

March 11, 2026

Our File No. 305083

VIA EMAIL: hertpb@toronto.caToronto Preservation Board
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Chair and Board Members:

**Re: Toronto Preservation Board – March 12, 2026 Meeting
Agenda Item PB41.4 “Bloor-Yorkville Cultural Heritage Resource Assessment –
Final Report****Re: 1358023 Ontario Limited
106 to 120, 126 and 128 Cumberland Street, Toronto**

Aird & Berlis LLP has been retained by 1358023 Ontario Limited with respect to the above noted matter as it relates to its above-captioned properties (the “Subject Properties” or “client’s properties”).

We have reviewed (i) the Final Report, dated February 25, 2026 from the Senior Manager, Heritage Planning which recommends that the Subject Properties be included on the Heritage Register and that City Council authorize staff to take such steps as may be necessary to determine whether the “Yorkville Village Core, or parts thereof, merits authorization for study as a potential Heritage Conservation District” and (ii) the Final Bloor-Yorkville CHRA Report, dated December 10, 2025.

We understand from these documents that the Subject Properties are included in a batch listing of eighty-eight (88) properties and are located within the area recommended for study as a potential Heritage Conservation District. The Final CHRA Report notes that our client’s properties have been identified as only meeting one of the nine criteria under Ontario Regulation 9/06.

We further note that the Subject Properties are identified in the Final CHRA Report as only meeting Criteria 7 in 9/06 which provides as follows:

7. the property has contextual value because it is important in defining, maintaining or supporting the character of an area.

Importantly, the Subject Properties are not among those identified as having potential to meet other criteria and warranting further study.

An extract from the Final CHRA Report illustrating our client’s properties is attached. It is apparent that each of these properties have been substantially renovated and overbuilt since their original construction and that little, if any, of the original exterior features remain legible. Further,

renovation and additions to the exterior front facade of each of the properties have removed most, if not all, of any originally street facing features.

There is nothing particular about our client's properties which identify them as part of the "Village Core Area" as contrasted with most main street commercial districts in the City that have also evolved from house form buildings. Importantly, the Heritage Planning Report acknowledges that the "area in question" remains a fluid concept as the study for a potential HCD has yet to be undertaken. The lack of a consistent pattern of properties which meet any criteria within the Village Core Area is such that it is unclear what the "character of the area" is today from a cultural heritage perspective.

While the basis for the staff report's recommendation is in our submission uncertain and limited, the effect of the recommendation and potential listing is clearly prejudicial to our client. Once the Subject Properties are included on the Heritage Register it becomes the obligation of our client to undertake further work – including completion of a Cultural Heritage Evaluation Report ("CHER") – as part of any application pursuant to the *Planning Act*. This effectively places the burden and cost of additional study on property owners such as our client.

This is particularly unreasonable, in our submission, as the current condition of the Subject Properties do not:


- (i) possess any identified design value or physical value,
- (ii) have any identified historical value or associative value, and
- (iii) have any contextual value as either a landmark or as being physically, functionally, visually or historically linked to its surroundings.

As a result, our client objects to the inclusion of its above-cited properties on the Heritage Register.

Please provide us with notice of all future reports, meetings and Committee and Council action respecting this matter.


Yours truly,


AIRD & BERLIS LLP


DocuSigned by:

D3AFE661D1B846D...
Leo F. Longo


LFL/ly


cc. Client


| 103 AVENUE RD | | |
|----------------------------------------------------------------------------------|---|-----|
|  | 1 | No |
| | 2 | No |
| | 3 | No |
| | 4 | Yes |
| | 5 | No |
| | 6 | tbd |
| | 7 | No |
| | 8 | No |
| | 9 | No |
| Date of Construction: c1956 Architect: Harry B. Kohl | | |


| 176 AVENUE RD | | |
|------------------------------------------------------------------------------------|---|-----|
|  | 1 | Yes |
| | 2 | No |
| | 3 | No |
| | 4 | No |
| | 5 | No |
| | 6 | No |
| | 7 | No |
| | 8 | No |
| | 9 | No |
| Date of Construction: c1913 Architect: | | |


| 100 CHARLES ST E | | |
|-------------------------------------------------------------------------------------|---|-----|
|  | 1 | Yes |
| | 2 | No |
| | 3 | No |
| | 4 | tbd |
| | 5 | No |
| | 6 | No |
| | 7 | No |
| | 8 | No |
| | 9 | No |
| Date of Construction: 1900 Architect: | | |


