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October 11, 2012

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VIA EMAIL

Chairman and Members
Planning & Growth Management Committee
City of Toronto
City Hall, 100 Queen Street West
10th Floor, West Tower
Toronto ON M5H 2N2

Attention: Ms. Merle MacDonald, Committee Administrator
City Clerk's Department

Dear Sirs/Mesdames,

**RE: Planning & Growth Management Committee
Agenda Item PG18.7 - October 12th, 2012
Recommended Changes to the Draft City-Wide Zoning By-law Resulting from
Public Consultation**

We represent the Ontario Conference of the Seventh-Day Adventist Church ("OCSDAC") with respect to approximately 40 church, school, and related property interests in the City of Toronto.

We understand that the Planning & Growth Management Committee will be considering the above-noted item at its meeting on October 12th, 2012 and we would like to take this opportunity to submit our client's comments for your consideration.

By way of background, our client appealed City of Toronto Zoning By-law 1156-2010 to the Ontario Municipal Board before it was repealed by City Council (the "**Repealed By-law**"). In the course of registering our client's objections with respect to the Repealed By-law, we filed on behalf of our client a letter to the Planning and Growth Management Committee, dated August 13th, 2010, in which we explained our client's concerns regarding the treatment of Places of Worship in the draft Zoning By-law. Incongruent treatment of these uses between the in-effect City of Toronto Official Plan and the Repealed By-law was one, but not our client's only, issue.

Based on our review of the draft Zoning By-law made available to the public through the City's website on June 18th, 2012, it appears not much has changed between the Repealed By-law and the draft Zoning By-law as far as Places of Worship are concerned.

Our client continues to be concerned by, among other things, the continued disconnect between Official Plan language that encourages Places of Worship and the draft Zoning By-law regulations that prohibit and discourage them. The absence of as-of-right permissions for Places of Worship in Residential Zone and Employment Industrial Zone categories suggests that Places of Worship continue to be targeted for specific discriminatory control within Neighbourhood Areas in the absence of any policy direction mandating this level of control and in direct opposition to the Official Plan which permits Places of Worship in Employment Areas on lots abutting major streets or where they already legally exist.

Our client is therefore disappointed with the recommendations of Staff contained in its report entitled "Recommended Changes to the Draft City-wide Zoning By-law Resulting from Public Consultation" issued September 27th, 2012. Permission for Places of Worship by site-specific rezoning is still the approach being recommended by Staff to the Committee. This is in spite of the fact that Staff's report acknowledges that its public consultations at open houses were dominated by concerns regarding the draft Zoning By-law's current approach on these important uses in the community.

Our client greatly appreciates the opportunity to express its concerns at the statutory open houses this past Summer. Our client will continue to monitor developments with respect to the draft Zoning By-law and remains committed to working with Staff, if given the opportunity, in an effort to resolve its outstanding issues.

We trust that you will find the above to be of assistance in your consideration of this matter. Should you have any questions, please contact the undersigned at 416.863.4786 or our client's planning consultant, Mr. Paul Stagl, at 416.784.2952.

Yours truly,

Fraser Milner Casgrain LLP

Jason Park
JIP/MAP/ss

c.c. Ontario Conference of the Seventh Day Adventist Church (by email)
Mr. Paul J. Stagl, MCIP, RPP, Opus Management Inc. (by email)

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