



January 7, 2020

Our File No.: 161048

**By E-mail**

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

**Attention: Ellen Devlin, Secretariat**

**Re: TE12.4 – King-Spadina Secondary Plan Update – Final Report**

We are solicitors for Hullmark (474 Wellington) LP, the owner of the property known municipally as 470-474 Wellington Street West in the King-Spadina area of the City of Toronto (the “**Hullmark Property**”). We write on behalf of our client to express concerns with the proposed update to the King-Spadina Secondary Plan (the “**Proposed Plan**”).

As background, the Hullmark Property is located in the West Precinct of King-Spadina, on the north side of Wellington Street West. The Hullmark Property, together with the neighbouring property known municipally as 482-488 Wellington Street West (the “**Doubledown Property**”), is also the subject of site-specific development applications involving the redevelopment of the Property and the Doubledown Property with an office building (the “**Development**”).

In our view, the Proposed Plan includes a number of policies that are inconsistent with other aspects of the Official Plan framework, do not accurately reflect the existing character of the King-Spadina area, and impose rigid standards that unnecessarily preclude context-sensitive development. As just two examples:

- Policy 6.11 prescribes a maximum height of 50 metres for properties in the West Precinct designated as *Mixed Use Area 2*. This is the case even though the in-force Downtown Plan provides that building heights consistent with the *Mixed Use Area 1* designation – which permits the highest heights and most intense form of development – may be permitted when properties within *Mixed Use Area 2* are in proximity to existing or planned rapid transit. As you know, much of the West Precinct – including the Hullmark Property – is in close proximity to existing or planned rapid transit such that greater heights are permitted under the Downtown Plan. The Proposed Plan would undermine this in-force policy direction. In addition, the Proposed Plan’s maximum height prescription would create a built form regime that is inconsistent with the existing context, which includes a number of buildings taller than 55 metres.

- Policy 7.8.3 requires a minimum 10 metre stepback above the streetwall on Wellington Street West. This prescriptive requirement unnecessarily precludes other approaches that would equally achieve the objective of respecting the scale and pattern of built heritage resources along Wellington Street West and framing the public realm.

In light of the deficiencies in the Proposed Plan, we ask that you direct staff to continue consultation on the Proposed Plan to resolve the outstanding issues.

Please also accept this letter as a request for notice of all matters relating to the Proposed Plan.

Yours very truly,

**Goodmans LLP**



Mark Noskiewicz  
MRN/

cc. Leona Savoie, Hullmark  
Aaron Platt, Counsel to the owner of the Doubledown Property