

445, 447, 449, and 451 Adelaide Street West - Demolition and New Construction on Designated Heritage Properties Under Part V, Section 42 of the Ontario Heritage Act - Refusal

Date: June 13, 2025

To: Toronto Preservation Board

Toronto and East York Community Council

From: Senior Manager, Heritage Planning, Urban Design, City Planning

Wards: Spadina-Fort York - Ward 10

SUMMARY

This report recommends that City Council refuse the application under Part V, Section 42 of the Ontario Heritage Act to demolish and construct a new building on the designated heritage properties at 445, 447, 449, and 451 Adelaide Street West, in connection with the proposed development of the site. The proposal demolishes four designated contributing heritage properties to replace them with a new 17-storey building with hotel and restaurant uses. The heritage permit application reflects the incomplete application submitted through the associated Zoning By-law Amendment application (25 152956 STE 10 OZ).

The proposed development site (the "Site") consists of four properties — 445, 447, 449, and 451 Adelaide Street West — identified as contributing residential properties within the in-effect King-Spadina Heritage Conservation District (KSHCD), designated under Part V of the Ontario Heritage Act (OHA). The Site is adjacent to the contributing residential property at 453 Adelaide Street West to the west, and to the north, adjacent to the St. Andrew's Playground — a significant historic public space within the KSHCD dating to the 1837 Hawkins Plan. Functionally, the properties at 447, 449, and 451 are comprised of the same building, including 453 Adelaide Street West, which is not incorporated into the Site.

Staff recommend refusal of the heritage permit application, as it does not demonstrate that the cultural heritage value and attributes of the King-Spadina HCD, as expressed through the contributing properties on, and adjacent to, the Site, will be conserved in a manner consistent with the heritage planning policy framework, including the KSHCD Plan. Nor does it demonstrate that the heritage impacts of the proposal would be appropriately mitigated.

The proposal would result in the permanent and irreversible loss of cultural heritage resources that form part of the KSHCD's heritage attributes, in direct conflict with the policies and objectives of the KSHCD Plan. The demolition of designated heritage properties, and negative impact on adjacent designated heritage properties, is not consistent with the Provincial Planning Statement (2024), does not conform to the City of Toronto Official Plan, including the King-Spadina Secondary Plan and the Downtown Plan, and fails to meet or be consistent with the Standards and Guidelines for the Conservation of Historic Places in Canada.

RECOMMENDATIONS

The Senior Manager, Heritage Planning, Urban Design, City Planning recommends that:

1. City Council refuse the demolition and new construction on the designated heritage properties at 445, 447, 449, and 451 Adelaide Street West in accordance with Section 42 of the Ontario Heritage Act, as found in the plans and drawings prepared by architects Alliance, dated April 24, 2025, and the Heritage Impact Assessment prepared by ERA Architects, dated April 23, 2025.
2. In the event of an appeal to the Ontario Land Tribunal, City Council authorize the City Solicitor and the necessary City staff to attend the Ontario Land Tribunal hearing in opposition to the appeal.

FINANCIAL IMPACT

City Planning confirms there are no financial implications resulting from the recommendations included in this report in the current budget year or in future years.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the information as presented in the Financial Impact Section.

DECISION HISTORY

On October 2, 2017, City Council designated the King-Spadina Heritage Conservation District and adopted the King-Spadina Heritage Conservation District Plan under Part V of the Ontario Heritage Act. The King-Spadina HCD was subsequently appealed to the Ontario Land Tribunal (OLT).

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.TE26.14>

On December 5, 2017, City Council adopted the inclusion of the properties at 445, 447, 449, and 451 Adelaide Street West on the City of Toronto's Heritage Register under Section 27 of the Ontario Heritage Act, as part of a multiple-property listing report.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.TE28.12>

On April 24, 2018, Council considered a report from Community Planning regarding the Zoning Amendment Application for the Site (dated March 8, 2018) and directed the City Solicitor and appropriate staff to attend and oppose the application at the OLT (formerly the Local Planning Appeal Tribunal or LPAT).

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.TE31.10>

On December 17 and 18, 2019, City Council stated its intention to designate the properties at 445-453 Adelaide Street West pursuant to Section 29 of the Ontario Heritage Act.

<https://secure.toronto.ca/council/agenda-item.do?item=2019.TE11.7>

On January 29, 2020, as a result of the City receiving no objections in respect of those notices of intention to designate, By-law 114-2020 was passed, designating 445 Adelaide Street West a property of cultural heritage value under Section 29 of the Ontario Heritage Act (<https://www.toronto.ca/legdocs/bylaws/2020/law0114.pdf>) and By-law 115-2020 was passed, designating 447-453 Adelaide Street West as a property of cultural heritage value under Section 29 of the Ontario Heritage Act (<https://www.toronto.ca/legdocs/bylaws/2020/law0115.pdf>).

On April 14, 2020, the LPAT issued its decision on the appeal filed by 445 Adelaide Street West Inc. under subsection 34(11) of the Planning Act, which was initiated due to City Council's failure to make a decision on the Zoning By-law Amendment application submitted in March 2018. The LPAT approved the proposed development, including the demolition of the designated heritage properties on the Site.

<https://www.omb.gov.on.ca/e-decisions/PL171452-APR-14-2020.pdf>

On March 16, 2022, the Ontario Superior Court of Justice – Divisional Court quashed the LPAT's decision for various reasons stated in the court decision.

[2022 ONSC 1471 \(CanLII\) | Toronto \(City of\) v. 445 Adelaide Street West Inc. | CanLII](#)

On August 14, 2023, the OLT brought into effect appealed portions of the new King-Spadina Secondary Plan, with approved modifications, and confirmed un-appealed portions of Official Plan Amendment 486 were in-effect as of March 5, 2020. The OLT Decision approving OPA 486, as modified, may be found here:

<https://www.omb.gov.on.ca/e-decisions/OLT-22-002453-OCT-05-2023.pdf>

On February 28, 2024, the OLT brought into effect the designation of the King-Spadina HCD under Part V of the Ontario Heritage Act and approved the King-Spadina HCD Plan, as modified.

<https://www.toronto.ca/wp-content/uploads/2024/04/8f30-city-planning-hcd-king-spadina.pdf>

The applicant (445 Adelaide Street West Inc., through Lamb Development Corp identifying the properties at 445-451 Adelaide Street West) for the subject development site was one of the appellants to the King-Spadina HCD Plan and the King-Spadina Secondary Plan. Their issues, along with those of other appellants, were resolved through the approval of the King-Spadina HCD Plan and King-Spadina Secondary Plan.

