

Amending the Sandbanks Provincial Park Management Plan to enable the demolition of two buildings

ERO: 019-0977

Comments from the Prince Edward Heritage Advisory Committee

Background

In accordance with the Environmental Registry of Ontario, The Ministry of the Environment, Conservation and Parks has posted a proposal regarding a Category B Environmental Assessment associated with a demolition project proposed at Sandbanks Provincial Park, and the associated proposed amendment to the Sandbanks Provincial Park Management Plan to allow for the demolition of the MacDonald and Hyatt houses.

The Prince Edward Heritage Advisory Committee is a statutory committee of Prince Edward County Council appointed to advise Council on all matters relating to the *Ontario Heritage Act* and the protection of the County's heritage. In response to the Environmental Registry posting and at the direction of Mayor Steven Ferguson, four PEHAC members visited the MacDonald and Hyatt sites on December 18, 2020 accompanied by Park Superintendent Robin Reilly, then PEHAC discussed the site visit observations and reviewed the Cultural Heritage Resource Evaluation Reports ("CHERs") and Heritage Impact Assessments ("HIAs") related to each property at its monthly meeting on January 16, 2020, at which the committee authorized the Chair to submit the comments herein to the Environmental Registry.

The 1993 Management Plan for Sandbanks Provincial Park committed to preserving buildings within the historical zone. Section 2 of the Plan identifies "management of heritage resources" as a "significant issue" arising from the extensive public consultation that took place at that time. With respect to cultural heritage resources, Section 6.5 states, "A cultural resources management plan will be developed to guide the management of the cultural resources of the park." With respect to the MacDonald and Hyatt (Gray) houses in particular, the Plan's stated policy at Section 5.2.2 includes:

"... the preservation of the MacDonald House and the barns, as well as the MacDonald / Hyatt wharf site and the site of the Lakeland Hotel. Any deterioration will be arrested, and potential for restoration, adaptive reuse and interpretation of the structures will be examined as part of the cultural resources management plan ... The Gray (Hyatt) House operated as the Lakeview Lodge soon after its construction in 1869 by the Hyatt family. The house is in good condition and it will not be allowed to deteriorate further."

In the over 25 years since this commitment to preserve was made, there is still no cultural resources management plan in place and, due to lack of maintenance and attention, Hyatt House and MacDonald House – buildings that date back to 1869/1878, respectively – are now in an advanced (but not irreversible) state of disrepair and Ontario Parks is proposing demolition. PEHAC submits that Ontario

Parks should develop a cultural resource management plan before any decision to demolish the two houses is contemplated. The time for a conservation management plan is now, while the buildings' deterioration is reversible.

CHERs and HIAs for MacDonald and Hyatt houses

One aim of PEHAC's comments to the Environmental Registry is to highlight for Ontario Parks and the Ministry of Heritage, Sport, Tourism and Culture Industries ("MHSTCI") the three main deficiencies of the CHERs and HIAs, with the recommendation that a peer-review of the existing CHERs and HIAs be carried out, which would include an in-depth consultation with PEHAC.

Firstly, the CHERs and HIAs are not informed by public consultation. A cultural heritage evaluation seeks to define the cultural heritage value of the resource and should be carried out with the involvement of the community. Community input can bring about major changes in a consultant's evaluation and impact assessment. Although the HIA for each house (Section 7) recommends that input from PEHAC and the Friends of Sandbanks be sought and "taken into consideration *in this HIA*," (emphasis added), even this limited community engagement did not happen, and the recommendation and omission is not noted in the HIAs' Executive Summary. (PEHAC understands that a member of the Friends of Sandbanks accompanied the CHER site visit in 2017 at his own request, and only to take photographs for the Friends' documentary purposes.)

Secondly, the CHERs and HIAs do not adequately capture the significance of the heritage resources and the impact of their proposed demolition on a remarkable natural and cultural heritage landscape of provincial significance. Both buildings provide significant physical, visual and historical context to the evolution of the Sandbanks area (not only historical context as the CHER asserts with respect to O. Reg. 9/06). Although the CHERs found that the MacDonald and Hyatt houses had heritage value under O. Reg. 9/06, the consultant found that neither met the criteria for provincial significance in O. Reg. 10/06. "The contextual importance of the MacDonald Farm structures is local, not provincial" (p 39). This contradicts the finding of the 1993 Management Plan, which states: "The MacDonald Farm ... illustrates the historical themes of agriculture and resort development *unique to this area of the province*" (Section 5.2.2, emphasis added). Although the Management Plan pre-dates the O. Reg. 10/06 criteria, its finding for the MacDonald Farm (and by extension the Hyatt house) neatly corresponds to Criteria 4, "The property is of aesthetic, visual or contextual importance to the province." PEHAC submits that both houses are an integral part of the unique Sandbanks landscape and that their physical presence at the Lake Ontario shoreline is crucial for an appreciation of a landscape of provincial significance.

