



City-wide Heritage Survey Feasibility Study

Date: June 6, 2019
To: Toronto Preservation Board
Planning and Housing Committee
From: Chief Planner and Executive Director, City Planning Division
Wards: All Wards

SUMMARY

This report responds to City Council's request in 2017 for a City-wide Heritage Survey Feasibility Study that would scope and describe the initiative, identify required operating costs and propose necessary resources. It provides the results of the Feasibility Study, makes recommendations for a transformative approach to the identification of heritage resources in the city, and seeks support for the launch of a city-wide heritage survey program to be delivered through a multi-year work plan.

This report recommends the initiation of a city-wide heritage survey program - an emerging international best practice - as a building block for good planning. In a development context where increasing demands for heritage evaluation and protection challenge the City's ability to respond quickly and effectively, a standardized and systematic "Toronto Heritage Survey" will result in operational efficiencies, enhance civic leadership and responsiveness to provincial land-use planning and cultural heritage policies, and improve predictability for City staff, property owners and the public. It will support timely and transparent decision-making while engaging Torontonians in the pro-active identification of cultural heritage resources that residents, neighbourhoods and communities value. A Toronto Heritage Survey will also contribute significantly to city-building through the collection and dissemination of comprehensive data about the heritage resources of the city. Importantly, the survey program will engage Indigenous communities and carefully consider Indigenous histories in fulfillment of the City's Statement of Commitment to the Aboriginal Communities of Toronto. Diversity and social equity will be fundamental principles as the survey moves forward.

A city-wide heritage survey is an ambitious, multi-year program that will modernize the day to day work of City Planning. This report proposes a phased survey program that, if sufficiently resourced, can efficiently and effectively identify heritage resources throughout the City while providing timely research and base-line data for heritage conservation districts and other area planning studies. A major outcome of the survey will be greater clarity for City Planning, communities and property owners about the location and value of heritage resources.

A city-wide heritage survey also has the potential to engage stakeholders, communities and volunteers through their contribution to the survey's understanding of local heritage, which in turn builds stronger communities. Survey data, gathered and made open and accessible through the digital exchange of information, can be used by public and private sectors for a variety of purposes, including informing public policy and decision-making and strengthening a culture of conservation. The Toronto Heritage Survey has the potential to engage Torontonians in ways that could dramatically enrich an understanding of pre- and post-European settlement Toronto. It will also benefit the work of city-builders through pro-active identification. Finally, the survey has the potential to weave together into a coherent whole, the histories and geographies of the amalgamated City.

This report provides the results of the City-wide Heritage Survey Feasibility Study conducted by City Planning in 2018-2019, including information on the following areas of interest as identified by Council:

- Sector Scan Analysis
- Proposed Survey Methodology
- Data Management
- Methodology to Prioritize Survey Areas
- Community Engagement
- Role of Volunteers
- Phased Approach to Timing and Costing

RECOMMENDATIONS

The Chief Planner and Executive Director, City Planning recommends that:

1. City Council approve the phased implementation of the Toronto Heritage Survey as outlined in this report, and as summarized in Attachment 2 and Attachment 3.
2. City Council request the Chief Planner & Executive Director, City Planning to report back through the City's 2020 Budget process, on a funding approach that will be required to support the first phase of the Toronto Heritage Survey.
3. City Council request the Chief Planner & Executive Director, City Planning to report back to City Council in 2021 following the completion of the first phase of the Toronto Heritage Survey work plan, and to make recommendations on future phases of work.
4. City Council request the Chief Planner & Executive Director, City Planning to develop a comprehensive public engagement program including potential partnerships, and a communications strategy, to support the Toronto Heritage Survey.
5. City Council request the Chief Planner & Executive Director, City Planning to work with the City's four Community Preservation Panels and Heritage Toronto to develop a volunteer program that will support the Toronto Heritage Survey, including the development of a fundraising strategy for community-based initiatives.

6. City Council request the Chief Planner & Executive Director, City Planning to prioritize outstanding nominations for the inclusion of properties on the Heritage Register in the first phase of the Toronto Heritage Survey.

FINANCIAL IMPACT

The proposed work plan outlined in this report for the Toronto Heritage Survey will not require any additional funding in 2019 but will require additional funding in 2020, 2021 and beyond. Additional costs to support the expanded program in 2020 are estimated to be approximately \$0.7 million, to be drawn from existing capital funds where possible, with any additional funding requests to be referred to the 2020 Budget process which will be considered and prioritized against other City-wide capital projects and operating impacts, as well as the City's financial and resource capacity to deliver additional infrastructure works.

A gradually expanded work plan for subsequent years will require funding commitments from Council. The preliminary cost estimate to City Planning of Toronto Heritage Survey in 2021 is estimated for planning purposes to be \$1.6 million, with portions of that cost proposed to be drawn from existing capital funds. Other sources of funding, including user fees and property tax funding, will be reviewed at that time. A review of the program in 2020-2021 will inform a go-forward estimated annual cost at full capacity, as well as operating costs required to manage survey results.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial impact information.

DECISION HISTORY

On February 10, 2015, City Council adopted motion MM3.6 and directed the Chief Planner and Executive Director, City Planning, to report back to the Planning and Growth Management Committee on the feasibility of conducting a comprehensive, city-wide study to identify all significant historic resources throughout our City, much like the SurveyLA program currently being undertaken in Los Angeles.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2015.MM3.6>

On January 31, 2017 City Council directed the Deputy City Manager, Cluster B, to report to the Planning and Growth Management Committee by September 7, 2017 on the current process within City Planning to prioritize properties for addition to the City's Heritage Register and to make recommendations to improve or enhance the current process that will ensure better protection for properties with potential heritage values, including specific criteria for prioritization.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.PG17.4>

At its meeting of April 5, 2017, the Chief Planner and Executive Director, City Planning, presented a Heritage Studies Update report to the Planning and Growth Management Committee.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.PG19.2>

On April 26, 2017, City Council adopted Motions MM28.25, MM28.26 and MM28.27 together and directed the Chief Planner and Executive Director, City Planning, to report back to the Planning and Growth Management Committee in September 2017 on the creation of a city-wide heritage survey to list all buildings that have potential heritage value, and that the feasibility and approximate cost of a heritage listing program and ongoing operational costs be considered.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.MM28.25>

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.MM28.26>

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2017.MM28.27>

On September 7, 2017, The Planning and Growth Management Committee received a report on a Status Update: Heritage Register and City-wide Heritage Survey from the Chief Planner and Executive Director, City Planning.