BACKGROUND

Area Context

The subject site is located within the King-Spadina Heritage Conservation District, which contains a concentration of late 19th- and early to mid-20th-century Residential and Industrial/Commercial building typologies, as well as three public parks and a distinctive network of laneways. These historic resources reflect the district's evolution from a residential neighbourhood to a warehouse and manufacturing area over the course of the district's period of significance (1880s to 1940s). The district retains Residential Buildings dating from the 1880s–1900s that often reflect the first use of the property and the initial wave of development. The Industrial/Commercial Buildings primarily date from the 1900s–1940s, when manufacturing was a key economic sector in Toronto and a key source of employment.

As stated in the KSHCD Plan, Residential Building Typology properties are among the oldest in the district and many remain largely intact. Where these buildings have survived individually, the conservation of their exterior form, design, materials, and craftsmanship is particularly important. When located adjacent to one another, they demonstrate the continuous nature of this typology. While some detached residential properties exist, semi-detached and row houses are more common.

The Site is located on the south of St. Andrew's Playground — a significant historic public space within the KSHCD that dates to the 1837 Hawkins Plan. The district's evolution from a residential neighbourhood to a manufacturing and commercial area has resulted in a unique geographic context in which the built form and public realm illustrate periods of change across nearly two centuries of the city's history. Within the KSHCD, the area surrounding St. Andrew's Playground, Wellington Street West, Spadina Avenue, and Duncan Street has been identified as representative of these periods of change and is integral to understanding the cultural heritage value of the district.

The area surrounding St. Andrew's Playground began to develop in the 1850s as a residential neighbourhood close to Spadina Avenue, with development extending to Bathurst Street by 1880. Although many of the original residential properties were later consolidated for commercial development, the area retains a strong residential character in the form of row houses, residential laneways, small narrow lots and undivided blocks. This residential character is particularly valuable in the context of the KSHCD, as it provides insight into the district's residential history from the earliest decades of its period of significance (1880s-1940s).

The area around St. Andrew's Playground generally consists of low- to mid-rise Industrial/Commercial properties, interspersed with rows of 2- to 2.5-storey Residential Buildings. The historic built form includes multiple generations of contributing Residential and Industrial/Commercial Buildings, as well as significant historical institutional and public properties such as the Brant Street Public School, the former Richmond Street Waterworks Building, and St. Andrew's Playground itself. The close proximity of Residential and Industrial/Commercial Buildings contribute to the diversity

of built form and the area's mixed-use character and a historic streetscape.

Heritage Properties

The Site contains four contributing Residential properties at 445, 447, 449, and 451 Adelaide Street West. These properties are located within the KSHCD and are designated under Part V of the OHA.

In addition to their designation under Part V, the properties are also individually designated under Part IV of the OHA. Constructed in 1880, the John P. Jackson House at 445 Adelaide Street West anchors the southwest corner of Adelaide Street West and Morrison Street. The properties at 447-453 Adelaide Street West, known as Eliza Lennox Houses, comprise a group of four row houses constructed in 1904 for Eliza Jackson Lennox, whose brother, John P. Jackson, commissioned the adjoining detached house at 445 Adelaide Street West.

The Eliza Lennox Houses at 447-453 Adelaide Street West were designed as a unified group, a quality reinforced by the shared brick parapet that extends across all four units. This parapet features a central segmental-arched pediment and decorative panels at the centre and ends, providing a symmetrical composition and reinforcing the impression of a complete, cohesive building. The property at 453 Adelaide Street West is not part of the subject development site.

Heritage Adjacencies

The Site is adjacent to the contributing property at 453 Adelaide Street West to the west, and to St. Andrew's Playground at 450 Adelaide Street West to the north. 453 Adelaide Street West is designated under both Part IV and Part V of the OHA, while St. Andrew's Playground is designated under Part V of the OHA as a contributing property.

Proposal

On May 6, 2025, a Zoning By-law Amendment application (25 152956 STE 10 OZ) was submitted for the properties at 445-451 Adelaide Street West. The application proposes to demolish the four heritage designated properties and construct a 17-storey hotel building containing 144 suites, featuring a contemporary architectural design.

On May 1, 2025, the City of Toronto received an application under Section 42 of the Ontario Heritage Act to demolish the four heritage designated properties and replace them with the proposed development. On June 13, 2025, the City issued a notice of receipt for the application.

Under the Ontario Heritage Act, if City Council fails to make a decision on the heritage permit application within 90 days of issuing a notice of receipt of the application, the application is deemed to be permitted under Section 42 of the OHA. In this case, the applicant must be notified of Council's decision by September 10, 2025.

Heritage Planning Policy Framework

Cultural heritage resources are protected and managed as part of planning for future growth under the Provincial Planning Statement (2024). Heritage conservation is enabled through the Ontario Heritage Act. The City of Toronto's Official Plan implements the provincial policy regime, the Planning Act, the Ontario Heritage Act and provides policies to guide decision making within the city.

The Planning Act

The Planning Act guides development in the Province of Ontario. It states that municipalities must have regard for matters of provincial interest. Section 2(d) specifically refers to “the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest” and 2(r) to a built form that is well designed and provides for a sense of place.

The Provincial Planning Statement (2024)

The Provincial Planning Statement (2024) (the "PPS") provides policy direction province-wide on land use planning and development to promote strong communities, a strong economy, and a clean and healthy environment. It includes policies on key issues that affect communities, such as:

- the efficient use and management of land and infrastructure
- ensuring the sufficient provision of housing to meet changing needs including affordable housing
- ensuring opportunities for job creation
- ensuring the appropriate transportation, water, sewer and other infrastructure is available to accommodate current and future needs
- protecting people, property and community resources by directing development away from natural or human-made hazards, and
- conservation of cultural heritage and archaeology

The provincial policy-led planning system recognizes and addresses the complex inter-relationships among environmental, economic and social factors in land use planning. The PPS supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas.

The PPS is issued under Section 3 of the Planning Act and all decisions of Council in respect of the exercise of any authority that affects a planning matter shall be consistent with the PPS. Comments, submissions or advice affecting a planning matter that are provided by Council shall also be consistent with the PPS.

Policy 4.6.1 of the PPS directs that “Protected heritage property, which may contain built heritage resources or cultural heritage landscapes, shall be conserved.” “Conserved” is defined in the PPS as the identification, protection, management and use of built heritage resources in a manner that ensures their cultural heritage value or interest is retained.

