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File #: 99999

April 27, 2018

VIA DIRECT COURIER:

TORONTO PLANNING AND
GROWTH MANAGEMENT COMMITTEE
Attn: Nancy Martins, Secretariat
Toronto City Hall, West Tower, 10th Floor
100 Queen Street West
Toronto, ON M5H 2N2

VIA EMAIL: pgmc@toronto.ca

Dear Planning and Growth Management Committee,

Re: TOcore: Proposed Downtown Plan

We are the solicitors for National Lending Corporation, the owners of 188 Avenue Road, Toronto (the “Property”). The Property is located on the west side of Avenue Road, south of Dupont Street between Chicora Avenue and Pears Avenue, and as is within the TOcore proposed Downtown Plan (the “Proposed Plan”).

The Proposed Plan currently seeks to designate the Property as *Mixed Use Areas 4*. Despite the location of the Property with frontage on a major street, this designation does not contemplate the Property as a site for significant intensification. Specifically, the Proposed Plan contemplates *Mixed Use Areas 4* as areas “generally off the main streets, embedded within the neighborhood fabric. The policies further contemplate *Mixed Use Areas 4* to be of “low-rise scale respecting and reinforcing the existing physical character of the neighborhood, including the prevailing heights, massing, scale, density and building type” (s. 8.29.2).

The subject Property has frontage directly on Avenue Road, a main street. Due to its frontage onto Avenue Road, the Property has a direct relationship with this main street as opposed to a connection with the neighborhood that is located internal off of the main street. These policies will have the effect of limiting any future redevelopment of the subject Property in a manner that is inconsistent with the balance of the properties fronting onto Avenue Road that comprise the subject block. In fact, the Proposed Plan designates the four properties that comprise the southern portion of the very same block and which are immediately adjacent to the Property as *Mixed Use Areas 3* which would provide for significantly greater heights and densities. We

believe that the designation that has been proposed for the subject Property to be a mischaracterization of the Property and its relationship to the surrounding area as well as a flaw in the Proposed Plan that the City should correct at this time.

As noted, the Property is located on Avenue Road, being a main street as well as important Avenue for the purpose of the Proposed Plan. Mixed Use Areas 4 is a designation that is intended to address properties that are located off main streets. Very clearly the subject Property does not fit with that initial classification. Instead the Proposed Plan contemplates main streets to contain Mid-rise scale of development which “provides intensification Downtown by contributing to liveable and vibrant main streets while protecting the stability and integrity of adjacent neighborhoods”. The immediately surrounding area has a number of existing or proposed developments that contemplate greater heights and densities than that which has been proposed for the Property. As the City will be aware, directly to the south of the Property at 127-170 Avenue Road at the corner of Avenue Road and Pears Avenue, exists a newly constructed 20-storey residential building that has been incorporated into the fabric of this neighborhood. On Pears Avenue itself, just west of Avenue Road (off the main Avenue) is a nearly completed 10-storey residential building which again fits within the surrounding character. 183-189 Avenue Road (the south east corner of Avenue Road and Pears Avenue) a 12-storey mixed-use residential building is also being proposed. In the context of these existing and planned developments, we fail to understand that rationale for a designation that instead of seeking to provide for the continuation of the successful and well-planned forms of development that surround the subject Property, instead seeks to draw a line that does not appear to appropriately account for the true neighborhood form.

The Proposed Plan in our view seeks to direct greater levels of intensification onto and along main streets such as Avenue Road in order to better utilize transit and other infrastructure and to provide for a vibrant street that will serve the internal neighborhood which is found and associated with the areas off of the main streets. This is what is currently seen in terms of development along Avenue Road in this area. The sheer fact that the City in its mapping and designation has sought to arbitrarily split the designation for the properties on this stretch of Avenue Road, and in particular for the properties on the very same block, appears to have been done without any consideration as to the appropriateness of how that line has been drawn. In our view a more appropriate break in any designation along Avenue Road should occur at the rail corridor to the north of the subject Property as this break provides for a natural and more rational transition between those properties that have already and will in the future provide an appropriate corridor for intensification and a vibrant street along Avenue Road and the area north of the rail corridor that transitions into a distinct neighborhood.

The proposed designation on the Property is inconsistent with the context of the surrounding area, inconsistent and does not conform in our view with the direction in PPS and the Growth Plan which seek to ensure that appropriate areas of intensification are planned for.

We request that that proposed designation for the Property be revisited and that the City carry forward a designation for the Property that appropriately reflects the ideal opportunity afforded by the site to provide for a great degree of intensification building upon Avenue Road in this location.

Thank you.

Yours very truly,

A handwritten signature in black ink, appearing to read "Paul DeMelo", enclosed within a dashed-line oval.

Paul DeMelo