

April 2, 2013

Our File No.: 021561

By Email

City Council

100 Queen Street West
City Hall, 12th Floor W
Toronto, ON M5H 2N2

Attention: Marilyn Toft, Secretariat

Dear Sirs/Mesdames:

Re: PG22.3 – Proposed OPA 199 (New Heritage and Public Realm Policies)

We are solicitors for Cityscape Development Corporation (“Cityscape”), and we are writing in respect of the lands identified as the Gooderham & Worts Special Identity Area in the King-Parliament Secondary Plan and the abutting lands known municipally as 31A Parliament Street (collectively, the “Distillery District”).

Cityscape has some concerns with respect to the new Heritage and Public Realm Policies (“OPA 199”) which may be adopted by City Council as part of the current Official Plan Review. In particular, it shares the concerns that have been expressed by others that some of the new heritage policies are vague and uncertain in their application. Cityscape’s concerns most notably include, but are not limited to, the following:

- The scope and impact of proposed Policies 26 and 27 remain unclear. The Distillery District constitutes one of Toronto’s preeminent heritage sites, and it has been widely acclaimed for its successful mix of restored heritage buildings and newer development. Redevelopment within the Distillery District has been accomplished in a manner that protects and enhances the cultural heritage character of the site, and it is uncertain to what extent the vague new policy language would discourage further integration of new development within the historic fabric of the site.
- Although the Views Policies have been improved since the initial draft of OPA 199, it still remains unclear to what extent redevelopment within the Distillery District and the surrounding area could be prejudiced by the policies pertaining to the views of the Downtown/Financial District skyline described in clause B1(f) of Schedule 4.

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We request that Council defer its consideration of OPA 199 in order to allow for more refinement of the proposed policies. We are available to meet with City staff to discuss Cityscape's concerns at any time.

Please provide us with notice of any further public meeting in connection with the proposed new heritage and public realm policies, and please also provide us with notice of adoption of the policies.

Yours very truly,

GOODMANS LLP

A handwritten signature in black ink, appearing to read 'MS', with a long horizontal line extending to the right.

Michael Stewart
MGS/

cc. Cityscape

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