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Our File No.: 161978

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

Attention: Marilyn Toft, Secretariat

Dear Sirs/Mesdames:

**Re: King-Spadina Secondary Plan
400 Front Street West**

We are solicitors for City Front Developments Inc. in respect of the property known municipally in the City of Toronto as 400 Front Street West (the "**Property**"). We are writing to express our client's concerns with the proposed updated King-Spadina Secondary Plan (the "**Secondary Plan**"), in particular that the Property should be excluded from the policies of the Secondary Plan at this time.

In a decision issued on October 3, 2019, the Tribunal allowed our client's appeal in respect of the Property, in part, contingent on our client amending its proposal in accordance with the Tribunal's direction. The Tribunal also withheld its final order pending finalization of draft zoning by-law amendments and the execution of a Section 37 agreement addressing certain stipulated matters. Our client is working with City staff to address these matters but it is unclear how the City intends to apply the Secondary Plan to active planning matters absent clear transition policies as were recently included in the Downtown Plan and the Midtown Plan.

Further, Policy 6.9 appears to apply to the Property, although City staff did not consult with our client regarding the drafting of this proposed policy. As drafted, this proposed policy does not accurately describe the relationship of the Property to the *Financial District* and is therefore confusing in its potential application to the Property. This would be another reason to exclude the property from the application of the Secondary Plan, at least until this proposed policy can be appropriately revised to reflect the location of the Property and its approved redevelopment.

This communication should be treated as our client's written representation in accordance with the *Planning Act*. We would also appreciate receiving notice of any decision of City Council in respect of this matter.

Yours truly,

Goodmans LLP



David Bronskill
DJB/

cc: Client

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