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Matter No. G357-01

March 27, 2017

Delivered Via Email (clerk@toronto.ca)

Mayor and Members of Council
c/o City Clerk's Office
Toronto & East York Community Council
City Hall, 2nd floor
100 Queen Street West
Toronto, ON M5H 2N2

Attn: Ulli Watkiss, Clerk

Dear Mayor and Members of Council:

RE: Council Agenda Item PG18.5 – "Technical Amendments to By-law 569-2013"
Proposed Changes to Accessible Parking Standards and Regulations
Consideration by City Council on March 28, 2017
Letter Submitted on Behalf of G. Gagliano Properties Ltd/Benton Property Corp.

We are solicitors for G. Gagliano Properties Ltd/Benton Property Corp., the owner of the property municipally known as 1235 to 1255 Lawrence Avenue West and 3 to 23 Benton Road in the City of Toronto (the "**Property**"). We are writing on behalf of our client to provide written submissions respecting the above-noted Item, which is being considered by Council at its meeting beginning March 28, 2017.

On February 23, 2017, the Planning and Growth Management Committee (the "**Committee**") adopted the above-noted item, which recommends certain amendments to Zoning By-law 569-2013 (the "**By-law**") respecting accessible parking spaces (the "**Amendments**"). The supporting staff report indicated that the Amendments are intended to bring the By-law into conformity with the *Accessibility for Ontarians with Disabilities Act* and certain regulations thereto (the "**Act**").

On behalf of our client, we wish to convey concerns respecting the substantive aspects of the Amendments. Notwithstanding the stated intention in the staff report, the Amendments include standards that exceed those set out in the Act, including an expanded width and length of accessible spaces and an increased number of required spaces. Our client is therefore concerned that the Amendments have the potential to impose onerous and unnecessary restrictions on the potential redevelopment of the Property.

In addition to the above, we support the submissions to the Committee made by BILD dated February 22, 2017, and by Thomas Woodhall of BA Group dated February 23, 2017, which further detail both substantive and procedural concerns with the Amendments.

Please accept this letter as our client's written submission respecting the Amendments prior to enactment by Council. We respectfully request notification of any further actions or decisions made by City Council or City committees respecting this matter.

Should you require further information or have any questions/concerns about the above, please do not hesitate to contact the undersigned.

Yours very truly,

Devine Park LLP

per Jason Park
JIP/AGF/ss

cc: G. Gagliano Properties Ltd./Benton Property Corp.