



Fraser Milner Casgrain LLP
77 King Street West, Suite 400
Toronto-Dominion Centre
Toronto, ON, Canada M5K 0A1

MAIN 416 863 4511
FAX 416 863 4592

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Mark A. Piel
mark.piel@fmc-law.com
DIRECT 416 863 474444
File No.: 237611-321

SENT VIA E-MAIL (pgmc@toronto.ca)

City of Toronto Clerk's Office
Planning and Growth Management Committee
City of Toronto
100 Queen Street West
10th Floor, West Tower
Toronto ON M5H 2N2

Attention: Administrator, Planning and Growth Management Committee

Dear Members of the Committee:

Re: PG22.3 - Official Plan Five Year Review: Official Plan Amendment to Adopt New Heritage and Public Realm Policies (Statutory Meeting)

We have been retained as counsel to The Governing Council of The Salvation Army in Canada ("The Salvation Army"), the owner of a number of properties in the City of Toronto.

We are writing to express our concerns with the proposed Official Plan Amendment respecting heritage resources and the public realm, specifically as they relate to places of worship.

The Salvation Army has monitored the Official Plan Review process and has attended a number of stakeholder meetings with City Planning and Heritage Preservation Staff with respect to heritage and public realm policies.

Despite this involvement, The Salvation Army remains concerned that the proposed policies in the Official Plan Amendment do not sufficiently acknowledge the unique spiritual and liturgical aspects of places of worship which the City regards as having heritage value.

In that respect, we are disappointed that the proposed Official Plan Amendment contains only one reference to heritage places of worship in a sidebar to the main policies of the Amendment. We note that this one reference is made in connection with the *Ontario Heritage Toolkit: Heritage Places of Worship* (the "**Toolkit**"), a document which The Salvation Army believes takes steps towards understanding and promoting heritage conservation strategies which acknowledge the unique issues for faith groups. In that regard, the Toolkit direction that objectives of heritage conservation and protection should be considered along with the religious

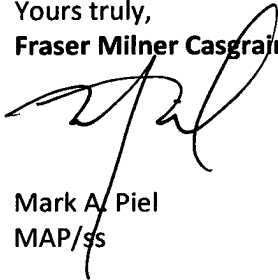
needs of a faith group on a case-by-case basis is a step in the right direction. Unfortunately, the proposed Official Plan Amendment does not incorporate many of the conservation strategies and directions of the Toolkit into its policies.

Accordingly, we are registering these concerns with this proposed Official Plan Amendment, and request that the Committee not adopt the recommendations of the City Planning staff report dated September 20th, 2012 at this time.

We continue to welcome the opportunity to meet with City Planning staff to discuss the concerns raised in this letter.

Please do not hesitate to contact the undersigned in order to discuss our concerns with the Official Plan Amendment.

Yours truly,
Fraser Milner Casgrain LLP



Mark A. Piel
MAP/ss

c.c. The Governing Council of The Salvation Army in Canada
Joseph Debono, Fraser Milner Casgrain LLP

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