



September 5, 2017

Members of the Planning and Growth Management Committee
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Re: PG22.5 Inclusion on the City of Toronto's Heritage Register - Midtown in Focus - Phase 1:
Main Street Properties (Ward 16, 22, 25, 26)

It is our understanding that the staff report and recommendations contained therein may be considered by Planning and Growth Management committee on September 7, 2017, and City Council in early October. As a large landowner in the City of Toronto with property holdings in midtown and downtown areas, Kingsett is concerned with the proposed approach to include properties on the Heritage Register as described in the staff report to the Toronto Preservation Board (TPB) dated August 10, 2017.

Kingsett currently has ownership interests in several blocks of main street properties along subway lines that are in Mixed Use Designations throughout the city. We also have interests in the Royal York Hotel, Scotia Bank Tower and other large office and commercial assets. We have worked fruitfully with Heritage staff in the past on several assets with successful results. This current approach may sterilize vast commercial assets throughout the city and stunt reinvestment as the rules and regulations applying to these lands becomes increasingly challenging and unpredictable.

This new draconian policy direction that is aimed at a few undesirable demolitions will have a severe impact on economic reinvestment along major corridors throughout the city and negatively impact the economic wellbeing of both large and small commercial landowners.

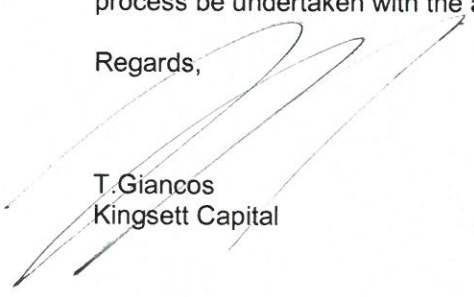
Our immediate concerns are as follows:

As noted by Heritage Preservation Services (HPS) staff during the TPB meeting, information relating to the evaluation and listing of specific properties was withheld at community consultation meetings in order to avoid the potential for preemptive demolitions. As a result, affected property owners only learned about the proposed inclusion of their property on the Heritage Register once the staff report was posted on the TPB agenda. Further, since no prior notice was given, it is likely that many affected property owners would be unaware of the proposed listing of their property unless the TPB agenda webpage was regularly accessed.

The approach to listing properties, and listings themselves, need clarification as HPS staff give equal consideration to both listed and designated properties as part of their application review process. Further, Statements of Significance have been prepared for each of the properties with an acknowledgement that thorough research has not been undertaken. It is troubling, then, that the staff report states that all of the properties in Phase 1 meet Ontario Regulation 9/06, which implies that they may be designated under Part IV of the Ontario Heritage Act at any time.

Based on the concerns outlined above and a concern regarding unintended future consequences of batch listings, we would like to request that the report recommendations not be endorsed and that a proper process be undertaken with the appropriate consultation.

Regards,


T. Giancos
Kingsett Capital