



Barristers & Solicitors

Bay Adelaide Centre - West Tower  
333 Bay Street, Suite 3400  
Toronto, Ontario M5H 2S7

Telephone: 416.979.2211  
Facsimile: 416.979.1234  
goodmans.ca

Direct Line: 416.597.4299  
dbronskill@goodmans.ca

November 25, 2019

Our File No.: 000031

**Via Email**

City Council  
12<sup>th</sup> Floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON  
M5H 2N2

**Attention: Marilyn Toft, Secretariat**

Dear Sirs/Mesdames:

**Re: Item PH10.1 – City-Initiated Priority Retail Streets Zoning By-law Amendments**

We are solicitors for Plazacorp in respect of a number of properties in the City of Toronto, including but not limited to the properties known municipally as 170 Spadina Avenue, 400 King Street West and 1 Yorkville Avenue. Many of these properties are the subject of ongoing development applications that could be impacted by the above-noted zoning by-law amendments.

While we believe that our client's development applications meet the general intent of these proposed zoning by-law amendments, our client has concerns with the proposed zoning by-law amendments, as described below. Some of these concerns may be mitigated if the City is able to provide great assurances regarding an approach to transition.

1. **Overly Prescriptive:** The proposed amendments are overly prescriptive, including requirements for 60% of the lot frontage to be used for certain uses, 15.0 metres of lot frontage to be used for other uses, pedestrian entrances, and 60% of facades to be used as windows/doors. Our client understands the intent of these provisions but would appreciate an opportunity to discuss with City staff to see if greater flexibility can be achieved.
2. **Heritage Matters:** The proposed amendments do not contain any exemptions where sites contain heritage buildings. Flexibility needs to be included to ensure the appropriate design approach for a listed or designated property.
3. **Lack of Transition:** The proposed amendments should exempt existing applications and approved developments. This is consistent with the approach taken by the City with other such general zoning by-law amendments.

Please also accept this letter as our client's request for notice of any decision made by City Council in respect of this matter.

Yours truly,

**Goodmans LLP**

A large, stylized handwritten signature in blue ink, appearing to be 'David Bronskill', is written over the printed name and extends to the right.

For

David Bronskill  
DJB/  
cc: Client

7008077