

May 9, 2016

File No.: 237611-613

BY ELECTRONIC MAIL (teycc@toronto.ca)

City of Toronto
c/o Toronto and East York Community Council
2nd Floor, West Tower
Toronto City Hall
100 Queen Street West
Toronto, Ontario M5H 2N2

Attention: Ms. Ellen Devlin

Dear Councillor Layton and Members of the Committee:

**RE: City of Toronto proposed Official Plan Amendment (Broadview Avenue)
The Governing Council of the Salvation Army in Canada
Item: TE 16.5**

We are the solicitors for The Governing Council of The Salvation Army in Canada ("The Salvation Army"). The Salvation Army owns 1132 Broadview Avenue (the "Property") which is located within the boundaries of the proposed Official Plan Amendment. The Salvation Army has owned this Property since 1940.

To assist you in considering the comments/concerns of The Salvation Army, we point out that this Property is likely the largest parcel of land within the boundaries of the Official Plan Amendment (the "OPA"). The Property is bordered by two roads and has its own internal road network/driveway with a number of buildings that serve the needs of the community. The Property is on a major road and is in close proximity to the Bloor-Danforth subway line (and proposed "Relief Line") and is well served by the City's bicycle transit network.

The Salvation Army has owned the Property since 1940 and has been an integral part of the community for over one hundred years. The Salvation Army has been serving the needs of the local community and the City throughout this period of time. In fact, as needs have evolved over time, the use of the Property by The Salvation Army has in turn evolved and will continue to evolve into the future.

The Salvation Army has been monitoring the Broadview Avenue Planning Study since its inception a number of years ago and concurs that this area of the City needed to have its Planning policies updated given the influx of new residents to the City and the need for

intensification along major transit corridors. As you aware, this section of Broadview Avenue (north of Hillside Drive) was only recently added to the Study Area. The Salvation Army supported this action by the City.

The Salvation Army has reviewed the proposed OPA and is concerned about a number of the proposed policies and offers some suggestions for changes. These concerns/suggestions include the following:

- 1) the proposed OPA does not support any potential intensification of use or level of development on the Property despite the physical attributes noted above, and the fact that the Property "faces" an area of the Broadview Avenue Study Area that does recognize the appropriate level of intensification;
- 2) the proposed OPA does not provide for a progression of uses on the Property despite the fact that the needs of the City and community are ever changing and will continue to change; and
- 3) the proposed Urban Design Guidelines imply that buildings beyond the "Coach House" should be considered for inclusion on the City's Heritage Register, however, The Salvation Army questions what the justification would be for such potential designation considering that these brick buildings date from the late 1960s.

We reserve the right to raise such other or further issues with the proposed OPA as The Salvation Army may consider appropriate from time to time.

Kindly provide the undersigned with notice of all further actions with respect to this matter, including Notice of Passing of the proposed OPA, if it is adopted. In addition, kindly ensure that this written submission is forwarded to City Council for its consideration prior to its deliberations in regard to the adoption of the proposed OPA.

We appreciate your consideration of The Salvation Army's concerns expressed in this letter.

Yours truly,

Dentons Canada LLP


Joseph Debono

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c.c.: Councillor Mary Fragedakis
c.c.: Francis Kwashi, City Planner, City of Toronto
c.c.: The Governing Council of The Salvation Army in Canada