ARCHITECTURAL CONSERVANCY ONTARIO

September 24, 2020

Chair and Members of the Toronto Preservation Board
2nd floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Re: PB 17.4 Comments on Queen's Park heritage

ACO was pleased to have been included in stakeholder meetings for the above noted project, represented by former provincial and local branch president, Catherine Nasmith. ACO supports the designation of Falconer Hall and the Edward Johnson building that is before you today, as well as regretting the loss of the Planetarium.

We have concerns with the overall redevelopment scheme, largely related to the scale of the new building in its context. The height of the new building challenges the visual dominance of the Legislative Assembly, which should remain the centerpiece of the existing unprotected cultural landscape. This proposal is being considered as an isolated project, yet it will set precedent and affect a much broader district.

In 2010-2011 ACO was active in the Ontario Capital Precinct Working Group which included representatives of several residents' associations in the area around Queen's Park, as well as the MPP's and local councillors. At the time we argued for two objectives:

The first was for views protection for the silhouette of the Legislative Assembly. Our efforts resulted in protection for the views from the vantage point of College Street, but from vantage points further south on University Avenue, taller buildings north of Queen's Park will interrupt the silhouette.

The second initiative was for the creation of an Ontario Capital Precinct and an associated planning regime to administer it. We did not set a definite boundary, but considered that University Avenue from Queen to Bloor, east to include Old and New City Hall, as well as Osgoode Hall, Queen's Park, Queen's Park and the U of T campus were territories that shared a common history and contain a highly concentrated wealth of heritage buildings and landscapes that should be considered as a whole.

All of the institutions in this zone need to grow and change. Complicating the establishment of a special planning regime for such a large precinct, is that to be effective, it would have to be supported by the Province, the University of Toronto and the City of Toronto. Until there is such agreement, development will continue to be discussed as a series of independent projects, potentially yielding haphazard results in this most important of territories.

Waterfront Toronto, with its tri-level representation, has been successful in working with communities and a broad range of landowners. The National Capital

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Commission has direct planning powers over federal lands and has been influential in municipal planning decisions.

A Heritage Conservation District (HCD) would be effective in areas outside of the Legislative Assembly and provincially owned buildings in the potential District. An HCD can be initiated by the City of Toronto. Putting this project and other projects in the area on hold to give time for an HCD process, would begin the broader conversation about options for comprehensive planning. ACO urges the City to take the first step by passing a holding bylaw in the area and initiating an HCD study.

Yours sincerely,

Matthew Zambri
President, ACO Toronto

Kae Elgie
Chair, ACO Board of Directors