OVERLAND LLP

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March 27, 2017

VIA EMAIL

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

Attention: City Clerk

Attention: Ms. Nancy Martins, Planning and Growth Management Committee

Your Worship and Members of Council:

RE: Technical Amendments to Zoning By-law 569-2013 – Item PG18.5
Proposed Amendments to Accessible Parking Requirements

We are the lawyers for the persons listed on the attached Schedule "A". Several of our clients have obtained site specific development approvals, have pipeline applications and/or pending redevelopment proposals.

We have reviewed the recommendations in the Staff Report and the draft amendments to By-law 569-2013 that are contained in the above-noted Item PG18.5. We have also reviewed the submissions made by others, including by BILD Toronto and by the BA Consulting Group Ltd. For the reasons generally summarized below, our clients have several concerns with the proposed amendments to the accessible parking requirements in By-law 569-2013 (the **"Proposed Amendments"**).

Although the Staff Report indicates that the Proposed Amendments are intended to be consistent with the Accessibility for Ontarians with Disabilities Act (**"AODA"**), we understand that, in fact, the Proposed Amendments would make the accessible parking requirements more onerous than the AODA standards and would, in some cases, require significant revisions to parking layouts and the organization of underground and structured parking garages.

Generally, our clients are concerned that the new requirements, which have been presented by City Staff as being consistent with the AODA standards, but which are in fact more onerous than the AODA standards, will result in parking arrangements that are inefficient, redundant, and potentially unsafe (for example, with respect to the change in parking space length and resulting changes in drive aisle width or alignment). Further, our clients are concerned that the Proposed Amendments will require changes to the design and layout of the parking garage for approved projects, pipeline projects, and may further negatively impact the ability to achieve efficient design in proposals that may be forthcoming.

Our clients are also concerned with the lack of any transitional or grandfathering provisions for pre-existing development applications and approved projects, which raises fundamental questions of fairness in the planning process.

We respectfully submit that the Proposed Amendments should be revised so that they match the AODA standard, on the understanding that it may be appropriate for property owners to seek revisions to the AODA standard on a site specific basis, and that they include appropriate transitional provisions to recognize approved and pipeline development proposals.

Where our clients' concerns are applicable to a specific property, such property has been indicated on the attached Schedule "A". However, given the broad applicability of the proposed amendments and the nature of the concerns expressed above, the identification of a specific property on Schedule "A" does not necessarily mean that our clients' interest in this matter are limited only to such property.

Please provide us with notice of City Council's decision in this matter, as well as the decision of any committee of Council or any further public meetings and any resulting Zoning By-law Amendment.

Yours truly,
Overland LLP



Per: Daniel B. Artenosi
Partner
Encl.

SCHEDULE "A"

Client	Concerns include Specific Property, if applicable**:
Graywood Developments Ltd.	250 Lawrence Avenue West & 219 Glengarry Avenue
2418832 Ontario Inc.	
2419732 Ontario Inc.	
i2 Developments Inc.	150 Bronoco Avenue 290 Old Weston Road
i2 Developments (Bronoco) Inc.	
i2 Developments (Old Weston) Inc.	
2076204 Ontario Limited	1650 Sheppard Avenue West
2076203 Ontario Limited	
Concert Properties Ltd.	5365 Dundas Street West
Concert Real Estate Corporation	
2397623 Ontario Ltd.	36-40 Churchill Avenue
2426684 Ontario Ltd.	
Ideal (MN) Developments Inc.	1730 Neilson Road & 2710 Morningside Avenue
Freed Grand Park Developments Inc.	1x, 2 and 10 Audley Street, 8 Newcastle Street, and 29, 31, 59 and 71 Portland Street
Tilzen Holding Limited	145 Sheppard Avenue East
Chabad of York Mills	2437 Bayview Avenue
Fortress Carlyle Peter Street Inc.	122-128 Peter Street, 357 Richmond Street
92 Peter Street Inc.	92 Peter Street
Carlton Tower Limited	235 Yorkland Boulevard
Northam CCPF Tenco (Yonge-Madison) Limited	4950 Yonge Street
ODC Holdings (V) Limited	260 King Street
Northam CCPF Tenco (BTS) Limited	483 Bay Street
Helmsbridge Holdings Limited	5840, 5860 and 5870 Yonge Street
1831988 Ontario Limited	
1860648 Ontario Limited	
Terranata Developments Inc.	346 to 350 Eglinton Avenue West and 352 to 356 Eglinton Avenue West
346-350 Eglinton Avenue West Holdings Ltd.	
352-356 Eglinton Avenue West Holdings Ltd.	
2344076 Ontario Inc.	414-418 Church Street

Client	Concerns include Specific Property, if applicable**:
Bondfield Construction Company Limited	
The Howard Property (386) Inc.	386 Eglinton Avenue East 368 Eglinton Avenue East
The Howard Property Company Inc.	
110 Adelaide Street East Inc.	100-112 Adelaide Street East
The Symington Holdings Ltd.	386-394 Symington Avenue, 485 Perth Avenue and 17 Kingsley Avenue
1175484 Ontario Inc.	301-317 Queen Street East
James Gault Holdings Inc.	
1606077 Ontario Inc.	
Dream Asset Management Corporation	
Dream Alternatives Master LP	
Dream Office LP	
N.H.D. Developments Limited	5200 Yonge Street
2053785 Ontario Inc.	6 Lloyd Avenue
2415118 Ontario Inc.	155 Wychwood Avenue

** Concerns not necessarily limited to Specific Property