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September 18, 2025

**VIA E-MAIL**

Toronto and East York Community Council  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

Dear Members of Toronto and East York Community Council:

**RE: Item TE25.8 - 15 Toronto Street  
Decision Report - Official Plan and Zoning By-law Amendment Applications**

We are the lawyers for Goband (Toronto) Development Ltd. and Goband 57 (Toronto) Development Ltd. (together, "**Goband**"), the owners of the property municipally known as 17-25 Toronto Street and 55-57 Adelaide Street East (the "**Goband Lands**"), in the City of Toronto. Our client's lands are located directly north of the proposed development for 15 Toronto Street (the "**Subject Lands**").

We have reviewed the Decision Report prepared by City Staff dated September 2, 2025, which recommends the approval of applications for an official plan amendment and zoning by-law amendment (the "**Applications**") to permit the redevelopment of the Subject Lands with a 56-storey mixed-use building (the "**Proposed Development**").

We have also reviewed the revised Architectural Plans and Drawings prepared by BDP Quadrangle, dated May 2025, submitted in support of the Proposed Development. The building as proposed appears to have a zero lot-line condition with the Goband Lands, with the tower sited immediately along the shared property line (the "**Zero Lot-line Condition**"). We also understand that, as depicted in the revised Architectural Plans and Drawings, no residential windows are proposed for the north elevation of the Proposed Development (the "**No Window Condition**").

Further to our correspondence dated August 23, 2024 (a copy of which is enclosed herein), we write to advise that our client has no objections to the approval of the Applications, including the Zero Lot-line Condition, on the understanding that the No Window Condition and the treatment of the north elevation will remain as proposed, such that no residential windows are permitted.

We request that City Council protect for the No Window Condition of the north elevation through the final form of the zoning by-law amendment, as well as through all subsequent approvals, including the site plan approval process for the Subject Lands. Our client's position regarding the location of the tower along the property line and the Zero Lot-line Condition is contingent on the No Window Condition being observed. Otherwise, an appropriate setback should be provided on the Subject Lands themselves.

Should you have any questions regarding this correspondence, please contact the undersigned and Christopher Tanzola ([ctanzola@overlandllp.ca](mailto:ctanzola@overlandllp.ca)). We request notice of all meetings or decisions with respect to this item.

Yours truly,

**Overland LLP**

A handwritten signature in black ink that reads "Justine Reyes". The signature is written in a cursive, flowing style.

Per: Justine Reyes  
Associate

Encl.

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**overland**

August 23, 2024

**VIA EMAIL**

John D. Elvidge, City Clerk  
City of Toronto, Toronto City Hall  
2<sup>nd</sup> Fl. West, 100 Queen Street West  
Toronto, ON M5H 2N2

Dear Mr. Elvidge:

**RE: Change of Contact Information  
Comments respecting 15 Toronto Street, Toronto  
Application Nos. 22 185154 STE 13 OZ & 185153 STE 13 SA**

Please be advised that Overland LLP was recently retained by Goband (Toronto) Development Ltd. and Goband 57 (Toronto) Development Ltd. (together, "**Goband**"), the owner of the property municipally known as 17-25 Toronto Street and 55-57 Adelaide Street East (the "**Goband Property**").

The Goband Property is the subject of applications for a zoning by-law amendment and site plan approval to facilitate a mixed-use development (City File Nos. 23 138421 STE 13 OZ & 23 138419 STE 13 SA) (the "**Goband Applications**").

On March 21, 2024, Goband's previous counsel Cassels Brock & Blackwell LLP ("**Cassels**") filed a letter with City Planning noting Goband's concerns with the proposed development for the adjacent property at 15 Toronto Street (City File Nos. 22 185154 STE 13 OZ & 185153 STE 13 SA) (the "**Madison Applications**"). A copy of the letter from Cassels is enclosed.

The Cassels letter notes a concern regarding the tower siting and setback proposed in the Madison Applications. On behalf of Goband, we remain concerned about the Madison Applications' reliance on the Goband Property to achieve the necessary tower separation, particularly given that City Council has yet to consider the Goband Applications and City Staff have yet to indicate their support for our client's proposed development. We submit that it continues to be premature to advance the planning process for the Madison Applications without any appreciable tower setbacks at this time, until there is greater clarity regarding the configuration, siting, and massing of our client's proposal on the Goband Property and, as a result, the overall planning for the block.

