



Project No. 18159

June 26, 2018

Toronto City Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Mr. Mayor and Members of City Council:

***Re: \$TOcore: Downtown Plan Official Plan Amendment
299 Queen Street West and related properties, City of Toronto***

We are the planning consultants for Bell Canada, BCE Inc. and CTV Limited with respect to its properties located within the block bounded by Queen Street West to the north, Duncan Street to the east, Richmond Street West to the south and John Street to the west (“the subject site”).

On behalf of our clients, we have reviewed the Downtown Plan Official Plan Amendment (“the Downtown Plan”), which was considered and adopted with amendments by City Council on May 22, 2018 (Item PG 29.4). We, along with our clients, have a number of concerns with the Downtown Plan, which are described below.

Firstly, it is our opinion that the Downtown Plan, as currently drafted, is not consistent with the Provincial Policy Statement and does not conform with the Growth Plan for the Greater Golden Horseshoe (the “Growth Plan”). More specifically, the Downtown Plan does not optimize the use of land and infrastructure, particularly as it applies to the subject site.

In this regard, the Downtown Plan does not take into account Provincial policy directions to optimize the use of land and infrastructure, particularly along transit and transportation corridors, and in particular within the Downtown Toronto urban growth centre and in “major transit station areas”. In this regard, “optimization” means making something “as fully perfect, functional, or effective as possible”.

We also have significant concerns with proposed Policy 6.8 applying to the King-Spadina and King-Parliament Secondary Plan Areas, which would require the greater of: the replacement of all existing non-residential gross floor area, including full replacement of cultural spaces; or a minimum of 25% of the total gross floor area as non-residential uses,

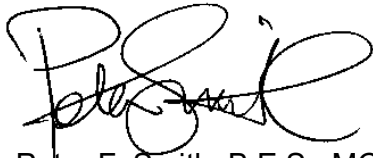
including full replacement of cultural spaces. The policy, as currently drafted, provides no flexibility to take into account site size, site-specific conditions, or the impacts that non-residential uses may have on built form.

In particular, the requirement for replacement of the gross floor area of existing non-residential gross floor area has the potential to restrict intensification (or “optimization”) of sites such as the subject site, which currently have a significant amount of non-residential floor area. Similarly, the requirement for at least 25% of the floor space to be used for non-residential purposes would effectively diminish the potential for intensification. In our opinion, such a result would be contrary to the direction to optimize the use of land and infrastructure.


We appreciate your consideration of the foregoing submission. Should you require any additional information, please do not hesitate to contact one of the undersigned.

Yours very truly,

Bousfields Inc.



Peter F. Smith, B.E.S., MCIP, RPP



David Huynh, MCIP, RPP

*cc: Anthony Perlingieri, Bell Canada
Meaghan Palynchuk, Bell Canada
Isaac Tang, Borden Ladner Gervais LLP*