<http://www.toronto.ca/legdocs/mmis/2017/pg/bgrd/backgroundfile-106380.pdf>

On January 31, 2018, City Council adopted a report from the Chief Planner and Executive Director, City Planning, on the Prioritization of Outstanding Heritage Conservation District Studies and Interim Protective Measures, and also requested the Chief Planner undertake a City-Wide Heritage Survey Feasibility Study. Subsequently Council adopted a \$122,000 gross and \$0 net increase to the 2018 Operating Budget for City Planning to hire one temporary FTE Project Manager to lead the Feasibility Study with the position fully funded from an existing capital account used to conduct Heritage Conservation District studies and plans and heritage planning studies.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.PG25.4>

At its meeting on July 12, 2018, the Toronto Preservation Board received an Update on City-wide Heritage Survey Feasibility Study.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.PB36.15>

ISSUE BACKGROUND

Identifying the City's cultural heritage resources is the first step toward managing change that may affect their cultural heritage value or interest. Since coming into force in 1975, the Ontario Heritage Act (OHA) has provided tools for identifying, evaluating and protecting built heritage resources. Parts IV and V of the OHA apply to real property, including all buildings and structures thereon. The appropriate authority (usually a municipality) identifies built heritage resources by following a formal identification and evaluation process, which allows for protection under Parts IV and V of the OHA. There are several existing tools municipalities may use to identify properties containing built heritage resources: designating a property individually or as part of a heritage conservation district; including a non-designated property on a municipal register; and entering into a heritage conservation easement.

The Planning Act, R.S.O. 1990, Section 2 identifies heritage conservation as a matter of provincial interest and directs that municipalities "shall have regard to" the conservation of features of significant architectural, historical, archaeological or scientific interest.

While Council has incrementally added heritage properties to the City's Heritage Register for more than 45 years, there has not yet been a comprehensive, organized and systematic effort to identify the amalgamated City's heritage resources. As a result, though portions of the city have been surveyed through Heritage Conservation Districts or Cultural Heritage Resource Assessments as a part of Planning Studies (see Attachment 5), large portions of the city have never been surveyed for heritage properties. Of the over 450,000 properties within the City, 11,700 properties are listed on the City's Heritage Register under the OHA. An unknown number of heritage properties remain unidentified.

As the pace of development and change has increased in recent decades, an incremental and reactive approach to the evaluation of properties for inclusion on the Heritage Register has resulted in significant challenges. Unidentified properties with potential cultural heritage value have been lost, and disputes between the community and owners have arisen over what properties should be preserved. Additionally, if a potential heritage property is not already included on the City's Heritage Register at the time of a renovation or redevelopment application, City staff have been challenged with meeting the required timelines for integrating staff comments on the evaluation of that property into the application review.

Given staff resources and the increased pace of requests for heritage evaluations in recent years, City Planning has not been able to keep up to service level demands resulting in the delay of heritage evaluations. A growing backlog exists of nomination applications for evaluation of individual properties, and of heritage conservation districts awaiting study. Efforts to protect properties faced with change through development has also resulted in geographic inequities. Over 90% percent of those properties are in the former City of Toronto, as recently emphasized in Heritage Toronto's 2019 State of Heritage Report.

Since 2005, when amendments to the OHA allowed for the addition to a municipal heritage register of properties with cultural heritage value or interest that are not designated (known as "listed"), development pressure has increased significantly. Despite this positive change in the OHA, uncertainty related to the uneven and timely identification of heritage properties has been a key challenge in meeting land-use planning requirements related to heritage conservation. It has also been a challenge to protect local landmarks, some of which have been demolished or irreversibly altered as a result of not being on the Register.

The City of Toronto has engaged in significant, multi-year, city-wide surveys to protect other vulnerable and irreplaceable resources. In 2002, the City launched a multi-year program to identify areas with archaeological potential, including areas related to the Indigenous history of Toronto, and to protect them through an Archaeological Management Plan. Distinguished by an award from the Archaeological Institute of America, the Archaeological Management Plan has resulted in a simple map layer tool which allows City staff to quickly and efficiently understand where there are areas of archaeological potential, and to ensure that proper processes and procedures are applied in those areas. Additionally, starting in 2006 and for the following six years, City Planning engaged experts to comprehensively identify all environmentally significant areas (ESAs) in Toronto.

A Toronto heritage survey program would provide a new tool to coordinate heritage survey work already being undertaken by City Planning, as well as initiate a systematic review of all lands within the City boundaries to identify properties and areas with cultural heritage value.

COMMENTS

Legislative Framework

In 1949, the Toronto Civic Historical Committee (the first of its kind in Canada) was established by Toronto City Council. Much of its early work was focused on the preservation of Fort York National Historic Site. Renamed the Toronto Historical Board (THB), the organization became an arm's length agency of the City on July 1, 1960. In the mid-1960s, at the request of City Council, the THB began identifying potential heritage properties for recognition and protection. In the early 1970s, with the help of provincial and federal funding, the THB conducted a street survey of all of the properties within the 1850 boundaries of the city, south of Bloor Street between Bathurst Street and the Don River. On June 20, 1973, Toronto City Council adopted the first list of nearly 400 properties as the official "Inventory of Heritage Properties."

Over the years the inventory has been subject to incremental additions, although provincial legislation until 2005 only allowed municipalities to observe a short holding period before even a listed property could be demolished. However, following significant changes to the Ontario Heritage Act and Planning Act in 2005, the City's inventory began a healthier and steadier growth. As of December 2018, there are approximately 11,700 properties on the City's (re-named) Heritage Register and hundreds of properties are added every year.

In 2007, Council adopted in principle the Phase One Heritage Management Plan, providing City Planning with a framework and a strategy for the management of heritage resources as an important part of city building. The plan recognized that our understanding of the past, and of our heritage resources, requires us to pay attention to the overlapping layers of history, to the diversity of stories, symbolisms, cultural references, events, and interpretations that weave together each structure or landscape with its context and its community. Particular attention was paid to the value of heritage conservation districts and the study of the evolution of our urban environment, which is understood to enrich our understanding of individual heritage resources. And correspondingly, the collective identification and conservation of individual heritage resources will strengthen the character and viability of the larger city.

In 2015, City Planning brought into force its first revision to the Official Plan heritage policies since 2004. The City of Toronto's Official Plan, (the "Official Plan"), contains a number of policies related to properties on the City's Heritage Register and properties adjacent to them, as well as the protection of areas of archaeological potential.

Emphasizing the role that heritage conservation plays in city-building, Section 3.1.5 of the Official Plan states that, "Cultural heritage is an important component of sustainable development and place making. The preservation of our cultural heritage is essential to the character of this urban and liveable City that can contribute to other social, cultural, economic and environmental goals of the City."

Policy 3.1.5.14 of the Official Plan directs that "potential and existing properties of cultural heritage value or interest, including cultural heritage landscapes and heritage conservation districts, will be identified and included in area planning studies and plans, with recommendations for further study, evaluation and conservation." Over the past several years, heritage staff and consultants have undertaken heritage surveys to support area studies and other planning frameworks.

