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September 6, 2016

Our File No.: 151262

DELIVERED BY E-MAIL AND COURIERCity Clerk's Office
Toronto and East York Community Council
City Hall, 2nd Floor
100 Queen Street West
Toronto, Ontario M5H 2N2**Attn: Ellen Devlin, Administrator, Toronto and East York Community Council**

Dear Ms. Devlin:

**Re: TEYCC Agenda Item 18.7
City-Initiated Request to Amend the Official Plan and Zoning By-Law Nos. 438-86
and 569-2013
Final Report - TOcore: Updating Tall Building Setbacks in the Downtown**

We are solicitors for WAM Development Group, a real estate development company that is active in the City of Toronto, including the *Downtown* area. We write to express our client's concerns regarding the above-noted proposed Official Plan and zoning by-law amendments (the "**Proposed Amendments**").

It is our view that the Proposed Amendments would, if adopted, have significant implications for all tall building development sites in the *Downtown* area, including sites currently owned by our client and other development sites that our client may acquire in the future. Particularly, the Proposed Amendments would introduce unnecessary rigidity into downtown Toronto's planning framework. Building strong, healthy communities in downtown Toronto requires a flexible approach that recognizes the unique characteristics of each site. Maintaining the setback standards in the Tall Buildings Design Guidelines is the best way to ensure that planning for tall buildings appropriately accounts for site-specific considerations.

It is also our view that the Proposed Amendments provide insufficient clarity on key issues. For example, the definition of "tall building" in the proposed Official Plan amendment is vague and it is unclear when its policies are intended to apply.

Further, the proposed transition mechanism in the Zoning By-law amendment is not acceptable. The transition provisions do not apply to sites with applications that are subject to appeals before the Ontario Municipal Board or sites for which complete applications have been submitted for

rezoning approval. Appropriate transition provisions should be incorporated into the Proposed Amendments to ensure that our client may continue to rely on the policies and regulations in force at the time an application is submitted.

Accordingly, on behalf of our client, we hereby object to the OPA and ZBA and request that Council not approve these planning instruments in their current form.

Yours very truly,

GOODMANS LLP



David Bronskill *for*
DJB/