



24 January 2020

Toronto City Council  
100 Queen Street West  
Toronto ON M5H 2N2  
Via email: teycc@toronto.ca and councilmeeting@toronto.ca

**Attention:**            **Ellen Devlin**, Administrator, Toronto and East York Community Council

Dear Members of Toronto City Council,

**RE:**                    **King-Spadina Secondary Plan Update - Final Report**  
**Agenda Item TE12.4**  
**225 King Street West and 200 Wellington Street West (MetroCentre)**  
**and 60 Simcoe Street**  
**Oxford Properties Group**  
Our File: 18.586

Walker, Nott, Dragicevic Associates Limited (“WND Associates”) is the planning consultant for Oxford Properties Group Inc. (“Oxford”), the owner of the lands municipally known as 225 King Street West and 200 Wellington Street West (also known as MetroCentre) and 60 Simcoe Street<sup>1</sup> in the City of Toronto. We are writing with respect to the proposed King-Spadina Secondary Plan Update and City-initiated Official Plan Amendment (the “Proposed Secondary Plan”).

The Oxford lands noted above are located outside of, but directly abutting, the Secondary Plan boundary, and therefore not directly subject to the policies of the proposed Secondary Plan. The Final Report prepared by City Planning staff, dated 12 December 2019, recommends that City Council direct staff to use the proposed Secondary Plan in the evaluation of all current and new development proposals *within its boundaries* (emphasis added). However, Section 1.2 of the Proposed Secondary Plan provides that “Site and Area Specific Policies and Heritage Conservation Districts that fall within, partially within, *or adjacent to the Boundaries of the Plan* (emphasis added) will be read together with this Plan”, and as such the application of the Plan are unclear with respect to the evaluation of development proposals on Oxford’s Lands.

We are advising City Council and City Planning staff of Oxford’s concerns with respect to the Proposed Secondary Plan, and specifically with the mapping and related policies of the Proposed Secondary Plan. In summary the concerns include, but are not limited to, the following:

- Being outside of the Proposed Secondary Plan boundary, it is our understanding that Oxford was not provided notice with or invited to participate in discussion of the Proposed Secondary Plan, yet the Plan includes new mapping applicable to Oxford’s lands (as discussed below). Oxford

should have been consulted on the Proposed Secondary Plan, and requests that approval of the Plan be deferred until these matters are corrected or clarified as appropriate.

