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Sent by EMAIL

Planning and Housing Committee
West Tower, City Hall
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RE: City-wide Heritage Survey Feasibility Study – PH7.11

Dear Members of the Planning and Housing Committee,

We have reviewed the June 6th Staff Report to the Toronto Preservation Board on the city-wide heritage survey feasibility study and wish to make the following comments.

First, we commend the Staff for their Report and we appreciate the complexity of this undertaking. We also fully support the need for the Architectural Conservancy of Ontario (ACO) and Heritage Toronto to play vital roles in its implementation. The survey constitutes the first serious reconsideration of how the City addresses heritage since the Toronto Historical Board first started its inventory in 1973. It is necessary to get it right.

The technical expert panel consulted during the preparation of this report recommended that a ‘Manifesto’ be created. This document would explain why the survey needs to be undertaken and how it would be implemented. These two elements are currently still missing from the Staff Report.

Why does the survey need to be undertaken?

1. Internationally, the nature of how heritage is understood has changed in the last thirty years. It has been called a paradigm shift. Heritage can now celebrate many things: it can be Indigenous people’s cultural ties to the land; it can be the cultures of new Canadians; it can be intangible heritage based on story telling; it can be the history of the working class, not just the history of the rich and wealthy; heritage can be the Sam the Record Man sign.
2. The existing registry of heritage properties has been based on the accumulation of data for bricks-and-mortar heritage conservation. The proposed Survey needs to expand on the definition of heritage to more inclusively recognize the broader ways that heritage is now

understood. How do you assess the heritage value of the first Chinese shopping mall in Scarborough? Or Indigenous cultural presence on the land?

3. The existing registry of heritage properties is also heavily focused on the downtown core. This is understandable as it was created by the former City of Toronto, but it is not truly representative of the current nature of this great city. Recognition of heritage creates value and every child living in Scarborough should feel that they live in a neighbourhood that has a history, that has stories, and that is an appreciated part of the city. A heritage survey presents a significant opportunity to achieve these goals.
4. A city-wide heritage survey shouldn't result in a denser and more intensely regulated municipal structure. Instead, it should open pathways for communities to celebrate the city's broad cultural history and for volunteer networks, like the ACO and Heritage Toronto, to play a vital role in recognizing that diversity.

How is the survey to be implemented? We would suggest several specific changes that have not been discussed in the Report.

1. **Expand Beyond the Ontario Heritage Act:** The Ontario Heritage Act which focuses on listing and designating individual properties is too limited to address this newer understanding of what heritage value can mean to Torontonians. In attempts to use the Act to address newer concepts of heritage, confusion has arisen as the Act, which was intended to protect significant built heritage resources, is now being used to designate very modest neighbourhood buildings of local interest. Using the Ontario Heritage Act as the main tool for implementing this Survey is fraught with difficulty. While the OHA and O. Reg. 9/06 could be used to identify and designate significant built heritage resources, these tools should not drive the methodology nor should they be the primary lens through which thousands of properties are evaluated.
2. **Work with Planning Staff:** Many in the Planning staff, who know the neighbourhoods of the city so well, should be instrumental in developing the foundational work of the survey. Their knowledge and expertise will form an important framework for understanding the city and its evolution, not just for heritage stewardship but for addressing planning issues as well.
3. **Conduct the Survey in Two Clearly Defined Phases:** This survey should be conducted in two phases. The first phase should focus on discovering and understanding the history of Toronto, its neighbourhoods, and the heritage values identified by communities without preset or assumed ideas about how this information will be regulated or used. After this first phase, the City can assess the progress and direction of the Survey. A subsequent phase would involve a deep-dive into individual assessments of the more than 400,000 properties in the city.
4. **Have a Timeline:** The first phase of the survey should build a better understanding of the evolution of the city and its component parts including layers and elements that are not typically understood as heritage, such as the presence of the City's ravines, parks, and community hubs within individual neighbourhoods. It would include a simple overview of the urban morphology of Toronto and neighbourhood heritage context statements that address community and social values. This foundational framework is essential to creating a comprehensive planning tool. Only

after this work is done can one focus on the fine grain of individual buildings. A defined timeline should be laid out for the development and completion of the first phase.

The end goal is to bring Toronto together and to respect and recognize the expansive history of the amalgamated city and its citizens. We think a well-executed city-wide survey can help make this happen.

Sincerely,

A handwritten signature in black ink, appearing to be 'Michael McClelland', with a stylized, flowing script.

Michael McClelland, Principal
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