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Via Email (clerk@toronto.ca)

City of Toronto Council
City of Toronto
2nd Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Ellen Devlin, Secretariat

Dear Sirs/Mesdames:

**Re: Item TE24.11 – King-Parliament Secondary Plan Review – Final Report
Secondary Plan and Zoning By-law Amendments**

We are solicitors for 1 Sumach Street Inc., who are the owners of the properties known municipally in the City of Toronto as 1 Sumach Street. Our client also has an interest in all of the properties immediately across the street, including those properties known municipally as 2-16 Sumach Street (collectively, the “**Properties**”) We are writing to provide our client’s concerns in respect of the draft King-Parliament Secondary Plan (the “**Draft Secondary Plan**”) and the draft Zoning By-law Amendment (the “**Draft ZBA**”) pursuant to the requirements of the *Planning Act*.

In particular, our client is requesting that the Properties be exempted from the Draft Secondary Plan and the Draft ZBA or, at a minimum, that the Properties be recognized as a site for additional study for the reasons set out below.

The Properties form a development site that is unique and distinct from other sites within the boundaries of the Draft Secondary Plan. It is atypically shaped, abutting the border between the Corktown and West Don Lands Policy Areas in policy but not in character form or use. While parts of the Corktown Policy Area are characterized by commercial heritage buildings and homes, and while the West Don Lands Policy Area is one of Toronto’s emerging (and exciting) mixed use communities, the Properties are bounded by an elevated expressway, a major arterial roadway (existing from another elevated expressway), and a dedicated streetcar right-of-way.

Recognizing the unique nature of the Properties, and acknowledging that it is surrounded by these challenging frontages (again, unique within the Secondary Plan area), our client has developed a vision for the Properties that responds to and engages with these challenges, with the opportunity for substantial public benefits at this vision’s core.

Clearly, the Properties represent an important opportunity for appropriate intensification that responds to the context. Our review of the Draft Secondary Plan and the Draft ZBA indicates proposed policies and performance standards that could limit that opportunity and otherwise frustrate appropriate optimization of the Properties.

Our suggestion is that the Properties be exempted from the Draft Secondary Plan and the Draft ZBA to allow further discussions on a site-specific basis. If the City is unwilling to exempt the Properties, at a minimum, the Properties should be identified as a site for additional study to determine the appropriate policies to be applied for future redevelopment of the Properties. This is an approach that the City has adopted in other Secondary Plans and could be implemented here.¹

We would also appreciate this letter being treated as our client's request for notice of any decision made in respect of both the draft Secondary Plan and draft Zoning By-law Amendments.

Yours truly,

Goodmans LLP



David Bronskill
DJB/rv

cc: Client

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¹ Please note that if the City does not grant the requested exemption, our client reserves the right to identify all objectionable aspects of the Draft Secondary Plan and Draft ZBA, including the lack of consistency with the Provincial Policy Statement (2020) and lack of conformity with the Growth Plan for the Greater Golden Horseshoe (2019).