

ST. LAWRENCE NEIGHBOURHOOD ASSOCIATION
PARTICIPANT STATEMENT

Local Planning Appeal Tribunal

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St. Lawrence Neighbourhood Heritage Conservation District

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Introduction

The St. Lawrence Neighbourhood Association (SLNA) is an association of residents in the St. Lawrence area of the City of Toronto; it was incorporated as a non-profit corporation in 1982. The SLNA, who often work on joint projects with our local BIA, represents 30,000+ residents in our neighbourhood and our boundaries run from Queen Street East south to the rail corridor and from Yonge Street east to Parliament – an area considerably larger than the boundaries of this HCD. As ‘neighbourhood boundaries’ are somewhat fluid, our easterly boundary overlaps with that of the Corktown Residents and Business Association from Berkeley to Parliament.

The SLNA has a long history of being an advocate for, among many things, responsible development and for promoting excellent public spaces and pedestrian safety. Part of our mandate is to enhance the quality of life in the St. Lawrence neighbourhood; encourage appropriate change and development beneficial to all the residents and businesses in St. Lawrence; to strengthen and celebrate the heritage character of the St. Lawrence neighbourhood, and to foster the sense of community that exists within our neighbourhood.

The St. Lawrence neighbourhood and the St. Lawrence Neighbourhood HCD includes the Original Ten Blocks of the Town of York, which was established in 1793 and the many 19th century core buildings which remain there and in adjacent areas are representative of the distinctive character of our neighbourhood’s rich history. The part of the St. Lawrence clustered around The Esplanade that was constructed in the late 20th century forms a family-friendly, mixed-income residential neighbourhood that combines low-rent and subsidized rental housing with co-ops, condominiums, and individually owned homes. In short, ours is a diverse, residential and commercial neighbourhood.

The SLNA started to work on what became the HCD Plan for the St. Lawrence in 2005; we formed a committee which included many local organizations and experts, including Michael Cruikshank who was mentioned earlier. Over the years we interviewed heritage architects including Michael McClelland and Catherine Naismith, we worked on heritage interpretation reports and heritage lighting reports. We started writing proposals for fund raising for a study (at the time the creation of HCDs was not funded by City Planning). City Council, at its meeting of September 2005, adopted a proposal for a heritage conservation district study area under Part V of the Ontario Heritage Act. The boundary of the proposed Area was “referred to as Phase 1 to allow for the fact that other parts of the St. Lawrence neighbourhood maybe studied at a later date.”

As money was being raised through Section 37 funds and other means, the City began to work on new procedures and policies for the creation of Heritage Conservation District Studies and Plans in order for the City to properly implement the new 2005 Ontario Heritage Act. Unfortunately, despite much pressure from our City Councillor (Pam McConnell), it took several years for City Planning to create this ‘framework’. In 2009 City Council re-defined the St. Lawrence Neighbourhood HCD Study area with the boundaries of Adelaide Street to the north, the railway corridor to the south, Parliament Street to the east, and Yonge Street to the west. In August 2012 Toronto City Council approved the Toronto Heritage Conservation District (HCD) Study Prioritization Report, which identified eight potential HCD areas throughout the City that would be moved forward on a priority basis and Council identified the

St. Lawrence neighbourhood as a high priority and in June 2013 FGMDA (now Evoq Architecture) began the Study.

The St. Lawrence Neighbourhood HCD Study is an example of strong neighbourhood support for the creation of a Plan in that a large proportion of the initial building surveys and photography in the early phase was done by neighbourhood volunteers organized by SLNA.

It is worth noting that the Study area defined by Council in 2009 covered almost all of the St. Lawrence neighbourhood south of Adelaide and during the Study it became very clear that the residential district, generally south of The Esplanade, has different heritage characteristics from the older (and more mixed) areas to the north. The St. Lawrence HCD Study of 2014 thus recommended that two separate Plans should be prepared, one for the mixed-use area that is covered by the Plan now before the Tribunal and another for the St. Lawrence residential district. In addition, a few small areas immediately outside the original Study boundaries were added (for example, the current Toronto Police Division 51 building that forms part of the much larger Consumers Gas complex around Front and Parliament) while a few others, such as the row of 19th century houses on the east side of Berkeley north of King (which fit better into Corktown) were excluded. The Plan for the St. Lawrence HCD that is the subject of this hearing was approved unanimously by City Council in December 2015.

When adopted, this HCD Plan will support the sense of place in our community and like visiting Old Montreal, Old Quebec City and Ottawa you will know you are in the birthplace of the City. We want to ensure that everyone is able to embrace the history through the remaining buildings, the laneways (many of which were named thanks to the work of an SLNA committee), the cultural heritage views, and the historic plaques (many of which have been erected thanks to SLNA donations to Heritage Toronto) that tell the stories of what was here in the past and is still here.

