April 3, 2017
Planning and Growth Management Committee
$10^{\text {th }}$ Floor, West Tower, City Hall
100 Queen St. West
Toronto, ON M5H 2N2

Dear Members of the Planning and Growth Management Committee,

Early in the morning on January $21^{\text {st }}, 2017$, the historic bank building at the corner of Yonge and Roselawn, 2444 Yonge, was reduced to rubble. Many have rushed to blame the developer for refusing to save the structure. But, there is another culprit; the City's woefully ineffective process for the protection of Toronto's built heritage.

Under the current approach to heritage preservation, we will continue to lose buildings. We need to rethink how heritage is protected in the City of Toronto. We believe there is a better way.

The Ontario Heritage Act has two levels of protection: 'listing' and 'designation'. A building that is listed cannot be demolished legally without heritage preservation staff having a chance to review it and determine if it merits formal designation.

The problem with Toronto's current approach is that we've concentrated on designating a few buildings at a time or embarking on years long heritage conservation district studies and not simply 'listing' important buildings like 2444 Yonge.

The number of architecturally and culturally significant buildings that have not been listed by the City, and therefore unprotected, is staggering. One only needs to think of the Stollery's building at Yonge and Bloor, never listed, and now demolished. Or the Davisville School, currently proposed for demolition, and again, never listed.

What we've lost is distressing, but it also spurs us to demand better protection for the important buildings that still stand today. To save Toronto's built history we recommend the City prioritize a shockingly simple approach: do a survey for the entire city, identify all the potential heritage buildings and list them.

Bizarrely this has never been done; the result is that we lose buildings to wrecking balls even though everyone agrees they are culturally valuable.

The idea is not to jump at each potential heritage building and propose to designate it under the Ontario Heritage Act, a complicated and cumbersome process, but rather simply to 'list' it, so that owners, purchasers and the city know the property has potential interest. Simple.

For evidence that the city-wide survey approach can work, we need look no further than our neighbouring City of Hamilton. Hamilton has begun using municipal staff and community volunteers to sweep across the city and identify all the historic, interesting or culturally significant structures. As Hamilton's inventory grows the possibility that a heritage building could legally be demolished without review shrinks. Similarly, Ottawa has now also undertaken this new approach.

Embracing the city-wide heritage survey would have the additional benefit of unleashing the passion and dedication of citizen volunteers. The infrastructure is already in place: since amalgamation Toronto has had a network of community heritage panels, but their role and impact has been limited. These panels could lead the heritage survey in their respective areas reducing the impact on city staffing resources and ensuring that those who know their community are the ones that identify and protect its history.

Toronto is a vast city but the focus of heritage conservation has been the downtown core. This approach will be too slow for Don Mills or Lawrence Park or all of the other remarkable neighbourhoods that exist throughout the city. And it needs to be said that designating every neighbourhood as a heritage conservation district - a very long and expensive process - will not be the right approach for each neighbourhood. We can't afford it.

We agree that to save Toronto's built heritage we need to think of heritage differently and refocus our efforts on a city-wide survey. To ensure we don't repeat the example of 2444 Yonge, City Council should embrace this approach as soon as possible.

Sincerely,

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