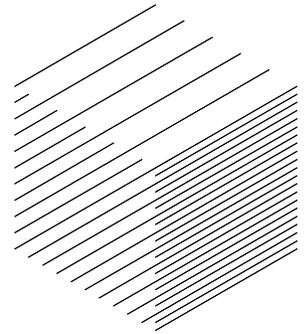


February 27, 2013

**Walker, Nott, Dragicevic
Associates Limited**
Planning
Urban Design

Planning and Growth Management Committee
City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Attention: Members of the Planning and Growth Committee



Dear Committee Members:

Re: Official Plan Review – Revised Heritage and Public Realm Policies
City File: 12 256312 STE 32 OZ
Our File: 12.501

90 Eglinton Avenue East
Suite 701
Toronto, Ontario
M4P 2Y3
Tel. 416/968-3511
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We represent the owners of the property known municipally as 1884 Queen Street East, located on the northeast corner of Queen Street East and Woodbine Avenue. We are submitting this letter in response to the revised Heritage and Public Realm Policies as they relate to view protection.

Our client made an application for re-zoning with respect to the lands located at the northeast corner of Queen Street and Woodbine Avenue October 2012 to permit six storey mixed use building.

Proposed OPA 199 affects our client's development proposal with respect to a specific view, identified on Map 7a, as follows:

A28. Beach Fire Station #227 Clock Tower [H]

The prominent clock tower can be seen rising above the roof of the main fire station building from the northwest corner of Queen Street East at Woodbine Ave.

Draft OPA 199 proposes (Policy 46):

46. Public and private development will preserve views to the heritage properties, identified on Maps 7a and 7b, unobstructed.

Peter R. Walker, FCIP, RPP
Wendy Nott, FCIP, RPP
Robert A. Dragicevic, MCIP, RPP
Senior Principals

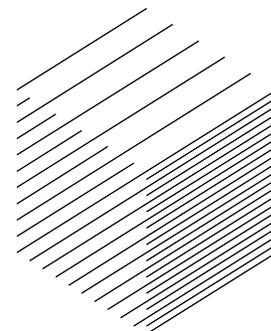
Andrew Ferancik, MCIP, RPP
Senior Associate

Martha Coffey
Controller

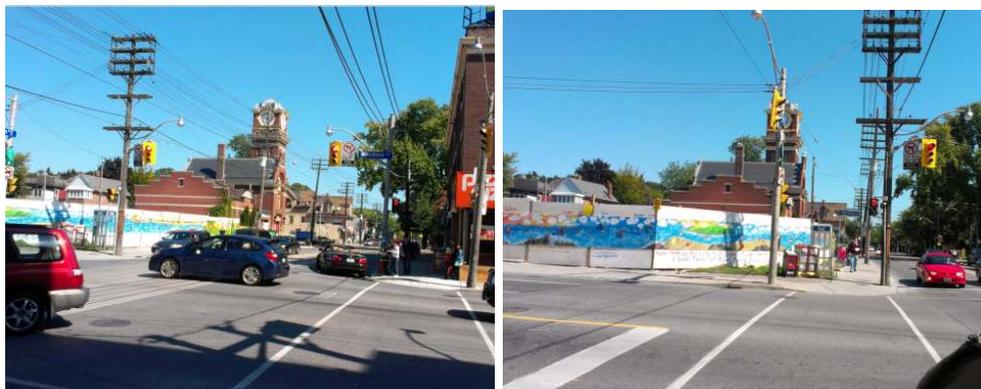
We request that view “A28. Beach Fire Station #227 Clock Tower [H]” be deleted from OPA 199 for the reasons set out in the following.

Our client has significant concerns with respect to the proposed policies, summarized as follows:

- There has been no empirical study which forms the basis for the identification of this particular view.
- In contrast, the heritage impact study specifically prepared for this application concludes:
“While it is important to have a sense of the Fire Hall as a landmark, it is not necessary to have the full view of the tower from the north side of the street.”
- This view has been ascribed the same level of significance as, for example, the view of City Hall and St. James Cathedral; however, no specific justification has been provided.
- This view has been addressed through the recent Queen Street East Urban Design Guidelines and it is unnecessary to designate this view through the Official Plan.



The views described for protection in draft OPA 199 for this site are inappropriate in an urban condition where numerous elements including infrastructure, other buildings and streetscape elements obstruct the view and the recent Queen Street East Urban Design Guidelines call for more streetscape elements such as street trees, banners and hanging baskets that will contribute to further obstruction of the views.

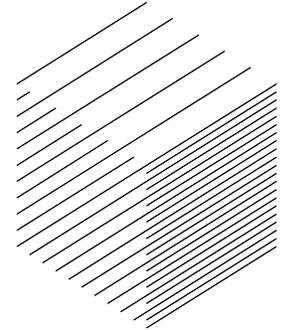


Existing views from southwest and northwest corners of intersection of Queen Street East and Woodbine Avenue.

Background and Analysis

Our client’s proposal for a six storey mixed-use retail-residential building was designed with input from ERA Architects, who specialize in heritage architecture, to specifically ensure that appropriate views to the Fire Hall were maintained. As part of the application to amend the zoning by-law to permit our client’s proposal, a Heritage Impact Assessment (HIA), a Visual Impact Assessment (VIA), and viewshed modelling were prepared.

These ERA heritage analyses concluded that, within an urban setting such as along Queen Street East, a view from the south side of Queen Street East, approximately one block west of Woodbine Avenue is an appropriate view to be maintained. OPA 199, without the same level of detailed study, unreasonably designates the view from the northwest corner of Woodbine Avenue and Queen Street.



As part of the VIA prepared as part of our application, it was noted that a number of existing infrastructure elements, streetscape improvement elements, other buildings and distance obscure the existing views of the Fire Hall from distances that are both consistent with our findings and those outlined in the Queen Street East Urban Design Guidelines. Aging joint use utility poles, light standards, hanging baskets, existing buildings which are consistent with the zoning by-law and urban design guidelines, and distance all contribute to the obstruction of views to the Fire Hall at various locations in the vicinity of the Fire Hall. It should also be noted that the Queen Street East Urban Design Guidelines encourage more street tree planting, including in proximity to our client's property, and more streetscape improvement elements, such as hanging baskets. These will contribute to additional obstruction of views to the Fire Hall in the future.

We have made numerous efforts to communicate our findings through the Official Plan review process by requesting a meeting with the relevant City staff responsible for the heritage policies to discuss this specific view. We also provided the various documents for City staff's information; however, City staff did not agree to meet with us prior to the issuance of OPA 199.

Should you require any clarification or have any questions related to the above, please do not hesitate to contact the undersigned.

Yours very truly,

WALKER, NOTT, DRAGICEVIC ASSOCIATES LIMITED

Planning · Urban Design

Wendy Nott, FCIP, RPP
Senior Principal

cc. Pamela Kraft, Queen EMPC Six Limited
David Bronskill, Goodmans LLP