

GARDNER

LAW FIRM

Barristers & Solicitors

Tel: (416) 351-9898

Fax: (416) 340-0884

E: FG@Gardner-Lawfirm.com

129 Yorkville Avenue

Suite 200

Toronto, Ontario

M5R 1C4

February 26, 2021

BY EMAIL TO: Councillor_Robinson@toronto.ca

Councillor Jaye Robinson
Ward 15, Don Valley West
Toronto City Hall
100 Queen Street West
Suite A12
Toronto, ON M5H 2N2

Dear Ms. Robinson:

RE: 19 Plymbridge Crescent, Toronto
Objection to proposed Listing of property on Heritage Register
Council Hearing: March 1, 2021
Our Clients: Mohammad Kassirian and Marzieh Taheri
Our File No.: 21-353

We are counsel representing your constituents, Mohammad Kassirian and Marzieh Beigum Taheri, the owners of the above lands. On behalf of our client, we object to the listing of this property. The reasons for our objection follow.

Our clients purchased the property on November 4, 2019 and have since invested considerable time, effort, and resources to redevelop the lands with a view to constructing a new home on the property.

Our clients' application for minor variances in regard to their development plan was scheduled for hearing on February 25, 2021. You can well imagine our clients' chagrin and disappointment to discover that their hearing by the Committee of Adjustment was deferred to allow Heritage staff time to assess the cultural heritage value of the property. Further review has shown that the Toronto Preservation Board, at its February 17, 2021 meeting, recommended that the property be included on Toronto's Heritage Register. We understand that heritage staff came to its conclusion that the property should be included on the Register without attending at the site to view the property or discuss our clients intentions with them.

We understand that this item will come before North York Community Council for approval on Monday March 1, 2021. Our clients first information regarding the possible inclusion of their property on the Heritage Register came when they attended the Committee of Adjustment. It is unclear how heritage staff came to this conclusion without a site inspection or discussion with the owners.

Our client's application to the Committee of Adjustment was submitted in November, 2020 and we believe that it is unfair in process because this listing is coming very late and without fair dealing with, and notification to, the owner.

We request that the NYCC receive **for information only**, the recommendation for listing and thereby allow the Committee of Adjustment to consider the proposal on its own merit without the encumbrance of a heritage listing.

Thank you in advance for your attention to these matters. Please forward any decision on this to our attention, as well as to our client. If you have any questions please do not hesitate to contact the undersigned at the telephone number noted above or by email at FG@Gardner-Lawfirm.com

Yours very truly,

GARDNER LAW FIRM

A handwritten signature in black ink, appearing to read 'Frank L. Gardner', with a long horizontal stroke extending to the right.

Frank L. Gardner