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April 3, 2018

Toronto & East York Community Council
City of Toronto, 100 Queen Street West
2nd Floor, West Tower, City Hall
Toronto, ON M5H 2N2

Attn: Ellen Devlin, Secretariat Contact

RE: TE31.20 - Intention to Designate under Part IV, Section 29 of the Ontario Heritage Act - 1132 Broadview Avenue

Dear members of the Toronto & East York Community Council,

The purpose of this letter is to respond to the above-noted Heritage Preservation Services ("HPS") staff report regarding the intention to designate 1132 Broadview Avenue (the "site") under Part IV of the Ontario Heritage Act. As a preface to our concerns, we begin this letter with some context surrounding our involvement with the site since December 2016.

ERA Architects Inc. ("ERA") was retained by Dentons Canada LLP in December 2016 to provide heritage consulting and architectural design services for the site on behalf of the owner, The Governing Council of the Salvation Army in Canada ("Salvation Army"). As part of our retainer, ERA prepared a Heritage Impact Assessment ("HIA"), dated September 27 2017, in support of the Salvation Army's site-specific Official Plan Amendment application to redesignate the site from "neighbourhoods" to "mixed-use" and recognize its potential to accommodate a mid-rise building up to 11 storeys, under certain conditions.

One of the findings of our HIA was that the site merits designation under Part IV of the Ontario Heritage Act by virtue of its inclusion of a historic Coach House, which is linked to the Taylor and Davies families who resided on the site prior to its sale to the Salvation Army in 1940. Using the provincial criteria for determining cultural heritage value or interest, as set out in O. Reg. 9/06, we concluded that remainder of the buildings on the site, including the three "Cottages" and one "Administration Building", do not contribute to the cultural heritage value of the site and do not merit inclusion in the Reasons for Designation.

In light of the foregoing, ERA supports the designation of the property to recognize the cultural heritage value of the Coach House. However, we have several concerns with the Reasons for Designation and Heritage Attributes prepared by HPS staff in their March 12, 2018 report (pages 13-16).

Dealing first with the Coach House, we have reviewed the Reasons for Designation and Heritage Attributes prepared by HPS, and have identified errors in two attributes [we have included with this letter an annotated version of the Heritage Attributes, written by HPS for the Coach House, to correct inaccuracies and to better-reflect existing conditions (Attachment 1). Photos are also provided for context]. We recommend deleting one of the Heritage Attributes for the Coach House, which identifies "the setting of the coach house which comprises an unobstructed view of the east elevation along the driveway from Broadview Avenue." This Heritage Attribute, as currently written,

is misleading as there is no wholly unobstructed view of the Coach House from Broadview Avenue. The view is partial, as parts of the (east) elevation of the Coach House are obstructed by mature trees and the westernmost Cottage. Furthermore, this view is not a historic condition dating back to the Taylor and Davies family tenures of the Chester Park estate; rather, carriage and vehicular traffic entered the estate by a diagonal drive that once cut through the lands now occupied by the Massey Centre at 1102 Broadview Avenue. This condition is verified by a 1942 aerial photograph of the site (Attachment 2).

This Heritage Attribute, as written by HPS staff does not accurately reflect historical conditions (the Chester Park estate did not have a driveway in this location and further, the former Victorian mansion would have itself partially obstructed views of the Coach House from Broadview Avenue) or existing conditions (the current view is partially obstructed by mature trees and the westerly Cottage.

With regards to the Administration Building, we disagree that this building contributes to the cultural heritage value of the property. In particular, we disagree with HPS' characterization of the building as a "representative example of a Post-War Modernist style institutional building which displays artistic merit in its combination of traditional and modernist elements which balance the dignity of an institution with a more progressive social agendas aimed at creating nurturing residential environments for children (p. 14)."

We recognize that the Administration Building has served the needs of the Salvation Army in the delivery of social services on the site since 1976. However, ERA has not found, nor has HPS staff provided, sufficient qualifying information to substantiate the assertion that this utilitarian building is architecturally distinguished or otherwise meets the prescribed criteria to merit designation under the Ontario Heritage Act.

The manner in which some of the Heritage Attributes have been drafted by HPS could have the potential to adversely impact the Salvation Army's current and future operations on the site. Few alterations to the existing facilities could be carried out without oversight of HPS staff. As an example, the lawn shrubs and four small trees in front of the principal (east) elevation of the Administration Building, are described as part of a Heritage Attribute. If a designation by-law were to be passed for the site, enshrining these features as Heritage Attributes, Council approval would be required to alter or remove these lawn shrubs or small trees.