- It should be made clear that the policies of the Proposed Secondary Plan do not override the policies of the Downtown Plan for areas outside of the Proposed Secondary Plan boundary.
  - Policies 1.4 and 1.5 of the Proposed Secondary Plan indicate that Council will approve a new Public Realm Strategy and new Urban Design Guidelines to further illustrate the intent of the policies in the Proposed Secondary Plan and guide the evaluation of applications. As with the Oxford's comments on Maps 16-3A to 16-3B, Oxford would like to understand if those implementing tools will be applicable to development on Oxford's lands, or apply during the evaluation of such development. Oxford does not believe such implementing tools should apply to its lands, but if they do, then Oxford should be consulted during the development of those implementing tools.
  - Proposed Maps 16-3B and 16-3C include David Pecaut Square as 'Existing and Planned Parks' and 'Existing and Planned Public Parks & Open Spaces', respectively. This mapping incorrectly includes the existing office buildings located at 225 King Street West and 200 Wellington Street West (also known as MetroCentre King Tower and MetroCentre Wellington Tower) as part of the park area. The lands containing these buildings are designated *Mixed Use Areas* on Map 18 of the Official Plan and *Mixed Use Areas 1 - Growth* on Map 14-3 in the Downtown Plan) and are not existing or planned park areas (please see attached Figures 1 and 2). The mapping of parks outside of the boundary of the Proposed Secondary Plan should be removed, or corrected to be consistent with the land use mapping. Please note that maps 16-3B and 16-3C are also not consistent with the mapping of David Pecaut Square found on Map 16-2 of the Proposed Secondary Plan or Map 41-13 of the Downtown Plan.
  - Proposed Map 16-3B includes 'Existing, Planned and Potential Mid-block Connections' through Oxford's lands. The planned and potential mid-block connections are new, and are not identified on any other City Planning document, and as such, it appears they are being introduced for the first time in the Proposed Secondary Plan. The Proposed Secondary Plan should not include any new policies or guidelines for lands outside of the boundary of the Plan, given that this will result in ambiguity as to whether policies are intended to be statutory. As such, Oxford requests that the mapping be updated to remove these connections and all identifications from its lands.
  - Proposed Map 16-3C includes 'Existing and Planned Privately Owned Publicly [sic] Accessible Spaces (POPS)' at the southwest corner of King Street West and Simcoe Street. These lands are not POPS, and as noted above, the Proposed Secondary Plan should not be used to establish new requirements on lands outside of the boundary of the Plan, and Oxford requests that the mapping be updated to remove this mapping identification from its lands.
  - Sections 4.1 and 4.3 of the Proposed Secondary Plan include policies regarding improving and expanding the public realm in accordance with Maps 16-3B and 16-3C. However, it is not clear whether these requirements do or do not apply to the Oxford lands; despite their inclusion in the proposed mapping and the language in Policy 1.2, they are located outside of the Proposed Secondary Plan boundary.
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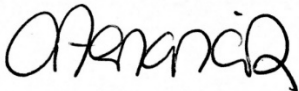
- Map 16-2 identifies Oxford's lands as *Mixed Use Area 1*, whereas the lands are identified as *Mixed Use Areas 1 - Growth* in the Downtown Plan. In addition to the difference in name between Map 16-2 of the Proposed Secondary Plan and Map 41-3 of the Downtown Plan, the mapping of the lands on Maps 16-2, 16-3B and 16-3C of the Proposed Secondary Plan is different both in terms of extent and the method of identification of parks. It is not clear whether the mapping on Map 16-2 of the Proposed Secondary Plan is intended to indicate whether the *Mixed Use Area 1* policies of the Proposed Secondary Plan are to apply to Oxford's lands, or whether it simply is intended to indicate that Oxford's lands are designated *Mixed Use Area 1* in the Downtown Plan. This matter should be clarified.

We respectfully submit this letter for the consideration of City Council, and request that approval of the Proposed Secondary Plan be deferred until so that these factual matters can be corrected and application of the Proposed Secondary Plan to Oxford's lands clarified prior to adoption.

Please ensure and confirm that WND Associates and Oxford Properties Group (Cory Estrela, Vice President Legal, Oxford Properties Group, 900-100 Adelaide Street West, Toronto ON, M5H 0E2) are added to the circulation list with respect to all items and notices related to this matter.

