



McCarthy Tétrault LLP  
PO Box 48, Suite 5300  
Toronto-Dominion Bank Tower  
Toronto ON M5K 1E6  
Canada  
Tel: 416-362-1812  
Fax: 416-868-0673

**Charlene Schafer**  
Associate  
Direct Line: (416) 601-7616  
Direct Fax: (416) 868-0673  
Email: cschafer@mccarthy.ca

**TE12.11.10**

December 7, 2015

**Via Email (clerk@toronto.ca)**

Toronto City Council  
Toronto City Hall, 12th Floor, West Tower  
100 Queen Street West  
Toronto, Ontario M5H 2N2  
Attention: Ms. Marilyn Toft, Secretariat

Dear Chair and Members of the Toronto City Council:

**Re: TE12.11 Designation of the St. Lawrence Neighbourhood Heritage Conservation District Under Part V of the Ontario Heritage Act (Ward 28 - Statutory: Ontario Heritage Act, RSO 1990)**

We are writing to you on behalf of Larco Investments Ltd., who, as owners of the properties known municipally as 2 Toronto Street & 34-36 King Street located within the proposed St. Lawrence Heritage Conservation District (HCD), have concerns about the HCD Plan and By-law.

Larco's three properties are located within the Court House Sub-Area of the HCD on the block bounded by Toronto Street to the east, King Street to the south, Victoria Street to the west, and Old Post Office Lane to the north. 2 Toronto (1886; Listed 1973) is a five-storey office building identified as a Contributing property within the Plan. 34 King Street East (c. 1967), a twelve-storey office building and 36 King Street East (c. 1963), an eight-storey office building, are both Non-Contributing properties.

While Larco supports the conservation of the HCD's heritage values, they have concerns regarding the lack of clarity in the Plan and the implications its restrictive guidelines and policies will have for potential development on their properties.

Their concerns include, but are not limited to, the following:

1. There is a lack of coherence and alignment between the objectives, which define what the HCD Plan and By-law are trying to achieve, and the policies and guidelines, which provide measures for achieving the objectives.
2. The relationship between policies and guidelines is unclear. For example, the policies are stated as mandatory. What is their status and is it the same or different from the guidelines? Presumably, a Heritage Impact Assessment (HIA) would evaluate potential impacts of additions, alterations, and new-infill development and would propose the appropriate mitigation based on the policies and guidelines.

3. Shadow Impacts on Shadow Sensitive Areas should also be evaluated through an HIA. For example, the Plan states that “[a]dditional shadows on [St. James Cathedral] would negatively impact the reading of the spire and the stained glass windows.” (5.10) There is concern that shadows that fall on the roof or rear of the church and that do not impact the reading of the spire or the stained glass windows would not be permitted in the current Plan.
4. The Plan should allow for a less imitative approach with respect to the design of new infill development within the District. Generally, there is concern that urban design guidelines have become mandatory policies within the Plan. (See 5.11.1-2 as examples)

Yours truly,

McCarthy Tétrault LLP

Per:

A handwritten signature in black ink, appearing to be 'CS' or similar initials, written in a cursive, stylized manner.

Charlene Schafer

c: Dennis J. F. Parolin, Larco Investments Ltd.