

25 November 2019

Toronto City Council
100 Queen Street West
Toronto ON M5H 2N2
Via email: phc@toronto.ca and councilmeeting@toronto.ca

Attention: Nancy Martins, Administrator, Planning and Housing Committee

Dear Ms. Martins,

**RE: City-Initiated Priority Retail Streets Zoning By-law Amendments:
Final Report and Supplementary Report
Item PH10.1**
Various Addresses in the City of Toronto

Walker, Nott, Dragicevic Associates Limited (“WND Associates”) is the planning consultant for a number of landowners with active or forthcoming development applications in the City of Toronto. We are writing with respect to the proposed City-initiated Zoning By-law Amendments to Former City of Toronto Zoning By-law 438-86 and City of Toronto Zoning By-law 569-2013, proposed to include additional zoning requirements for “Priority Retail Streets”.

We are advising City Council of our concerns with respect to the proposed Zoning By-law Amendments. In summary our concerns include, but are not limited to, the following:

- The requirements are overly restrictive and do not provide for the necessary flexibility for sites with existing, unique or constrained conditions that are not conducive to, or do not allow for, the requirements set out in the proposed Zoning By-law Amendments, including: the 60% lot frontage use requirement; the 15.0 metre lot frontage use restriction; the main pedestrian entrance requirements; and, the 60% windows or doors requirement. These regulations are proposed to apply as a blanket across entire streets, regardless of site-specific circumstances or the existing physical character of an area.
- City Planning staff’s supplementary report and the revised proposed Zoning By-law Amendments now include transition language with respect to Building Permit, Zoning By-law Amendment and Minor Variance applications submitted on or before 5 June 2019; however, it remains unclear if the proposed zoning would apply to alterations to lawful sites, not otherwise requiring a zoning amendment for change of use, additions, etc. (but which require a future building permit) with conditions that do not allow for the proposed requirements. These sites would be required to meet overly restrictive regulations as discussed above.

- The proposed Zoning By-law Amendments are premature in light of the above concerns, and also with respect to the ongoing work being undertaken by City Planning staff. The staff report accompanying the proposed Zoning By-law Amendment notes that City Planning staff are currently preparing a Retail Design Manual and Retail Main Streets Study; both of which may provide further information and guidance with respect to the appropriate retail regulations on a site-specific basis.

Below please find a list of sites and landowners (which is not exhaustive) for which our concerns apply, in addition to sites in the City of Toronto for which WND Associates is the applicant for development applications:

Site	Owner(s)	Related City File Nos.
187 King Street East and 65 George Street	York London Holdings Limited	17 147290 STE 28 OZ
225 King Street West and 200 Wellington Street West (MetroCentre) 60 Simcoe Street 225, 255, 277, 315 and 325 Front Street West	Oxford Properties Group*	A0484/19TEY
301-319 King Street West	2477879 Ontario Inc., 1579661 Ontario Inc., Claireville Holdings Limited and Frances Danyliw in Trust	13 144733 STE 20 OZ

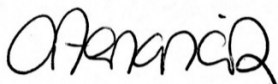
*Please also provide notices of decision to Cory Estrela, Vice President Legal, Oxford Properties Group, 900-100 Adelaide Street West, Toronto ON, M5H 0E2

We respectfully submit this letter for the consideration of City Council in advance of the meeting on 26-27 November 2019. We request that, given the concerns listed above, this matter be referred back to City staff for further review, consideration and reporting.

Please also ensure and confirm that WND Associates is added to the circulation list with respect to all items and notices related to this matter.

Yours very truly,

WND associates
planning + urban design



Andrew Ferancik, MCIP, RPP
Principal