



Project No. 1847 "

April 30, 2018

Planning and Growth Management Committee  
Toronto City Hall, West Tower, 10<sup>th</sup> Floor  
100 Queen Street West  
Toronto, ON, M5H 2N2

Dear Chair and Members of the Committee:

**Re: \$ TOcore: Downtown Plan Official Plan Amendment  
187-193 Parliament Street**

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We are the planning consultants for Downing Street (187 Parliament) Inc., with respect to their file at 187-193 Parliament Street, located on the east side of Parliament Street just north of Queen Street East ("the subject site").

On behalf of our client, we filed applications for an Official Plan Amendment, a Zoning By-law Amendment and Site Plan Control on December 16, 2016 (Fil Nos. 16 268588 STE 28 SA and 16 268586 Ste 28 OZ) in order to permit a mid-rise, mixed-use building, comprised of retail, office and work/live uses. Since the time of our original application, we have worked closely with City of Toronto staff to secure approval for a development with a built form which is acceptable to the City. Planning staff have advised that they are working on a Final Report in support of the application that is anticipated to go before Community Council before the Council recess. The current proposal is for an 11-storey building (inclusive of a mechanical penthouse/amenity level), with an overall density of 6.24 FSI.

The subject site is within the boundaries of proposed Official Plan Amendment No. 406, the Downtown Plan ("the Plan"), which is to come before your Committee on May 1, 2018. The Plan redesignates the subject site from *Mixed Use Areas* to *Mixed Use Areas 3*. The *Mixed Use Areas 3* designation permits low-rise and mid-rise buildings, which generally have heights equal to the right-of-way width and generally meet certain prescribed setbacks and angular planes. Tall buildings are not permitted in *Mixed Use Areas 3*.

Although the policies appear to include some flexibility in their application which would not preclude the proposed development, we are concerned that they might be narrowly interpreted and might not include sufficient flexibility to permit the proposed design. This, in our opinion, would not allow the use of the property to be optimized in a manner that is consistent with the Provincial Policy Statement (2014) and in conformity with the Growth Plan for the Greater Golden Horseshoe (2017).

As importantly, OPA No. 406, if adopted in its present form, fails to recognize the meaningful consultation which has occurred with this application. Given the extent to which we have worked with staff to provide a built form which responds to the very special attributes of the subject site, and the anticipated staff recommendation to Council, we request that a site-specific exception be granted for the subject site from the Downtown Plan with the inclusion of a "grandfathering clause" or transition provisions which would allow the approval of the application to be completed under the current policy regime.

If you have any questions, please do not hesitate to ask the undersigned or Caitlin Allan of our office at (416) 947-9744. By way of this letter, we also formally request that we are provided with notice of any meetings where reports related to the City-initiated TO Core OPA are to be considered.

Yours truly,

**Bousfields Inc.**



Lindsay Dale-Harris, FCIP, RPP

cc. ! *Daniel Odorico, The Downing Street Group*  
*Mark Joblin, Loopstra Nixon LLP*