

November 4, 2015

Via E-mail and Courier

Our File No.: 132176

Toronto Preservation Board
c/o City Clerk's Office
Toronto City Hall
2nd Floor West, 100 Queen Street East
Toronto, Ontario
M5H 2N2

Attention: Lourdes Bettencourt, Committee Secretary

Dear Sirs/Mesdames:

Re: PB9.2 - Designation of the St. Lawrence Neighbourhood Heritage Conservation District under Part V of the Ontario Heritage Act

We are solicitors for First Gulf Ontario Street Corporation, the owner of the property known municipally as 25 Ontario Street located at the southeast corner of Adelaide Street East and Ontario Street ("25 Ontario").

On behalf of our client, we submitted the attached letter to the City's consultant on October 15, 2015, requesting that 25 Ontario be exempt from the Heritage Conservation District Plan given that a planning process for this property has been underway for some time. There has been no response to our letter as of yet, but we were advised by the consultant that City staff recommended that we forward our request to the Toronto Preservation Board and Toronto East York Community Council.

Please do not hesitate to contact us if you require additional information.

Yours truly,

Goodmans LLP



Michael Stewart
MGS/

cc: First Gulf Ontario Street Corporation

October 15, 2015

By Courier and Email

Bousfields Inc.
3 Church Street, Suite 200
Toronto, Ontario M5E 1M2

Attention: Louis Tinker and Caitlin Allan

Dear Sirs/Mesdames:

**Re: Proposed St. Lawrence Heritage Conservation District Plan
25 Ontario Street**

We are solicitors for First Gulf Ontario Street Corporation (“**First Gulf**”), the owner of the property known municipally as 25 Ontario Street located at the southeast corner of Adelaide Street East and Ontario Street (“**25 Ontario**”).

First Gulf has reviewed the “final draft” of the St. Lawrence Heritage Conservation District Plan (the “**Draft HCD Plan**”). On behalf of our client, we are writing to express concern with the Draft HCD Plan and to request that 25 Ontario be exempted from the plan while the existing planning process for this property is underway.

Background

25 Ontario is approximately 0.2 hectares (0.5 acres) in size, and is occupied by a two-storey brick and limestone building constructed in 1942 and 1946 (known as “The Drug Trading Company Administrative Office”), as well as surface parking.

In 2011, the previous owner of 25 Ontario submitted rezoning and site plan applications (the “**Applications**”) to redevelop the property with a 21-storey building, while retaining the north and west walls of the existing heritage building as part of the podium of the new development. After a comprehensive public planning process, Heritage Preservation Services issued a report dated November 7, 2012 recommending approval of alterations to The Drug Trading Company Administrative Office building, subject to a number of conditions. In a report dated December 18, 2012, Community Planning recommended the approval of the rezoning application for 25 Ontario, also subject to conditions. The Toronto Preservation Board adopted the heritage recommendations in November 2012, and Toronto and East York Community Council adopted the planning recommendations in January 2013. As part of this planning process, 25 Ontario

was designated under Part IV of the *Ontario Heritage Act* at the Council meeting of February 20 and 21, 2013.

City Council ultimately deferred its consideration of the item in order to allow the applicant and the City to address environmental compatibility issues posed by noise and emissions from equipment within the adjacent office development at 280 King Street East. The complexities associated with the potential mitigation measures have resulted in ongoing delays in the enactment of the zoning amendment recommended by City staff. First Gulf acquired 25 Ontario in October 2013 and is moving forward to refine and revise the proposal set out in Applications in a manner that responds to the challenges posed by the adjacent office development.

Proposed Heritage Conservation District Plan

As noted above, there has been a comprehensive review of the Applications, in which City staff considered in detail the appropriate built-form for 25 Ontario, both in respect of the appropriate treatment and conservation of the heritage attributes of the existing heritage building, and also in relation to the surrounding area. For this reason, First Gulf believes that 25 Ontario should not be subject to a number of the provisions proposed in the Draft HCD Plan (including, but not limited to, policies respecting building height and minimum setbacks between the streetwall of contributing properties and new vertical additions). While these provisions may be appropriate for contributing properties that have not been the subject of detailed review through a site specific development application, it is neither necessary nor appropriate to apply these provisions to a property that has already undergone detailed scrutiny by planning and heritage staff.

We trust this request for exemption from the Draft HCD Plan will be given due consideration. Please do not hesitate to contact us to discuss further or if you require additional information.

Yours truly,

Goodmans LLP



Michael Stewart
MGS/rg

cc: Tamara Anson-Cartwright, Heritage Preservation Services, City of Toronto