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Via Email

Our File No.: 232029

City Council
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Sylwia Przedziecki, City Clerk

Dear Sirs/Mesdames:

Re: PH16.1 – Housing Action Plan: As-of-Right Zoning for Mid-rise Buildings on Avenues and Updated Rear Transition Performance Standards – Final Report

We are solicitors for Nikali Holding Corp., the registered owner of the property known municipally in the City of Toronto (the “City”) as 202 Sheppard Avenue West (the “Property”), and the applicant in respect of official plan and zoning amendment applications for the Property.

Our client is supportive of the City’s efforts to expand housing options and to simplify built form standards for mid-rise buildings. In particular, the approach to rear transitions reflected in the updated performance standards for mid-rise buildings recognizes that angular plane requirements reduce the constructability and efficiency of mid-rise buildings, result in fewer homes, and produce more carbon emissions contrary to the City’s objective to address the Council-declared climate emergency.

However, consistent with the views of Mayor Chow as set out in her letter dated October 29, 2024, our client does not believe the recommendations in the above-noted staff report go far enough. In particular, there is no sound reason for the updated approach to rear transitions, as reflected in the mid-rise performance standards and the associated zoning amendments, to not apply to *Avenues* subject to existing secondary plans.

Staff have advised – and Council has recognized – that angular plane requirements run counter to the City’s housing and sustainability objectives. The purpose of the zoning amendments and guideline updates staff are recommending is to eliminate outdated and inappropriate barriers to facilitating housing in a more sustainable form. Secondary plan areas are typically subject to secondary plans *precisely because* they are well-suited to accommodating new housing. If it is appropriate to remove these barriers from *Avenues* not subject to secondary plans, it is illogical



not to also do so for areas subject to secondary plans. Accordingly, we ask that the same approach to rear transitions also apply to areas subject to secondary plans, such as the Property.

Yours truly,

Goodmans LLP

A handwritten signature in blue ink, appearing to read "Max Laskin", written over a light blue rectangular background.

Max Laskin
ML/

Encl.