Current Practice of Heritage Surveys

Starting in 2012, with the Mimico 20/20 Revitalization Plan, City heritage staff have instituted the practice of undertaking Cultural Heritage Resource Assessments (CHRA) in tandem with area planning studies. Conducted by City staff and consultants, CHRAs present the findings of historic research, identify important themes and drivers for the evolution of the historic urban environment, conduct a field survey to identify properties of potential heritage value, make recommendations for further study and sometimes recommend more immediate protection.

To deliver an efficient and consistent evaluation of properties within a study area, CHRAs utilize the application of provincial criteria - identified in the Ontario Heritage Act-Ontario Regulation 9/06 and consistent with the Official Plan - for determining cultural heritage value or interest (see Attachment 4). Of those criteria, the greatest attention has substantially been given to design/physical values and historical/associative values. Historical and associative values, however, are often not visually evident or readily known without extensive, time-consuming primary research being undertaken. As a previous staff report (2017) has noted, contextual values have typically received the least attention of all and usually only with respect to the property's place in its immediate surroundings.

Following international examples identified below, City heritage staff have focused on identifying contextual values in the CHRA to inform and guide survey work and analysis. After developing a thorough understanding of the key themes of the historical evolution of a study area, staff and consultants have used those themes to identify properties that relate directly to the themes - indicating an important connection to the history of that area. At the same time, staff have increasingly relied on public consultation to obtain research from local experts and to enrich an understanding of historical/associative, social and community values.

City-wide Heritage Survey Feasibility Study

In May 2018, a Project Manager position was filled on a temporary contract basis to conduct a City-wide Heritage Survey Feasibility Study and to assist in aspects of the Heritage Conservation District Program. The Feasibility Study commenced in June 2018 and working groups comprised of City staff within Heritage Preservation Services (HPS)

were tasked to summarize existing internal best practices, to consolidate internal documentation of the City's historical development, and to prepare for change as a result of the amount of data that could be generated by a city-wide heritage survey. A project team composed of representatives from key sections of City Planning was then established to research and provide recommendations based on key deliverables identified by City Council.

Directions and recommendations developed through the project team were brought to a steering committee composed of Divisional management. The steering committee met four times to review the key findings and approach outlined in this report.

Sector Scan and Stakeholder Consultation

In addition to considering existing approaches to area heritage studies within City Planning, the City-wide Heritage Survey Feasibility Study also reviewed other large-scale heritage survey programs in Ontario, including Hamilton, Ottawa, and Brantford; in Canada, including Montreal; from the United States, including Los Angeles, San Francisco, Dallas, Chicago, and Philadelphia; and internationally with Historic England. The purpose of the review was to gather best practices from other jurisdictions for large-scale heritage surveys intended to identify heritage properties and areas in a systematic way.

Furthermore, the City-wide Heritage Survey Feasibility Study has been informed by early and ongoing engagement with the public, key stakeholders and potential partners. To ensure that key stakeholders had an opportunity to provide input into the study, Heritage Preservation Services (HPS) staff have undertaken a series of consultations between May 2018 and May 2019. Staff have employed a range of tools aimed at reaching diverse stakeholders across the city with varied interests in heritage preservation. Consultations to date have included a public event, over 30 individual meetings, and an online questionnaire. The study has engaged with the heritage industry, including the Ward Museum, Myseum of Toronto, and the study's Technical Heritage Survey Expert Panel (TEP). The TEP was a panel of heritage experts external to the City who were asked to provide advice on technical aspects of heritage surveys. Members included representatives from heritage consulting firms, as well as representatives of key stakeholder organizations including the Toronto Preservation Board, the Architectural Conservancy of Ontario, Heritage Toronto and the Ontario Heritage Trust. The TEP met twice in the fall, and a final time in early March 2019. (See Attachment 1: Technical Expert Panel Summary of Advice.)

The study has also engaged with the volunteer heritage sector, including the Architectural Conservancy Ontario (ACO) NextGen, the Toronto Historical Association, and the four City of Toronto Community Preservation Panels. The study sought advice from the Toronto Planning Review Panel, Business Improvement Areas (BIAs) through the Toronto Association of Business Improvement Areas (TABIA), and the Building Industry Land Development Association (BILD). Agencies, units, sections and divisions within the City of Toronto have also been consulted, including the Indigenous Affairs Office, the City of Toronto Archives (City Clerks Office), Museums and Heritage Services (Economic Development & Culture), Social Development, Finance and

Administration, the Innovation Office, Transportation Services, Heritage Toronto and the Toronto Public Library.

During these consultations staff have gathered extensive feedback, advice, and expertise which have directly informed the recommendations of the City-wide Heritage Survey Feasibility Study. Among the most important key points are:

- Large-scale heritage surveys can achieve consistency and efficiencies by testing survey methodologies over a diverse range of urban areas and by using trained professionals as surveyors.
- A contextual approach to heritage evaluation is an effective and efficient way to conduct a heritage survey. Historic context statements should be used to understand significance in both a local and city-wide context, and to avoid reliance on physical and design values alone.
- A robust community engagement and volunteer program is essential to the success of large-scale heritage surveys. Community engagement and volunteers can provide essential local knowledge regarding potential heritage resources. Volunteers can provide great support to a heritage survey if they are provided with well-defined roles and are adequately trained.
- A well-resourced and GIS-based data management system is an essential tool for implementing a large-scale survey. The system must be able to gather and organize data, and to provide a dynamic and visual resource for all users, from planners to property owners to the general public.

Should Council adopt the phased implementation of the Toronto Heritage Survey as recommended in this report, City Planning will proceed to hold public meetings in each Community Council area to present residents across the City with the results of the Feasibility Study, and to receive comments that can be considered in the early phases of preparation for the Toronto heritage survey program launch.

Heritage Integration and Digital Modernization

Current data management systems available to City Planning are inadequate for the purposes of a large-scale survey. IBMS, which is currently used to manage the Heritage Register and to review building permits, is not designed for survey purposes. Equally important, the public facing on-line tools currently representing the Heritage Register are out-dated and limited in the information they provide.

In order to serve a number of current and future needs, City Planning needs to digitally transform its current heritage business practices, including automating heritage nominations, building application and tracking systems, improving visualization of and access to the Heritage Register, and cleaning up and geo-locating internal research and data storage systems. Stakeholder consultations, the Technical Expert Panel, and the sector scan all underlined the critical importance of building a GIS-based, sophisticated, data-management system that is easy to use and capable of delivering attractive online tools to gather information from communities and represent the survey results. These

upgraded tools will be essential for the success of the Toronto Heritage Survey program, and for the everyday functioning of the Heritage Preservation Services unit as well.

Staff are currently investigating technology resources and tools needed to enhance its service to the public, and to prepare for a city-wide heritage survey program. After years of limited investment, the time is right to modernize and transform the digital presence of heritage planning in the City for the benefit of both staff and the public.

Survey Areas and Prioritization

A Toronto heritage survey program will need to consider approximately 400,000 properties over a multi-year period. Prioritizing when areas of the city are surveyed will be an important and sensitive task.

