

AIRD BERLIS

Eileen P. K. Costello
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October 2, 2017

Our File No.: 123838

BY EMAIL

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

Attention: Marilyn Toft at clerk@toronto.ca

Dear Mayor and Members of Council:

**Re: City Council Agenda Item TE26.14
Objection and Request for Deferral**

Please be advised that Aird & Berlis LLP represents a number of landowners who own properties within the King Spadina area, including but not limited to those listed on the attached Appendix 1. Together, these clients represent properties totaling more than 3,500,000 square feet of active office and commercial space within the area. Many of these properties are both listed pursuant to Part IV of the *Ontario Heritage Act* as well as listed on the City of Toronto's Heritage Register.

Attached for Council's review is a copy of correspondence submitted to the last meeting of the Toronto East York Community Council on this item. During that meeting, a number of questions were raised with respect to the methodology and the process leading to the King-Spadina Heritage Conservation District which is before Council today for approval. Following our deputation, Councillor Cressy requested that Staff author a report responding to a number of the criticisms and concerns which had yet to be addressed by Staff throughout the process leading to this matter. Specifically, the Councillor requested that Staff ensure that that Report was posted sufficiently in advance of the Council meeting to allow our clients to review and respond to the comments. That Report was never posted. Accordingly, we are respectfully requesting a deferral of Council's consideration of this matter so that the questions posed to Staff at the last meeting of Toronto East York Community Council could be addressed.

We reiterate again the submissions made at Toronto East York Community Council which is that the owners represented by our firm are not opposed to the adoption of the Heritage Conservation District but rather want to ensure that the policies and guidelines enclosed in the District Plan are fair and balanced and represent a best approach to heritage conservation. As it currently stands, it is our respectful submission, and it is the opinion of heritage experts who have been consulting with us throughout this process, that the Plan failed in a number of respects.

Specifically, we are requesting a deferral in order that we may pursue the following issues and items with Heritage Preservation Services Staff in an effort to reach a resolution with respect to the King-Spadina Heritage Conservation District:

1. **Evolving Cities and Multiculturalism** – How can the District's social and cultural value be more strongly reflected in the Statement of Cultural Heritage Value, Heritage Attributes, its periods of significance and implementing policies and guidelines? As it stands, the identified period of significance (1880-1940) results in a limited list of attributes which in turn are used to direct the appearance of new developments and other design controls such as signage. Why is a building designed by an Anglo architect in 1920 dictating alterations proposed by foreign business owners in 2017? Contributions of immigrant communities to Kensington Market and Chinatown would not be possible with such controls.
2. **Design Excellence** – We commend the Plan's intention to support design excellence. However, we ask whether the design review panel can be relied upon to assess architectural and urban design considerations related to new construction, including street wall competitions, setbacks and stepbacks. Similarly, are there ways for the Plan to encourage creative site specific design solutions that balance multiple planning objectives? This could be achieved through a Staff review of heritage impact assessments as well as through further discussions, design related policies and guidelines.
3. **Adaptive Reuse** – Our clients also commend the Plan's intention to foster the adaptive reuse of contributing properties, a practice which has been undertaken by many of our clients for generations. However, we think the policies could do more to encourage and support adaptive reuse of heritage buildings as that is essential for the conservation of the District as well as the cultural vitality of the City. In particular, we suggest that Staff review the policies and guidelines related to alterations to contributing buildings and properties and to assess whether the owners' obligations and financial pressure of property owners may be alleviated. Reliance on the City's heritage tax rebate program is not a sufficient response to this concern. For example, the Plan appears to prohibit additions to contributing properties on any street facing elevation which would disrupt the feasibility of the adaptive reuse of many of these properties.

We note that some members of our client group in King Spadina are currently actively engaged in a collaborative and productive mediation through the Ontario Municipal Board process for the St. Lawrence Neighbourhood Plan. We see no reason why a similar discussion on the King Spadina Plan cannot occur now and without the oversight of the Ontario Municipal Board. We are respectfully requesting a deferral of the Council's consideration of this matter to allow those conversations to occur.

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In the event that Council does not see fit to permit the deferral, both to allow those discussions to occur and to allow our clients to have sufficient opportunity to review the report requested by Councillor Cressy, then our clients will have no other option but to appeal the adoption of the King-Spadina Heritage Conservation District Plan for all the reasons stated in our previous correspondence which is attached hereto.

