



Reply to the Attention of: Mary Flynn-Guglietti  
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Our File No.: 248950  
Date: January 15, 2024

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Toronto Preservation Board  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

**Attention: Chair and Members of the Toronto Preservation Board**

Dear Chair & Members of the Toronto Preservation Board:

Re: **Toronto Preservation Board Meeting of January 18, 2024**  
**Agenda Item No. PB 13.2**  
**Notice of Intention to Designate a Property under Part IV, Section 29 of**  
**the *Ontario Heritage Act***  
**505 University Avenue (including entrance address 136 Edward Street)**

We are the solicitors retained on behalf of Cartareal Corporation N.V., ("**Cartareal**"), owner of the lands municipally known as 505 University Avenue, in the City of Toronto (the "**Subject Site**"). The Subject Site is located on the northeast corner of University Avenue and Edward Street.

The Subject Site is located within the *Downtown* in the City of Toronto Official Plan, Urban Structure Map 2, where significant growth is planned to be accommodated and within the *Mixed Use Areas* designation and *Mixed Use Areas 1 – Growth* in OPA 406. The property is centrally located in the *Downtown* and is in close proximity to higher order transit, retail shops, services, restaurants, entertainment, institutional and official commercial uses. The Subject Site is an ideal candidate for redevelopment which can accommodate significant residential development in keeping with the growth and intensification policies of the Provincial Policy Statement, the Growth Plan and the City's Official Plan.

A Rezoning Application was filed with the City of Toronto ("**City**") on August 31, 2022 to permit a 64 storey mixed use building with a 12 storey office podium. Presently the Subject Site is not listed or designated under Part IV of the *Ontario Heritage Act*.

The existing building is not proposed to be conserved *in situ*. The existing building does not occupy the full site. The tower occupies only approximately a third of the site and therefore conserving the exiting building challenges the potential for intensification of the site.

As part of the Rezoning application a Heritage Impact Assessment dated August 15, 2022 was prepared by Goldsmith Borgal & Company Ltd. Architects ("**GBCA Report**"). The GBCA Report outlines the numerous challenges to preserving the building *in situ* together with the strategy to mitigate the adverse impact on cultural heritage value. The proposal focuses on salvage and re-installation of materials and building design reinterpretation. The proposed reinterpreted building design will maintain some of the building's design features, including floor to floor heights and window pattern fenestration such that the new reinterpreted building will be of its own time, and adapted to the current project, while incorporating important features of the original building design.

The main items to be salvaged, restored and reinstated in the new reinterpreted building include select stone panels (from the west and south elevations), select granite panels and select aluminium screens of the 13<sup>th</sup> floor mechanical level.

We have had an opportunity to review the January 3, 2024, Statement of Significance Report and wish to comment specifically regarding the reference to the significance of the Subject Site and Shell Oil. It is important to note that Shell Oil occupied the building from 1958 to 1983 wherein Shell Oil moved its head office out of Toronto and the province of Ontario and relocated to Calgary. The present owners of the Subject Site have owned the building since 1983 and it has been used as a multi-tenanted office building for over 40 years.

We also note that the mitigation strategy as set out in the GBCA Report is not discussed or evaluated nor is there a discussion regarding the opportunity to significantly intensify the site to allow a mixed use development that will incorporate significant residential development that meets the growth and intensification policies of the Provincial Policy Statement, the Growth Plan and the City's Official Plan.

We therefore strongly object to the designation of the Subject Site under Part IV of section 29 of the *Ontario Heritage Act*. I have formally requested to be added as a deputation to speak at the January 18, 2024 meeting in connection with this item.

Yours truly,



Mary Flynn-Guglietti\*  
\*A Professional Corporation

CC: Cartareal Corporation N.V., Attention: David McCordic  
Goldberg Group, Attention: Mr. Michael Goldberg & Ms. Michelle Tiger  
GBCA, Attention: Mr. Chris Borgal