



CANADA LANDS COMPANY
SOCIÉTÉ IMMOBILIÈRE DU CANADA

Via Email

June 3, 2014

Toronto Preservation Board
West Tower, City Hall, 2nd Floor
100 Queen Street West
Toronto, ON M5H 2N2

PB32.5.1

Attention: Mr. Robert Saunders, Chair

Dear Chair Saunders and Members of the Committee:

Re: 1113-1377 Sheppard Avenue West (the Downsview Lands)
Inclusion on City of Toronto Heritage Inventory
Your Agenda Item No. PB32.5

This letter is further to your agenda item PB32.5 in respect of a recommendation from City staff to include certain buildings located on property known as the Downsview Lands (the "Site") in the City of Toronto's Heritage Inventory.

As we have previously advised in our letter of March 21, 2014 the Canada Lands Company has recently taken over the responsibility of the Downsview Lands in the amalgamation of these federal Crown Corporations.

This matter was brought before Toronto Preservation Board in March 2014, at which time the Board agreed with the recommendation of staff to defer consideration of this matter. Canada Lands attended at that meeting of the Board and had indicated an interest in meeting with staff to discuss the proposed inclusion of certain buildings on the City's Inventory and, in particular, the Statements of Significance being proposed by staff for those buildings. Canada Lands and its heritage consultant, Taylor Hazell Architects Inc., met with staff on April 29, 2014 to discuss the possibility of treating the Site as a whole rather than listing individual buildings.

The purpose of this letter is to request that the Toronto Preservation Board defer consideration of the staff recommendation for a sufficient time to permit staff:

1. to meet again with Canada Lands and with Taylor Hazell Architects to discuss the approach being advanced in the staff report dated May 16, 2014 and to consider the approach of treating the Site as a cultural heritage landscape;
2. to conduct a site visit of the buildings in question at the Downsview Lands; and
3. to work with Taylor Hazell Architects to create one Statement of Significance for the Site that would reference individual buildings.

Canada Lands see the development of a Statement of Significance as an important foundational component of the heritage planning for the Site and would appreciate an opportunity to provide input to these important documents. In particular, we believe our consultant, Taylor Hazell, has valuable expertise and input it can offer since it has worked with the City in the development of the new heritage policies for the City's Official Plan (OPA 199), and conducted the King-Spadina Heritage Conservation District Study as well as completing the cultural heritage management process for Metrolinx.

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Canada Lands asked Taylor Hazell to review the staff report and the Statements of Significance proposed by staff and have identified a number of issues with the general approach and with the content of the individual statements. These issues include:

1. inclusion of individual buildings rather than treating the Site, in its entirety, as a cultural heritage landscape;
2. the evaluation matrices appear to lack a comprehensive rationale for how the buildings meet the criteria in O. Reg. 9/06;
3. the Administration Building (Building 100; constructed 1971) and the Storage Building (Building 41; constructed 1944) do not appear to meet the criteria under Reg. 9/06 and should therefore not be included on the City's Heritage Inventory.

Additionally, Canada Lands believe it is important that the cultural heritage landscape value of the Site and the role of any particular individual building must also be considered in the context of the Secondary Plan for the Site.

In light of the work to be undertaken, and in recognition of the upcoming municipal election and the potential changes to the composition of Council and its Committees, we are respectfully requesting a deferral of this matter until January, 2015. We believe this request to be fair and reasonable in the circumstances.

Moreover, as Canada Lands has previously given an undertaking to not demolish any of the buildings which are being contemplated by staff for inclusion on the Heritage Inventory, there is no risk to the heritage character of the Downsview Lands while this work is undertaken. Indeed, in Canada Lands' submission, the purpose of the work to be undertaken and the consultation we seek with staff is intended to ensure that it is the true heritage character of the Downsview Lands which is appropriately captured by the listing and, more importantly, the Statements of Significance being developed.

Thank you for your attention to this matter and your consideration of CLC's request.

Yours truly,

Rodger Martin P. Eng
Acting General Manager, Real Estate Ontario and Atlantic

cc Ellen Kowalchuk, Manager of Heritage Planning, Taylor Hazell Architects
Jennifer Keesmaat, Chief Planner
Harold Madi, Director of Urban Design
Mary MacDonald, Acting Manager, Heritage Preservation Services
Allen Appleby, Director of Planning, North District
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