

June 21, 2017

By E-Mail Only to teycc@toronto.ca

Toronto Preservation Board
2nd floor, West Tower, City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

Attention: Ms. Lourdes Bettencourt, Board Secretary

Dear Chair and Members of the Toronto Preservation Board:

**Re: Proposed Designation of the King-Spadina Heritage Conservation District
and Adoption of the King-Spadina Heritage Conservation District Plan
127 Portland Street (the "Subject Lands")**

We are counsel to 1758173 Ontario Ltd., the owner of the Subject Lands.

The Subject Lands are located within the boundary of the proposed King-Spadina Heritage Conservation District (the "HCD") and have been identified as a "contributing property" in the proposed King-Spadina Heritage Conservation District Plan (the "Plan").

The designation of the proposed HCD and adoption of the proposed Plan will be considered by the Toronto Preservation Board at its meeting on June 22, 2017.

Our client and its consultants have had limited opportunity to review the proposed Plan and staff's June 14, 2017 report. However, based on an initial review, we wish to provide the following comments on the Plan's contents:

- The Plan unduly restricts the development potential of many properties within the HCD, including our client's, as a result of the proposed changes to the current by-law and policy requirements. Our client's property is uniquely configured and ideally located to make it a candidate site for future additions and modifications. The proposed Plan would frustrate these reasonable opportunities for improvement and modification;
- The objectives of Plan appear to not only strengthen the current status of properties within the HCD, but also direct property owners to "enhance"

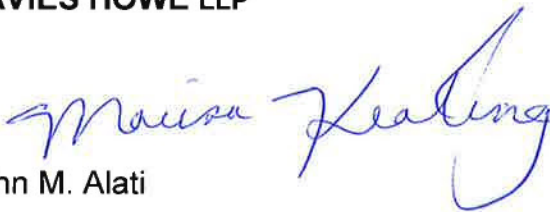
contributing properties, which is contradictory and unduly restrictive on future development;

- The criteria used to classify properties as either “contributing” or “non-contributing” is overly vague and does not sufficiently account for issues related to structural stability, substantiality, health and safety and accessibility; and
- It is inappropriate to finalize the Plan while the King-Spadina Secondary Plan and TOcore initiatives are ongoing and incomplete.

For the reasons noted above, our client objects to designation of the proposed King-Spadina HCD and the adoption of the proposed Plan in its current form.

Please notify the undersigned of any and all meetings, including open house, public, Council and committee meetings, reports and background reports with respect to the Plan.

Yours truly,
DAVIES HOWE LLP


per John M. Alati

JMA:MK
encl.:

copy: Clients
Peter Swinton, PMG Planning Consultants
Chris Borgal, Goldsmith Borgal & Company Ltd. Architects