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Our File No.: 210431

Via Email: hertpb@toronto.ca

Toronto Preservation Board
City of Toronto
2nd Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Ellen Devlin, Secretariat

Dear Sirs/Mesdames:

**Re: Toronto Preservation Board Meeting May 12, 2021
Item PB24.4 – Intention to Designate under Part IV, Section 29 of the Ontario
Heritage Act - 103 Heath Street West**

We are solicitors for 103 Heath Holdings Inc. in respect of the lands known municipally in the City of Toronto as 103 Heath Street West (the “**Property**”). We are writing to indicate our client’s objection to the proposed intention to designate the Property.

As background, our client has had extensive discussions with City staff regarding the proposed redevelopment of the Property, which led to submission of a site plan approval application on June 4, 2020. Further consultation resulted in revisions to the proposed redevelopment and, on February 26, 2021, submission of a variance application to permit the redevelopment of the Property (along with the property known municipally as 101 Heath Street West) as a 3-storey residential apartment building containing 10 family-sized dwelling units.

First, our client is concerned with the timing of the proposed intention to designate the Property. Our client and its consultants have been engaged in extensive discussions with Heritage Planning staff (“**HPS**”) as part of the proposed redevelopment of the Property. As recently as May 4, 2021, our client’s heritage consultant requested further meetings with HPS. We respectfully submit that this matter should be deferred to enable those meetings to continue without an objection being filed with the Conservation Review Board.

Second, and more importantly, our client has significant concerns regarding the merits of the proposed intention to designate the Property. Our client’s heritage consultant prepared a heritage impact assessment, submitted in November 2019 and updated in May 2020 and March 2021, that concluded that the Property only has limited heritage value and does not warrant designation under

Ontario Regulation 9/06. In particular, the heritage impact assessment concluded that the Property does not warrant designation because the existing building lacks significant design or physical value and the house style is neither unique nor rare. However, the HIA does recommend that the north portion of the existing house on the Property should be conserved.

It is for all of these reasons that our client is objecting to the proposed intention to designate the Property and would refer any such intention to designate to the Conservation Review Board. As noted above, a deferral of this matter would enable further meetings between our client, its consultants and HPS that could eliminate the need to file such an objection. Our client would welcome that opportunity, whether through a deferral or through the Conservation Review Board process.

We would appreciate receiving notice of any decisions made in respect of this matter.

Yours truly,

Goodmans LLP



David Bronskill
DJB/
Encl.

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