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Matter No. P751-05

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Delivered via E-mail (hertpb@toronto.ca) & Courier

John D. Elvidge, City Clerk
City Clerk's Office
Toronto City Hall
2nd Floor West, 100 Queen St. W.
Toronto ON M5H 2N2

Attn: Administrator, Secretariat

Dear Mr. Elvidge:

RE: Notice of Objection: Proposed Designation of 625 Yonge Street Under Part IV, Section 29 of the *Ontario Heritage Act*

This letter has been prepared on behalf of our client RML 625 Yonge Street Limited, the registered owner of the lands municipally known as 625 Yonge Street (the "**Property**").

On August 15, 2022, our client received notice that the City of Toronto intends to designate the Property, including all lands, buildings and structures located thereon, pursuant to Part IV, Section 29 of the *Ontario Heritage Act*, R.S.O. 1990, c. I.18, as amended, as a property of cultural heritage value or interest.

We are writing to object to the proposed designation pursuant to subsection 29(5) of the *Ontario Heritage Act*, for reasons which include those outlined below.

In 2016, the Ontario Municipal Board (as it then was) approved a redevelopment proposal for the Property and an abutting site at 9 Isabella Street, which was the result of a settlement ratified by City Council. As part of the original development proposal, our client submitted a Heritage Impact Assessment report which evaluated the architectural, historic/associative, and contextual value of the Property, in its relevant context. The report concluded that the Property did not hold sufficient heritage value to warrant its retention, and that any value it may have held had been superseded by alterations or

deterioration in condition. The redevelopment therefore provided for the removal of the existing building at 625 Yonge Street, and its replacement with a residential high rise. By ratifying the settlement, the City effectively agreed that the Property did not hold sufficient cultural value as to merit its retention.

Our client, through its related companies, subsequently acquired an additional abutting site at 619 Yonge Street, and has submitted an amended redevelopment proposal to the City. As part of that conveyance, our client has also taken on carriage of an appeal of the Historic Yonge Street Heritage Conservation District Plan with respect to the Property and the related abutting sites.

In our view, the Proposed Designation fails to appropriately assess the existing conditions of the buildings on the Property, and ascribes undue significance to their design value when in actual fact, they were (as noted in the original assessment) relatively generic and functional for their time, and not unique in style, design, materials or construction methods. Moreover, the Proposed Designation flies in the face of the recent development approval, obtained with the support of the City Council, which called for the demolition and replacement of the very building now proposed to be designated.

We have reviewed the report submitted to the Toronto Preservation Board in support of the request for the Proposed Designation, and our opinion remains unchanged: the Property is not a significant cultural heritage resource, and it does not merit individual designation.

We respectfully request notification of any further actions or decision made by City Council respecting this matter.

Please do not hesitate to contact me at 416.645.4582 or via email at adrian.frank@devinepark.com should you require further information regarding this notice of objection.

Yours very truly,

Devine Park LLP



Adrian Frank
AGF/ITK/ss

cc: Client
Ira Kagan, Kagan Shastri LLP