

March 17, 2025

Our File No.: 250398

Via Email – phc@toronto.ca

Planning and Housing Committee
City Clerk's Office
100 Queen Street West
Toronto, Ontario, M5H 2N2

Attention: Nancy Martins

Dear Committee Members:

Re: PH19.5 - 667 King Street West - Notice of Intention to Designate a Property under Part IV, Section 29 of the Ontario Heritage Act

We are the solicitors for Wheat Sheaf Corporation, the owner of the property known municipally as 667 King Street West (the “**Property**”), the subject of consideration under PH19.5. Our client is the proud owner and operator of The Wheat Sheaf Tavern and since becoming the owner of the Property in 1995, has completed systematic and substantial renovations to modernize and improve the building. Our client has reviewed the March 3, 2025 report of the Chief Planner and Executive Director, City Planning in relation to PH19.5 and monitored Item PB27.2 before the Toronto Preservation Board. We write to you today on behalf of our client to express its strong preference that City Council decline to designate the Property under Part IV, Section 29 of the *Ontario Heritage Act* (the “**Act**”).

Extensive Renovations Completed

As noted above, our client has completed substantial renovations to the building to modernize it. There have been four major renovations of the building since 1995 with millions of dollars spent completing the same. The following is a summary list of all of the works completed:

1. Structural Works - Major structural components were constructed during several phases of construction over a number of years;
2. Mechanical – HVAC works, upgrading of gas lines, installation of new Roof top units, installation of new heating, cooling and make up air systems;
3. Plumbing - Main supply water lines, main drains, branch plumbing were replaced;

4. Life safety systems – Installation of new sprinklers, new fire alarm system, emergency lighting throughout;
5. Installation of a new kitchen with kitchen exhaust equipment and a kitchen suppression system;
6. Electrical – Replacement of main services, panels, transformers, etc, all wiring throughout;
7. New roof installed;
8. Additions to south side of building with new staircase for egress points from all three floors; and,
9. Building envelope has been reworked, modernized and restored over the years (Windows, doors replaced, bricks cleaned/replaced, decorative wood components, signage etc).

Our client takes pride in The Wheat Sheaf Tavern and has worked hard and invested heavily into making it a success. The genuine hope is that these investments will allow The Wheat Sheaf Tavern continued success over the coming years. However, our client does not welcome the prospect of designation of the Property under the Act because when all things are considered, it does not warrant designation. Further and importantly, the designation could unnecessarily complicate or limit future redevelopment of the Property, should the same be pursued.

Investment in Transit Infrastructure and Need for Densification

The Property is strategically located in immediate proximity to the new King-Bathurst Subway Station of the Ontario Line. This area has been designated as a Transit-Oriented Community and is the subject of incredible amounts of investment by the Province of Ontario. This hub or area is of great importance to City building and the Property represents an important opportunity to help leverage public investments that are currently being made.

At some point in the future, it is likely that the highest and best use of the Property, from a public and private perspective, is for a more densified use than the current building. While redevelopment may proceed when a property is designated under the Act, designation can increase the expense and uncertainty of being able to pursue development that would otherwise be acceptable. Given the important locational advantages that the Property benefits from, it is preferable and in the public interest to best protect the redevelopment potential of the Property by declining to designate it under the Act.

Discretion Beyond Criteria

The Act requires that a property meet at least 2 of the criteria provided for in Ontario Regulation 9/06 to allow the property to be designated under Part IV, Section 29 of the Act. However, it does not follow that a property that meets 2 or more of the criteria must or even should be designated.

There remains a significant residual discretion for this Committee and City Council to consider. That discretion can and should take into account the broader context of the Property in City building and the future of the area around the new King-Bathurst subway station of the Ontario Line. The City has previously used its discretion to not designate properties when appropriate. The former University of Toronto Planetarium is but one example.

Conclusion

Our client objects to the designation of the Property and asks this Committee and City Council to use its discretion well. Respectfully, our client asks that City Council decline to designate this Property under the Act.

Yours truly,

Goodmans LLP



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