



ERA Architects Inc.  
#600-625 Church St  
Toronto ON, M4Y 2G1

December 2, 2019

Sent by EMAIL

Ellen Devlin, Secretariat  
Toronto & East York Community Council  
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100 Queen St. W.  
Toronto, ON M5H 2N2  
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**R E :            Notice of Objection: Proposed Designation Of 38 Camden Street Under Part IV,  
Section 29 of the Ontario Heritage Act**

Dear Ellen,

This letter has been prepared by ERA Architects Inc. ("ERA"), heritage consultants to Manga Hotels (Richmond) Inc. ("the client"), the owner of the lands municipally known as 465-471 Richmond Street West and 38 Camden Street (the "Development Site").

On December 3, 2019, Toronto and East York Community Council ("TEYCC") will consider Item TE11.8, comprised of a Staff Report, dated November 7, 2019 (the "Staff Report") and a letter from the Toronto Preservation Board, dated November 12, 2019, which recommend that City Council state its intention to designate the listed property at 38 Camden Street, under Part IV, Section 29 of the Ontario Heritage Act. On behalf of our client, we are writing to object to the proposed designation.

This Staff Report was previously considered by the Toronto Preservation Board at its meeting on November 12, 2019. At that time, ERA filed the attached Notice of Objection, dated November 11, 2019 (the "Notice of Objection").

We ask that TEYCC consider the comments outlined in the previously submitted Notice of Objection, prior to making a decision respecting Item TE11.8 during its meeting on December 3, 2019.

We respectfully request notification of any further actions or decisions made by City Council respecting this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'Michael McClelland'.

Michael McClelland, Principal  
E.R.A. Architects Inc.

Attachment: Notice of Objection, prepared by ERA Architects Inc., dated November 11, 2019

Cc: Manga Hotels (Richmond) Inc.  
Devine Park LLP



ERA Architects Inc.  
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Toronto ON, M4Y 2G1

**Subject:** **NOTICE OF OBJECTION: PROPOSED DESIGNATION OF 38 CAMDEN STREET UNDER PART IV, SECTION 29 OF THE ONTARIO HERITAGE ACT**

**Issued To:** Ellen Devlin  
Administrator, Toronto Preservation Board  
City Hall, 2nd Floor, West Tower  
100 Queen Street West  
Toronto, ON M5H 2N2

**Project:** **465-471 Richmond Street West & 38 Camden Street**

**Date Issued:** November 11, 2019

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This Notice of Objection has been prepared by ERA Architects Inc. ("ERA"), heritage consultants to Manga Hotels (Richmond) Inc., the owner of the lands municipally known as 465-471 Richmond Street West and 38 Camden Street (the "Development Site").

On November 12, 2019, the Toronto Preservation Board will consider Item PB11.9, a Staff Report which recommends that City Council state its intention to designate the listed property at 38 Camden Street, under Part IV, Section 29 of the Ontario Heritage Act. On behalf of our client, we are writing to object to the proposed designation. The reasons for the objection are detailed below.

### **Background**

On July 4, 2019, a zoning by-law amendment application was submitted for the Development Site, and a Heritage Impact Assessment ("HIA") dated May 29, 2019 and prepared by ERA was submitted as part of the rezoning application. The development proposal removes and replaces the existing buildings and surface parking lot with two multi-storey buildings containing hotel uses.

The Development Site is located within the boundaries of the King-Spadina Heritage Conservation District (HCD), which has been appealed to the Local Planning Appeal Tribunal (LPAT) and is not in force. Within the King-Spadina HCD, 38 Camden Street is identified as a 'contributing' property and was included on the City of Toronto Heritage Register as part of a City-initiated batch listing of all 'contributing' properties in the HCD on December 5, 2017.