Development within the HCD

The creation of an HCD, as has been stressed by the City is about the management of change: it is not about stopping it. It is very important to reiterate that the SLNA does not want to deter development, we simply want to ensure that what attracts developers and new residents to our neighbourhood is not lost in the process. This neighbourhood has evolved over the years and must continue to do so. However, we want growth and intensification that respects the character of the neighbourhood. We understand regeneration and intensification and have already seen the benefits of the change from rail yards and parking lots to new offices, homes, and retail. We want to live in a vibrant mixed-use area that protects its heritage while welcoming change. We almost lost the St. Lawrence Hall to neglect in the 1960s and at one time the St. Lawrence Market was almost closed but in the last few weeks we have seen the Market join the Hall in being properly illuminated and will soon see St. James Cathedral lit following plans established in the Heritage Lighting Master Plan for Old Town Toronto which the SLNA helped create.

For about 20 years the SLNA has had a Development Committee which meets regularly with City Planners, Councillors and developers to discuss how new developments can provide new housing, offices and retail and provide the profits that the development industry expects while not overwhelming our heritage. We have developed guidelines of what types of development would suit this area and we shared our perspective with the City as the Plan was developed. We too have had to adjust: what we once considered a tall building for this area would now be considered a mid-rise.

Just as the Plan discusses and describes “character sub-areas”, we see our neighbourhood as a series of rooms and each one has its own personality. For example, along the western edge of our neighbourhood (adjacent to the high-rise Financial District) we recently supported a new 57 storey building at 88 Scott because we understand and support the aims of the PPS and the Growth Plan. As we move further east, however, we look for development of a finer grain and less height in order to complement the much lower heights in Corktown and transitions into that area.

As residents of the St. Lawrence it is important that our neighbourhood is not seen as only ‘physical buildings’. Along with trying to improve the physical development of our area we have worked with the City on projects such as the programming of the Toronto Sculpture Garden and the redesign of both Berczy and St. James Park. It has been mentioned that these parks are described as non-contributing to the HCD Plan, but they certainly contribute to the lives our residents.

We are sometimes asked which development projects we have supported. We often provide examples of King George Square (168 King Street), St. James Place (39 Jarvis Street) The Berczy (55 Front Street East) and London on the Esplanade (38 The Esplanade). These are all projects where we provided input, and in some cases struck a working group with the developer. In the last few years, we have met several times with the developers of 158 and 197 Front Street East and, more recently, we were approached by the Canadian Opera Company (COC) as they look at intensifying on their site. To date they have met with our Development Committee to talk about their upcoming application for their site.

We are not NIMBY, we support development and our area has contributed to meeting the aspirations of the Growth Plan and the PPS with many projects. Though we have welcomed and celebrated several developments that pays homage to the heritage of the area, we have also endured developments that have ignored the history and heritage that attracted the developers in the first place.

This, or any, HCD plan may be seen by some as deterring development but we see our HCD Plan as encouraging development that respects the heritage attributes of this neighbourhood. We are not saying “no” to development. Although Listed and Designated buildings can be repurposed and expanded under current Official Plan heritage policies but it cannot be stated enough that facadism alone is not conservation. We accept that sometimes only facades can remain but in these cases the facade must be presented in its historic context and not simply “pasted onto a new brick wall”. Once approved, the St. Lawrence Neighbourhood HCD will help guide new development and ensure that new buildings with greater height and density fit into our neighbourhood and its historic character. And we hope it not only encourages people to but will also add to their quality of life once they live here.

It has been mentioned before in the evidence of the Appellants that this Plan will impact affordable housing. It is our understanding that there is nothing in the Plan that precludes affordable housing: we hope it encourages more. Whenever our Development Committee meets with property developers, we raise the issue of adding more affordable housing. Unfortunately, to date, we have not been very successful as this is often not seen as being ‘financially viable’. We were very close recently when we supported a settlement of an application for a building that would have added to the rental stock only to discover that, soon after the settlement was agreed, the site was sold to a developer who intends to build only condominiums.

Cultural Heritage

The SLNA strongly supports the HCD Plan and it is important to emphasize again that we are neither hoping nor expecting to use the HCD to deter development or thwart change. We fully realize that our neighbourhood has evolved and will evolve, and we have a long track record of working with property owners and developers as the neighbourhood grows and incorporates new development. We welcome responsible and sensitive development and we want to be able to use the provisions of this HCD Plan to ensure that the inevitable, and generally welcome changes do not obliterate our past. We are not, and we do not want to be described as, either for or against change and new development; we prefer to look at each proposal individually through the eyes of residents and we prefer to be seen as a group which speaks about and supports development that conserves, enhances, highlights and does not overwhelm what is already here. We want to ensure that in the area where our City began the story of our past can be told through the buildings, the blocks, and the views that remain. It is for this reason we strongly support policies that maintain street wall heights and appropriate step-backs.

