TE26.14.39

## Stikeman Elliott

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September 29, 2017 File No.: 138852.1001 By E-mail clerk@toronto.ca

City Council
City of Toronto
12th Floor, West Tower, City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Attention: Ms. Marilyn Toft

Dear Sirs/Mesdames:

Re: TE26.14 - Designation of the King-Spadina Heritage Conservation District under Part V of the Ontario Heritage Act 217 Adelaide Street West

We are counsel to 217 Adelaide Holdings Limited (the "Client"), the owner of the property municipally known in the City of Toronto as 217 Adelaide Street West (the "Property"). The Property is located within the proposed King-Spadina Heritage Conservation District.

Our Client has reviewed the draft King-Spadina Heritage Conservation District Plan, and in particular, the draft plan dated June 2017 (the "**Draft HCD Plan**"), which is included as Attachment 5 to the Report for Action from the Chief Planner and Executive Director, City Planning, dated June 14, 2017.

As outlined in our previous submission to the Toronto and East York Community Council, dated September 6, 2017, we wish to reiterate our Client's concerns regarding the Draft HCD Plan.

The policies and guidelines of the Draft HCD Plan impose overly prescriptive built form requirements for development. Such unduly restrictive requirements are inappropriate for a high-level policy document like the Draft HCD Plan, which does not contain a mechanism for amendment or appeal once the HCD Plan is in effect.

We are happy to discuss these issues further with City staff, and we strongly urge City Council not to accept the recommendations to designate and adopt the Draft HCD Plan until meaningful consultation is undertaken by City staff to address these concerns.

Please provide us with notice of all other meetings of Council and Committees of Council at which the proposed designation of the King-Spadina Heritage Conservation District and the adoption of the Heritage Conservation District Plan will be considered, and any notice of Council's decision with respect thereto.

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If you have any questions or require further information, please contact the undersigned. Thank you for your attention to this matter.

Yours truly,

For Calvin Lantz

CL/jsc

cc. Clients