



6 May 2015

Planning and Growth Management Committee  
City of Toronto  
100 Queen Street West  
Toronto, ON M5H 2N2

**Attention:**                    **Nancy Martins, Secretariat Contact**

Dear Ms. Martins,

**RE:**                                **City of Toronto Proposed Official Plan Amendment No. 289  
Mount Pleasant Cemetery**

We are planning consultants to the Mount Pleasant Group of Cemeteries ('MPGC') and are submitting this letter in response to the proposed Official Plan No. 289 ('OPA 289'), informed by the Midtown in Focus planning study. We have reviewed both the Midtown in Focus Planning Study and OPA 289 with regard to the Mount Pleasant Cemetery, located on the east side of Yonge Street, south of Merton Street and extending eastward to Bayview Avenue.

We have reviewed OPA 289 and have noted that section 2.31 states, "The City will seek to secure agreement for public access through Mount Pleasant Cemetery to complete a circular walking trail through the Vale of Avoca Park Ravine and Moore Park Ravine." We recognize that an identical policy is currently in force and that an existing agreement exists between the City and the MPGC to provide access to the Moore Park Ravine as part of the Kay Gardner Beltline Trail, however, the City has never initiated a process whereby a similar agreement related to access to the Vale of Avoca Ravine. Such a connection could affect the MPGC's current and future plans for the cemetery lands in this area.

This policy should also not be understood to establish an agreement whereby there would be unrestricted access to the cemetery lands at all times of day. The usage of the word 'will' in this policy is equivalent to 'shall' as outlined in the City of Toronto Official Plan and creates a condition whereby it is reasonable to assume that the agreement could include unrestricted access, as is customary on publicly-owned open space. The MPGC has an interest in operating the cemetery according to their internal by-laws which require that the cemetery lands be closed generally between dusk and dawn. Moreover, this language implies that the agreement referenced above providing access to the Vale of Avoca Ravine by way of the cemetery lands is mandatory, notwithstanding MPGC's interests on the cemetery lands. MPGC has an interest in ensuring, first and foremost, that the cemetery lands can be used in accordance with their current and future plans for that portion of the property.

We would suggest that section 2.31 of the proposed OPA 289 either be removed or be replaced with the following:

“An agreement for public access through Mount Pleasant Cemetery to complete a circular walking trail through the Vale of Avoca Park Ravine and Moore Park Ravine, accessible during cemetery hours of operation is encouraged.”

We also formally request that we be notified of any decision related to this item.

We trust that this letter is sufficiently clear however, should you require additional information or have questions with regard to the contents, please do not hesitate to contact the undersigned.

Yours very truly,

**WND associates**  
planning + urban design

A handwritten signature in black ink, reading "Robert A. Dragicevic". The signature is written in a cursive style with a large, sweeping initial "R".

Robert A. Dragicevic, MCIP, RPP  
Senior Principal