February 23, 2015

Planning and Growth Management Committee
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2
email: pgmc@toronto.ca
Att: Nancy Martins, Committee Clerk

RE: PG2.8 Heritage Conservation District (HCD) Study Prioritization Report

Dear Councillor Shiner, Chair and Members, Planning and Growth Management Committee

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 at this time are limited to (1) the need for a “representation” criterion for selection in addition to the “operational” criteria currently in use and (2) the need to maintain and indeed increase the City resources applied to this process. (Please note our comments on this topic submitted to the Toronto Preservation Board included comments on the criteria utilized, plus the results of their application on the selection of HCD areas).

In October 2012 City Council adopted an HCD prioritization system and criteria for determining which potential heritage conservation district studies should be undertaken first. They are: Development Activity; Existing Level of Protection; Fragility of the Area, and [land use] Planning Priorities. In addition the current process included an additional criterion - Archaeological Value.

The current approach to HCDs prioritization lacks a systematic approach to preserving representative elements of the city's built form reflecting its history. Surely the fundamental objective of designating a heritage conservation district is to represent the cultural and architectural periods of Toronto's 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 early (garden city) town plan, plus its prevalent architectural styles: (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.

Secondly, we are concerned about the slow implementation of the HCD program. The current process provides for 8 of the 16 nominated district studies to commence by the end of 2016. Meanwhile several of these areas, including Leaside, face a rapid erosion of the heritage character for which they are being nominated. In addition there are...
Committee proposals to reduce the capital and operations budgets for HCD studies and related staff which were approved in 2014.

The long overdue infusion of resources for heritage conservation district planning that was approved in 2014 will serve to protect many of the City’s neighbourhoods of character, as well as recognizing HCD planning as a legitimate city planning process, instead of as a volunteer-based, bake-sale funded process. City planning will legitimately need additional resources to permit it to properly manage the resulting HCDs.

Heritage preservation and conservation increases employment (especially for skilled workers), encourages the development of a diverse and vibrant city with character, and supports environmental sustainability and the conservation of our material and energy resources.

We recommend:

- That staff be directed to review and revise the 2012 HCD prioritization system and include consideration of a representation criterion.

- That the PGMC Committee express its support for the implementation of the HCD program and the resources required for this.

The LPOA appreciates your consideration of our comments.

Yours truly,

Geoff Kettel

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
Allen Appleby, Director, Community Planning, North York District