



May 1, 2017

By E-mail: teycc@toronto.ca

Ms. Ellen Devlin, Administrator
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file # 1-3011

Dear Ms. Devlin:

**Re: College Street Study - Official Plan Amendment 379 and Guidelines
Toronto and East York Community Council Meeting: Tuesday, May 2, 2017**

We are the solicitors for The Governing Council of the University of Toronto (the "**University**"). We have reviewed the materials being considered by the Toronto and East York Community Council at its May 2, 2017 meeting with respect to proposed Official Plan Amendment ("**OPA 379**") and the College Street Urban Design Guidelines and we are writing to express our client's concerns.

The University is in the middle of a multi-year overhaul of the official plan, zoning, and urban design guidelines that apply to the St. George Campus, generally bounded by Spadina Avenue, Bloor Street West, Bay Street, and College Street (the "**St. George Campus**"). In particular, a revised secondary plan was submitted to the City (the "**St. George Campus Secondary Plan**") in September 2016, following over 18 months of collaboration including six meetings with City Planning staff. Likewise, this consultation included St. George Campus Urban Design Guidelines and a proposed Zoning By-law Amendment (collectively with the St. George Campus Secondary Plan, the "**Proposed University Policy Instruments**").

OPA 379 and its companion College Street Urban Design Guidelines are proposed to apply to lands on and near the St. George Campus. The general policies and Character-Area specific policies for Character Area "D" apply directly to the lands at the southwest corner of the St. George Campus, while general policies and Character Area-specific policies apply to lands directly adjacent to the St. George Campus. Not only is the University invested in the planning of these adjacent lands due to the interface of the lands with the St. George Campus, but the University also maintains an interest in property located in neighbouring Character Areas. While there is recognition in OPA 379 and the Guidelines of the new St. George Campus Secondary Plan and Urban Design Guidelines, the University is concerned that these do not clearly exempt the St. George Campus Secondary Plan area.

The University has been actively engaged throughout the public consultation process, attending public meetings hosted by the City on the College Street Study. Despite this, and despite the above-referenced ongoing discussions with the City regarding the Proposed University Policy Instruments, OPA 379 and the Design Guidelines do not sufficiently recognize the Proposed University Policy Instruments or the unique urban design circumstances of the St. George Campus.

The University's concerns can be characterized as follows:

- The St. George Campus should be removed entirely from OPA 379 and the Guidelines. Although OPA 379's interpretation policies suggest that the St. George Campus Secondary Plan would prevail in the event of conflict, this has not been clearly applied to all policies and Guidelines. Moreover, the policy intentions of OPA 379 and the Guidelines do not apply to the University, which does not abut a Neighbourhood designation, does not provide market residential uses, or provide parkland dedication, to name a few. There are also many inaccuracies in the Guidelines, which will only create further confusion. There is therefore no basis to include these lands in OPA 379 or the Guidelines.
- City staff have identified through the Guidelines a number of properties as having "heritage potential" and have recommended that City Council direct the Senior Manager, Heritage Preservation Services to report to the Toronto Preservation Board and Toronto and East York Community Council on the possibility for inclusion of these properties on the City's Heritage Register. The University maintains an interest in properties immediately adjacent to the St. George Campus that have been identified as properties of "heritage potential". Identifying properties as having "heritage potential" through the passing of the associated Guidelines, and fast tracking heritage designations outside of the *Ontario Heritage Act* process is inappropriate.
- OPA 368, protecting the view of and around Knox College, is under appeal and should not be referred to as policy in Section 4.1.3 of the Design Guidelines.
- Within Character Area "F", the rear transition and associated massing policies are overly restrictive and do not recognize the institutional uses and pre-existing massing and densities extending south along McCaul Street immediately outside the study area. We ask that 167 College Street be removed from OPA 379 and the Design Guidelines.

For the foregoing reasons, we ask that the above-noted amendments to OPA 379 and the Design Guidelines be made prior to passage.



We welcome the opportunity to discuss this matter further. Please provide the undersigned with notice of any further consideration or decision respecting this matter.

Yours truly,

Cassels Brock & Blackwell LLP

A handwritten signature in blue ink, appearing to read "Signe Leisk". The signature is fluid and cursive, with a large initial 'S' and a long, sweeping tail.

Signe Leisk

SL/CEG