In conclusion, we wish to emphasize that we support, in principal, a list of detailed Heritage Attributes for the Coach House, provided they clearly and accurately describe existing conditions. We would be happy to consult with HPS staff to refine the Heritage Attributes related to the Coach House, in order to address ERA's and the Salvation Army's concerns that the draft Heritage Attributes for the Coach House, as written, are inaccurate.

We recommend that the Coach House Heritage Attribute written by staff, related to the unobstructed view of the Coach House along the Driveway from Broadview Avenue, be deleted as (i) it is incorrect to characterize this view as unobstructed given that it is partially obstructed by mature trees and the westerly Cottage, and (ii) this is not a

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historic condition related to the Taylor and Davies family's occupation of the former Chester Park Estate. We firmly maintain that the Administration Building should not be included in the Reasons for Designation and the Heritage Attributes for the site, if a Part IV designation by-law is to be passed for the site at this time. Sufficient evidence has not been provided to establish that the threshold criteria for determining cultural heritage value or interest are met by the Administration Building.

In light of the various issues raised in this letter, we have significant concerns that the Reasons for Designation, as currently proposed by HPS staff in their March 12, 2018 report, would not only put an inappropriate constraint on the property, but could adversely impact the ability of the Salvation Army to continue to carry out their current activities and services should there be a need to undertake site alterations.

Thank you for taking the time to review our concerns. If you have any questions regarding the contents of this letter, please do not hesitate to contact me.

Sincerely,



Andrew Pruss
Principal, ERA Architects Inc.

ATTACHMENT 1

This attachment provides annotations to the list of Heritage Attributes for the Coach House, as written by HPS staff on page 15 of the March 12, 2018 report re. Intention to Designate 1132 Broadview Avenue. We identify further concerns with these attributes in our letter to the Toronto Preservation Board, dated March 20, 2018. The list of Heritage Attributes below is reproduced verbatim. Strike-throughs and comments (underlined) have been made by ERA.

[BEGIN]

The heritage attributes of the coach house are:

- The placement and orientation of the building on the property on the west side of Broadview Avenue, north of Pottery Road, facing the end of the driveway which leads from Broadview Avenue to the coach house.
- The scale, form and massing of the building which includes a principal one-and-a-half-storey main section with a truncated, hipped roof and eight dormers and to the south a one-storey flat-roofed wing.
- The orange-red brick cladding with its fine relief detailing of segmental arched openings with three raised voussoirs and the quoins at the corners on all elevations and the stone/composite stone sills on all window openings.
- ~~On the principal, east elevation, the remaining remnants of four arched-headed openings – two modified to accommodate a new higher windows and a door with glazed surrounds, two bricked-in but with the voussoirs still intact, and two small arches still retaining their original configuration for a door and a narrow window.~~ Six segmental arch-headed openings of varying width, from south to north, one fully bricked in, one bricked in with a smaller window, one infilled with a glazed door with sidelites and transom, one with a door, and two with windows.
- On the south, side elevation, the openings on the ground floor level which include the two windows openings on the wing ~~with their a transom light over three vertical lights~~, and on the original carriage house the original high level window opening with the segmental arched head and the adjacent window opening which has been extended to accommodate a door.
- On the west, rear elevation, the openings on the ground floor level which include on the wing, four equally spaced segmentally arched openings, three with high level windows and one extended to accommodate a door and on the main coach house building five arched headed window openings of varying height and length.
- On the north, side, elevation, the four, high, segmentally arched openings (currently filled in) and the single glazed openings.
- The eight dormers, three on the east elevation, three on the west and one facing south and one facing north all symmetrically arranged within the truncated hipped roof. Except for the north dormer which has an exit to the fire escape, all dormers include windows.
- ~~The setting of the coach house which comprises an unobstructed view of the east elevation along the driveway from Broadview Avenue.~~

[END]

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EAST ELEVATION (COACH HOUSE)





EAST ELEVATION (COACH HOUSE)





SOUTH ELEVATION (COACH HOUSE)





WEST ELEVATION (COACH HOUSE)







NORTH ELEVATION (COACH HOUSE)





ADMINISTRATION BUILDING (EAST ELEVATION)



ADMINISTRATION BUILDING (WEST ELEVATION)



ATTACHMENT 2



1942 aerial photograph of the site (City of Toronto Aerial Photographs, 1942; annotation by ERA).