Yours very truly,

**WND associates**  
planning + urban design



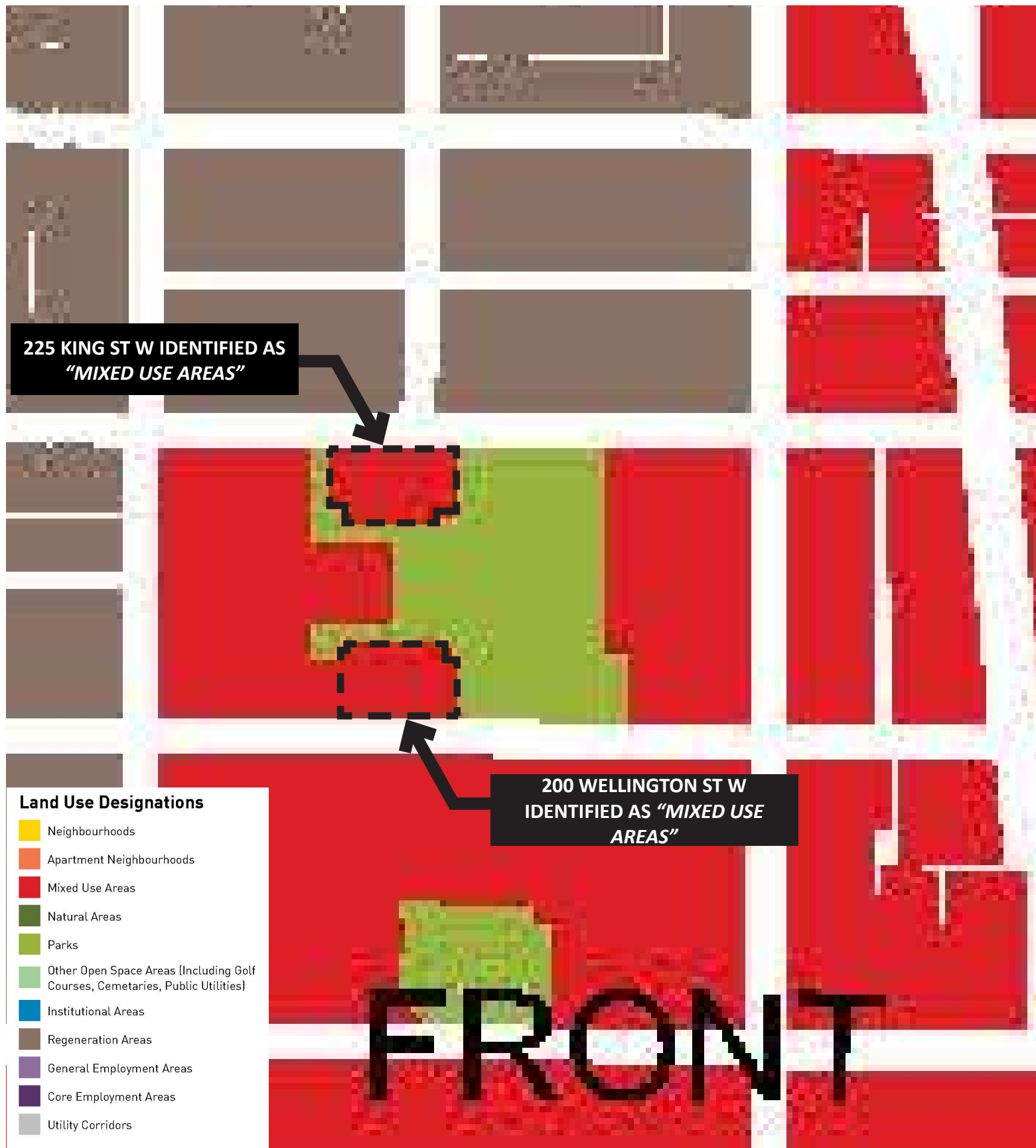
Andrew Ferancik, MCIP, RPP  
Principal

cc. Cory Estrela, Vice President Legal, Oxford Properties Group  
Sarah Phipps and Joanna Kimont, City Planning

