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Our File No.: 120458

**Via Email**Toronto City Council  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2**Attention: Marilyn Toft, Secretariat (clerk@toronto.ca)**

Dear Sirs/Mesdames:

**Re: Item PG29.4 – TOcore: Downtown Official Plan Amendment  
625 Church Street**

We are solicitors for the owners of the property known municipally as 625 Church Street (the “Site”). Further to our correspondence to Planning & Growth Management Committee dated April 30, 2018, we are writing on behalf of our client to provide more specific comments regarding the draft Downtown Official Plan Amendment (the “Draft OPA”) as it would apply to the Site.

Our client believes that the Draft OPA, as currently proposed to apply to the Site, is not consistent with the Provincial Policy Statement (2014) and does not conform with the Growth Plan for the Greater Golden Horseshoe (2017). In particular, the Draft OPA does not optimize the use of land and infrastructure, particularly as it would apply to the Site.

**Lack of Consistency with the Provincial Policy Statement (2014)**

A key direction of the PPS (2014) is to build strong communities by promoting efficient development and land use patterns. This key direction is manifested in a number of policies that promote intensification, redevelopment and compact built form, with an emphasis on areas well-served by public transit. As an example, policy 1.1.3.2 supports densities and a mix of land uses which efficiently use land, resources, infrastructure and public service facilities and which are transit-supportive. The Draft OPA is not consistent with this policy direction, in particular because it would designate the Site as Mixed Use Areas 2 and not Mixed Use Areas 1, unlike properties immediately to the west (across Church Street) and immediately to the north (across Hayden Street).

**Lack of Conformity with the Growth Plan for the Greater Golden Horseshoe (2017)**

The Growth Plan policies prioritize integration of land use and infrastructure planning and the importance of “optimizing” the use of the land supply and infrastructure. In our client’s view, and based on advice from its consultant land use planners, “optimization” means making something “as fully perfect, functional, or effective as possible”. This policy priority has particular importance in Downtown Toronto. Again, however, as noted above, the Draft OPA does not conform with this policy direction, in particular because it would designate the Site as Mixed Use Areas 2 and not Mixed Use Areas 1, unlike properties immediately to the west (across Church Street) and immediately to the north (across Hayden Street).

**Other Concerns**

Our client has concerns regarding proposed Policy 11.1, which would apply to developments containing more than 80 residential units. When applicable, this policy would require both a minimum number of two-bedroom units and three-bedroom units **and** minimum unit sizes for such two-bedroom units and three bed-room units. In our client’s view, and based on advice from its consultant land use planners, such detailed numerical standards are inappropriate for inclusion in a policy document, such as the Draft OPA. Our client is also concerned about the potential impact of such policies on housing affordability and the provision of new housing in Downtown Toronto.

Our client also has concerns with the detailed numerical standard used in Policy 9.15, which would restrict the maximum floorplate size to 750 square metres. While the proposed policy would allow for consideration of increases in floorplate sizes, our client is concerned that the policy could be interpreted in an overly restrictive fashion, even though concerns regarding shadow, wind, sky view and transition impacts have been appropriately mitigated.

Please also accept this letter as our client’s request for notice of any decision by City Council regarding this item.

Yours truly,

**Goodmans LLP**



David Bronskill

DJB/

cc: Client