

June 27, 2025

Our File No.: 221960

Via Email (hertpb@toronto.ca)

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

Attention: Tanya Spinello

Dear Sirs/Mesdames:

Re: Item No. PB33.3 – 123 Garratt Boulevard – Inclusion on the Heritage Register

We are counsel to PSPIB Downsview Investments Inc. (“**PSPIB**”) and Northcrest Developments, the registered owner and developer, respectively, of the lands known municipally as 123 Garratt Boulevard (the “**Northcrest Lands**”). The Northcrest Lands are the site of the former Downsview Airport, and are recognized as one of the largest and most significant opportunities in the City for realizing the vision of providing complete communities in a transit-supportive form to deliver on the City’s policy objectives, including the creation of new homes in a manner that prioritizes sustainability.

We write on behalf of our clients to express concerns with the recommendation to list portions of the first District within the Northcrest Lands, known as the Taxiway West District, on the City’s Heritage Register as set out in the report dated June 13, 2025 (the “**Staff Report**”). While our clients have worked extensively and collaboratively with City staff on heritage matters pertaining to the District, it has concerns with certain aspects of the proposed listing statement.

Background: The Secondary Plan and the Taxiway West District

In 2024, City Council unanimously adopted the Downsview Secondary Plan (the “**Secondary Plan**”) to support the development of the Northcrest Lands and certain other lands in the area. The Secondary Plan provides that the area is anticipated to accommodate 115,000 residents and 52,000 workers over the next 30 years, representing “one of the largest and most transformative city-building efforts in the history of Toronto”.

The Taxiway West District (the “**District**”), located on the western portion of the Northcrest Lands, is the first District our clients intend to develop. Zoning and plan of subdivision applications were filed for the District in June of 2022 and public notice was issued on August 19, 2022. The District is proposed to be comprised of a mix of uses, with residential uses primarily in a mid-rise

form. The District would also include a vibrant employment hub, centred around the adaptive re-use of certain portions of the existing buildings on the lands, including the existing airplane hangars. A staff report recommending approval of the zoning application for the District will be considered by North York Community Council on July 3, 2025.

The Proposed Listing

The Staff Report before the Preservation Board recommends that the City list on the heritage register “specific buildings” on a portion of the Northcrest Lands (the “**Buildings Proposed for Listing**”), as outlined in black in the diagram in the listing statement included in the Staff Report as Attachment 1 (the “**Listing Diagram**”). The Buildings Proposed for Listing consist of: (1) the south hangar building (Bays 1-5, Administration Building, and Superstore); (2) the north hangar building (Bays 7-10); and (3) an eastern building known as Bay 12. As outlined in the Staff Report, this approach is intended to acknowledge the unique context of the planning process for the Northcrest Lands and identify only specific buildings as having design, physical, historical/associative and contextual value. The listing notes that spaces around and in-between the Buildings Proposed for Listing are not considered in the listing statement.

Our clients engaged extensively with City staff through the processing of its applications for the District regarding heritage matters, continuing the collaborative approach it has pursued throughout the development process for the Northcrest Lands. Despite these efforts, the proposed listing statement is problematic in a number of respects, including the following:

- ***Later additions*** – The Listing Diagram inappropriately includes later additions to the Buildings Proposed for Listing, such as portions of the Superstore and Bay 12. Specifically, the portions of the Buildings Proposed for Listing outlined in red in Schedule A to this letter (the “**Later Additions**”) have been identified by ERA Architects as ones that do not have cultural heritage value. The Staff Report acknowledges the extensive research ERA conducted on the lands over the past decade as reflected in the Cultural Heritage Resource Assessment and a Heritage Impact Study. However, without any analysis or justification, the listing statement proposes to include the Later Additions in the listing. There is no basis for this approach. The Later Additions should be removed from the Listing Diagram and the associated attributes for the Later Additions should be removed from the listing statement to correspond. Only those buildings identified in Schedule B to this letter should be subject to the listing statement, and the Listing Diagram should be revised accordingly.
- ***Administration building***. The Listing Diagram includes Building A, which is known as the Administration Building. The Administration Building includes Later Additions that should be removed from the diagram for the reasons outlined above. Furthermore, the listing statement does not include any attributes for the Administration Building. In the absence of any corresponding attributes, there is no basis for including the portions of the Administration Building that consist of the Later Additions in the Listing Diagram and they should be removed.

- ***Western portions of Bays 1 and 2 (Buildings C and D).*** Certain western portions of Bays 1 and 2 (identified in the Listing Diagram as Buildings C and D) have consistently been identified in our clients' materials as being intended for demolition to create a pedestrianized mid-block connection. The Listing Diagram should exclude these portions of Buildings Bays 1 and 2 (Buildings C and D).
- ***Interiors*** – The proposed listing statement identifies building interiors as heritage attributes, without consideration of the modifications required to facilitate the adaptive reuse of the hangar buildings. The identification of interiors is problematic. The interior spaces cannot be maintained in their current condition while also activating the spaces as intended. Interiors should be removed from the scope of the listing statement.
- ***Bays 7-10 (Buildings H-K)*** – City staff requested that additional research be completed for Bays 7-10 (identified in the Listing Diagram as Buildings H-K) to help determine if there is potential heritage value. ERA Architects completed the requested additional research and determined that Bays 7-10 do not meet the threshold of having cultural heritage value. Staff have not provided any substantive justification for determining that Bays 7-10 meet that threshold. They should be removed from the proposed listing and the Listing Diagram.

As noted above, our clients' intent is to repurpose and modify the existing buildings on the lands to support a thriving employment hub. Substantial interior modifications will be required to allow for such adaptive re-use to attract tenants. Through the engagement process, heritage staff have advised that the proposed listing is not intended to frustrate the development proposed in our clients' plan of subdivision and zoning amendment applications for the District, or the associated District Plan. Further, City staff have advised they will not seek to influence proposals to alter the Buildings Proposed for Listing to facilitate the intended adaptive re-use of those buildings on the basis that the buildings are on the heritage register. Rather, the proposed listing has a limited purpose: it is only intended to allow heritage staff to stay informed with respect to any proposed demolition of existing buildings on the Relevant Lands, and any proposed development on or adjacent to the Relevant Lands through the provision of required heritage reports.

While our clients appreciate the comfort staff are seeking to provide, it does not address the deficiencies in the proposed listing statement as outlined above. Further, in our view, listing is not necessary given constraints on the City's authority to designate lands within the District in any event. Given the concerns set out in this letter, in our view, the Buildings Proposed to be Listed should not be added to the heritage register at this time, and the matter should be referred back to City staff for further review and consultation with our clients.

If any listing is to proceed, our clients support the approach of listing only specific buildings and not the District as a whole. Only those buildings identified on Schedule B should be listed.

We appreciate your consideration of these comments and would appreciate being added to the notice list with respect to this matter.

Yours truly,

Goodmans LLP



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Schedule A:

Later Additions to be Removed from Listing Diagram



Schedule B:

Proposed Replacement Listing Diagram