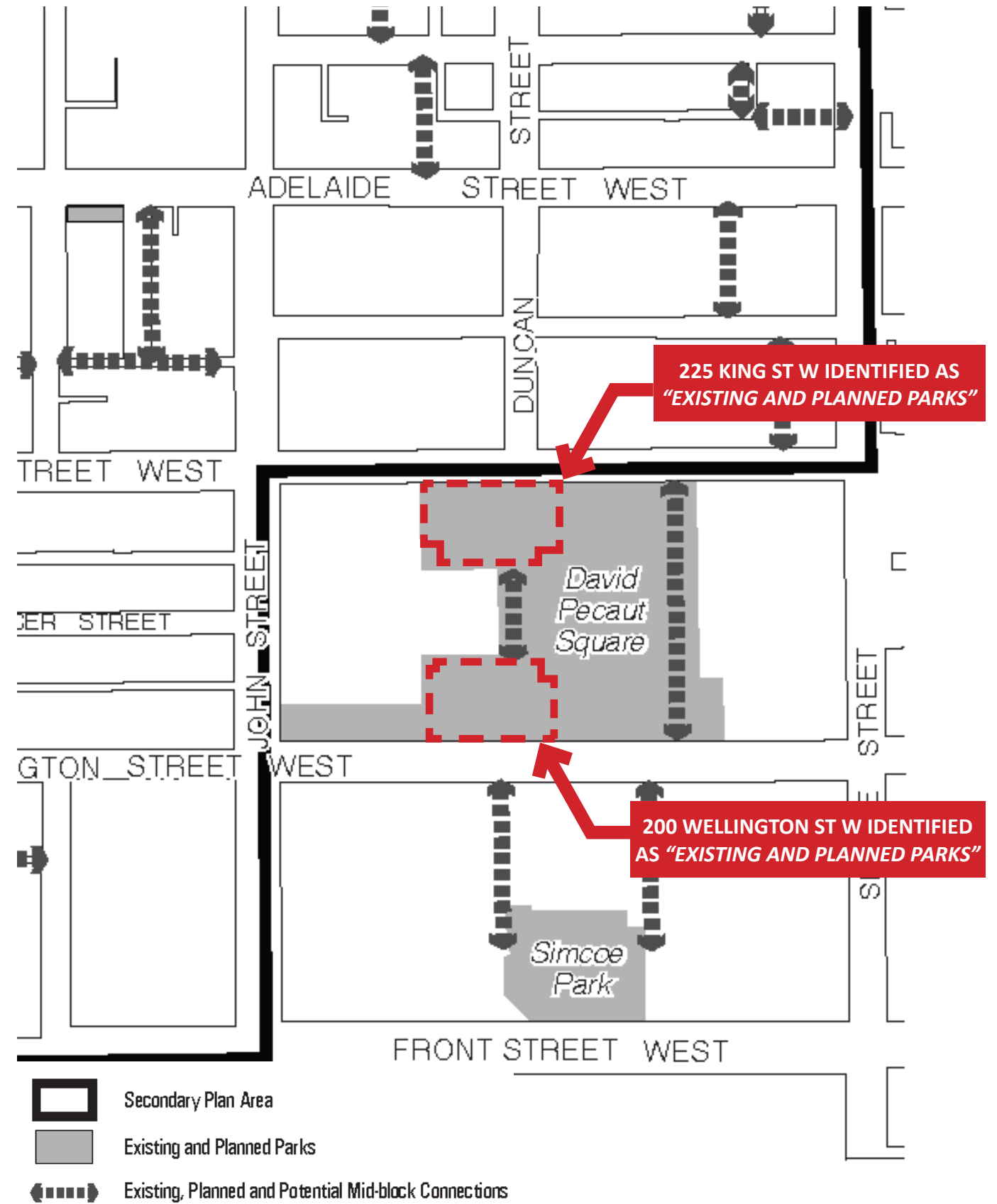
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<sup>1</sup> Oxford is the owner of the land, but not the Roy Thomson Hall building.