Yours truly,

AIRD & BERLIS LLP



Eileen P. K. Costello
EPKC/MTB/lm

Encl.

c: All clients
Councillor Joe Cressy
ERA Architects

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AIRD BERLIS

Appendix 1

This list is provided for information purposes only and not to suggest interests are limited to the sites listed.

Hullmark Developments Ltd.	Various sites including: 474 Wellington Street, 545 King Street West, 230-240 Richmond Street West, 205 Richmond Street West
Harhay Construction Management Ltd.	Various sites including: 542 Richmond Street West, 111 Bathurst Street
Stonehouse Holdings Inc.	540 Richmond Street West
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Diamond Corp.	Various sites
Easton's Group of Hotels Inc.	Various sites including: 92 Peter Street, 355 King Street West
Greenland 355 King Street West Development Company Limited	355 King Street West
Seniority Investments Ltd.	Various sites
Strashin Developments	Various sites
Canada Lands	Various sites
Next Property Group Inc.	Various sites

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AIRD BERLIS

Eileen P. K. Costello
Direct: 416.865.4740
E-mail: ecostello@airdberlis.com

September 5, 2017

Our File No.: 123838

BY EMAIL

Toronto and East York Community Council
City Clerk's Office
2nd Floor, West Tower
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Ellen Devlin, Committee Administrator

Dear Community Council Members:

**Re: TEYCC Agenda Item TE26.14
Designation of the King-Spadina Heritage Conservation District under
Part V of the Ontario Heritage Act**

Aird & Berlis LLP acts for a number of landowners who own property within the King-Spadina Heritage Conservation District (the "HCD") study area. The properties owned by clients of Aird & Berlis LLP include but are not limited to the list attached as Appendix 1.

The purpose of this letter is to object to the current draft of the King-Spadina HCD plan (the "HCD Plan" or "Plan") for the reasons outlined in this letter, the principal issues being:

1. that the Plan as drafted exceeds the jurisdiction afforded pursuant to Part V of the *Ontario Heritage Act* in that it clearly goes beyond identifying and conserving the cultural heritage of the area and seeks to limit the degree, nature and form of development including on non-contributing properties;
2. that the Plan boundary does not contain a sufficient coherent and integrated area which justify or would benefit from a Part V designation;
3. that the objectives as currently drafted are incompatible with the existing and planned context of this area as a mixed use area for growth;
4. that the Plan guidelines as currently drafted are mandatory in application while being overly generic in their description and application such that they would have the effect of resulting in new development which must mimic previous generations of architectural expression rather than being of its own place and time;
5. that the list of "contributing" properties has been undertaken without sufficient care, attention or consideration for the prejudicial impact such categorization will have on those properties as a result of the contingent application of mandatory "guidelines"; and

6. that the Plan as drafted was undertaken without meaningful consultation and collaboration with the community in direct contrast to the City's own Council adopted *Heritage Conservation Districts in Toronto: Procedures Policies and Terms of Reference*.

Many of our clients, who have owned and maintained properties in the area for successive generations, have been engaged with the HCD process since its inception and have repeatedly sought an opportunity for meaningful consultation with City Staff on the proposed HCD. Once the draft HCD Plan was released and a limited period for public comment was permitted in October 2016, we wrote to Heritage Preservation Services Staff with extensive and comprehensive comments on the proposed policies. We received no response and our request for a meeting was ignored. Although Councillor Cressy did make himself available for a meeting organized with by the area's BIA, neither HPS Staff nor the consultant team previously engaged on the project attended.

When a second version of the HCD Plan was released in June 2017, we again wrote to the Toronto Preservation Board highlighting a number of outstanding issues and inconsistencies with the Plan's proposed policies. Copies of these letters are enclosed herein. Along with a number of property owners, we spoke at the Toronto Preservation Board meeting on June 22, 2017, reiterating our clients' concerns with the HCD Plan's policies and the process leading up to its release.

On behalf of our clients, we have requested an opportunity for meaningful discussion with Staff on a number of occasions. However, despite the fact that our clients own more than 3.5 million square feet of property within the HCD study area, we have received no response from Staff.

We have spent considerable time and client resources to clearly articulate problems with the draft HCD Plan. These concerns have been echoed by recognized experts that practice heritage conservation and by a number of property owners, some of whom have been stewards of this City's heritage properties for generations. Nevertheless, we have received no meaningful response from the City.

