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June 19, 2019

Sent by EMAIL

Toronto Preservation Board
West Tower, City Hall
100 Queen Street West
Toronto, ON
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teycc@toronto.ca

RE: City-wide Heritage Survey Feasibility Study

Dear Members of the Preservation Board,

The proposed City-wide Survey Feasibility Study contains a number of innovative and exciting recommendations, particularly those related to highlighting diversity and social equity as fundamental principles of the Survey.

City-wide surveys are powerful best-practice planning tools used increasingly by municipalities around the world to better understand existing conditions within cities. These include multi-layered and integrated geographic and environmental conditions, urban morphology, infrastructure, and community and social values. The City of Toronto is in a position to undertake a ground-breaking planning study that would generate new information and deeper understanding of all areas in the city. Of particular interest is the opportunity to better understand Toronto's suburbs from a planning perspective as these areas are under-studied in contrast to the downtown core. Data collected through the Survey process would be a basis for celebrating the history of Toronto and could empower residents in all neighbourhoods through greater knowledge of the places in which they live.

The Staff Report references a proposed Manifesto that could be used to articulate the values of and approach to the City-wide Survey. We strongly support this proposal and encourage its development as early in the project as possible. The Manifesto could articulate this complex endeavor, serving not only as a public communication tool but also as a way to clearly link the Survey to best practices in planning. This would include discussion of how the Survey addresses Indigenous culture, intangible heritage, and the social and community values that are not always rooted in built heritage. To this end, could the Manifesto articulate the need to involve all Planning departments in the City? Could it also articulate the ways in which data collected through the Survey process can contribute to good planning and decision-making processes across the city?

By emphasizing the Survey as a broader planning study, certain efficiencies may emerge as well as adjustments to the methodology as currently described. For example, the proposed focus on buildings over 40 years old may no longer be relevant if the Survey aims to create a comprehensive overview of all

resources from all time periods. Once this comprehensive study is undertaken, a heritage lens can then be applied to the data collected. The Ontario Heritage Act may be applied for future decision-making and stewardship of cultural heritage resources but should not drive the methodology. Over emphasis on the OHA and individual property evaluations using Ontario Regulation 9/06 may pose both a significant administrative challenge and also deflects from the higher-level objectives of the Survey.

The Survey as proposed represents a large undertaking. To be useful to all Torontonians, it needs to be leveraged as a broad planning tool for a range of decision-making processes across the city, not just for heritage.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael McClelland', with a stylized, sweeping flourish at the end.

Michael McClelland, Principal
E.R.A. Architects Inc.