In Phase One of the Toronto Heritage Survey work plan, priority will be given to the triage and evaluation of over 300 properties that have already been nominated by City Council and the public for inclusion on the Heritage Register. The Toronto Heritage Survey will prevent the build up a future backlog by establishing and resourcing efficient screening and evaluation processes for heritage potential. Proposed Toronto Heritage Survey methodologies will also be tested through the existing heritage study work plan in 2019-2020.

Following the completion of Phase One, the Toronto Heritage Survey will move beyond the existing study work program to survey new areas. City staff propose to advance the survey using neighbourhood boundaries that the City of Toronto currently uses for other statistical and planning purposes, as defined according to Statistics Canada census tracks. These neighborhood study units have the benefit of covering the entire City, and have been used for many years to generate data for researchers examining socio-economic changes over time.

An internal working group composed of staff from across City Planning was established to consider an approach to prioritizing neighbourhoods for survey. The working group began with the assumption that any prioritization system for the Toronto heritage survey program would need to be transparent, data-driven, and easily understood.

Accordingly, the City Planning working group considered the approach that was used in 2015 to prioritize potential Heritage Conservation Districts for study. At that time, key criteria were adopted, including development pressure and a variety of indicators with respect to the fragility of an area. Additional criteria applicable to a city-wide heritage survey were developed, including the need to survey areas that are subject to a broader planning study, areas that may be identified as having high potential for cultural heritage value, and the need to reflect geographic equity. Staff refined those criteria through consultation with the Toronto Planning Review Panel in November 2018 and the Technical Expert Panel in December 2018.

Staff then considered a process which could generate a multi-year phasing of the survey based on a prioritized list of neighbourhoods. Working with Ryerson University's Master of Spatial Analysis program, a multi-criteria evaluation tool has been created to analyze inputted data sets according to any chosen weighting scheme. Data sets are

now being acquired and analyzed by City staff to understand which might best serve the prioritization process.

With Council's endorsement, City staff will bring both the draft criteria and the multi-criteria evaluation tool to stakeholders and the public for consultation. Staff propose striking an advisory panel representing a variety of stakeholders to provide advice on further refinements to the criteria, data sets, and the weighting system, in order to produce a fair and transparent prioritization of neighbourhoods. As indicated in the Phase One Work Plan (see Attachment 3), the results of this prioritization approach would inform which areas are surveyed first as the program scales up in 2021 and 2022.

Engagement and Consultation

As indicated in the discussion of recommended evaluation methods in Attachment 2, a broad and thorough engagement and consultation process in each survey area will be a fundamental requirement of a Toronto Heritage Survey program. A robust, well-funded, inclusive and innovative engagement and consultation program will be essential to the survey program's success and will leave a rich legacy of heritage data and of stronger, more cohesive communities.

The importance of community engagement to a heritage survey program in Toronto was crystalized at a public event held in October 2018 in North York. Over 80 people attended, and a clear common understanding emerged that a community engagement program must be well-planned and funded as a core component of a comprehensive heritage survey program, and that a Toronto Heritage Survey should not be delayed. The following approach to consultation and engagement is recommended:

- A robust engagement and consultation program will be required to inform the survey results. Attachment 2 indicates the two formal opportunities within a proposed survey process where broad consultation will occur.
- In consultation with the Indigenous Affairs Office it was confirmed that a heritage survey program must include a distinct engagement program for Indigenous communities. City Planning has already committed capital funds to an Indigenous engagement program and the Indigenous Affairs Office has agreed to advise City Planning on the development of the program, to ensure that it serves the needs of Indigenous communities as well as the City.
- A heritage survey engagement program has the potential to benefit from partnerships. Partners, including City divisions, agencies and not-for-profit organizations should coordinate with other related engagement programs to reach deeply into communities and to nurture the capacity of the heritage sector. Partnerships may also bring the potential of additional funding sources. Staff request Council's approval to formally engage with potential partners through 2019 to begin to develop a structure and approach to a heritage survey engagement program.

Volunteers

The City of Toronto is fortunate to have a dedicated and active volunteer heritage sector. Consultation underlined the immense value that volunteers could contribute to a heritage survey. For example, volunteers can provide historical expertise and research skills that could contribute significantly to an understanding of the City's neighbourhoods. Volunteers can also ensure the legacy of a heritage survey through their contribution and commitment to the results.

Volunteers can and must benefit equally from their contribution to a Toronto heritage survey program. Consultation with the City's four volunteer Community Preservation Panels, among others, emphasized that a volunteer program must be properly resourced and designed to ensure that volunteers can be provided training and clear position descriptions that demonstrate the value of their contribution. Best-practices in the sector would include the development of detailed volunteer work programs and job descriptions, a broad call for volunteers that offers all Torontonians the opportunity to apply, and interviews to ensure that volunteer expectations and skills are matched with program expectations and deliverables.

The interjurisdictional sector scan and local stakeholder consultation, including the Technical Expert Panel, have led City staff to recommend that heritage professionals are required for the survey to ensure consistency in evaluations across all survey areas. Staff are not recommending the use of volunteers in the role of surveyors/property evaluators. However, it is anticipated that volunteers will provide essential community input and local knowledge within the survey process.

In order to develop a volunteer program to support the heritage survey, staff seek Council's approval to engage the Community Preservation Panels and Heritage Toronto as potential volunteer program partners. The Community Preservation Panels are volunteer bodies nominated by community council, and have a broad mandate to engage citizens to protect, preserve, and promote heritage properties. Heritage Toronto is a City agency mandated to, among other things, serve as a focal point for volunteer sector groups. It has developed connections and expertise by engaging volunteers through its city-wide programs. Both the Community Preservation Panels and Heritage Toronto are well-positioned to contribute significantly to a Toronto heritage survey volunteer program.

Recommended Phasing of a Toronto Heritage Survey Program

The City-wide Heritage Survey Feasibility Study team has gathered information from other large-scale surveys to arrive at a recommended methodology. It has also gathered information from a sector scan of surveys in other cities to prepare a phased approach for a Toronto Heritage Survey program (see Attachment 3: Phase One Work Plan 2019-2022). Estimated resourcing requirements have been prepared for the preparation and testing phase of the program in 2020 and 2021. Cost and time estimates for subsequent years will rely on testing completed to that date.

A phased approach is recommended for a heritage survey program in Toronto based on the scale of the work and the importance of establishing clear and consistent methods. Staff are recommending that Council adopt the phased approach to a city-wide heritage survey program as identified in Attachment 3 that will support the fundamental technical, communications, and research needs of a full-scale survey. Those resources will include the digital modernization of heritage data, the development and launch of an Indigenous Engagement Program, the initial planning of heritage survey volunteer and engagement programs, and the research and writing of historic context statements. Staff will also test and refine survey and engagement methodologies through the existing heritage study work program and through addressing the backlog of individual property nominations, to create efficiencies in evaluations and to assist in meeting service level demands.

