



Project No. 17348

September 14, 2020

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

Dear Members of Toronto and East York Community Council,

**Re: 100 College Street –Proposed Inclusion of the City of Toronto’s
Heritage Register and Intention to Designate under Part IV, Section 29
of the Ontario Heritage Act (Item No. TE18.16)**

We are the planning consultants for the University of Toronto (“the University”), with respect to their property at 100 College Street in the City of Toronto. Regarding Item No. TE18.16, we request that the designation of 100 College Street be deferred.

ERA Architects, who have been working with the University on a campus-wide Cultural Heritage Resource Assessment in support of the updates to the Secondary Plan, submitted correspondence to the Toronto Preservation Board on August 26, 2020 to oppose the designation. In their letter they state that they disagree with the City’s assessment because 100 College Street is not a candidate for designation under Part IV of the *Ontario Heritage Act* and does not meet any of the criteria in O.Reg. 9/06.

Further, it is premature to be deal with the designation of the building in the absence of consideration of the other matters that would be addressed through a development application. Although the site has been identified as a future development phase (Phase 2) of the Schwartz Reisman Innovation Centre (“SRIC”), as you are aware, there are currently no planning applications for the 100 College Street site before the City. Without the comprehensive consideration of all of the matters that would be addressed through a development application, including access and circulation, surrounding context, public realm, open space, built form and heritage conservation, it is premature to make a decision regarding this property.

The need to balance and comprehensively address a broad range of issues is provided for in provincial and City policy and objectives. The Provincial Policy Statement (“PPS”) 2020 provides direction on matters of provincial interest related to land use planning and development including balancing appropriate development while protecting resources, such as cultural heritage. Similarly the City’s Official Plan provides for an integrated approach to planning that balances

multiple interests. In particular, the opening paragraph of Section 2 of the Official Plan states that:

“Holistic and integrated thinking is a fundamental requirement for planning a modern city like Toronto. Integrated thinking means seeing, understanding and accounting for all the connections as we go about our decision making. Sometimes it means thinking differently about solutions. Always it means searching for outcomes that demonstrate integration, balance and interdependence and that earn social, environmental and economic rewards.

Both the PPS and the Official Plan direct that these policies/plans should be read as a whole, thereby requiring a comprehensive approach. Without the comprehensive review, it is premature to consider only heritage matters at this time.

Through the approval process for the zoning by-law amendment application for 112 College Street, the City requested a concept block plan be completed for the block including 100 College Street. The concept block plan was also intended to feed into the finalization of the Secondary Plan and would address the amount of open space area to the east of 100 College Street, provision of a north-south midblock connection, and the general location of buildings.

A block study report was provided to the City in January 2019 outlining analysis completed to create a vision for the potential buildout of the block and the public realm. This was by no means an application or a detailed plan for the future development of 100 College Street. See **Figure 1**. The block study, which included input from ERA Architects that the building did not merit heritage designation, concluded that conserving 100 College Street would have significant impacts on the building program, the built form (including compromised building setbacks and transitions), accessibility and circulation, access to parking and loading, the surrounding open space and the midblock connection.

Despite ERA Architect’s assessment and their objection to the City’s position that 100 College had heritage value, the University team engaged in a series of workshops in February and April of this year with City staff to consider conservation of the existing building. At these workshops and at additional meetings with community members and City staff, a number of concept options for the SRIC Phase 2 site were presented. These options considered the existing building as well as the adjacent open space area, midblock connection, surrounding buildings/context and the programmatic requirements for the building. Additional material prepared by the University’s team was submitted to the City in late May and a response was provided by the City on May 29, 2020. Based on the comments in their letter, we understood that staff intended to recommend that the building be designated, however, we were not aware that the matter would be coming forward now.

Given that there is no current development application for 100 College Street, there is no reason for this matter to be advanced at this time. It is the University’s position and my opinion that that the recommendations should be

refused, or at the very least deferred until such a time that the SRIC Phase 2 development application is put forward and a comprehensive review of the proposal is possible.

Yours very truly,

Bousfields Inc.



Emma West, MCIP, RPP