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October 11, 2023

**Via EMAIL**

Mayor and Members of Council  
Toronto City Hall  
10<sup>th</sup> Floor, West Tower  
100 Queen Street West  
Toronto, ON M5H 2N2

Your worship and Members of Council:

**Re: City Council – October 11, 2023  
PH6.2 - Bill 109 Implementation, Phase 3 - Recommended Official Plan and  
Municipal Code Amendments respecting Site Plan Control  
20 Brentcliffe Road**

We are solicitors to 939GP Inc. (the “Company”) which is the owner of the lands municipally known as 20 Brentcliffe Road in the City of Toronto (the “City”) and more particularly described as Part of Block A, Plan 2755 Leaside, designated as Part 10 on Reference Plan 66R-29297, as reflected in PIN 10369-0350(LT) (the “Site”). The Site is approximately 0.49 hectares in size, with frontages along Vanderhoof Avenue and Brentcliffe Road, and south of Eglinton Avenue East.

We are writing this letter to express concerns with the proposed Official Plan Amendment 688 (“OPA 688”), which would require an in-force Zoning By-law to be in place as part of a complete application for Site Plan Control approval. The Company is concerned that proposed OPA 688 will create unnecessary delays in obtaining required approvals and the construction of new housing, in the context of an on-going shortage of housing, which is not good planning, nor in the public interest.

The Company is also concerned that proposed OPA 688 will make it more difficult for the City to assess the merits of proposed new developments where it is appropriate to consider Zoning by-law amendments and Site Plan Control applications concurrently, or prior to finalizing a Zoning Bylaw amendment. In addition, it is not clear that the City has the authority to impose new pre-conditions for the acceptance, preventing owners of lands from filing a Site Plan Control application.

These and other considerations form the basis for the Company’s position that OPA 688 will hinder the City’s ability to make thorough, well-informed decisions which would create additional delays and potential complications in the development approval process, and would further lead

to the overall effect of delaying the construction of new development proposals, including much-needed new housing.

The Company understands the City's financial constraints and its representatives would appreciate an opportunity to work with the City to achieve potential solutions. Therefore, we respectfully request that City Council defer consideration of OPA 688 and the accompanying amendments to the City's Municipal Code.

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

Yours truly,



Cynthia A. MacDougall  
Partner | Associée