In 2020, a core team and a survey team will be established to deliver the heritage study work plan, to eliminate the nomination backlog, and to further test training and evaluation models. Following the elimination of the nomination backlog, a communications program, volunteer program, and engagement program will be launched to promote the nomination of landmark properties for inclusion on the Heritage Register. That nomination process will be focused on the identification of properties that are of particular interest and significance to local communities. In 2021 and subsequent years, and based on the testing and refinement of survey systems and available funding, additional survey teams will be added to undertake heritage survey work across the entire City of Toronto in a systematic manner.

How quickly the survey will be able to proceed depends on the speed and efficiency of survey teams. Estimates from other municipalities are important to consider, but range widely based on survey methodology. That wide range in productivity underlines the need for testing of the recommended methodology in Toronto before more accurate estimates can be made. Testing a survey methodology in different environments, from 1910s streetcar suburbs to 1970s industrial parks, will provide City Planning with predictive tools to determine how many survey teams would be required to survey the entire city within a particular period of time. Better estimates for both the cost and timing of a survey of the entire City of Toronto will rely on strong estimates for the productivity of a single survey team.

While a Toronto heritage survey program will be able to cover the entire City of Toronto in a period of years, it will require ongoing maintenance and updating. New information will result from further research, and changing perspectives on heritage value may require new approaches to evaluation in the future.

Properties identified through the Toronto Heritage Survey as having cultural heritage value will be added to a Toronto Heritage Survey map layer. The map layer will allow the general public, property owners, and City staff to quickly identify properties with cultural heritage value and to manage change on those properties where change is proposed. The map layer will also inform the development of planning policy through area studies.

Properties and areas identified as having cultural heritage value through the survey may be further evaluated in order to be recommended for inclusion on the Heritage Register. Additions to the Heritage Register will result in an increased number of permit applications requiring staff attention. Estimated impacts on future operating budgets related to increased staffing levels will be brought to Council for its consideration in 2021, following the testing of survey methodologies, and prior to the scaling-up of the Toronto Heritage Survey.

Finally, it is important to note that Bill 108, the More Homes, More Choice Act does not propose changes to the provincial criteria for determining cultural heritage value or interest or for the identification of cultural heritage landscapes. However, the proposed legislation will have significant impacts to the City relating to heritage conservation (identification, notification, application processes, timelines and protection). Under the proposed legislation, City Planning will need to take a more pro-active approach to the inclusion of properties on the Heritage Register. The Toronto Heritage Survey will be an essential tool for City Planning in the identification of heritage resources on development sites in advance of planning applications.

Next Steps

With Council's adoption of the recommendations of this report, staff will implement the Phased Work Plan outlined above and in Attachment 3. Prioritized areas for survey will be reported back to Council annually through the City Planning Work Program. Staff propose to return to Council in 2021 with a report that will share the results of the work plan to date, and bring recommendations forward about future phases of work, including the expansion of the Toronto Heritage Survey once the testing of survey methodologies is complete. At that time, more detailed estimates of completion time and the cost required to survey the entire city will be presented, along with the identification of funding sources and cost estimates for the on-going management of the survey and its results.

CONCLUSION

The identification and conservation of cultural heritage resources is an integral component of good planning, contributing to long term economic prosperity, environmental sustainability through adaptive re-use, a sense of place and healthy and equitable communities. Heritage conservation and growth are not mutually exclusive objectives, and conservation is an important part of an integrated approach to city building.

The City-wide Heritage Survey Feasibility Study engaged several City divisions and agencies, consulted leading North American municipalities and created a Technical Expert Panel. Stakeholder consultation was conducted with the heritage sector, TABIA, and BILD to understand and clarify city-building opportunities and concerns about the establishment of a Toronto Heritage Survey. The Feasibility Study also identified ways to address the backlog of Council requests for heritage evaluation of properties, streamline the inclusion of properties to the City's Heritage Register and advance outstanding heritage conservation district studies and interim protection measures.

Upon City Council's adoption of the recommendations of this report, City staff's first priority will be to develop a business case for the digital resources and tools it needs to enhance service to Council and the public, and to prepare for a data-rich survey program. City staff are proposing a Heritage Digital Transformation project that will evaluate technical options, including a modernization of the Heritage Register and the management of heritage planning data. A new data management system has the potential to revolutionize how City Planning currently collects and communicates information about heritage resources, and would be a major step forward as a tool to help protect these resources for future generations, so that they may experience Toronto as a vibrant and liveable city.

At the same time, staff will launch a public engagement and consultation program enhanced by partnerships and volunteers. Staff are also consulting with the Indigenous Affairs Office to initiate an Indigenous engagement program designed to gain a comprehensive understanding of the places in Toronto that are valued by Indigenous communities.

Through test surveys, largely undertaken in support of on-going planning and HCD studies, staff will continue to refine a survey methodology that can be scaled up to predictably, efficiently, and transparently survey the entire city.

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ATTACHMENTS

- Attachment 1: Technical Expert Panel Summary of Advice
- Attachment 2: Toronto Heritage Survey Methodology
- Attachment 3: Phase One Work Plan (2019 - 2022)
- Attachment 4: Existing Policy Framework for Determining Cultural Heritage Value or Interest
- Attachment 5: Map of Areas Surveyed Through Heritage Conservation Districts and Cultural Heritage Resource Assessments

Attachment 1: Technical Expert Panel Summary of Advice

A Technical Expert Panel was formed in October 2018 to inform the City-wide Heritage Survey Feasibility Study with expert advice on heritage survey methodologies. The panel was comprised of representatives of firms that had conducted heritage surveys in the City of Toronto, the Chair of the Toronto Preservation Board, as well as representatives the Architectural Conservancy of Toronto, Heritage Toronto, and the Ontario Heritage Trust. The panel met three times between October 2018 and March 2019. A summary of the Panel's advice is included below.

Panel Members:

Charlton Carscallen (AECOM); Alexis Cohen (ERA); Dima Cook (EVOQ Architecture); Lynne DiStefano (The University of Hong Kong/Willowbank); Antonio Gómez-Palacio (Dailog); Ellen Kowalchuk (Common Bond Collective); Kristina Martens (ASI); Michael McClelland (ERA); Barbara McPhail (Unterman McPhail Associates); Richard Moorhouse (Heritage Toronto); Catherine Nasmith (Architectural Conservancy of Ontario, Toronto Chapter); Meaghan Rivard (Stantec); Rebecca Sciarra (ASI); Erin Semande (Ontario Heritage Trust); Sandra Shaul (Toronto Preservation Board); Annie Veilleux (ASI); Richard Unterman (Unterman McPhail Associates).

