

April 17, 2026

File No.: 237611-172814

Sent via E-mail (clerk@toronto.ca)

Toronto City Council
c/o: Mr. John D. Elvidge, City Clerk
100 Queen Street West
Toronto, Ontario
M5H 2N2

Dear Members of City Council:

Re: Agenda Item TE31.23 - Bloor - Yorkville Cultural Heritage Resource Assessment - Final Report; 131 Bloor Street East and 133 Bloor Street East and 650 Church Street; Comments of The Governing Council of The Salvation Army in Canada.

We are counsel to The Governing Council of The Salvation Army in Canada (“**The Salvation Army**”), the owner of three parcels of land known municipally as 650 Church Street, 131 Bloor Street East and 133 Bloor Street East (collectively, the “**Property**”) in the City of Toronto. The Property is currently occupied by the Toronto Grace Health Centre known municipally as 650 Church Street and an associated surface parking lot known municipally as 131 Bloor Street East and 133 Bloor Street East (the “**Parking Lot**”).

We write in advance of the meeting of City Council scheduled for April 22-24, 2026, during which City Council will consider a resolution identifying the Property as having “potential cultural heritage value or interest” in accordance with the recommendations in the Bloor-Yorkville Cultural Heritage Resource Assessment Study (the “**BYCHRA Study**”). This resolution will result in the Property, referred to collectively in the BYCHRA Study as “131 Bloor Street East”, being included in a list of properties that will require the preparation of heritage reports in the event of certain development applications pursuant to Official Plan Amendment No. 720.

The Salvation Army formally objects to the inclusion of the Property on this list and respectfully requests that City Council remove the Property from the list.

We refer to four primary grounds in support of this request.

First, the BYCHRA Study identifies the Property as having met two or more criteria under O. Reg. 9/06, yet provides no meaningful analysis to support this conclusion. The information about the Property in the BYCHRA Study is limited to a photograph, the date of construction of the Toronto

Grace Health Centre (being 650 Church Street) and the name of architect. The BYCHRA Study fails to include historical research or analysis which explains why the Property meets criteria 1 and 4 under Section 1(2) of O. Reg. 9/06.

Second, the Property constitutes a large site, with the Parking Lot, in close proximity to higher-order transit and within an area planned for growth and intensification. Identifying the Property as having potential heritage value will complicate the future redevelopment of the Property, without any meaningful justification, and is therefore disconnected from broader City planning objectives.

Third, the BYCHRA Study and related recommendations to City Council were advanced through a flawed process that did not involve engagement with impacted landowners. The Salvation Army only became aware of the recommendation upon receipt of a notice from Heritage Planning in January 2026, after the BYCHRA Study had been prepared. This effectively prevented any meaningful input by The Salvation Army in the outcome of the Study. At the same time, the City's own record shows a prolonged gap in the planning process, with the last report on this matter going to City Council in 2021, followed by years of inactivity until the matter was revived in early 2026. This approach reflects the lack of coordination between the City's planning and heritage-related goals and undermines the recommendations put forward in the BYCHRA Study.

Fourth, at a minimum, the list should be updated to distinguish between 650 Church Street (as the Toronto Grace Health Centre) and the Parking Lot and so as explicitly state that the Parking Lot does not have "potential cultural heritage value or interest". A surface parking lot does not, and cannot, satisfy any of the prescribed criteria under O. Reg. 9/06, on any grounds. It would be inappropriate if future development applications on or adjacent to the Parking Lot were impacted by the inclusion of the Property on the list.

In light of the above, The Salvation Army respectfully submits that the Property should be removed from the list or, at a minimum, that the list should be updated to explicitly exclude the Parking Lot.

In the alternative, if City Council declines to remove the Property from the list, The Salvation Army requests the City Council include a notation on the list which explicitly states that the Parking Lot does not have "potential cultural heritage value or interest", as is self-evident from the circumstances of the Parking Lot.

We would be pleased to discuss this matter further with City Staff.

We appreciate this opportunity to make this submission.

Yours truly,

Dentons Canada LLP



Joseph Debono
Partner
JCD/jb

cc: Dentons Canada LLP
Attention: Mr. Max Reedijk