

June 5, 2021

Toronto City Council,  
100 Queen St. W.,  
10th floor, West Tower,  
Toronto, ON M5H 2N2



Via email [councilmeeting@toronto.ca](mailto:councilmeeting@toronto.ca)

Re: **EX24.3 Ontario Place Redevelopment Update**

Dear Mayor Tory and Members of Council,

Thank you for your work beginning the engagement process on the future of Exhibition Place and Ontario Place, two very important waterfront sites.

As a provincial charitable organization, Architectural Conservancy Ontario is especially concerned that the provincial, as well as national and international, value of Ontario Place be recognized and maintained as its revitalization moves forward. It was our recognition of the Cultural Heritage Value of Ontario Place that led us to nominate it to the [World Monuments Fund 2020 Watch List](#), where it joined Easter Island, Notre Dame Cathedral and 22 other sites of great cultural importance from around the world.

The proposed Terms of Reference for the City-Province Engagement on the Future of Ontario Place and Exhibition Place **need to be strengthened** to ensure that Ontario Place's Cultural Heritage Value is protected.

We respectfully request the following amendments:

- **Anticipated benefits** should include "Opportunity to showcase world class stewardship practices". Just as Alan Croker's Conservation Management Plan for the Sydney Opera House became the subject of international attention, so could the Conservation Management Plan for Ontario Place.
- **Opportunity for Collaboration:** The final bullet point "Conservation of these two significant heritage properties" should include the qualifier "incorporating leading best practices" as was added in bullet four regarding "heightened environmental sustainability, and resiliency".
- **Shared Objectives and Principles** must include "Conservation of Ontario Place's Cultural Heritage Value: development of a Strategic Conservation Plan/Conservation Management Plan in advance of site preparation to protect Ontario Place's cultural assets from unforeseen or unintended damage. This Strategic Conservation Plan must be developed respecting the 2014 Statement of Cultural Heritage Value and with full transparency and public consultation.
- **Roles and Responsibilities:** Conservation of Ontario Place's cultural heritage assets needs to be mentioned as a responsibility of **both** the Province and the City. Heritage conservation, in accordance with the requirements of the Ontario

Heritage Act, needs to be added to the Province's list of roles and responsibilities. The City should share this responsibility. Ontario Place is an iconic part of Toronto's waterfront. The City should not cede the vision for the future of Ontario Place to the Province.

**These additions are critical.**

The province has a legal duty to follow the Standards and Guidelines (S&Gs) for Conservation of Heritage Properties of Provincial Importance established by the Ontario Heritage Act, but has failed on several occasions.

Specific contradictions include:

- The S&Gs (C.1) state *"For identified provincial heritage properties, prepare a Strategic Conservation Plan to provide guidance on conserving, maintaining, using and disposing of them"*. No plan has been produced.
- The S&Gs (F.2) state *"If a provincial heritage property is to leave provincial control, use best efforts to the extent possible in law to ensure the ongoing, legally binding protection of the property's cultural heritage value"*. However, the Ontario Place Request For Expressions of Interest (RFEOI) stated "there are no limitations of use and/or retention of existing assets on Site."
- The S&Gs (E.1) specify *"Where the use of a Provincial Heritage Property is significant or of long standing, and the property has cultural value or interest because of that use, apply best efforts to continuing that use"*. Ontario Place's function as a public park is clearly significant under these terms. However, the RFEOI stated "There is no requirement for unrestricted public access. If necessary, access to all or portions of the Site can be controlled and should reflect the commercial requirements of the individual submissions."

Given these actions it is critical that the City does not cede responsibility for cultural heritage conservation to the Province -- to date, they have not proven to be good stewards.

It is also essential that the Terms of Reference clearly reiterate the Province's responsibility.

We note, with concern, that the City's own 2019 Council-Adopted Guiding Principles for the Revitalization of Ontario Place omitted any mention of the heritage value of the original Ontario Place site. (The only reference was to Trillium Park and the William G Davis Trail, key place-making features, to be sure, but not the original features upon which the World Monuments Fund recognition was based.)

This unfortunate oversight makes it doubly important that the current Terms of Reference ensure the protection of Ontario Place's Cultural Heritage Value, in the ways we have outlined above.

Again, thanks to you Mayor Tory, Council and Staff for all your work establishing a way forward that protects Ontario Place for future generations. Please let us know how we can help and support these efforts.

Yours truly,

The image shows two handwritten signatures in black ink. The signature on the left is 'Kae Elgie' and the signature on the right is 'Bill Greaves'.

Kae Elgie, Chair, Board of Directors      Bill Greaves, Ontario Place Committee Chair  
Architectural Conservancy Ontario

c.c. Tracey Cook, Deputy City Manager, Infrastructure and Development Service  
Gregg Lintern, Chief Planner and Executive Director, City Planning Division  
Patrick Tobin, Acting General Manager, Economic Development & Culture Division  
Sandra Shaul, Chair, Toronto Preservation Board  
Mary Macdonald, Senior Manager, Heritage Planning  
Tamara Anson-Cartwright, Program Manager, Heritage Planning  
Mark Saunders, Ontario Place Special Advisor  
Lisa MacLeod, Minister, Heritage, Sport, Tourism and Culture Industries  
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