Policy 4.6.2 states that "Planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved."

Policy 4.6.3 of the PPS directs that "Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property unless the heritage attributes of the protected heritage property will be conserved."

All decisions of Council in respect of the exercise of any authority that affects a planning matter shall be consistent with the PPS and shall conform with Provincial Plans. All comments, submissions or advice affecting a planning matter that are provided by Council shall also be consistent with the PPS and conform with Provincial Plans.

Provincial Plans are intended to be read in their entirety and relevant policies are to be applied to each situation.

Toronto Official Plan

This application has been reviewed for consistency with the applicable policies of the City of Toronto Official Plan, which provides the policy framework for heritage conservation in the City. The following Official Plan policies apply to the proposed application:

3.1.6.3 Heritage properties of cultural heritage value or interest, including Heritage Conservation Districts and archaeological sites that are publicly known will be protected by being designated under the Ontario Heritage Act and/or included on the Heritage Register.

3.1.6.4 Properties on the Heritage Register will be conserved and maintained consistent with the Standards and Guidelines for the Conservation of Historic Places in Canada, as revised from time to time and adopted by Council.

3.1.6.5 Proposed alterations, development, and/or public works on or adjacent to, a property on the Heritage Register will ensure that the integrity of the heritage property's cultural heritage value and attributes will be retained, prior to work commencing on the property and to the satisfaction of the City.

3.1.6.6 The adaptive re-use of properties on the Heritage Register is encouraged for new uses permitted in the applicable Official Plan land use designation, consistent with the Standards and Guidelines for the Conservation of Historic Places in Canada.

3.1.6.26 New construction on, or adjacent to, a property on the Heritage Register will be designed to conserve the cultural heritage values, attributes and character of that property and to mitigate visual and physical impact on it.

3.1.6.27 Where it is supported by the cultural heritage values and attributes of a property on the Heritage Register, the conservation of whole or substantial portions of buildings, structures and landscapes on those properties is desirable and encouraged. The retention of façades alone is discouraged.

3.1.6.32 Impacts of site alterations, developments, municipal improvements, and/or public works within or adjacent to Heritage Conservation Districts will be assessed to ensure that the integrity of the districts' heritage values, attributes, and character are conserved. This assessment will be achieved through a Heritage Impact Assessment, consistent with Schedule 3 of the Official Plan, to the satisfaction of the City.

3.1.6.33 Heritage Conservation Districts should be managed and conserved by approving only those alterations, additions, new development, demolitions, removals and public works in accordance with respective Heritage Conservation District plans.

The Official Plan defines demolition as "the complete destruction of a heritage structure and property from its site, including the disassembly of structures and properties on the Heritage Register for the purpose of reassembly at a later date."

The City of Toronto Official Plan can be found here: <https://www.toronto.ca/city-government/planning-development/official-plan-guidelines/official-plan/>

Standards and Guidelines

The Standards and Guidelines for the Conservation of Historic Places in Canada (the "Standards and Guidelines") is the official document guiding planning, stewardship and the conservation approach for all listed and designated heritage resources within the City of Toronto. The General Standards (1-9), the Standards for Rehabilitation (10-12), and the Standards for Restoration (13-14) apply to the proposed project.

The Standards and Guidelines can be accessed here:
<http://www.historicplaces.ca/media/18072/81468-parks-s+g-eng-web2.pdf>

Downtown Secondary Plan

This application has been reviewed for conformity with the policies of the Downtown Plan. In addition to other policies of this Secondary Plan, the following policies are highlighted below:

The Vision of the Downtown Plan establishes that new buildings have been shaped and scaled to fit within their setting, conserve heritage, improve liveability of the public spaces surrounding them and provide the amenities needed by residents and workers.

Policy 3.3 New buildings will fit within their existing and planned context, conserve heritage attributes, expand and improve the public realm, as a community benefit, create a comfortable microclimate, provide compatibility between differing scales of development and include indoor and outdoor amenities for both residents and workers, as provided for by this Plan.

Policy 6.22 Not all sites can accommodate the maximum scale of development anticipated in each of the Mixed Use Areas while also supporting the liveability of the development and the neighbourhood, while other sites may be able to accommodate more than the anticipated scale. Development will be required to address specific site characteristics including lot width and depth, location on a block, on-site or adjacent

heritage buildings, parks or open spaces, shadow impacts, and other sensitive adjacencies, potentially resulting in a lower-scale building.

Section 9 of the Downtown Plan states that: Many factors will shape and influence the type and scale of development, including the site's unique characteristics, existing and planned context, land use designations, area character, shadow impacts, fit and transition in scale to different land uses and scales of development, hospital helicopter flight paths, important view corridors, heritage buildings and Heritage Conservation Districts.

Policy 9.10 Development on sites that include or are adjacent to properties on the Heritage Register will include base buildings that are compatible with the streetwall height, articulation, proportion, materiality and alignment thereof.

Policy 9.24 Development may be required to incorporate transition in scale to achieve built form compatibility when it is:

9.24.3 adjacent to a property designated under Part IV of the Ontario Heritage Act or a Heritage Conservation District.

King-Spadina Secondary Plan

This application has been reviewed for conformity with the policies of the King-Spadina Secondary Plan. In addition to other policies of the Secondary Plan, the following policies are highlighted below:

2.2 King-Spadina's identity comes from its heritage character including from the adaptive re-use of heritage properties for office and culture sector employment uses, such as small-scale employment uses and the arts. The Area's heritage character is defined by a range of heritage resources, including a concentration of significant 19th and 20th century heritage properties associated with several periods of Toronto's historical and economic development. The parks and open spaces, network of laneways and mid-block connections also contribute to its heritage character. The retention of the heritage character and the adaptive re-use of heritage properties for office and cultural, and employment uses is an important part of the built form and land use vision for King-Spadina.

2.3 Development and investment in King-Spadina will:

2.3.1 contribute to King-Spadina's identity, providing compatible infill development and investment that is contextually and historically appropriate; and

2.3.3 conserve the Area's heritage resources and consider the adaptive re-use of properties on the heritage register, in particular, but not exclusively, for culture sector employment uses.

3.1 The objectives of this Plan are to:

3.1.3 Conserve cultural heritage resources to enhance the heritage character of the Area.

6.1. Development will achieve a compatible relationship with the existing and planned built form context through consideration of matters including, but not limited to: land use, building height, massing, scale, transition, setbacks, tower separation, stepbacks, roof line and profile, and architectural character and expression.