Though, as the Plan notes, many buildings and views have certainly been lost, there is still much history remaining in the area and the Original Ten Blocks of the Town of York, where the story of the City begins, lie within the Plan boundaries. The Plan area still contains many 19th century and early 20th century buildings and the typology of these buildings exemplifies the District's physical character and historical evolution. While Listing and Designating an individual building under the Act can certainly preserve that building individually, being within a Heritage Conservation District ensures that buildings, blocks, views, and landscapes are preserved and protected and can be seen in their wider context.

Clearly, the determination of the boundaries of any HCD are a matter of opinion but it is worth noting again that the boundaries in this Plan are based on a very exhaustive Study of a far larger area and has, largely remained unchanged since an HCD for the St. Lawrence was first discussed in 2005.

It has been suggested that the area surrounding the site of Canada's First Parliament building should be removed from the Plan area but, in our opinion the First Parliament Site and the associated Consumers Gas buildings are a vital part of our neighbourhood and its history and they play an integral part in telling the story of the birth and development of Toronto. Almost all the buildings in this quadrant are either designated or listed.

Most of these lands are owned by the City and the Ontario Heritage Trust and both are supportive of an HCD Plan. Though nothing has been finalized, it may be worth noting that the City has started work on a Master Plan for the First Parliament site and it has been determined that a new District Library will be erected on part of the site. As an example of how we support development and affordable housing, the SLNA will be pressing to have affordable housing of an appropriate height built on top of the library building. Though it is not directly connected to the creation of an HCD in our neighbourhood, we note that we are part of the City's Working Group for the creation of a Master Plan of the First Parliament site and that there is an opportunity to work with the City's Division of Economic Development and Culture to create a cultural corridor which would include Meridian Hall, the St. Lawrence Centre for the Arts, the Young People's, Berkeley and Alumnae Theatres and the COC complex on Front Street.

It has also been suggested that 33 Yonge Street (just west of Berczy Park) should be removed from the Plan area. The reason we think this site should remain in the St. Lawrence HCD area is that, if the Plan is approved as written, the area covered will be about the area covered by the Union Station HCD. In our opinion it would be anomalous if 33 Yonge is excluded as it would be an 'orphan' and not part of either HCD.

This Plan only covers the northern part of the St. Lawrence HCD Study area and we note again that the southern (residential) part of the Study area is slated, in due course, to have a second Plan developed that will suit its unique character and much greater proportion of the late 20th century buildings. For this reason, we strongly object to the suggestion of having the south side of Front Street East removed from the area covered by this HCD Plan as most of the properties on that side of Front Street fit much better with this Plan's area and many are listed.

Though it is important to remember that the development of a Plan for the area south of the current Plan boundaries has been approved, we also think it useful to remember that there is already an HCD covering Union Station and adjacent buildings to the west of our area and that a Study is currently underway for the Distillery District (to our south east). Furthermore, there are now moves towards having an HCD Study of Corktown to the east of the area of this Plan. The area covered by this Plan must be viewed with these facts in mind.

The social value of 'heritage' is also of significance to the SLNA; currently the look and feel within the area of the proposed HCD still reflects the "Old Town". This "Old Town" serves as a City landmark and tourist destination; it contains many historic buildings and institutions whose look and character continue to attract visitors to the neighbourhood from across the City and the world.

Our neighbourhood contains major and iconic buildings such as St. Lawrence Hall, the Flatiron Building, St. Lawrence Market and St. James Cathedral and we also have lesser known but equally important buildings such as the row of 19th century stores on King Street between Jarvis and George. Though many of our streetscapes also reflect and demonstrate our history and its many eras. Though many of the buildings in our neighbourhood are old, there are certainly some newer developments; some of the latter (for example St. James Place and The Berczy) have been recently built to 'fit in'; others have not.

It was surprising to hear earlier in this Tribunal process that this HCD process was 'premature'. We have many volunteers, professionals, and residents who would say otherwise. We are confident the process and conversation has been flexible, professional and thoughtful and was long overdue. Development (or in our case, redevelopment) is messy, we are not starting with a clean slate and the art is developing a framework around these heritage pockets to protect them while not inhibiting thoughtful and respectful development.

The objective we are hoping to achieve is that the area covered by the St. Lawrence Heritage Conservation District is protected and conserved, and that future additions and changes to our neighbourhood are compatible with their context. We want to be able to see, and celebrate, the heritage buildings that remain and be able to feel, understand, and appreciate their cultural heritage values by seeing them in context and as part of a vibrant neighbourhood that is not a 'theme park' dotted with miscellaneous structures.

