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January 12, 2015

File No.: 237611-503

SENT VIA E-MAIL (teycc@toronto.ca)Toronto East York Community Council
City of Toronto
2nd Floor, West Tower, City Hall
100 Queen Street West
Toronto, Ontario
M5H 2N2

Attention: Ms. Ros Dyers, Secretariat Contact

Dear Chair and Members of Community Council:

RE: Item TE3.1 - Final Report - Queen River Secondary Plan

We are counsel to The Governing Council of The Salvation Army in Canada ("**The Salvation Army**"), the owner of lands located at the south east corner of River Street and Labatt Avenue municipally known as 77 River Street. Various social and community services, including the River Street Café, are provided by The Salvation Army at this location. The Salvation Army wishes to register its concerns with the City-initiated Official Plan Amendment No. 287 respecting the Queen – River Secondary Plan (the "**Secondary Plan**").

On behalf of our client, we have monitored the development of the Secondary Plan through numerous iterations over a number of years. The Salvation Army extends its sincere appreciation to staff for their efforts in drafting the document currently before Community Council. The creation of policies to guide development in this *Regeneration Area* will help improve an area which has already benefitted from the positive steps taken with the redevelopment of Regent Park.

Therefore, The Salvation Army wishes to make clear that it is not opposed in principle to the adoption of a Secondary Plan for this area and it acknowledges the City of Toronto Official Plan requires such a Plan be in place for *Regeneration Areas* prior to the approval of development. The Salvation Army is concerned, however, that the proposed Secondary Plan policies regarding height and/or density incentives do not sufficiently recognize existing community services as a community benefit.

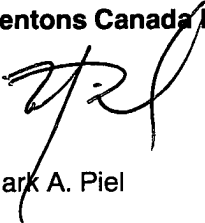
Section 4.5.1 of the proposed Secondary Plan lists four specific community benefit priorities and concludes that other community services and facilities may be identified that are not specifically included in the Secondary Plan subject to the review of community services and facilities studies filed in connection with a development application. The retention of existing community services is not listed as one of the four priorities of the Secondary Plan.

The Salvation Army believes the retention of existing community services should be added to the list of community benefit priorities in section 4.5.1. The Salvation Army supports an approach similar to the one found in the North York Centre Secondary Plan, section 3.3(a) and figure 3.3.1, where height/density incentive policies clearly exempt gross floor areas for social facility uses from the gross floor area calculations of a development project. These kinds of policies promote clarity and transparency in the development approval process and encourage redevelopment which promotes the recognition and retention of valuable community services.

The Salvation Army remains committed to continue its work serving the Queen – River area and the surrounding community. The adoption of the Secondary Plan provides the City with the opportunity to help The Salvation Army fulfill that commitment and we respectfully request Community Council direct staff to consult with The Salvation Army in order to add a fifth priority to section 4.5.1 of the Plan which recognizes the retention of existing social facilities as a height/density benefit.

We ask that The Salvation Army, care of the undersigned, be advised of all decisions made by Community Council and City Council with respect to the proposed Secondary Plan and that City Council be made aware of the request set out in this letter prior to it considering the adoption of the Secondary Plan.

Yours truly,
Dentons Canada LLP



Mark A. Piel

MAP/ss
enclosures

c.c. The Governing Council of The Salvation Army in Canada
Joseph Debono, Dentons Canada LLP