6.3. Development will provide stepbacks on all elevations facing public streets, not including laneways. Greater stepbacks may be required to conserve existing heritage resources or address a built form character on the on the street. The stepbacks will generally be free of any projections.

King-Spadina Heritage Conservation District Plan

This application has been reviewed for consistency with the policies of the KSHCD Plan. One of the purposes of the KSHCD Plan is to provide policies, guidelines, and procedures for managing change in the district and to achieve the objectives outlined in Section 4.0 of the Plan. The cultural heritage value of the district is expressed through its heritage attributes which are identified in Section 3.3 of the Plan. The objectives of the KSHCD Plan include:

- Conserve the cultural heritage value of the District as embodied in its physical character, which is described in general terms in the heritage attributes. (Objective 1)
- Conserve the legibility of the District's period of significance as described in Section 3.2 of this Plan. (Objective 2)
- Conserve the historic form and scale of the District's building typologies as represented by its contributing properties. (Objective 3)
- Conserve contributing properties, Part IV designated properties, listed properties and National Historic Sites. (Objective 4)
- Conserve and maintain the historic scale, and residential and mixed-use character of contributing properties surrounding St. Andrew's Playground. (Objective 6)
- Ensure that new development and additions conserve and maintain the cultural heritage value of the District in general, particularly with respect to the historic scale of contributing properties, the public realm and the general built form pattern. (Objective 7)
- Maintain and enhance the cultural heritage value of the District as a historic place of employment by encouraging commercial and employment uses that support the retention and adaptive reuse of contributing properties. (Objective 17)

The following policies of the KSHCD Plan apply to the proposed development:

6.1.1 Alterations to a contributing property shall be based on a firm understanding of the contributing property and how it contributes to the District's cultural heritage value and heritage attributes.

6.1.3 Alterations to a contributing property may be permitted only once the cultural heritage value and heritage attributes of the District, as expressed through the property, have been documented and described, and the impact of any proposed alteration on those cultural heritage values and heritage attributes has been determined.

6.2.1 Contributing properties shall be conserved in a manner that ensures the long-term conservation of the District's cultural heritage value, heritage attributes, and the integrity of the contributing property.

6.6.1 Buildings or structures that are on contributing properties shall be conserved; however, applications for the demolition of buildings or structures may be considered when:

- the building or structure on a contributing property has been determined by the Chief Building Official and Executive Director, Toronto Building to be in a condition that is unsafe and the remedial step(s) necessary to render the building or structure safe in an Order issued under the Building Code Act from the Chief Building Official and Executive Director, Toronto Building require the building to be demolished; or
- the heritage integrity and the cultural heritage value of a contributing property to the District for which the demolition application has been submitted has been lost, as informed by a Heritage Impact Assessment; and
- the loss of heritage integrity and cultural heritage value of the contributing property is not the result of demolition by neglect, deferred maintenance or purposeful damage to the property.

6.10.5 Alterations to a contributing property shall be designed so that whole, or substantial portions of, the property are retained and the three-dimensional integrity of the building is conserved.

6.11.1 Additions to contributing properties shall conserve the primary structure's three-dimensional integrity as seen from the public realm.

6.11.3 Additions to contributing properties should not negatively impact the cultural heritage values and heritage attributes of the District.

6.11.15 New development and additions taller than the roof ridge or flat roof of contributing residential properties shall be located behind the primary structure.

8.1.2 New development on non-contributing properties and additions to contributing properties shall not negatively impact the heritage attributes of St. Andrew's Playground, Clarence Square and Victoria Memorial Square.

8.1.18 New development on non-contributing properties and additions to contributing properties shall conserve the historic scale of the contributing properties surrounding St. Andrew's Playground and the block and lot pattern through massing transitions, façade articulation and conserving and enhancing the network of laneways.

COMMENTS

The proposal includes the complete demolition and replacement of four contributing properties on the Site. Policy 6.6.1 of the KSHCD Plan directs that buildings on contributing properties shall be conserved; however, it identifies specific circumstances under which the demolition may be acceptable, specifically where: a building is determined to be in a condition that is unsafe; the heritage integrity and cultural heritage value of the contributing property have been lost; and the loss of heritage integrity and value is not the result of demolition by neglect, deferred maintenance, or purposeful damage.

The submitted Heritage Impact Assessment (the "HIA") acknowledges that the proposed demolition "does not align with the demolition policies in the KSHCD Plan or conserve the cultural heritage attributes identified in the Site's Part IV designation by-laws," but contends that it "is necessary to realize the full potential of the Site, offering a greater opportunity to meet the objectives of the KSHCD Plan and ensure the long-term benefit and success of the District." In the opinion of staff, the proposal does not meet the fundamental objectives of the KSHCD Plan, which include the conservation of the district's heritage value, attributes, and contributing properties. The demolition of contributing properties directly contradicts these objectives.

In addition, Policy 6.1.3 of the KSHCD Plan directs that alterations to contributing properties may be permitted only once the heritage value and attributes of the district, as expressed through the properties, have been documented and described, and the impact of any proposed alteration on those values and attributes has been determined. The submitted HIA does not explain how the proposed demolition of four contributing buildings would affect the cultural heritage value and attributes of the district as a whole.

The HIA further states: "best efforts were made to explore opportunities to adaptively reuse the existing buildings on the Site. However, given the constraints of a small site and the operating needs of the proposed hotel, retaining existing fabric was not a viable option". Despite this assertion, no evidence or detailed analysis is provided. The HIA also states that "options for the full or partial retention and adaptive reuse of the existing buildings on the Site were explored and found not viable," yet it does not describe the alternatives considered, explain why they were deemed unviable, or provide justification for their dismissal. Crucially, the HIA fails to demonstrate how the proposed demolition aligns with the heritage conservation policies of the KSHCD Plan or the broader heritage planning framework. Instead, the document presents demolition as "necessary", without evaluating whether less intrusive alternatives could achieve both conservation and appropriately scaled development.

Moreover, the HIA identifies only the physical impact on the adjacent designated property at 453 Adelaide Street West and the shadow impact on St. Andrew's

Playground. It does not include a comprehensive analysis of the proposal's impact on the heritage value and attributes of the KSHCD, does not assess the visual impacts on the adjacent heritage property at 453 Adelaide Street West, and does not assess the impact on the protected heritage properties' cultural heritage value and heritage attributes which will be lost as a result of this proposal.

As required by the KSHCD Plan, contributing properties shall be conserved in a manner that supports the long-term conservation of the heritage value and attributes of the district, as well as the integrity of the contributing properties. Policy 6.10.5 requires that alterations to contributing properties be designed so that whole or substantial portions of the properties are retained, and the three-dimensional integrity of the buildings is conserved. Policy 6.11.1 further directs that additions to contributing properties must conserve the three-dimensional integrity of the primary structure as seen from the public realm.

Staff are of the opinion that the proposal fails to conserve the KSHCD's cultural heritage value and attributes, as expressed through the contributing properties on and adjacent to the Site. Replacing four heritage properties with a 17-storey building would result in their complete and permanent loss — an irreversible impact on the heritage character and value of the KSHCD. The proposal would negatively impact the district's heritage value and attributes, in direct conflict with Policy 6.11.3 of the KSHCD Plan.

Policy 6.11.15 directs that new development taller than the roof ridge or flat roof of contributing residential properties must be located behind the primary structure. The proposal does not include a conservation strategy, lacks a defined base building, and is not physically and visually compatible with the KSHCD's heritage value and attributes and the adjacent contributing property at 453 Adelaide Street West. It also does not relate to the streetwall along Adelaide Street West or the adjacent contributing property, and is not compatible in design, scale, form, and massing.

In the opinion of staff, the proposal fails to treat conservation as a guiding and directive principle and instead treats heritage conservation as an external constraint, to be addressed after the built form and design is established. Heritage conservation policies, particularly within HCDs, require that new development respond to and be shaped by the existing heritage context. This understanding and application of policies stems directly from the requirements for an HCD which include a mandatory statutory requirement for policy statements to achieve the stated objectives of the HCD Plan and for managing change in the district. In this case, the proposed massing and architectural expression are unrelated to the heritage attributes and character-defining elements of the district and fail to demonstrate an integrated approach to conservation and design as required by the heritage planning framework.

The proposal also destroys the symmetrical composition of the unified row at 447-453 Adelaide Street West by removing three of the four houses that make up this architecturally cohesive set, severely compromising the heritage value, attributes, and integrity of 453 Adelaide Street West. With the removal of the adjoining buildings, the integrity and legibility of 453 Adelaide Street West as part of a unified architectural group would be effectively lost. The proposal fails to maintain and complement the primary horizontal and vertical articulation of the streetscape in this portion of Adelaide

Street West, does not reference the fine-grained residential lot pattern, and does not incorporate massing transitions to respect the historic scale of contributing Residential properties, as outlined in the KSHCD Plan.

Good conservation practice, as generally outlined in the Parks Canada Standards and Guidelines for the Conservation of Historic Places in Canada, seeks a minimal intervention approach and states that repairable character-defining elements should not be removed, replaced, or substantially altered.

The proposed development would result in the complete demolition and permanent loss of four contributing properties within the KSHCD. Staff are of the opinion that the proposal does not comply with the provincial and municipal heritage planning policy framework, including the KSHCD Plan, nor with recognized best practices in the field of heritage conservation in Canada. The demolition of contributing properties in this HCD Plan are limited to specific parameters set out in the HCD Plan, none of which apply to these properties. It is contrary to the KSHCD Plan to propose or authorize demolition of these contributing properties where the proposal does not meet the limited circumstances, and as such, it fails to conserve the cultural heritage value and heritage attributes of the District in accordance with the HCD Plan. Approval of this heritage permit application would set a negative precedent for the demolition of contributing properties in Heritage Conservation Districts, weakening the express intent and authority of the King-Spadina HCD Plan and the City's broader heritage policy framework.

CONCLUSION

The application proposes the complete demolition and replacement of four contributing Residential properties on the Site. This would result in the permanent and irreversible loss of cultural heritage resources that form part of the King-Spadina HCD's heritage attributes, in direct conflict with the policies and objectives of the KSHCD Plan. The demolition of designated heritage properties is not consistent with the heritage conservation policies of the Provincial Planning Statement (2024), fails to conform to the City of Toronto Official Plan, including the Downtown Plan and King-Spadina Secondary Plan, and fails to meet the intent or be consistent with the Standards and Guidelines for the Conservation of Historic Places in Canada.

The proposal has not demonstrated that the cultural heritage value and attributes of the King-Spadina HCD will be conserved in a manner consistent with the heritage planning policy framework, including the KSHCD Plan, nor that the heritage impacts of the proposal would be appropriately mitigated. The proposal also has negative impacts on, and fails to conserve, the heritage attributes of the adjacent protected heritage property at 453 Adelaide Street West. Staff recommend that Council refuse the application for the reasons outlined in this report. Refusing the application reinforces the City's commitment to a policy-led approach to heritage conservation and the long-term protection of Toronto's cultural heritage resources.

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SIGNATURE

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ATTACHMENTS

Attachment 1 - Location Map
Attachment 2 - Photographs
Attachment 3 - Proposal Renderings
Attachment 4 - Selected Plans and Drawings

LOCATION MAP

ATTACHMENT 1

445-451 Adelaide Street West

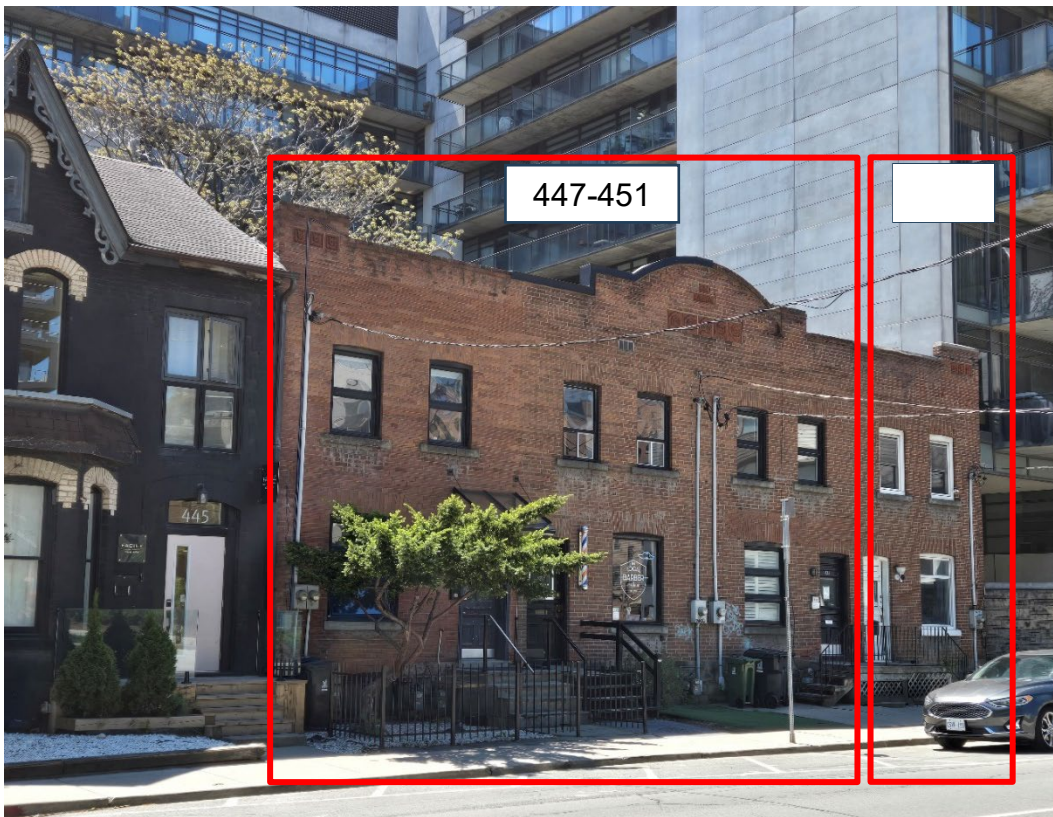


Location map showing the proposed development site at 445-451 Adelaide Street West outlined in red, situated at the southwest corner of Adelaide Street West and Morrison Avenue. This location map is for information purposes only; the exact boundaries of the properties are not shown (City of Toronto Mapping).

445-451 Adelaide Street West



View of 445 and 447-453 Adelaide Street West, looking south (Heritage Planning, 2025)



447-453 Adelaide Street West. Note: 453 Adelaide Street West is not part of the proposed development site. (Heritage Planning, 2025)



445 Adelaide Street West, looking south (Heritage Planning, 2025)



445-453 Adelaide Street West, looking southwest (Heritage Planning, 2025)



St. Andrew's Playground, located north of the proposed development site, looking north (Heritage Planning, 2025)

445-451 Adelaide Street West

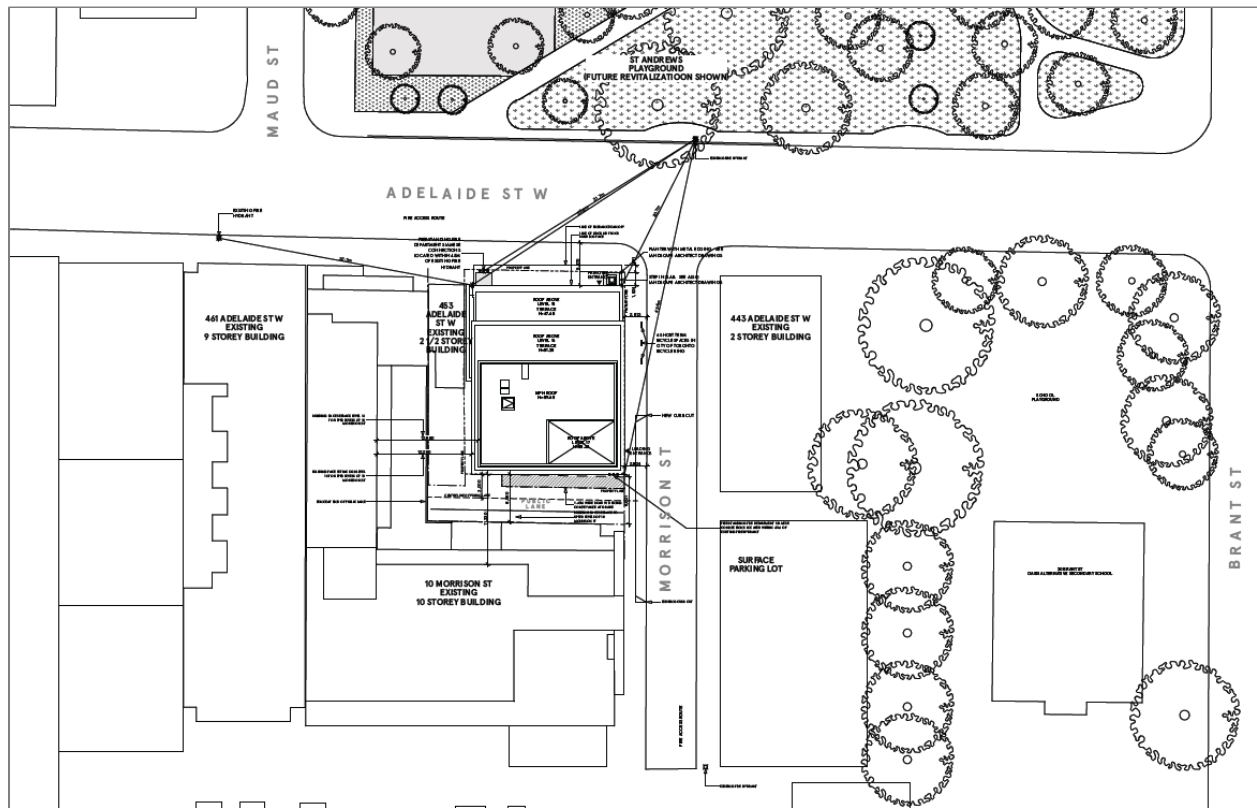


Rendering – aerial view looking southwest (architects Alliance)

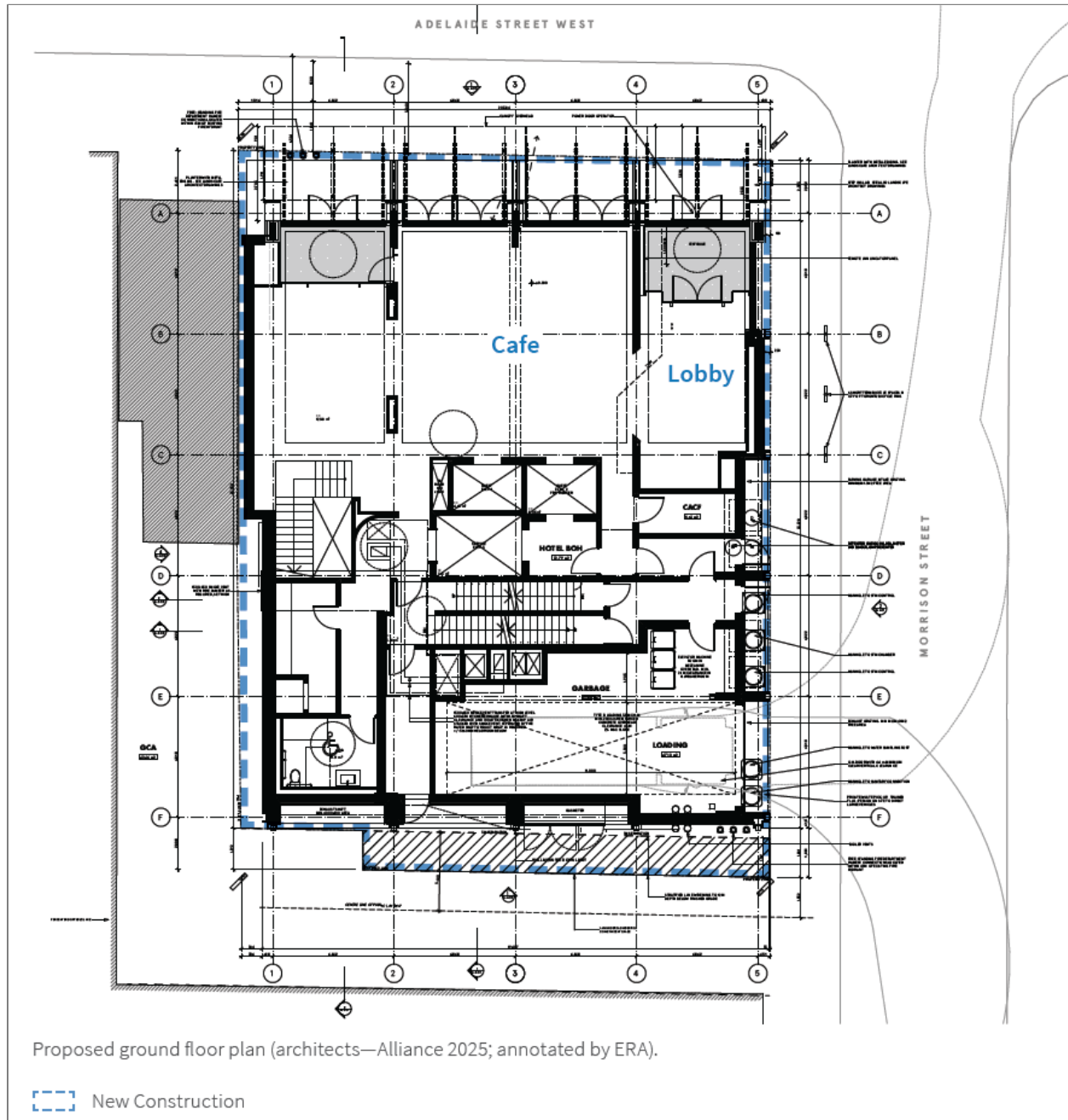


Rendering of the north elevation of the proposed development (architects Alliance)

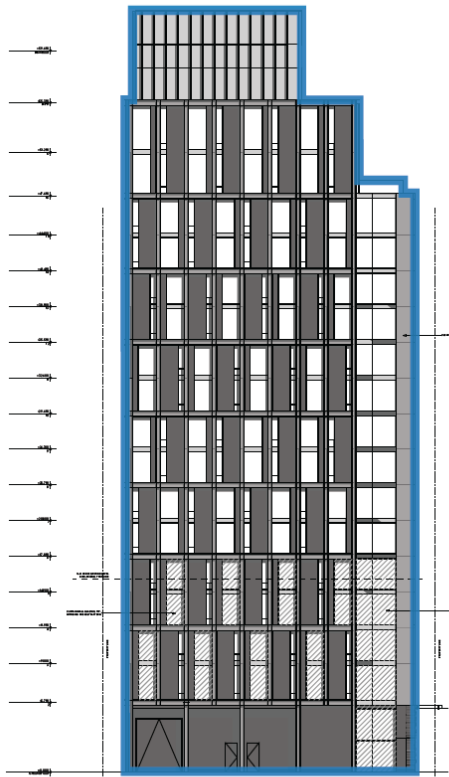
445-451 Adelaide Street West



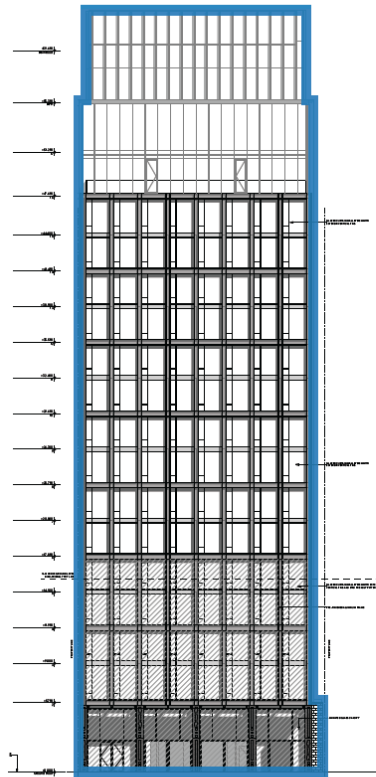
Proposed Development: Context Plan (architects Alliance)



Proposed Ground Floor Plan (Heritage Impact Assessment, ERA Architects)