Thirdly, the consultant does not bring the appropriate expertise to determining the condition of the buildings relative to the findings of the 2012 Bradley Engineering report, or to assessing the measures and costs required for rehabilitation at this time. The recommendations of the Bradley Engineering report appear to be generally still relevant. Bradley Engineering found for the MacDonald House that "the structural components of the main sections of the building ... have useful life remaining ... The structural rehabilitation component of the entire project will not be the critical factor when deciding on proceeding with the rehabilitation." (p 3). In the case of the Hyatt House, Bradley Engineering did not

obtain sufficient information to advise on the rehabilitation of the centre block and east wing: “The decision on whether to demolish or rehabilitate is not easy to recommend given the available information” and the report recommends further investigations (p 2). The advice of a qualified heritage architect, informed also by the architect’s engagement of a structural engineer with heritage experience, is needed for both buildings before the irreversible step of demolition is decided. It was the collective opinion of the four PEHAC members who visited the buildings in December 2019, informed by their professional qualifications and expertise in engineering, planning, and cultural heritage, that the buildings can be rehabilitated.

County Context

Over the last decade the County has become an increasingly popular destination for tourists, many of them destined for Sandbanks Provincial Park. In recent years, the County has welcomed upwards of a million visitors annually. Accommodations in the area are at a premium.

At the same time, the County is benefitting from several privately-led projects to restore and repurpose heritage-designated properties including the Royal Hotel and former Picton Legion (now Culinary Arts of Prince Edward – CAPE), among many examples. The private sector is currently a leading force in heritage preservation and restoration in our community because owners recognize that preserving the cultural heritage value of their properties brings both amenities to the visiting public and an economic return to the owner.

PEHAC’s Recommendations

Based on the site visit, document review, lack of stakeholder consultation for the CHERs and HIAs, County context, and motivated by a commitment to protect and promote the County’s heritage, the committee recommends that Ontario Parks:

- postpone the decision to amend the Sandbanks Provincial Park Management Plan, which would enable the demolition of two buildings, until the following recommendations have been addressed;
- take immediate steps to prevent water infiltration into the MacDonald house by using sheet metal to close the hole in the roof (HIA, fig. 13) and the gap between the second floor joists (HIA, fig. 8), and to prevent water infiltration into the Hyatt House by using sheet metal to close the hole visible in fig. 6 in the HIA; and install fencing around each building to prevent unauthorized access;
- commission a peer review of the existing CHERs and HIAs for the MacDonald and Hyatt houses by a qualified heritage architect, the peer review to include engaging a structural engineer with heritage experience for additional assessment, a site visit, review of all documents, and a meeting with PEHAC;
- hold public consultations within Prince Edward County with stakeholders on the future retention and use of all heritage assets in the park;

- create and implement a comprehensive Cultural Heritage Plan for the park, and when creating the Cultural Heritage Plan, evaluate the use of one or both buildings as the anchor for an interpretive center or public space with additional office space; and
- seek the creation of a joint public / private partnership to restore and repurpose the MacDonald and Hyatt properties as commercially viable accommodations for park visitors.

PEHAC requests assurance from Ontario Parks that PEHAC's comments, and all other submitted comments related to culture heritage, will be reviewed and considered by the MHSTCI, before any decision is taken with respect to the proposed amendment to the Management Plan.

PEHAC believes that the MacDonald and Hyatt properties present a unique opportunity to restore and repurpose heritage assets through a joint public/ private venture that can result in a sustainable and commercially viable operation for the benefit of all stakeholders. The committee urges the Ontario Government and Sandbanks Provincial Park to recognize the heritage value of the buildings, in addition to the embodied carbon in the structures, and make a commitment on behalf of the people of Ontario to give careful and due consideration to these Provincial assets.

Ken Dewar, Chair

On behalf of the Prince Edward Heritage Advisory Committee