Additionally, we observe that the City's website incorrectly shows that properties are designated under Part V of the *Ontario Heritage Act* and as being part of the King-Spadina HCD, even though Council has not yet approved or enacted a by-law designating the HCD. Such misinformation has caused considerable confusion and concern for property owners in the District and serves to show the City's disregard for the statutorily mandated process for the designation of heritage conservation districts

We commend this letter and those attached, which provide a detailed analysis of some of the specific concerns with the draft HCD Plan to Community Council members. By this letter, we formally request that:

1. Community Council NOT accept the staff recommendation to adopt the draft HCD Plan in its current format;
2. Community Council direct HPS Staff to undertake meaningful consultation with the property owners in the King Spadina area including holding discussions on the key issues outlined in our previous correspondence as it relates to the current framing of the

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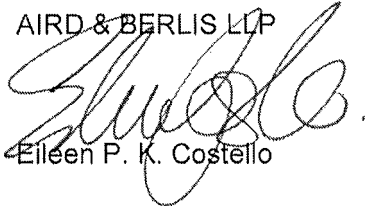
objections, the mandatory nature of the guidelines, the boundary of the proposed HCD area and the process for and treatment of "contributing" properties; and

3. Community Council direct Staff to report back on the consultations and any recommended changes to the draft HCD Plan arising from those consultations, at the first TEYCC meeting in 2018.

On behalf of our clients, we welcome the opportunity to work with Staff and Council members to ensure that the HCD plan which is ultimately adopted provides the appropriate framework in which the cultural heritage of King Spadina can be recognized and conserved in a manner compatible with its current and planned role in a growing and diverse City.

Yours truly,

AIRD & BERLIS LLP



Eileen P. K. Costello

EPKC/MTB

Encl.

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AIRD & BERLIS LLP

Barristers and Solicitors

Eileen P. K. Costello
Direct: 416.865.4740
E-mail: ecostello@airdberlis.com

November 14, 2016

Our File No.: 123838

Tamara Anson-Cartwright
Program Manager
Heritage Preservation Services
City Hall, 17th Floor, East Tower
100 Queen Street West
Toronto, Ontario
M5H 2N2
tansonc@toronto.ca

Dear Ms. Anson-Cartwright:

**Re: Draft King-Spadina HCD Study Plan
Released for Public Review and Comment on October 25, 2016**

Further to our earlier correspondence in March 2015, please be advised that Aird & Berlis LLP has been retained by a group of landowners who own property within the King-Spadina Heritage Conservation District (the "HCD") study area including, but not limited to, those listed in the attached Schedule "A".

As our previous correspondence has advised, our clients collectively own more than 3.5 million square feet of property within the HCD study area. Many of our clients have properties which are either listed or designated on the City of Toronto Heritage Property Register. Our clients, through the restoration, adaptive reuse, and redevelopment of their properties, have played a significant leadership role in the preservation and maintenance of the area's attributes. A key element has been the ongoing reinvestment and revitalization of these properties for a variety of uses, including redevelopment for mixed use proposals. Our clients, through their ongoing investments in the area, are clearly committed to the stewardship of the heritage character of the area and to its growth. These are not mutually exclusive goals.

On behalf of our clients, our office took part in the initial consultation meetings which occurred during the initial phases of this process, including the meetings associated with the study process in 2014 through to the more recent meetings in April, 2015 and June, 2016. Our clients also attended these meetings. At the outset, our clients raised a number of foundational questions including:

- the need for a heritage conservation district in an area which already has a substantial number of listed and/or designated properties;
- whether the boundaries and the proposed division of the HCD area into eight sub-character areas is appropriate or necessary;
- the distinction between "contributing" and "non-contributing properties"; and
- the basis for determining whether a property was "contributing" and the utility of the contribution statements.

To the contrary, the proposed HCD boundary results in an area which lacks cohesion in terms of built form and heritage attributes and is lacking in the crucial element of historic integrity. This is acknowledged by the fact that eight sub-districts are required in order to provide any certainty with respect to the application of the policies.

Moreover, the use of general attributes to apply to the entire area results in such broad and generic statements as to render the policies meaningless. See the comments below on Section 4.3 for further on this issue.

Request: On behalf of our clients we request that the draft HCD Plan be sent back for further consultation with the community with a specific issue of: the extent of the proposed boundary, the alternative of more physically concentrated districts which are demonstrated to have a coherent and integral cultural heritage value and discernable heritage attributes.

(3) Contributing verses Non-Contributing

The HCD Plan only distinguishes between contributing and non-contributing properties. If everything within the District which is "contributing" is of equal value, then how can we judge the significance of the heritage cultural attributes within the District as we are required to do under the PPS? This is further complicated by the fact that the actual "statements of contribution" are in fact a mere collection of observations (architectural style, number of storeys) of the buildings on a property. When everything is of equal value, and no guidance is given as to the reasons or extent of that value, nothing has specific value. This renders it difficult if not impossible, to contemplate using this document in order to evaluate development applications on a specific property.

