

Leaside Property Owners Association Incorporated

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February 18, 2015

Toronto Preservation Board
Att: Janette Gerrard, Committee Clerk
Email: jgerrar@toronto.ca

Re: PB 2.7 Heritage Conservation District (HCD) Study Prioritization Report

Dear Chair and Members, Toronto Preservation Board

The Leaside Property Owners' Association provides this correspondence regarding the above noted report. This report assesses 16 qualifying potential HCD study areas including Leaside. Our comments on the report are based on our experience as a nominator and participant in the process, and are not intended to dispute the particular results for Leaside outside of the collective of study areas.

The Criteria Used in the Evaluation

In October 2012 City Council adopted an HCD prioritization system and criteria for determining which potential heritage conservation district studies should be undertaken first. The HCD Study Prioritization Report describes how the four evaluation criteria were applied by staff, and with input from the nominators via a questionnaire. However in addition two unapproved criteria were added, without any consultation with nominators.

- Criterion #1 Development Activity states that "Planning applications were not included in the assessment of potential districts that are identified as Neighbourhoods in the Official Plan, and that do not contain an Avenue." So if they do contain an Avenue, were planning applications included?

- Criterion #2 Existing Level of Protection - almost all areas have extremely few properties that are protected. How do you compare when all (except the Distillery) are poorly protected? The criterion is weak.

- Criterion #4 [land use] Planning Priorities. High priority is assigned to areas where a planning study is underway or anticipated in the coming year or where a heritage conservation district study or plan is likely to support Official Plan objectives. The logic is unclear.

- Additional Criterion #1 Archaeological Value. The relevance of this criterion to HCDs is unclear. Heritage Conservation Districts fall under Part V of the Ontario Heritage Act, while the conservation of resources of archaeological value are under Part VI. Further, "the districts were measured for the percentage of land identified as having archaeological potential in the interim Archaeological Management Plan" (2006). This is a weak benchmark since it only maps archaeological potential.

- Additional criterion #2 – The Report defines Cultural Heritage Value by the presence of a National Historic Site designation. National historic site designation, which is symbolic rather than instrumental in effect, is a high standard for determining local significance. If the standard is applied equally across all the nominated areas, the benchmark would be eligibility for national historic site designation not the designation itself. There are 36 national historic sites in the entire city, but only one of them is truly an historic district – Kensington Market. Fort York, the Distillery, and Mount Pleasant Cemetery are single-property cultural heritage landscapes.

Application of the Criteria

- The weight given to each of the six criteria is not revealed.
- The rating per criterion is subjective and cannot be scrutinized without supporting data. In the case of Leaside, for example, the evaluation arrived at a “moderate” rating for planning, Committee of Adjustment and building/demolition permit applications and an absence of major planning studies in the coming year. This despite the development pressures resulting from the Eglinton Crosstown LRT, and the Eglinton Connects corridor land use study.

Other Aspects of the Evaluation

All the nominators were asked to submit a detailed questionnaire to support the prioritization process. The report and attachments make no reference to this input. Were the questionnaire responses considered or disregarded? If the latter, what was the point of the exercise?

Besides applying the evaluative criteria, the report indicates staff took into consideration their observations from site visits. When did the site visits occur? Did they occur in the company of the nominators (the 2012 procedures have staff visiting the nominated area in the company of the nominator).

The Results

Flawed criteria and flawed application of the criteria leads to flawed results. The Distillery District received top overall rating yet much of the proposed Distillery District HCD has already been protected under Part IV of the Ontario Heritage Act for decades, and its extensive redevelopment is largely complete. Harbord Village Phase III ranks as a high priority, but it ends up in the same group as the other districts rated as medium priority.

Need for Representation Criterion

Surely the fundamental objective of designating a heritage conservation district is to represent the cultural and architectural periods of Toronto’s history? The current approach to HCDs prioritization lacks a systematic approach to preserving representative elements of the city’s built form reflecting its history. Should there not be an effort made to select HCDs that *represent* specific built form types, like Victorian, Edwardian, early 20th century garden city/suburb, Modernist architecture? For example, Leaside may be distinguished by its (garden city) town plan plus its architectural style:

(1) “the Town of Leaside may be and likely is the first new town established on garden city principles in Ontario. Frederick Todd’s plan in 1912 was only 8 years after Letchworth Garden City in England” (Dilse, 2014)

(2) the Georgian and Tudor Revival architecture associated with Leaside’s tract development 1938-45

We note that if the representation criterion was employed it might also result in a fairer and more equitable distribution of HCDs across the city. The 8 recommended potential HCDs are all from TEY and Etobicoke - none are from North York or Scarborough. Leaside was the only nomination from North York, and Agincourt the only one from Scarborough.

The 2015 Prioritization exercise is the first major “outing” for the HCD prioritization system and criteria, and there is an opportunity to reconsider the methodology while it is “new” and before it gets embedded.

As such we recommend that:

- The 2015 HCD Prioritization Report be referred back to staff for re-consideration and report back to TPB with any necessary revisions/adjustments.
- That staff be directed to review and revise the 2012 HCD prioritization system and criteria based on the 2015 experience and feedback.

The LPOA appreciates your consideration of our comments.

Yours truly,



Geoff Kettel and Carol Burtin Fripp
Co-Presidents

c.c. Councillor Jon Burnside
Mary Macdonald, A/Manager, Heritage Preservation Services
Harold Madi, Director, Urban Design