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CITY OF TORONTO OFFICIAL PLAN - MAP 18 LAND USE PLAN



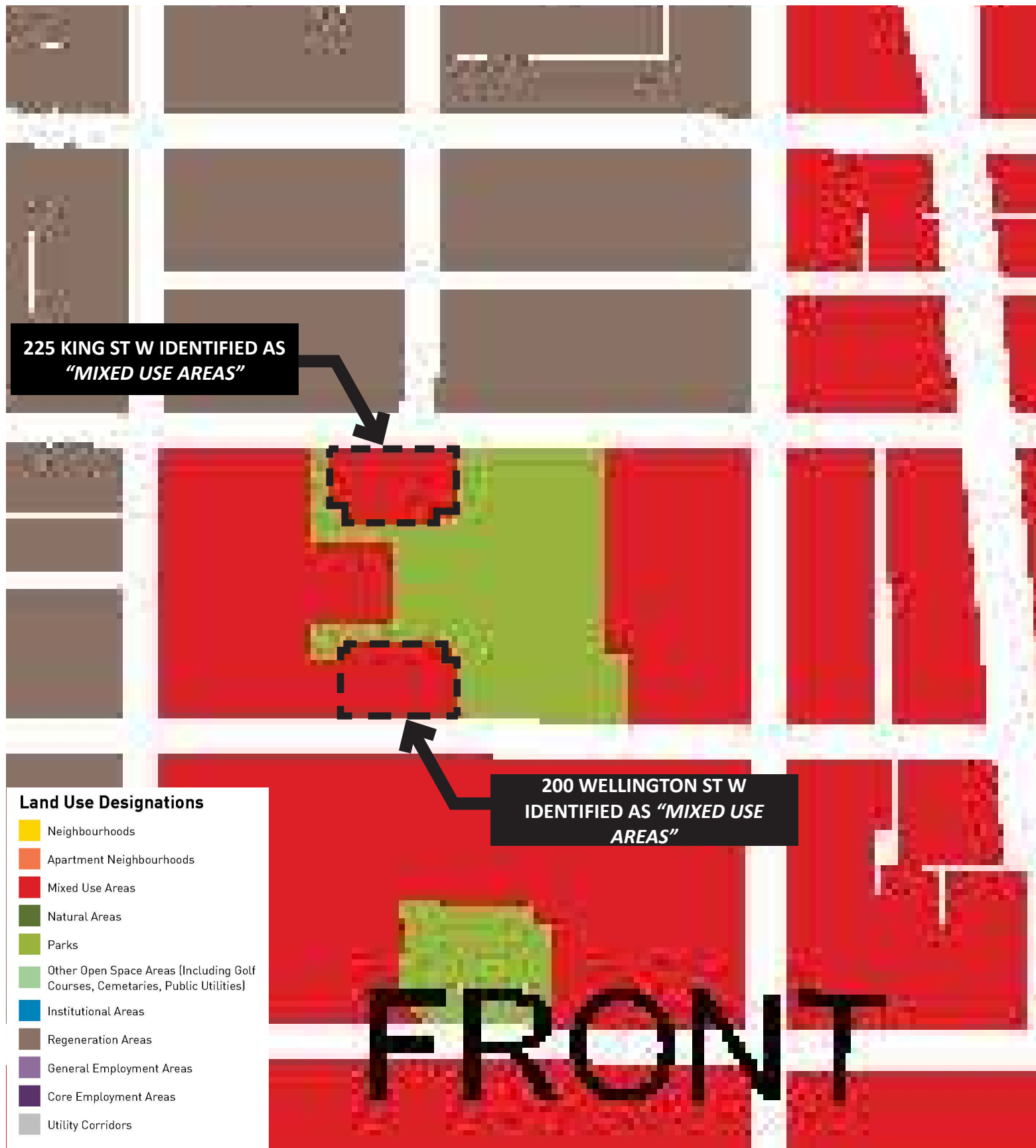
KING-SPADINA SECONDARY PLAN - MAP 16-3B MIDBLOCK CONNECTIONS

**DAVID PECAUT SQUARE MAPPING INCONSISTENCIES**  
**KING-SPADINA SECONDARY PLAN - MAP 16-3B**

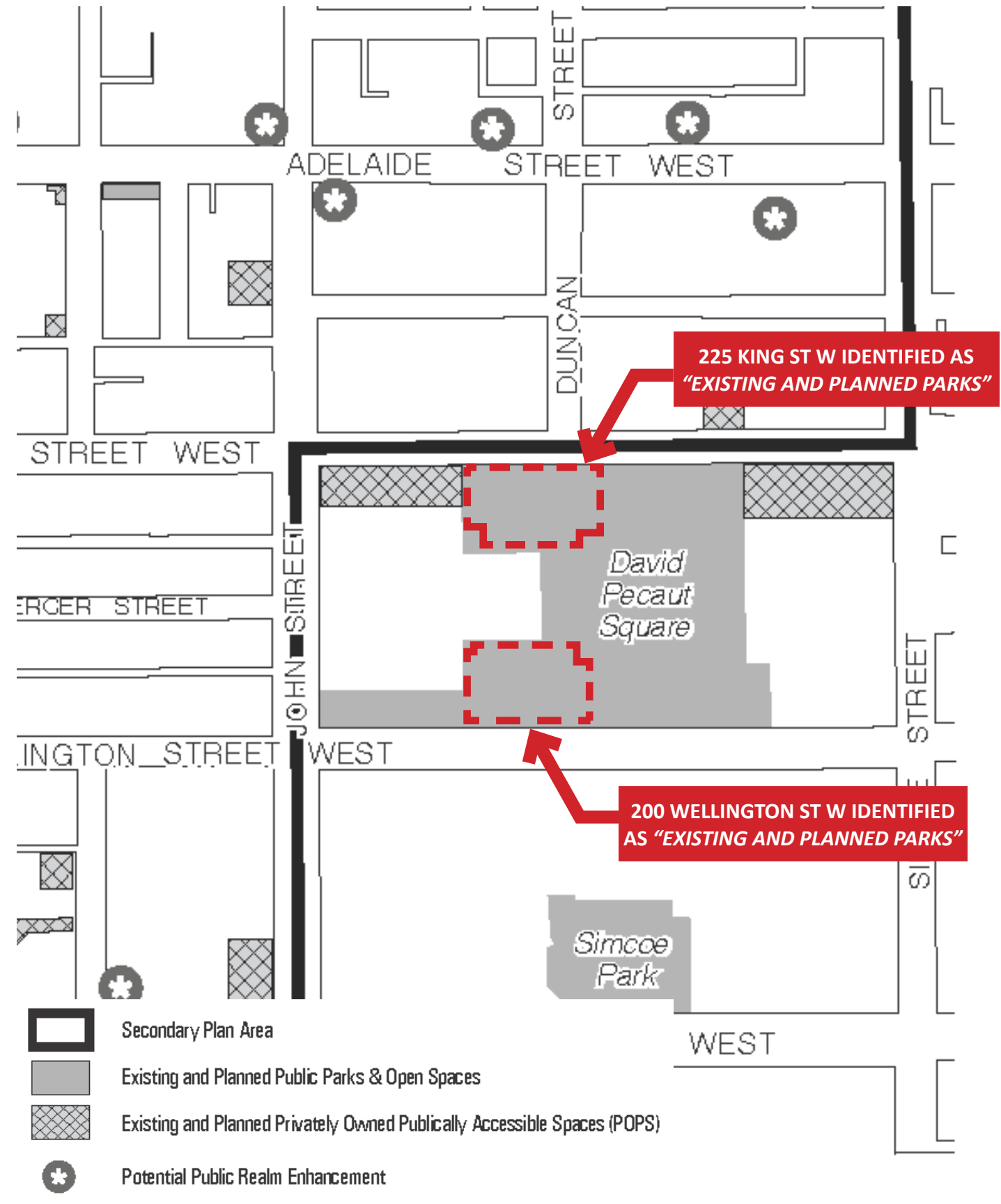
Existing Building Footprint (225 King St W & 200 Wellington St W)

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**Figure 1**  
 225 King Street West & 200 Wellington Street West



CITY OF TORONTO OFFICIAL PLAN - MAP 18 LAND USE PLAN



KING-SPADINA SECONDARY PLAN - MAP 16-3C PUBLIC REALM STRUCTURE PLAN

**DAVID PECAUT SQUARE MAPPING INCONSISTENCIES**  
KING-SPADINA SECONDARY PLAN - MAP 16-3C

**Figure 2**  
225 King Street West & 200 Wellington Street West

Existing Building Footprint (225 King St W & 200 Wellington St W)

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