

**AIRD BERLIS**

Eileen P. K. Costello  
Direct: 416.865.4740  
E-mail: [ecostello@airdberlis.com](mailto:ecostello@airdberlis.com)

November 29, 2017

Our File No.: 123838

BY EMAIL

**Toronto Preservation Board**  
City of Toronto  
100 Queen Street West  
2<sup>nd</sup> Floor, West Tower, City Hall  
Toronto, Ontario M5H 2N2

Attn: Lourdes Bettencourt, Secretariat Contact

Dear Chair and Members of the Toronto Preservation Board:

**Re:      **Objection to Item TE28.12 - Inclusion of King-Spadina Contributing  
          Properties on City's Heritage Registry****

---

Aird & Berlis LLP represents a group of landowners who own property within the King-Spadina Heritage Conservation District (the "HCD") which is included on the list of properties that Heritage Preservation Services has recommended be added to the City's Heritage Register.

On behalf of our clients, we have filed an appeal of Council's designation of the King-Spadina HCD and adoption of the HCD Plan. One of the grounds of appeal is that the HCD Plan fails to include virtually any description of individual properties' heritage or cultural attributes in its Statements of Contributions for contributing properties, which suggests that insufficient care and attention was taken by City staff in the process of categorizing the properties in the District. Accordingly, this list of properties which is lacking in rigour and contains errors, should not be the basis for a batch listing of properties on the City's Heritage Register. Additionally, we note that this batch listing is proceeding by way of individual Statements of Contribution which is inconsistent with the HCD approach which utilizes Statements of Contribution to understand the contribution these individual sites make to the cultural heritage value of the District (as proposed) as a whole. This inconsistent approach by the City illustrates a fundamental misunderstanding of the HCD process.


On this basis, our client asks that the Toronto Preservation Board refuse Heritage Preservation Services' recommendation that the properties identified as "contributing" in the King-Spadina HCD Plan be included on the City's Heritage Register.

Thank you for your consideration.

November 29, 2017  
Page 2

Yours truly,

AIRD & BERLIS LLP

*Per: EPLB*  
  
Eileen P. K. Costello  
EPKC/MTB  
31090097.1