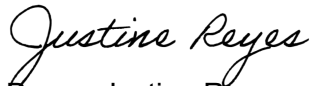
The Cassels Letter referenced a Limiting Distance Agreement. We confirm that at this time, Goband has not entered into any agreements with respect to the Madison Applications.

We write to request that the City's records be updated to note Overland LLP as counsel for Goband and that written notice of all decisions and/or updates in respect of the Madison

Applications be provided to the undersigned and Christopher Tanzola ([ctanzola@overlandllp.ca](mailto:ctanzola@overlandllp.ca)).  
Our contact details can be found in the header above.

Thank you for your attention to this matter. Should anything further be required for the City to process this request, please contact the undersigned as soon as possible.

Yours truly,  
**Overland LLP**



Per: Justine Reyes  
Associate

Encl.

c. Christy Chow, Planner for the City of Toronto  
David Bronskill, Goodmans LLP



March 21, 2024

Email: [christy.chow@toronto.ca](mailto:christy.chow@toronto.ca)

City Planning  
City of Toronto  
Toronto City Hall  
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file #060309-00001

Attention: Christy Chow, Planner

Dear Christy Chow:

**Re: Letter of Objection  
15 Toronto Street, Toronto  
Application Nos. 22 185154 STE 13 OZ and 22 185153 STE 13 SA**

We are the solicitors for Goband (Toronto) Development Ltd. and Goband 57 (Toronto) Development Ltd., the owners of 17-25 Toronto Street and 55-57 Adelaide Street East (the **"Goband Property"**). The Goband Property is the subject of zoning by-law amendment and site plan approval applications to facilitate the development of an 80-storey mixed-use building (the **"Goband Application"**, Application Nos.: 23 138421 STE 13 OZ and 23 138419 STE 13 SA).

We are writing to note our preliminary concerns with respect to the proposed development (the **"Madison Application"**) at 15 Toronto Street (the **"Madison Property"**).

The Madison Property is immediately south of the Goband Property, and has a small footprint of 511sm. The Madison Application proposes a 53-storey mixed-use tower less than 0.213m from the mutual lot line, relying almost fully on the Goband Development to provide all required tower separation.

By-law No. 1105-2016, adopting Amendment No. 352 to the Official Plan, (**"OPA 352"**) contains clear requirements for tall building setbacks, noting amongst other things that:

- zoning will contain minimum numerical standards, with amendments able to be considered through rezoning or minor variance processes providing that adequate space between towers within the block will meet a number of clear requirements, including consideration of development potential, where appropriate, of other sites within the block (B(ii)); and
- not every site in the area governed by OPA 352 can accommodate a tall building, and proposed tall buildings that do not meet the intentions set out in OPA 352 "present

significant concern for building strong healthy communities... and as such those sites are not considered suitable for tall building development” (B(iii)).

By-law No. 1106-2016, amending Zoning By-law 438-86, set out the prescriptive requirements introduced through OPA 352, namely that every tower must be no closer than 12.5 metres to a lot line having no abutting street (1.380(1)).

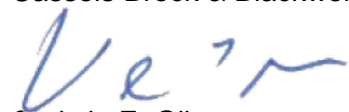
The City's Downtown Tall Building Guidelines and Tall Building Design Guidelines further reinforce that some sites are not appropriate for tall buildings, and that one must, “on small sites, apply the recommended minimum tower setbacks and setbacks to determine the resultant floor plate size and feasibility of the site dimensions to accommodate a tall building”. Undertaking this exercise with the Madison Application makes clear that the Madison Property, in and of itself, is simply too small for a tower.

The Madison Application fails to conform to the policy and zoning framework and is premature absent meaningful block discussions and a Limiting Distance Agreement securing appropriate tower separation distance and permitting what is otherwise the over-development of the Madison Property.

As the Madison Application proceeds through the City's review process, we will continue to monitor. Please provide the undersigned with written notice of all steps and proceedings in the Madison Application.

Yours truly,

Cassels Brock & Blackwell LLP



Christie E. Gibson

CEG/SL/nv

Cc: City Clerk, City of Toronto ([clerk@toronto.ca](mailto:clerk@toronto.ca))  
Mike Dror, Bousfields Inc. ([mdror@bousfields.ca](mailto:mdror@bousfields.ca))