

hullmark

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07/01/2020

Ellen Devlin, Secretariat  
Toronto and East York Community Council  
100 Queen Street West  
2<sup>nd</sup> Floor, West Tower, City Hall  
Toronto, ON M5H 2N2

Dear Ms. Devlin

**RE: King-Spadina Secondary Plan Update – Final Report  
Toronto and East York Community Council Item TE12.4  
230-240 Richmond Street West, Toronto**

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Hullmark (230-240 Richmond) LP & OCAD University are the owners of the property municipally known as 230-240 Richmond Street West (the “Site”) in the City of Toronto. The Site is located on the northeast corner of Richmond Street West and Duncan Street.

We write to share our concerns with respect to the proposed update to the King-Spadina Secondary Plan (the “Proposed Plan”) as it pertains to the Site and as owners with continued investment interest in the area. In our opinion, the Proposed Plan contains prescriptive language and policies that do not reflect the existing and planned character of the area and are inconsistent with the Official Plan policy framework. Some policy concerns are outlined below:

- Policy 7.13 requires that development provide a minimum setback of 10 metres above the streetwall on Duncan Street. This requirement prohibits context-specific interventions and flexibility for prominent corners, including the Site.
- Policy 3.1.2. and 5.2 requiring the replacement of existing non-residential gross floor area and *community service facilities* should be revised in alignment with the in-force Downtown Plan (OPA 406) to encourage the replacement of this gross floor area.

The concerns outlined above do not represent an exhaustive list of our concerns and we request that Item TE12.4 is directed back to staff for additional consultation. We also request that we are circulated on any communications or notices regarding the Proposed Plan.

Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Hullmark (230-240 Richmond) LP  
Per:

Leona Savoie  
*Senior VP, Developments*