Topic

Evaluation Methodology

- Panelists were asked if Google Streetview was valuable as a survey tool. The general agreement was that it was valuable for a pre-survey reconnaissance, but not for evaluation. All agreed that site visit was important to evaluation.
- Panelists agreed that surveys were an iterative process, involving research, site visits, and more research, prior to evaluation.
- Panelists saw value in the City-wide context statement approach, given that it could help place properties being evaluated in a particular area in a much wider context, allowing them to be better understood. An understanding of the morphology of Toronto, provided through context statements, would be of great interest to planning.
- Contexts and themes would have to be informed by community values to understand importance of properties to neighbourhoods (i.e. strip malls).
- Contexts are valuable, but they should not take away from the evaluation of individual properties. We need to make sure we are catching landmarks before they are gone.
- The value of context statements is also in their flexibility to evaluate different kinds of cultural heritage resources.
- City-wide emphasis cannot obscure local stories, or it won't receive support it needs. We need to also use neighbourhood level of analysis to understand how properties are valued by the local community.
- The scale of this project will require significant resourcing, including dedicated resources for community engagement and database management. Staff were urged to not underestimate the funding required.
- Given the volume of evaluation that would need to take place on site, panelists emphasized the need for clear criteria, and strong in-office preparation. If on-site

evaluation is going to work, surveyors will need to be well prepared and have a good sense of what they will be evaluating, gathered through research and a reconnaissance survey, before they enter the field for an intensive survey. Strong and clear systems need to be in place.

- Panelists were divided on whether a 40-year old or older threshold should be used for this survey. If it was used, panelists advised that it be a soft threshold, to allow full consideration for properties younger than 40 years which might be highly valued by communities. Participants also emphasized the need to continue to update the survey after the initial sweep was completed, given that properties not considered because of their age could gain value in subsequent years. Planning for ongoing evaluations should be considered as part of the financial modelling.
- Concern was also expressed about the ability of the survey to understand how communities have moved and evolved over time. We need to think carefully about how we can capture the history of an area that is related to a cultural community, for example, that no longer lives there.

Role of Volunteers and Community Engagement Discussion:

- Volunteers will be essential to a Toronto heritage survey. Not only can they provide valuable support at minimal cost, but they can also provide a great deal of value through generating community engagement and support for the project. They can be champions to explain why heritage matters. They can also help the program to build relationships.
- Local volunteers can provide invaluable understanding of place that would otherwise be unavailable to professionals from outside of the community. They can also act as mentors by sharing their knowledge with others.
- Volunteer roles need to be defined carefully and accurately with job profiles, and an interview process should match qualified volunteers to roles. Roles can range widely, depending on qualifications of volunteers.
- Panelists indicated that the use of volunteers as property evaluators in the past has indicated that volunteers may not best be placed in role of property evaluators where evaluations will have legal significance.
- Volunteer management takes dedicated resources, time and energy. Heritage Toronto could be engaged to train and perhaps provide accreditation for volunteers
- Panelists generally agreed that a "Manifesto"— a high level pitch for why the survey is vital to Toronto - was needed. They considered the survey to have the potential to be a post-amalgamation healing tool. The City will need to clearly articulate the goals of the survey to get community support, and to avoid common misperceptions about heritage conservation.

Data Management:

- Arches was supported by some panelists, with the caveat that it must be able to support crowd-sourcing of information, and it must be able to pick up typologies across the City. Others expressed caution about the complexity of developing and operating Arches.

- Participants expressed interest in a data management tool that could share data across the GTHA.
- A few panelists agreed that building a database internally was not a good idea, given that staff change, and upgrading is very difficult. Tend to become obsolete very quickly.
- Whatever database we use, it must be geo-spatial.
- The City should establish a working group to develop standardized fields of information for survey forms.

Prioritization

- A few panelists questioned the proposed criterion of potential cultural heritage value, and noted that any effort to predict which areas have more potential cultural heritage value than others, without community input, would have a bias to date of construction.
- Select test areas that capture the diversity of built form in the City. Test an area we know and one we have little data on.
- The survey should start where we have not yet been.
- Participants generally endorsed the use of the City's official neighbourhood boundaries for survey areas, particularly given their connection to census data that can help inform evaluation.

Benefits of a city-wide heritage survey program

- Social equity should be considered a key goal of a city-wide heritage survey program
- Conservation could be characterized as an element of sustainability – an important strategic goal of the City.
- The heritage survey should be positioned as an investment in growth.

Attachment 2: Toronto Heritage Survey Methodology

The following survey methodology is proposed as a result of a review of internal best practices, the analysis of methodologies gathered through a sector scan, and the results of stakeholder consultation, including the advice of the Technical Expert Panel.

Staff are recommending a contextual approach to heritage evaluation for a city-wide heritage survey in Toronto. A contextual approach has become an international best-practice for heritage surveys, and has been applied in various ways in recent large-scale surveys identified through a sector scan. The approach was also strongly endorsed by the Technical Expert Panel. It offers the best approach to maintaining consistency in evaluations - a major challenge highlighted by all heritage professionals consulted - and can allow for efficiencies in the speed of evaluation.

A contextual approach to heritage evaluation has the benefit of allowing evaluators to consider the cultural heritage value of an area or property based on its connection to the important themes and key periods of development that have shaped the historical evolution of its local area, and the larger city. While in the past evaluators have relied primarily on the design or physical value of a property, a contextual approach to evaluation enriches a survey by allowing evaluators to not only consider beautiful or rare buildings, but to consider properties without distinctive design whose value may lie in their contribution to the historic context of an area, community, or the city as a whole. Late-nineteenth and early twentieth century warehouses, for example, are important within the King-Spadina area, once a key industrial sector in Toronto. In Don Mills, an important post-war satellite town carefully planned to include clean industry, industrial buildings from its period of construction have also been identified as having cultural heritage value.

Such an approach is being tested within the City of Toronto. As noted above, in order to shorten the time it takes to research and evaluate properties for surveys associated with city-initiated planning studies, City staff have been successfully applying an abbreviated approach, one that still applies provincial criteria as required in the Official Plan, but which sets out a preliminary, not exhaustive, set of values. An understanding and articulation of contextual value has been prioritized.

A Toronto heritage survey would take a contextual approach to heritage evaluation on a local and city-wide scale through the creation of historic context statements. These research and evaluation tools will allow evaluators to consider the significance of a property or area to the historical evolution of its neighbourhood, and to the historical evolution of the entire city. Currently, for example, evaluators conducting a heritage survey for a planning study only consider properties within the study area. Through a city-wide historic context approach, evaluators would be able to understand the cultural heritage value of a property in relation to other similar properties in other areas of the City. An evaluator considering a mid-century modern building in Scarborough, for example, would be able to evaluate it in the same consistent manner as a similar property in Etobicoke, by understanding its value through the same city-wide historic context statement.