The implementation of a Heritage Conservation District will ensure that future developments, while certainly not prohibited, will celebrate and enhance existing buildings, streets, and blocks and that the inevitable development does not detract from vistas and views we currently enjoy.

We want to ensure that the St. Lawrence neighbourhood retains a sense of community and that we are able to continue to engage in civic activity and have open spaces for public gatherings or private reflection. We want to ensure that the Original Ten Blocks of the Town of York, the original Government Reserve lands, and the site of Canada's First Parliament Buildings will be celebrated and properly conserved: and not just with commemorative plaques or rebuilt facades.

Characterization of District

When you read the Plan, you can clearly see how the boundaries of the District align with the different component sub-neighbourhoods. As noted above, some changes in boundaries were made from the Study to the Plan; in our opinion these changes make sense. The final boundaries wrap around sub-neighbourhoods which, in turn, wrap around the typologies and attributes for that area. The boundary ties together the landmark public buildings; the warehouse buildings, the residential buildings and the industrial buildings. The landmark buildings in particular need to be protected from insensitive future development so that the views from and of them are protected and their architectural integrity can be maintained. As noted in the Plan, the recommended HCD boundary further identifies and shows the significance of the layers of development that have occurred in the past and the delineation of the sub-areas further speaks to and of the history of this part of our City and the layers in these sub-areas shows the early development from the establishment of the Town of York in 1793 through to the renewal, growth, and redevelopment occurring today.

The evidence presented by the Appellants that spoke to signage inferred that the Plan policies are too restrictive. But, we already have evidence that these sign policies can work and examples are the Starbucks at the National Hotel and RBC in the St. Lawrence Hall.

As well it has been suggested that the Plan focuses too much on tall buildings. It is seldom that we see an application that doesn't have a zoning bylaw amendment attached to it and that applications seek the maximum density and height possible. We do need the Plan to guide new developments and as with anything we have good actors and bad actors. As is reflected now we do have some developments that complement the heritage and have won awards and sadly we have the opposite.

If this Plan was already in effect, development applications would still be coming in and buildings would still be built. As was mentioned, the Plan would need to be reviewed, amended etc. HCDs are not meant to be static and along the way currently non-contributing buildings (largely built within the last 25 years, could be added). We are already going through this exercise with the King Parliament Secondary Plan. The setbacks, stepbacks and angular plane in this HCD Plan does not stop development but rather preserves the cultural heritage value.

Conclusion

If we are asked what the SLNA wants to see at the end of this process, we can say clearly and loudly that we expect to see the St. Lawrence Heritage Conservation District Plan, which was unanimously adopted by City Council in 2015, approved and implemented essentially unchanged. That said, though we think that the rationale and arguments in the Study and the Plan for the inclusion or exclusion of particular buildings or blocks is strong, we realize that there may need to be some discussion of the fine details of some policy wording for clarity but at the end of this very lengthy process we expect to see the Tribunal approve the HCD Plan as presented.

One hundred years from now, when we are all gone, people walking these streets should know and see evidence that this is where the City began. They should not see a 'heritage theme park' but should see some heritage buildings and streetscapes and be able to imagine something of what Toronto once looked like.

Today, there is less "built heritage" remaining in our neighbourhood than we would like and thus we want to ensure that what remains is preserved and conserved and that a tourist or a citizen who comes here in 2119 will be able to experience a similar feeling to walking in Old Montreal or Old Quebec City today. We celebrate our neighbourhood's history, we are proud of its present state and we hope that we can leave behind a legacy so that our successors can know that our City has a long history and that the St. Lawrence is where Toronto began. Since 1793 the Town of York has been an urban community of workers, residents and visitors; we expect and hope this will continue and that the future will be built not on the ruins of the past but in a way that preserves the past while serving the present and looking out into the future.

Some may view the standards and principles associated with the creation of any Heritage Conservation District as too restrictive and say that they impose too many constraints onto property owners. Many buildings within the proposed St. Lawrence HCD are already designated or listed under the Act and we note that the owners of the buildings individually listed or designated under Part IV are already restricted. We understand that this responsibility will affect additional owners when the HCD is implemented. However, 'heritage' does not only belong to the 'property owner' and, to slightly alter the well-known 'proverb', "we do not inherit heritage from our ancestors; we borrow it from our children." Without an HCD for St. Lawrence we fear that the historic fabric of our neighbourhood will continue to unravel and that the 'buildings' that remain may simply be facades fastened to the base of a huge skyscraper and that they will no longer be able to be viewed and appreciated in context.

Having this HCD Plan approved is essential to the future of St. Lawrence and we would point out that it has strong support from the residents of our neighbourhood, from many property owners and, the unanimous support of our City Council. The St. Lawrence Neighbourhood Association thanks you for your time, and we look forward to the Tribunal approving this Plan.