



McCarthy Tétrault LLP  
PO Box 48, Suite 5300  
Toronto-Dominion Bank Tower  
Toronto ON M5K 1E6  
Canada  
Tel: 416-362-1812  
Fax: 416-868-0673

**John A.R. Dawson**  
Direct Line: 416-601-8300  
Direct Fax: 416-868-0673  
Email: jdawson@mccarthy.ca

October 10, 2023

**Via Email (councilmeeting@toronto.ca)**

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

**Attention: City Clerk**

Dear Mayor Chow and Members of Council:

**Re: PH6.2 Bill 109 Implementation, Phase 3 - Recommended Official Plan and Municipal Code Amendments respecting Site Plan Control**

We are the solicitors for SNY Development Corporation and 190 Ridley Limited (collectively, the “**Companies**”), which have development interests in lands within the City of Toronto (the “**City**”).

We are writing on behalf of the Companies to express concerns with proposed Official Plan Amendment 688 (“**OPA 688**”), which proposes to require compliance with an “in-effect” Zoning By-law to be in place as part of a complete application for Site Plan Control. The Companies are concerned that the proposed policy does not provide adequate flexibility to recognize situations where it is appropriate to file a Site Plan Control application concurrently with or after the filing of a Zoning By-law amendment application or a minor variance application, but prior to such application’s approval.

The consequence of this new policy would create unnecessary delays in obtaining required approvals and the construction of new housing, in the context of an on-going shortage of housing.

The Companies are also concerned that the City lacks the authority to create new requirements for the filing of a Site Plan Control application, be it a new application, or a revision to an existing Site Plan Control approval.

The Companies recognize the City’s financial constraints and the need for solutions, however the approach proposed will not assist the approval process and is not in the public interest.

Given the aforementioned concerns, on behalf of the Companies, we respectfully request that City Council defer consideration of OPA 688 and the accompanying amendments to the City’s

Municipal Code. If OPA 688 was to proceed as it is currently constituted our clients would be compelled to object.

Please do not hesitate to contact the undersigned should you have any questions or require further information.

Yours truly,

McCarthy Tétrault LLP

Per:

A handwritten signature in blue ink, appearing to read "John A.R. Dawson". The signature is fluid and cursive, with a long horizontal stroke at the end.

John A.R. Dawson

C: Ori Yuval, SNY Development Corporation and 190 Ridley Limited  
George S. Belza, Analogica