A contextual approach to heritage evaluation relies on the research and development of robust historic context statements as key evaluation tools. Beyond creating the evaluation framework for a city-wide heritage survey, these statements will play an important role in assisting City Planning to reduce its backlog of nominations in preparation for surveys, and to lay an important city-wide contextual framework for heritage conservation district studies. These statements, even prior to their use as evaluation tools, will also serve planners and citizens who are seeking to better understand how the history of an area has informed its contemporary character. In Q3 of 2019, City Planning will initiate the production of historic context statements using existing capital funds to create an understanding of the historical evolution of residential, commercial, institutional and industrial development of Toronto.

Staff propose to find further efficiencies required for the scale of a city-wide heritage survey in Toronto by describing the heritage character of all areas of the City of Toronto, and by documenting, through the use of historic context statements, only those specific properties, areas and infrastructure that are identified as having cultural heritage value. Prior to the introduction of Google Streetview, there was significant value to documenting all properties in a survey area. Survey LA in Los Angeles, and the city-wide heritage survey in Ottawa, however, have shown that significant efficiencies can be found by having evaluators photograph and document only properties, areas, or infrastructure which they consider to have cultural heritage value.

Staff propose that a city-wide heritage survey program in Toronto also find efficiencies by focusing on properties 40 years old or older. A "40-year rule" is embedded within the Government of Canada's Treasury Board Policy on Management of Real Property, which mandates that federal departments must evaluate the buildings they administer or that they are planning to purchase that are 40 years of age or older, in order to determine their heritage character. Also applied by the Government of Ontario to provincially owned properties, the 40-year rule has been routinely used as a standard for heritage surveys for many years. The rule allows enough time for evaluators to be able to understand the lasting cultural heritage value of a property.

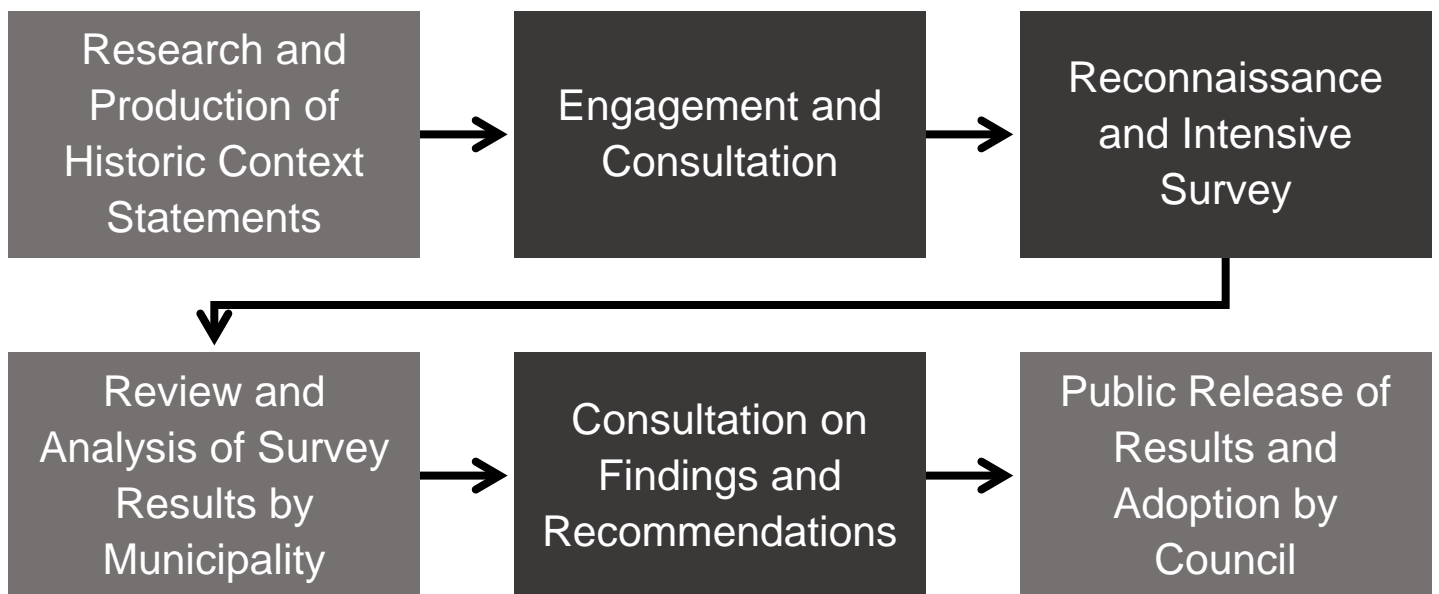
Members of the Technical Expert Panel underlined the importance of having a historical perspective on a property, given that properties hailed as having great value or no value on their opening may be viewed very differently decades later. At the same time, the survey will not apply a 40-year rule exclusively, again on the advice of members of the Technical Expert Panel. As a result, it is recommended that a city-wide heritage survey in Toronto consider buildings less than 40 years old for their heritage value if they are exceptional in their design, historic or contextual value, and if a community identifies them as having significant cultural heritage value.

Staff further propose to follow international best practices in heritage evaluation by considering the cultural heritage value of areas and infrastructure as well as individual properties. Criteria will be established to allow surveyors to evaluate infrastructure as well as areas for potential heritage conservation districts or cultural heritage landscapes.

Finally, staff propose to follow the award-winning and effective example of the City's Archaeological Management Plan by placing all properties and areas identified as

having cultural heritage value on a publicly accessible city-wide heritage survey map layer. This map layer will add a new tool to the City's heritage toolkit. The map layer will allow the general public, property owners, and City staff to quickly identify properties with cultural heritage value and to manage change on those properties where change is proposed. Properties and areas identified as having cultural heritage value through the survey may be further evaluated in order to be recommended for inclusion on the Heritage Register.

Following the testing of survey methodologies, and prior to the scaling up the survey process, City staff will produce a process chart to clearly explain for residents and property owners the decision-making process, including criteria, through which properties and areas will be identified through the survey.