(4) Comments on Draft Plan

Section 1 – Objectives

The Objectives include the term "conserve" repetitively. We note that the definition of conserve, which includes "preservation, rehabilitation, restoration, or a combination of these conservation treatments" does not contemplate the adaptive reuse or development of the lands. We find it curious that the Statement of Objectives for an area which is designated and zoned for growth does not recognize, save and except for one objective, the nature and manner in which that development will occur within the District.

The objectives as stated are inappropriately one-sided, fail to recognize the need for ongoing change and growth within the District, and have been drafted so as to limit and mitigate any change, as opposed to guiding the change which is intended to occur within the area.

In particular, we make the following observations with respect to the Objectives.

- Objective #5 speaks to conserving the "predominant scale and built form pattern" in each character sub-area; this will inherently limit redevelopment as the predominant scale of built form character in many sub-character areas is in the range of less than 12 storeys. It also suggests, as an operating principle, that maintenance of heritage attributes is inconsistent with intensification and redevelopment. Our clients, through their actions, have clearly demonstrated that is not the case.

specific building, not a heritage attribute of the entire District. The fact that the range of 10 storeys is offered, a significant variation in actual building height given the large floor to ceiling clearances in many warehouse buildings, indicates the area as a whole lacks the integrity which one would expect within a heritage conservation district.

By contrast for example, the Draper Heritage Conservation District has a clear and consistent built form which includes both a typology, height, massing and setbacks. This is lacking in this area.

Moreover, in our respectful submission, the fact that the general heritage attributes are so general, so as to be in our submission meaningless, is further reinforced by the fact that eight sub-character areas are required to provide further detail. We again challenge the operating notion that this is an appropriately sized and scaled district and that the boundaries are indeed responsive to any notion of integrity in terms of built form and cultural heritage.

The reference to the Heritage Attributes of the public realm also give rise to questions. The public realm with respect to the overall proposed district provides observational statements which do not provide a clear indication as to how these statements relate to the cultural heritage value of the area. They are merely descriptive.

We offer the following comments with respect to some of the policies provided in the heritage sub-areas.

With respect to the King Street Spadina Avenue to John Street area, the description of the built form ignores recent approvals on the south side of King Street and, in particular, along 321 to 333 King Street as well as the development at the corner of King and John. The reference to commercial row properties, generally 2-3 storeys, without accommodating these substantive changes, is misleading and incorrect.

The reference to the "small floorplates of commercial row properties" appears to us to be an attempt to relate to the use of those properties. As staff are well aware, based on individual designations for some of these properties, there is very little in the interior of any of those commercial row properties which is original. The actual floorplates have been amalgamated or substantially changed in many instances. To suggest that the "small floorplates" without any definition are somehow original to the heritage of the area is therefore not accurate.

It is unclear if the reference to the "10-12 storeys tall" landmark buildings at the corner of Spadina Avenue and Adelaide Street West which define the character sub-area are intended to act as a height cap for that area. Explanation with respect to that reference would be appreciated. Please note that, in the context of the approved Official Plan designation for the area and the street, the substantial access to existing and planned public transit, and the right of way width of Spadina Avenue at 36m, our clients would view any attempt to use the HCD to cap heights at 12 storeys on Spadina Avenue as being in direct conflict with the Official Plan as well as Provincial policies and approved Plans which speak to intensification occurring within the built up area in locations well served by transit.

With respect to the St. Andrew sub-character area, no rationale has been provided for the extension of the area to include the south side only of Richmond Street West. We note that, with the exception of the Public Utility complex, there are only two properties listed as "contributing" in the draft Plan and yet the entire area has been brought into the draft Plan area. The attributes

must be subordinate to the District's cultural heritage value and heritage attributes. We would have thought it would have to respond to and enhance the heritage value of the contributing property.

Additionally, it is unclear what the requirement of "subordinate" means in respect of alterations which would involve an increase in height since any increase in height above 12 storeys would be contrary to the 2-12 storey datum established in the overall heritage attributes of the District. In the context of an area which has been designated for growth in the City's Official Plan consistent with the Growth Plan in the Provincial Policy Statement, such an approach is inappropriate.