| 106 CUMBERLAND ST | | |
|----------------------------------------------------------------------------------|---|-----|
|  | 1 | No |
| | 2 | No |
| | 3 | No |
| | 4 | No |
| | 5 | No |
| | 6 | No |
| | 7 | Yes |
| | 8 | No |
| | 9 | No |
| Date of Construction: c1913 Architect: | | |

| 108 CUMBERLAND ST | | |
|------------------------------------------------------------------------------------|---|-----|
|  | 1 | No |
| | 2 | No |
| | 3 | No |
| | 4 | No |
| | 5 | No |
| | 6 | No |
| | 7 | Yes |
| | 8 | No |
| | 9 | No |
| Date of Construction: c1913 Architect: | | |


| 116 CUMBERLAND ST | | |
|-------------------------------------------------------------------------------------|---|-----|
|  | 1 | No |
| | 2 | No |
| | 3 | No |
| | 4 | No |
| | 5 | No |
| | 6 | No |
| | 7 | Yes |
| | 8 | No |
| | 9 | No |
| Date of Construction: c1890 Architect: | | |

| 118 CUMBERLAND ST | | |
|------------------------------------------------------------------------------------|---|-----|
|  | 1 | No |
| | 2 | No |
| | 3 | No |
| | 4 | No |
| | 5 | No |
| | 6 | No |
| | 7 | Yes |
| | 8 | No |
| | 9 | No |
| Date of Construction: c1890 Architect: | | |

| 120 CUMBERLAND ST | | |
|--------------------------------------------------------------------------------------|---|-----|
|  | 1 | No |
| | 2 | No |
| | 3 | No |
| | 4 | No |
| | 5 | No |
| | 6 | No |
| | 7 | Yes |
| | 8 | No |
| | 9 | No |
| Date of Construction: c1890 Architect: | | |

| 122 CUMBERLAND ST | | |
|---------------------------------------------------------------------------------------|---|-----|
|  | 1 | No |
| | 2 | No |
| | 3 | No |
| | 4 | No |
| | 5 | No |
| | 6 | No |
| | 7 | Yes |
| | 8 | No |
| | 9 | No |
| Date of Construction: c1890 Architect: | | |


124 CUMBERLAND ST



| | |
|---|-----|
| 1 | No |
| 2 | No |
| 3 | No |
| 4 | No |
| 5 | No |
| 6 | No |
| 7 | Yes |
| 8 | No |
| 9 | No |

Date of Construction: c1890
Architect:


126 CUMBERLAND ST



| | |
|---|-----|
| 1 | No |
| 2 | No |
| 3 | No |
| 4 | No |
| 5 | No |
| 6 | No |
| 7 | Yes |
| 8 | No |
| 9 | No |

Date of Construction: c1884
Architect:


140 CUMBERLAND ST



| | |
|---|-----|
| 1 | No |
| 2 | No |
| 3 | No |
| 4 | tbd |
| 5 | No |
| 6 | No |
| 7 | Yes |
| 8 | No |
| 9 | No |

Date of Construction: c1884
Architect:


142 CUMBERLAND ST



| | |
|---|-----|
| 1 | No |
| 2 | No |
| 3 | No |
| 4 | tbd |
| 5 | No |
| 6 | No |
| 7 | Yes |
| 8 | No |
| 9 | No |

Date of Construction: c1884
Architect:


156 CUMBERLAND ST



| | |
|---|-----|
| 1 | No |
| 2 | No |
| 3 | No |
| 4 | No |
| 5 | No |
| 6 | No |
| 7 | Yes |
| 8 | No |
| 9 | No |

Date of Construction: c1913
Architect:


158 CUMBERLAND ST



| | |
|---|-----|
| 1 | No |
| 2 | No |
| 3 | No |
| 4 | No |
| 5 | No |
| 6 | No |
| 7 | Yes |
| 8 | No |
| 9 | No |

Date of Construction: c1913
Architect:


135 DAVENPORT RD



| | |
|---|-----|
| 1 | Yes |
| 2 | tbd |
| 3 | No |
| 4 | tbd |
| 5 | No |
| 6 | tbd |
| 7 | No |
| 8 | No |
| 9 | No |

Date of Construction: c1924
Architect:


144 DAVENPORT RD



| | |
|---|-----|
| 1 | Yes |
| 2 | No |
| 3 | No |
| 4 | No |
| 5 | No |
| 6 | No |
| 7 | Yes |
| 8 | No |
| 9 | No |

Date of Construction: c1890
Architect:

146 DAVENPORT RD



| | |
|---|-----|
| 1 | No |
| 2 | No |
| 3 | No |
| 4 | tbd |
| 5 | No |
| 6 | No |
| 7 | Yes |
| 8 | No |
| 9 | No |

Date of Construction: c1913
Architect: