

June 26, 2025

**To: Members of the Toronto Preservation Board**

**Re: PB33.8 - 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**

Dear Members of the Toronto Preservation Board,

On behalf of the Board of Directors of TSCC 2874 – Waterworks Residences, located directly north of the subject application across St. Andrew’s Playground – we are writing you to express our opposition to the proposed development. Waterworks is an acclaimed project, recipient of many awards including the 2024 GHBA National Award for Housing Excellence for Best Mid-to-High-Rise Building in Canada, the 2023 BILD Award for Best New Built Community and the 2022 Heritage Toronto Award for Adaptive Reuse in Built Heritage.

We believe that the proposed development does not represent good planning nor respect the principles of the King-Spadina Heritage Conservation Plan (“KSHCD”) or the King-Spadina Secondary Plan.

## **1. The King-Spadina HCD**

We have reviewed the Heritage Impact Assessment prepared by ERA Architects and the Planning & Urban Design Rationale by Bousfields Inc.

ERA states that:

*The Site is designated under Part V of the Ontario Heritage Act (OHA), as part of the King-Spadina Heritage Conservation District (KSHCD). **The KSHCD Plan identifies the properties on the Site as contributing.***

*The properties on the Site are designated under Part IV of the OHA by By-laws 114-2020 and 115- 2020, and are described as follows:*

- *445 Adelaide Street West: a two-and-a-half storey house-form building, built in 1880; and*
- *447–451 Adelaide Street West: three connected two-storey row-houses, built in 1904.*

*The Site is adjacent to 453 Adelaide Street West (designated Part IV and Part V), which forms part of a series of four row-houses at 447–453 Adelaide Street West.*

***The Site is adjacent to St. Andrew's Playground, a contributing property in the KSHCD.***

Note that these properties have been on the city's Inventory of Heritage Properties since 2017 and were designated in 2020.

The Bousfield Report says:

*The purpose of the King-Spadina HCD Plan is to establish a framework that will conserve the District's cultural heritage value through the protection, conservation and management of its heritage attributes. The policies and guidelines established in the Plan are intended to guide the review of development applications and permits within the District. The Plan includes policies and guidelines that relate to contributing and non-contributing properties and character sub-areas, as well as parks and the public realm.*

*Section 4.0 includes the Statement of Objectives... Specific objectives include:*

- conserving the historic form and scale of the District's building typologies as represented by its contributing properties;*
- conserving contributing properties, Part IV designated properties, listed properties and National Historic Sites;*
- conserving and maintaining the historic scale, and residential and mixed-use character of contributing properties surrounding St. Andrew's Playground;*

ERA acknowledges that:

*The proposed development involves the demolition of all existing buildings on the contributing properties..... **this 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.***

## **2. The King-Spadina Secondary Plan**

The Secondary Plan stresses the importance of heritage conservation:

### **2. Vision**

2.3 Development and investment in King-Spadina will:

2.3.3 conserve and complement the Area's heritage resources.

### **3. Objectives**

3.1 The objectives of this Plan are to:

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

Given the historic and cultural significance of St. Andrew's Playground under the KSHCD, special height provisions were included in the King-Spadina Secondary Plan, approved in 2020, to preserve the existing scale of buildings flanking the park.

The subject site is within Mixed-Use Area 2 which clearly states:

*Specifically, Policy 6.11 provides that development in Mixed Use Areas 2 within the West Precinct “will generally not exceed 50 metres in height”.*

Because of the historic location of the park, the subject site was included in a special height transition zone (Zone G). As stated in the Bousfield report:

*A number of Height Transition Zones are shown on Map 16-4; the subject site is identified as part of Height Transition Zone G (see Figure 24). Policy 6.6.7 provides that, in Height Transition Zone G, development will transition downwards in height and scale towards St. Andrew’s Playground.*

St. Andrew’s Playground, in addition to being a contributing property in the KSHCD, is also identified in the Secondary Plan as an **Area of Special Identity**:

*Section 7 of the Secondary Plan identifies **St. Andrew’s Playground as an Area of Special Identity** on Map 16-5 (see Figure 25). **Policy 7.2 provides that development will transition downwards in height towards St. Andrew’s Playground.***

However, the architectural plans submitted with the application show a 17-storey building with a total height of 63.95M to the top of the glass screen that projects 3.3M above the mechanical penthouse. This is inconsistent with the heights shown in the Bousfield report (Figure 37), which show the subject development at 59.65M. In any case, the proposed height is substantially higher than any of the existing and approved buildings flanking the park:

- Waterworks: 53.5M – 13-storeys (set back from the 2-storey 1932 heritage building which flanks the north side of the park)
- The Ace Hotel: 45.0M – 14-storeys
- 425 Adelaide: 42.5M – 10-storeys
- 39 Brant: 35.6M – 11-storeys
- 461 Adelaide: 35.7M – 11 storeys (9-storeys on the Adelaide frontage; this building is just west of the subject 17-storey proposal)
- 471 Adelaide: 51.95M - 12 storeys (approved but not built; this site is further west at the corner of Portland)

The proposed height does not comply with the height policies of the Secondary Plan, which clearly state that the heights within Mixed-Use Area 2 should not exceed 50.0M and that properties flanking the park should be lower in both height and scale, given the heritage significance of the park.

### **3. Conclusion**

For the reasons outlined above, we believe that the proposed development represents bad planning and contravenes the core principles of both the King Spadina Heritage Conservation Plan and the King Spadina Secondary Plan. The City should not be supporting the demolition of four designated heritage buildings in the heart of a Heritage Conservation District and the proposal will also have a deleterious effect on St. Andrew’s Playground, a contributing property in the HCD.

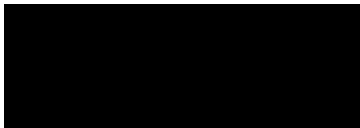
The height and scale represent the over-development of a small lot (551.6 SM or 5,937 SF) and the size of the lot prevents the proponent from preserving any of the heritage buildings. It does not comply with the maximum height of 50.0M outlined in the Secondary Plan, not does it demonstrate the required height transitioning in relation to St. Andrew's Playground, an Area of Special Identity.

Since St. Andrew's Playground was expanded and redesigned in 2021, combined with the conversion of the block-long heritage 1932 art deco former machine hall into the Waterworks Food Hall, it is one of the most animated, well-used park downtown, a place of extraordinary beauty that has become the heart of the surrounding neighbourhood. In justifying the demolition of heritage buildings and the construction of a new building on the south side of the park, ERA stretches credibility when it states:

*Although demolishing the existing buildings does not align with the KSHCD Plan's demolition policies, it enables the construction of a new building that **conserves the significant cultural heritage value of St. Andrew's Playground** and contributes to the KSHCD as a whole, with hotel and restaurant uses that will further activate the area and strengthen the Playground's sense of place within the public realm.*

We do not believe that the demolition of heritage buildings and the construction of a 17-storey building (which will cast shadows on the park between 10:18am and 3:18pm on the March and September equinoxes) will conserve the park's cultural heritage value nor strengthen the Playground's "sense of place within the public realm."

We respectfully ask you to refuse the application.



Marie-Josée Vinet  
Secretary  
The Board of Directors for TSCC 2874