Estimated survey team time based on other jurisdictions

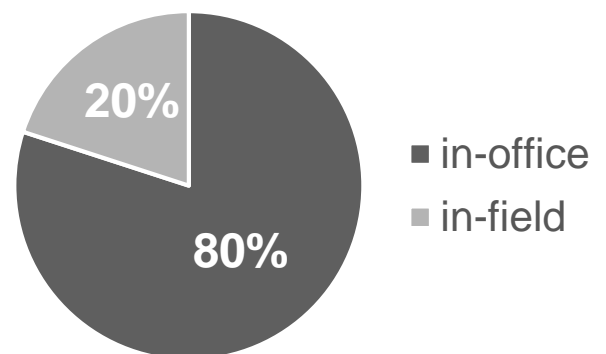
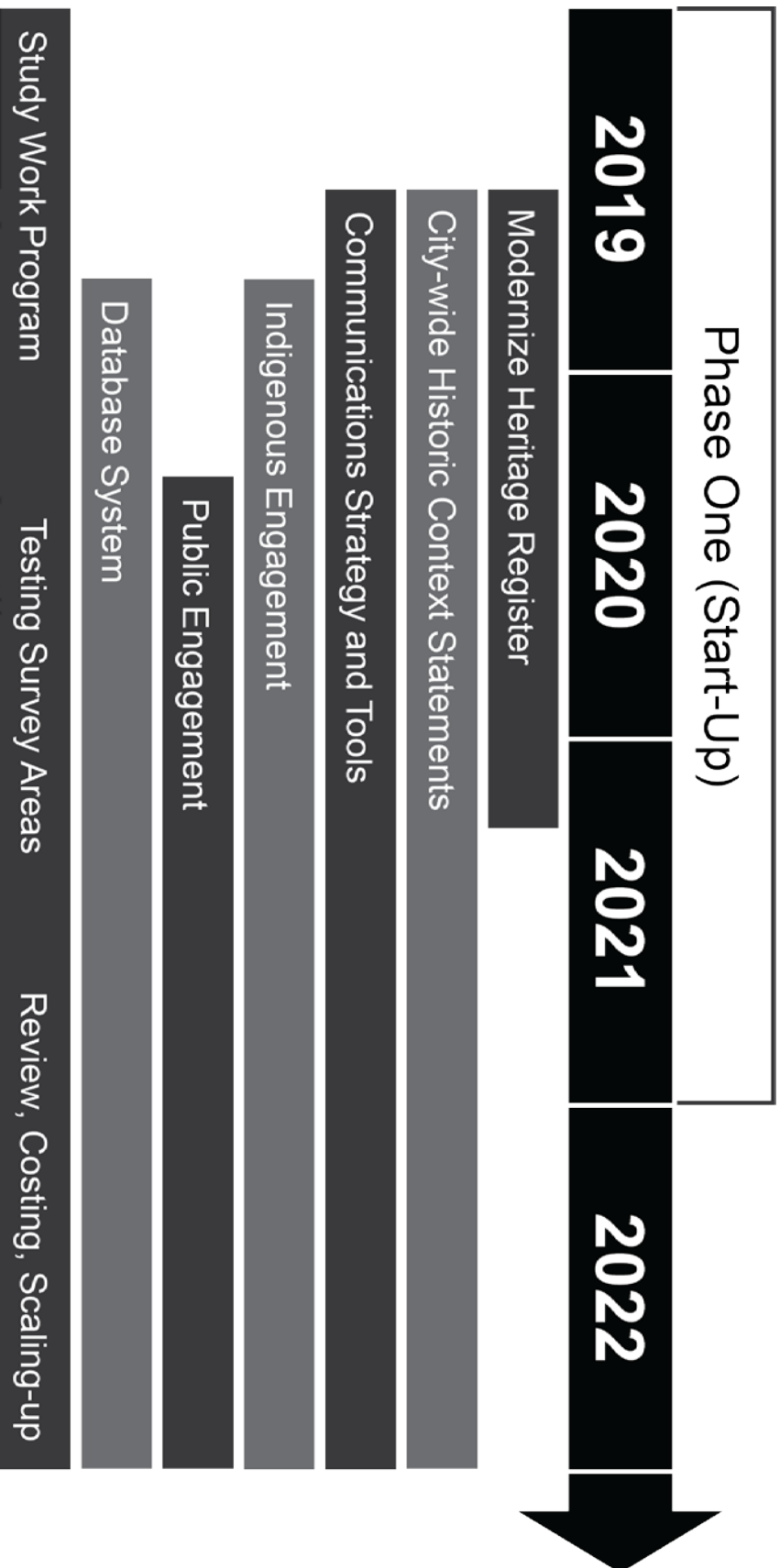


Figure 1: Toronto Heritage Survey Workflow

Attachment 3: Phase One Work Plan (2019-2022)



Attachment 4: Existing Policy Framework for Determining Cultural Heritage Value or Interest

Understanding historic places is an essential first step to conserving them. Identification begins with a survey to find the buildings, structures and sites that have value to the community. Criteria are used to maximize the objectivity in this culturally subjective evaluation process. A values-based approach is the current most preferred approach to heritage conservation, adopted, and advocated by major conservation authorities, both at national level (e.g., USA, Canada, Australia, and UK) and at international level (e.g., UNESCO World Heritage Centre). Ontario Regulation 9/06 identifies the criteria that municipalities must use to determine cultural heritage value or interest (included below). They were adopted in 2006 to provide a more consistent and rigorous approach to the designation of heritage properties, and clearer and more defensible designation by-laws.

ONTARIO REGULATION 9/06 criteria for determining cultural heritage value or interest

1. (1) The criteria set out in subsection (2) are prescribed for the purposes of clause 29 (1) (a) of the Act. O. Reg. 9/06, s. 1 (1).

(2) A property may be designated under section 29 of the Act if it meets one or more of the following criteria for determining whether it is of cultural heritage value or interest:

1. The property has design value or physical value because it,
 - i. is a rare, unique, representative or early example of a style, type, expression, material or construction method,
 - ii. displays a high degree of craftsmanship or artistic merit, or
 - iii. demonstrates a high degree of technical or scientific achievement.
2. The property has historical value or associative value because it,
 - i. has direct associations with a theme, event, belief, person, activity, organization or institution that is significant to a community,
 - ii. yields, or has the potential to yield, information that contributes to an understanding of a community or culture, or
 - iii. demonstrates or reflects the work or ideas of an architect, artist, builder, designer or theorist who is significant to a community.
3. The property has contextual value because it,
 - i. is important in defining, maintaining or supporting the character of an area,
 - ii. is physically, functionally, visually or historically linked to its surroundings, or
 - iii. is a landmark. O. Reg. 9/06, s. 1 (2).

In 2008, Council endorsed a values-based approach for heritage conservation with the adoption of The Standards and Guidelines for the Conservation of Historic Places in Canada as the official standards and guidelines for planning, stewardship and conservation of heritage resources within the City of Toronto. It offers results oriented guidance for sound decision making when planning for, intervening in and using historic places.

The City of Toronto's Official Plan provides the policy framework for heritage conservation in the City. The following Official Plan policies speak directly to Ontario Regulation 9/06 and the Standards and Guidelines for the Conservation of Historic Places in Canada:

3.1.5.2: "Properties and Heritage Conservation Districts of potential cultural heritage value or interest will be identified and evaluated to determine their cultural heritage value or interest consistent with provincial regulations, where applicable, and will include consideration of cultural heritage values including design or physical value, historical or associative value and contextual value..."

3.1.5.4: "Properties on the Heritage Register will be conserved and maintained consistent with the Standards and Guidelines for the Conservation of Historic Places in Canada, as revised from time to time and adopted by Council."

Attachment 5: Map of Areas Surveyed Through Heritage Conservation Districts and Cultural Heritage Resource Assessments



- Note:
1. Map does not include individual properties on the Heritage Register