

April 27, 2026

Toronto Preservation Board
c/o Heritage Planning
100 Queen Street West
19th Floor, East Tower
Toronto ON M5H 2N2

Attention: Toronto Preservation Board

**Re: *Liberty Village Cultural Heritage Resource Assessment – Final Report
Toronto Preservation Board Item PB43.7***

Bousfields Inc. are the planning consultants to Lipson & Doran Group, who are the owners of a block of lands in Liberty Village bound by Dufferin Street to the west, King Street West to the north, Mowat Avenue to the east and Liberty Street to the south. Our client has owned these lands for more than three decades. On their behalf, we have reviewed the Liberty Village Cultural Heritage Resource Assessment (CHRA) with respect to the properties within this block.

Heritage Planning staff are recommending that the Toronto Preservation Board (TPB) endorse the properties listed in Attachment 2 of the Liberty Village Cultural Heritage Resource Assessment – Final Report (dated April 14, 2026) as having cultural heritage value or interest. Staff are also recommending direction to have City Council identify these properties as having cultural heritage value. The referred to Attachment 2 includes three properties within our client's ownership: 233 Dufferin Street, 190 Liberty Street and 78 Mowat Avenue.

In our opinion, the recommendations before the TPB are not aligned with Policy 3.1.6(22)(a) of the Official Plan, as recently amended by Official Plan Amendment No. 720 (OPA 720). This policy requires the preparation of a site-specific Cultural Heritage Evaluation Report (CHER) to determine whether a property has cultural heritage value if it has "been identified by City Council through a City-led study as having potential cultural heritage value or interest [...]". The intent of this policy framework is to give Council the opportunity to identify the potential heritage value of a property, but a CHER must then confirm the actual value.

The recommendations to the TPB from Heritage Planning seek to identify the properties "as having cultural heritage value or interest", with no reference to the

concept of “potential”. Similarly, the CHRA report itself does not set out a framework for determining whether the properties identified have heritage value; instead, the recommendations included in Section 6.0 of the CHRA focus on conserving, maintaining and enhancing properties identified as having cultural heritage value or interest. In our opinion, without additional study through a CHER, this cannot be assumed as the appropriate strategy for all properties identified in the Study.

In our opinion, the recommendations presented to the TPB should be amended to be reflective of the framework set out through OPA 720, as follows:

1. The Toronto Preservation Board endorse the properties listed in Attachment 2 to the report (April 14, 2026) as having **potential** cultural heritage value or interest, as identified through the Liberty Village Cultural Heritage Resource Assessment.
2. The Toronto Preservation Board recommends that the Toronto and East York Community Council recommend that City Council identify the properties listed in Attachment 2 to the report (April 14, 2026) as having **potential** cultural heritage value or interest, as identified through the Liberty Village Cultural Heritage Resource Assessment.

If this language is not modified, our client objects to the inclusion of 233 Dufferin Street and 78 Mowat Avenue on Attachment 2, as they are of the opinion that neither have heritage value, summarized as follows:

- 78 Mowat Avenue: our client’s opinion is that this building has no historically significant structures or architectural features. We have been advised that the existing southeast and northeast facades were rebuilt by our client using reclaimed masonry and are not reflective of an original condition.
- 233 Dufferin Street is a parking lot with a wall around it. Page 57 of the CHRA suggests that Staff believe there may be potential cultural heritage value, but that further research is required. This property should not be identified as having heritage value until this additional research has been completed.

If the language is modified in accordance with our suggestions, then our client understands there would be an opportunity to demonstrate that the properties do not have heritage value through the preparation of a CHER.

We respectfully request you modify the recommendations contained in PB43.7 as outlined in this letter. Should you have any questions or require clarification, please do not hesitate to contact the undersigned or Peter Smith of our office at 416-947-9744.

Yours very truly,
Bousfields Inc.



Caitlin Allan, MCIP RPP

cc. *Lipson & Doran Group*