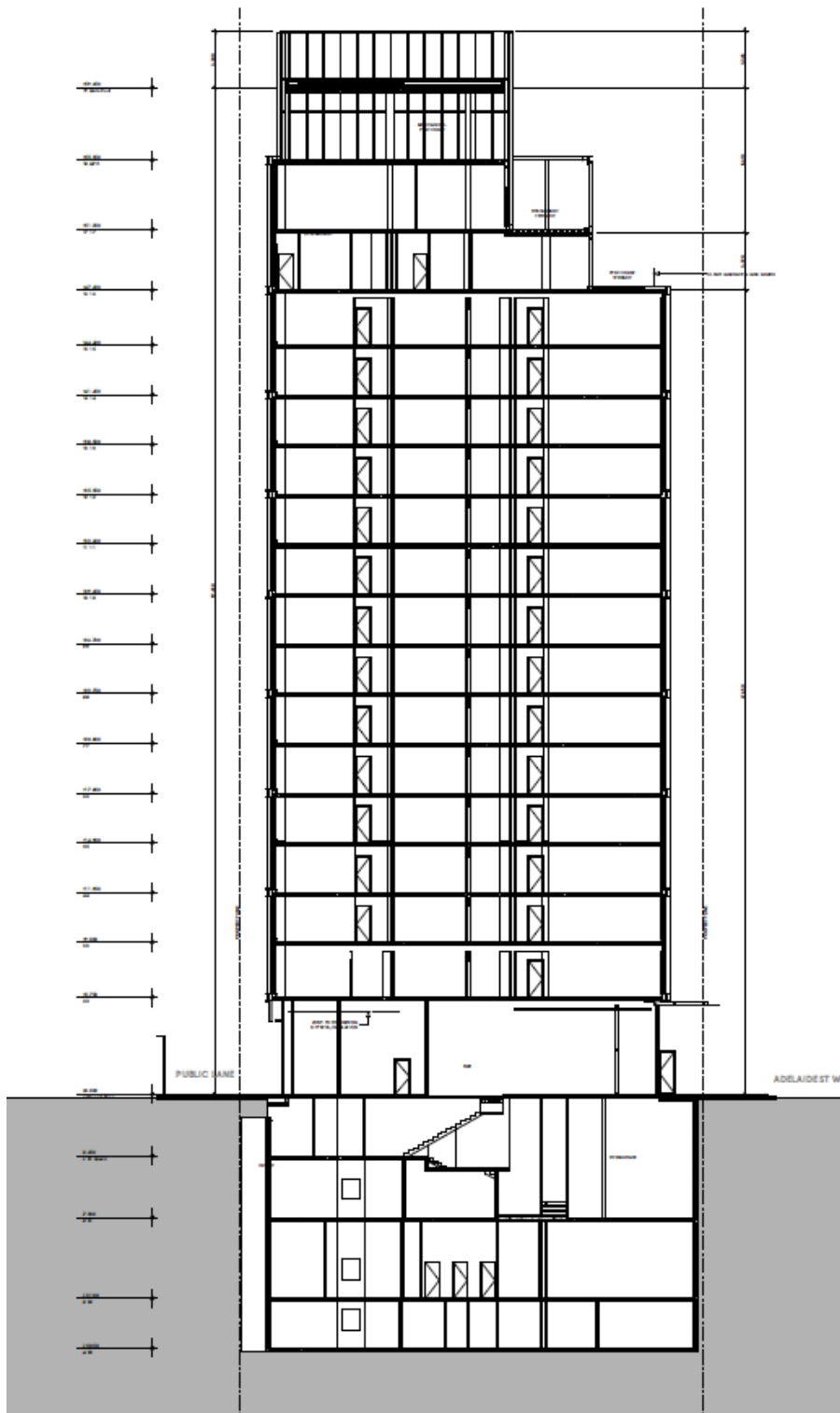


Proposed east elevation
(architects—Alliance 2025; annotated by ERA).

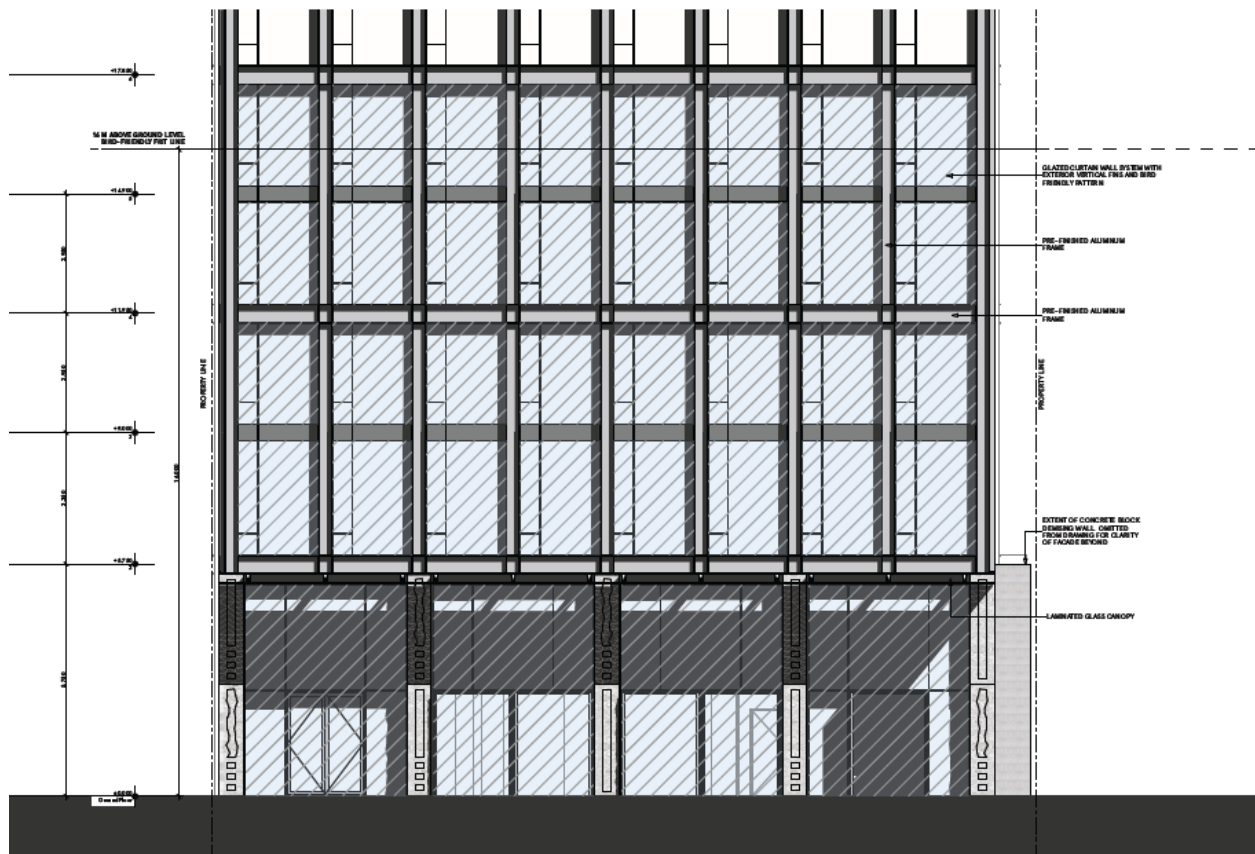


Proposed north elevation
(architects—Alliance 2025; annotated by ERA).

Proposed Development: East and North Elevations; new construction is shown in blue (Heritage Impact Assessment, ERA Architects)



Proposed Development: North-South Elevation (architects Alliance)



Proposed Development: North Elevation (architects Alliance)