

July 20, 2018

Our File No.: 180543

Via Email: clerk@toronto.ca

Toronto City Council
City Hall, West Tower, 2nd Floor
100 Queen St. West
Toronto, ON M5H 2N2

Attention: Ulli S. Watkiss, City Clerk and Marilyn Toft, Manager

Dear Mayor Tory and Members of Council:

**Re: Item PG31.7 – Midtown in Focus Final Report
Oxford Property Group**

We are solicitors for Oxford Properties Group and related companies (collectively, “**Oxford**”) the owners, developers and/or managers of numerous properties throughout the City of Toronto. On behalf of Oxford, we are pleased to provide this comment letter further to our review of the Midtown in Focus Proposals Report and the Proposed Yonge-Eglinton Secondary Plan Update (November 2017) and the Midtown in Focus Final Report and the Proposed Yonge-Eglinton Secondary Plan as Schedule “III” to Amendment No. 405 (May 2018) (the “**Plan**”).

Oxford is specifically interested in the application of the Plan to the lands known as Canada Square, located at the south west corner of Yonge Street and Eglinton Avenue (the “**Property**” or “**Canada Square**”). Oxford is the development manager for the leasehold owners¹ of Canada Square, who are currently in negotiations, to expand their interest in the Property for the purpose redeveloping the Property as a vibrant mixed use development incorporating office, residential and open space components seamlessly connected to existing and under construction high level transit infrastructure.

Comprehensive Study of Canada Square

As an engaged and supportive development partner, Oxford participated in the Midtown in Focus planning process, has reviewed the Plan, and supports the City’s proposal to engage in a further comprehensive study to guide development on the Property. Oxford’s main comment is to

¹ Oxford comments are provided on behalf of itself and the leasehold owners, being OPG Investment Holdings GP Inc., CT REIT (Yonge Eglinton) Inc., 2180 Yonge (Canada 8) Holdings Limited, 2190 Yonge (Canada 8) Holdings Limited, and 2200 Yonge (Canada 8) Holdings Limited

confirm that the comprehensive study mandated for Canada Square (Policy 5.5.3) will examine and balance the range of objectives for the site

Given its location contiguous with existing and under construction public transit, the Property has significant potential, but will need to be planned thoughtfully given the physical constraints associated with the transit infrastructure, grade differences, and public realm objectives for the Property.

It should also be recognized that the City has significant control over the future use and development of this Property by virtue of the fact that the land is in public ownership, which weights in favour of a broader scope for the comprehensive study.

For redevelopment of Canada Square to be successful, the comprehensive study should not be constrained by secondary plan policies that unnecessarily limit the options available to the City, the public and Oxford in executing on a shared vision for the Property. Examples of policy requirements that should be considered and refined through the comprehensive study include:

- locations of public conveyances for parkland or new internal roads (s.3.3.2, Map 21-8, s.4.6 and Map 21-9) ;
- requirements for publicly accessible spaces, squares, and mid-block connections (s.3.2.3, Map 21-6 and ss.4.13-4.16 and Map 21-9);
- setback and stepback requirements (s.3.1.8 and Map 12-7);
- required percentages of residential and non-residential uses on the Property (s.2.5.4);
- limitations for at grade uses on priority retail streets (e.g. limits on large office lobbies required by office tenants); and
- requirements in regard to unit mix and unit size, and the calculation and provision of s.37 community benefits to be secured through redevelopment of the Site (ss.7., and 9.4.1-9.4.5).

Clarification of the development parameters being considered through the Comprehensive Study can be accomplished by revising Section 5.5.1 of the Plan. This will allow the City and Oxford to address the unique advantages and challenges of the Property while delivering the goals of the Plan as set out in Section 1.2.

Yours truly,

Goodmans LLP



Anne Benedetti

cc: Oxford Properties Group