



SENT BY EMAIL: clerk@toronto.ca; councilmeeting@toronto.ca

December 16, 2024

Toronto City Council
Toronto City Hall
100 Queen Street West, 2nd Floor
Toronto ON M5H 2N2

Dear Mayor and Members of Council,

**Re: Item 2024.TE18.10 - Designation of the West Queen West Heritage Conservation District Plan under Part V of the *Ontario Heritage Act*
877-881 & 893 Queen Street West**

We are the planning consultants for B & C Ltd. and IG Woolf Textiles Ltd., the owners of the properties municipally known as 877, 881, and 893 Queen Street West in the City of Toronto (collectively, the "Properties"), which are located on the south side of Queen Street West between Walnut Street and Strachan Avenue.

The Properties each contain an existing three-storey building that was listed on the City of Toronto's Heritage Register on December 16, 2020, as part of the "batch listing" of properties identified through the West Queen West Planning Study.

877, 881, and 893 Queen Street West are three of the eight properties from 875 to 895 Queen Street West that are located within the area of the proposed West Queen West Heritage Conservation District Plan (the "HCD Plan").

Each of the three Properties is proposed to be identified as a "contributing property" in the HCD Plan within the "Main Street Commercial Block" typology. Additionally, the Properties are proposed to be included on Schedule 2 (properties with historic storefronts) within Appendix D (Statements of Contribution) of the HCD Plan.

The proposed HCD Plan provides that the Properties' "low-rise, fine-grained built forms contribute to an historic streetwall between Walnut and Strachan Avenues.... As a result, the properties maintain and support the historic main street character of the District."

We are writing to express our concern that the proposed HCD Plan, as currently drafted, is overly prescriptive. Specifically, the built form policies in sections 6.11.5 and 6.11.7 provide restrictive

and rigid development standards that will not permit development proposals to respond appropriately to site specific conditions.

In our opinion, a better approach would be to include broader, more flexible, and less rigid development standards that will not unduly limit intensification as required by the applicable Provincial and municipal planning policies.

The OLT has noted in previous decisions regarding other HCD Plans (e.g., St. Lawrence HCD Plan, King-Spadina HCD Plan, and Historic Yonge Street HCD Plan) that prescriptive and rigid built form policies are not required to achieve appropriate heritage conservation, and that such restrictive policies in HCD Plans may unduly limit development proposals that respond sensitively to site specific conditions.

We respectfully request that the Toronto City Council not adopt the HCD Plan as currently drafted, refer the matter back to staff so that the concerns outlined in this letter can be incorporated into a revised HCD Plan, and provide us with notice of the decision on this matter.

Yours very truly,
DALES CONSULTING



Andrew Dales, MCIP RPP

Cc: Client