Section 6.10 – Massing

This section provides policies and guidelines in respect of massing, there is an introduction of certain mandatory step-backs:

- a minimum of 3 metres from all elevations facing a laneway on a commercial detached property;
- a requirement for multiple step-backs of 5 metres for additions to contributing commercial properties with a street wall of 14 metres or greater;
- a requirement for a single step-back of 10 metres from all elevations when a contributing property is the tallest within a surrounding landscape;
- a requirement of a minimum of 10 metres from all elevations for additions to contributing properties less than 14 metres; and
- a requirement that there be a step-back of 10 metres from all elevations facing the street or park for additions to contributing commercial row properties.

We make the following observations with respect to the step-backs:

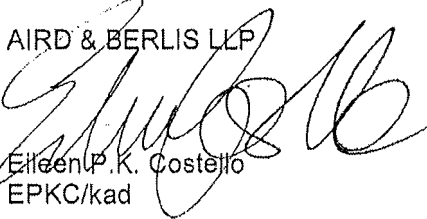
- Step-backs as set out in Section 6.10.9 to 6.10.12 of the draft Plan have no basis as heritage attributes within the proposed District. Rather, the draft Plan, in many instances, states that a front elevation rising straight from the lot line is an attribute.
- There is no discretion provided with respect to the application of these minimum step-backs as it relates to the height, composition or materiality of the addition. So, by way of example, a 10 metre step-back will be required from all elevations facing a street for a 1 storey glass addition on a commercial building. The same step-back would be required if a 10 storey massing addition was proposed on a contributing building. In our respectful submission, this is inappropriate, and without any rationale.
- Similarly, no discretion is taken with respect to the differentiation in the commercial buildings save and except for the street wall height. The mandatory nature of these guidelines and the lack of any reference to the actual heritage attributes of contributing property in applying these minimums are not responding to the actual

November 14, 2016
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On behalf of our clients, we urge you to consider the within requests and to be open to substantial modifications to the draft, including its boundary and extent, its statement of cultural value, its policies and the involvement of the community in drafting.

Sincerely,

AIRD & BERLIS LLP

A handwritten signature in black ink, appearing to read "Eileen P. K. Costello". The signature is fluid and cursive, with a large initial "E" and "C".

Eileen P. K. Costello
EPKC/kad

- c. Clients as listed on the attached Schedule "A"
City Clerk
Councillor Joe Cressy
Entertainment District BIA

AIRD & BERLIS LLP

Barristers and Solicitors

Eileen P. K. Costello
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June 21, 2017

Our File No.: 123838

BY EMAIL

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

Attn: Lourdes Bettencourt, Secretariat Contact

Dear Chair and Members of the Toronto Preservation Board:

**Re: PB24.1 Designation of the King-Spadina Heritage Conservation District
under Part V of the Ontario Heritage Act (Ward 20)**

Aird & Berlis LLP represents a group of landowners who own property within the King-Spadina Heritage Conservation District (the "HCD") study area including, but not limited to, those listed in the attached Schedule "A". Collectively, our clients own more than 3.5 million square feet of property within the HCD study area.

On behalf of our clients, we have been actively involved in the consultation opportunities provided during the HCD process, including the initial consultation meetings associated with the study process in 2014, public consultation meetings in April 2015 and June 2016 prior to the release of the Draft King-Spadina HCD Study Plan (the "Draft HCD Plan"), and a meeting on March 31, 2017 hosted by Councillor Cressy following the release of the Draft HCD Plan. A number of our clients have also been in attendance at these meetings to share their concerns.

Upon receipt of the Draft HCD Plan in October 2016, the City provided a three week window for comments on the draft document. Accordingly, we took immediate steps to consult with each of our clients and their consultants and provided comprehensive comments on behalf of our clients in our letter dated November 14, 2016 (enclosed). We received no response to our letter in the nearly eight months between submitting our comments and the release of the HCD Plan, despite repeated requests to meet with Heritage Preservation Staff.

The proposed King-Spadina HCD Plan was released on June 15, 2017 (the "HCD Plan"). While we recognize it will not be considered by Toronto and East York Community Council, and subsequently Council, prior to the fall, we do note that the Toronto Preservation Board is being asked to recommend approval of the HCD Plan at its meeting on June 22nd, a mere week following the release of the HCD Plan to the public.

To put it simply, there has been no meaningful communication or consultation to the community who will be directly impacted by the HCD Plan in advance of it being brought forward to the Toronto Preservation Board. Moreover, there has been no response from

City staff to enquiries of questions raised with respect to specific issues (i.e. for example, why certain buildings are listed as "contributing", the change in proposed boundaries for the Plan area, etc.). In our submission, this lack of response runs contrary to the requirement under the *Ontario Heritage Act* to consult and inform the community before adopting a heritage conservation district plan. Neither our clients nor their consultants have been able, in a week's time, to thoroughly review and digest the changes to the HCD Plan.