At the time of the batch listing, the Staff Report recommending inclusion of 38 Camden Street on the Heritage Register stated that an abbreviated approach was taken for the inclusion of the property on the Heritage Register and that "[d]etailed historical research was not undertaken at this time to determine potential additional values, including historical associations with individuals, communities and architects." As a result, a heritage evaluation under Ontario Regulation 9/06 was not included in the municipally-prepared Statement of Significance (Reasons for Inclusion) for 38 Camden Street.



## **ERA Opinion**

In the absence of a completed municipal assessment, ERA undertook a heritage evaluation of 38 Camden Street under Ontario Regulation 9/06 in preparation of the HIA.

ERA's heritage evaluation found that while 38 Camden Street reflects a mid-20th century commercial character, the property is a simple 2-storey red brick building with minimal detailing and is similar to many low-rise commercial buildings found in the King-Spadina neighbourhood. Given the building's modest scale and materiality, in addition to its restrained architectural detailing, it is not considered to be a rare or good representative example of a mid-20th century commercial building. Further, it does not reflect a high degree of craftsmanship, artistic merit, or technical achievement.

As part of the heritage evaluation, a review of City directories was completed, which indicated that 38 Camden Street has been occupied by a variety of commercial tenants since its construction in 1951. However, further historical research into the property did not reveal any additional significant links with a theme, event, belief, person, activity, organization, or institution that is known to be meaningful to a community. While the building does yield general information about the industrial development and history of the King-Spadina area in the mid-20th century, this link is not unique to the existing building and is not considered to be of significant cultural heritage value. A review of archival building records indicate the architect of 38 Camden Street is E. I. Richmond. While the firm is still active (as Richmond Architects Ltd.), E. I. Richmond was primarily known for the development of high-rise apartment towers such as the Palace Pier Tower on Lakeshore Boulevard West. The building at 38 Camden Street is not considered one of E.I. Richmond's significant works.

Camden Street generally reflects a contemporary mixed-use character, interspersed with remnant mid-20th century low-rise commercial buildings. ERA's heritage evaluation found that while 38 Camden Street does share a similar scale, materiality and use to other remnant commercial buildings on the street, given the evolved built-form context of Camden Street, 38 Camden Street is not considered to be important in defining, maintaining, or supporting the character of the area. Similar to most buildings, 38 Camden Street is found to be physically, visually, and historically linked to its surroundings, however these links are not considered to be of significant cultural heritage value. Through the heritage evaluation, the property at 38 Camden Street was not found to be a landmark.

Ultimately, the heritage evaluation undertaken by ERA as part of the HIA determined that the property does not possess significant design, historical or contextual value. Thus, it is our opinion that 38 Camden Street is not considered to be a significant cultural heritage resource and does not merit individual designation under Part IV of the Ontario Heritage Act.

## **Heritage Preservation Services (HPS) Heritage Evaluation**

ERA has reviewed the Staff Report to be considered by TPB, which includes a Statement of Significance for the property and the research and evaluation report for 38 Camden Street. The City's evaluation determined that 38 Camden Street has design, associative, and contextual value, for its "Mid-Century Modern design by Toronto architect E. I. Richmond that contributes historically and contextually to the evolution of the King-Spadina neighbourhood where it is part of a collection of extant commercial buildings on Camden Street that are recognized on the City of Toronto's Heritage Register."



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### **Conclusion**

ERA has reviewed the materials prepared by HPS, however our opinion remains unchanged from the assessment and conclusions presented in the HIA, that 38 Camden Street is not considered to be a significant cultural heritage resource and it does not merit individual designation. In light of the upcoming TPB meeting on November 12, ERA wishes to submit this Notice of Objection regarding the recommendation that Council state its intention to designate the property at 38 Camden Street under Part IV, Section 29 of the Ontario Heritage Act.

Please do not hesitate to contact the undersigned should you have any further questions.

Sincerely,

Michael McClelland, Principal  
E.R.A. Architects Inc.

CC: Patrick Devine, Devine Park LLP  
Jennifer Evola, Devine Park LLP