties more time to consider the implications of the Amendments.

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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