Accordingly, we request that the TPB receive the HCD Plan but make no recommendation at this time.

We note that no outline or description of changes from the version released in October 2016 was provided in the accompanying Staff Report dated June 14, 2017 (the "**Staff Report**"). Many of the changes to the HCD Plan, such as subtle changes to the language of some of the Statements of Objectives, have complex implications for the rest of the document that must be carefully tracked and considered.

After an initial, preliminary review of the HCD Plan, we provide the following general comments:

- The HCD Plan has altered and extended the boundary of the HCD area and significantly changes the system of character sub-areas, but provides no rationale for these revisions.
- While it appears that the HCD Plan responds to some comments that were provided as part of the consultation process, for example, including a reference to the area's designation as a Regeneration Area in the City's Official Plan in the Statement of Cultural Heritage, there are a number of inconsistencies in how this statement is then referenced in the balance of the document. For example, Objective 2 refers to conserving the HCD's period of significance, "particularly the early phase of residential development, and the later commercial phase of development" and makes no recognition of the residential development that has occurred since the mid-1990s.
- The HCD Plan lists a number of properties as contributing, but provides no explanation as to the reason for their contributing status. In fact, this iteration of the HCD Plan removes the built form description that was included as part of the Statements of Contribution for contributing properties in the Draft HCD Plan. There is no evidence in the Statements of Contribution that staff individually examined each contributing building to determine if it supported the HCD's cultural heritage values, as is stated in the Staff Report.
- Our examination of the policies and guidelines to date suggests that the HCD Plan remains overly restrictive as to prevent appropriate change within the district through a diversity of built form. Overly restrictive policies and guidelines appear to contradict the intent of the guidelines. For example, policies pertaining to streetwall composition (7.7.1 to 7.7.3) require an imitative approach to design and appear to contradict Objective 12 which encourages "high quality architecture that is of its

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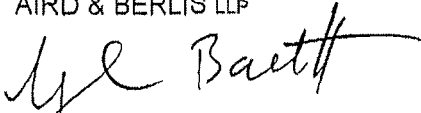
time." In another case, Objective 16 seeks to support the adaptive reuse of contributing properties, yet the policies and guidelines for alterations place heavy obligation and financial pressure on the owners of these properties, such as requiring the retention of attributes as detailed as window hardware.

Based on the foregoing, we ask that the Toronto Preservation Board make no recommendation until private landowners and the community have an opportunity to review and provide meaningful comments on the HCD Plan.

Thank you for your consideration.

Yours truly,

AIRD & BERLIS LLP



10: Eileen P. K. Costello

EPKC/MTB

Encl.



Schedule "A"

1107051 Ontario Ltd.
1572654 Ontario Inc.
214 King Holdings Limited
217 Adelaide Holdings Limited
2462582 Ontario Inc.
321 King Street Residences Inc.
450 Richmond Street West Limited
456 Wellington Street Developments Inc.
457 Richmond Street West Limited
458728 Ontario Limited
462 Wellington Inc.
57 Spadina Avenue Inc.
738489 Ontario Limited
Allied Properties REIT
Auburn Developments
Blue Jay & Main Urban Properties Inc.
Brant Park Inc.
C Squared Properties 580 King Inc.
Cabo Three Investments Inc.
Camden House Inc.
Century Acquisitions Limited
Cityzen Development Corporation
Concord Adex Developments Corp.
Devgreat Inc.
Diamond Corp.
Easton's Group of Hotels Inc.
Forty-Six Spadina Ave. Limited
Frala Dick Holdings Inc.
Great Gulf Enterprises Inc.
Greenland 355 King Street West Development Company Limited
Harhay Construction
Kasol Investments
King Charlotte Corp.
King Financial
L Richmond Corp.
Lamb Development Corp.
Pinedale Properties Ltd.
Portland Property Spadina Inc.
Portland Property Wellington Inc.
Portwell Developments Inc.
Projectcore Inc.
Seniority Investments Ltd.
Strashin Developments
Stewart and Main Urban Properties Inc.
Streetcar Developments Inc.
The Harlowe Inc.
Wellington and Main Urban Properties Inc.
Wellington House Inc.
Westbank Projects Corp.
Wittington Investments
YAD Investments Limited

