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ERA

SENT BY EMAIL

June 2, 2016

Attn: Lourdes Bettencourt

Toronto Preservation Board City of Toronto 100 Queen Street West 2nd Floor, West Tower, City Hall Toronto, Ontario M5H 2N2

Dear Chair and Members of the Toronto Preservation Board:

RE: 19 DUNCAN STREET (ITEM PB 15.6)

We are responding to the proposed designation of 19 Duncan Street and, in particular, to the list of heritage attributes that accompanies the Statement of Significance. Our concerns include, but are not limited to, the following items:

[Bullet 10]: the south elevation, with the symmetrically-arranged fenestration, the elevator shaft, and the remnants of the painted sign reading "Southam Press" at the west end beneath the parapet;

[Bullet 11]: viewed from Adelaide Street West, east elevation with the flat-headed window openings.

It is our respectful view that the above-mentioned attributes do not meet the definition of *heritage attributes* in the Provincial Policy Statement 2014 (PPS 2014): "the principal features or elements that contribute to a protected heritage property's cultural heritage value or interest, and may include the property's built or manufactured elements, as well as natural landforms, vegetation, water features, and its visual setting (including significant views or vistas to and from a protected heritage property)."

Aside from the first structural bay, the south elevation described in Bullet 10 is barely visible from the street. Bullet 11 describes a secondary elevation and window openings that could be obscured by an as-of-right building on or adjacent to the property.

We share TPB and HPS's interest in conserving the Southam Press Building. We have raised these concerns and believe there needs to be further discussion with Staff to ensure that the proposed designation appropriately identifies the heritage attributes that contribute to the heritage value of the property.

Sincerely,

Philip Evans, RAIC CAHP Principal, ERA Architects, Inc.

Images of Proposed Attributes



South elevation viewed from Duncan Street (ERA, 2016).



East elevation viewed from Adelaide Street West (ERA, 2016).