



Reply Attention of Mary Flynn-Guglietti  
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 Our File No. 241972  
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**DELIVERED BY EMAIL – [teycc@toronto.ca](mailto:teycc@toronto.ca)**

The Toronto and East York Community Council  
 City of Toronto  
 City Hall, 2<sup>nd</sup> Floor  
 100 Queen Street West  
 Toronto, ON M5H 2N2

**Attention: Ms. Ellen Devlin, Secretariat**

Dear Chair and Members of the Toronto and East York Community Council:

**Re: September 6, 2017 TEYCC Meeting  
 Item No. TE26.14  
 Designation of the King-Spadina Heritage Conservation  
 District under Part V of the *Ontario Heritage Act*  
 Our Client: Registered Nurses Association of Ontario  
 Property: 158 Pearl Street**

We are the solicitors retained to act on behalf of Registered Nurses Association of Ontario (“**RNAO**”), the owner of lands municipally known as 158 Pearl Street (the “**Property**”), which is located in the City’s downtown and specifically within the boundary of the proposed King-Spadina Heritage Conservation District (“**King Spadina HCD**”). We have now had an opportunity to review the recommendations from the Chief Planner and Executive Director of City Planning recommending adoption of the King Spadina HCD. It is our submission that it is premature for the TEYCC to recommend adoption of the King Spadina HCD until such time that the concerns raised in the numerous written and oral submissions have been appropriately addressed.

While we acknowledge that the goal of preserving the City’s history is a laudable goal however, preservation should not ignore the need for appropriate change and growth. The proposed King Spadina HCD isolates the goals and objectives of the plan to a specific historical period (1880 -1940) and ignores the numerous modifications and renovations that have occurred during the evolution of the area. It is overly onerous to expect present landowners to restore properties to previous building iterations. It is also equally unfair and onerous to classify extensively modified and renovated buildings to the category of contributing properties and then require strict adherence to the contribution property policies.

Many of the policies contained in the King Spadina HCD would appear to make intensification nearly impossible for both contributing and non-contributing properties. A number of the policies are unduly onerous and impose excessive step-back requirements, the introduction of maintaining the three dimensional integrity of contributing buildings and the requirement of non-contributing properties to maintain the scale, height, massing and form of adjacent contributing properties. It is difficult to contemplate how the policies, as currently drafted, would encourage growth and prosperity.

The preservation of a municipality's heritage must be reviewed within the context of important provincial policies as such as the PPS and Growth Plan with respect to intensification of land uses and the promotion of long term economic vitality. In reviewing the Map of contributing properties, almost half of the properties within the 45 hectare area are classified as contributing properties. However, it is important to note that at the time of preparation of the staff report only 65 of the approximately 517 properties are found on the City's Heritage Register, yet 287 properties are classified as contributing properties. Therefore the likelihood of growth and redevelopment within this important area will be seriously challenged. We respectfully submit that to adopt the King Spadina HCD as currently proposed, with its overreaching policies, will create unrealistic standards that will seriously impede growth and reinvestment in this important area of the City.

The King Spadina Heritage HCD will create one of the largest HCD's in the City of Toronto, consisting of 45 hectares of land with a total of approximately 512 properties. We respectfully submit that the TEYCC and the Council of the City of Toronto should not adopt the King Spadina HCD in haste but rather carefully consider the various concerns and serious issues that have been raised by this author and the many property owners in the King Spadina area.

Yours truly,



Mary Flynn-Guglietti

CC: Registered Nurses Association of Ontario, Doris Grinspun  
Registered Nurses Association of Ontario, Nancy Campbell  
Scott Shields Architects Inc., Deborah Scott