

March 27, 2023

Our File No.: 210604

Via Email: councilmeeting@toronto.ca

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

Attention: Sylwia Przewdziecki

Dear Sirs/Mesdames:

Re: Item No. PH.2.1 – Bill 109 Implementation, Phase 1 - Recommended Official Plan and Municipal Code Amendments.

We are solicitors for Tenblock¹, the owners of a number of properties in the City of Toronto (the “City”) where applications for official plan amendment, zoning by-law amendment and Site Plan Control have been filed.

Most recently, Tenblock filed Site Plan Control applications for the properties known municipally as:

- 5 Capri Road - Community Planning: Etobicoke York District (Central Section); and
- 155 Antibes Drive - Community Planning: North York District (West Section).

Tenblock is generally supportive of the City’s larger initiative to create and implement an expedited framework for the review of development applications pursuant to the *Planning Act* and the *City of Toronto Act, 2006*, further to the Bill 109 amendments to provincial legislation. Tenblock has, however, also been working closely with City Planning Staff, including on its most recent Site Plan Control applications, where Staff have begun an inconsistent transition towards implementing portions of the City’s expedited review framework.

Further, in part, to that experience, while Tenblock supports the objective of expediting the review of development applications, we would note potential issues with the proposed official plan amendment (Official Plan Amendment 641). Tenblock is concerned with the lack of clarity provided in regard to the implementation of mandatory “minimum application requirements” for

¹ Tenblock, including its owners and affiliated entities.



Site Plan Control applications particularly where complete zoning by-law amendment applications have been filed for the same development project and the lack of clear transition requirements for in process Site Plan Control applications. In that regard, we would emphasize the importance of ensuring that the effort and expense that have gone into the preparation of in process development applications is protected through the inclusion of flexible transition provisions particularly when important development related matters, including the determination of the amount of development charges payable in regard to a project, is directly related to the date on which a Site Plan Control application was made. Tenblock is also in the process of discussing additional concerns with Staff related to application timelines, processing delays, and a lack of clarity in regard to statutory timelines among others concerns.

Our client appreciates the effort that has gone into the processing of the Tenblock applications filed to date and that has gone into this larger City initiative to create an expedited framework for the review of development applications pursuant to the *Planning Act* and the *City of Toronto Act, 2006*. We would ask that we are provided with notice of any updates and future meetings in regard to the above noted matters and please do not hesitate to contact the undersigned if there are any questions.

Yours truly,

Goodmans LLP

A handwritten signature in blue ink, appearing to read "AB", followed by a long horizontal line.

Anne Benedetti

AB/

cc: Stephen Job, Tenblock

7362024