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Canadian Association of Heritage Professionals
Association canadienne d'experts-conseils de patrimoine

April 25, 2022

CAHP/OHAP Submission

Opportunities to increase missing middle housing and gentle density, including supports for multigenerational housing

The Canadian Association of Heritage Professionals (CAHP) in partnership with its Ontario Chapter, OHAP, respectfully submits the following comments related to 'Opportunities to increase missing middle housing and gentle density', as part of the Ontario's *More Homes for Everyone Plan*. Our organization represents more than 400 heritage professionals living and working in the province of Ontario, the majority of whom are actively involved in countless development projects. Our response is based on a survey to our membership, who were unanimous in noting that the Housing Task Force Report recommendations will have a direct impact on their work as heritage professionals.

As an organization, we welcome the Province's commitment to addressing the current housing crisis and we also look forward to more information on the work that the Minister and cabinet are doing to address *affordable* housing. We also welcome the staged approach to implementing the majority of recommendations of the Task Force. This will offer an opportunity for additional consultation with stakeholders, which has yet to be undertaken with any heritage stakeholders including the Architectural Conservancy of Ontario, Community Heritage Ontario, or our Ontario members represented by OHAP.

Meeting the targets of More Homes for Everyone will require creative solutions. We believe that CAHP could bring the perspective of professionals with expertise in using existing buildings to the Working Group's deliberations as a means of providing more affordable housing. It is also important to include existing buildings in these discussions because of their role in building sustainable and healthy communities. CAHP is prepared to play an active role in the Working Group and would like to formally request to become a member.

According to the 2022 Report from the federal Net-Zero Advisory Board¹, over two thirds of existing houses in Canada will still be there in 2050. As a result, we believe that heritage conservation has to be part of the discussion when exploring how to create gentle density in neighborhoods.

We urge the Province to ensure that the path forward to addressing the housing crisis not be forged at the expense of built heritage resources, cultural heritage landscapes, and archaeological resources. Cultural Heritage can be an integral component in the creation of affordable housing and healthy, sustainable neighborhoods.

Current barriers inhibit the re-use of existing and heritage buildings in Ontario. Addressing these barriers and providing incentives for the conversion and expansion of existing buildings would increase the ability for the Province to provide affordable and sustainable housing.

New construction and reuse often get treated the same way in the development permitting process. Introducing policies to support reuse or repurposing of existing buildings and the removal of certain 'new build' requirements for existing buildings would lead to more housing faster.

¹ Net-Zero Advisory Body (2022) *The Net-Zero Advisory Body's Submission to the Government of Canada's 2030 Emissions Reduction Plan*. Canada. Available at:
https://nzab2050.ca/publications/news_feed/submission-for-canada-s-2030-emissions-reduction-plan



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The Task Force Report Recommendation 4: Permit “as of right” conversion of underutilized or redundant commercial properties to residential or mixed residential and commercial use offers one possible solution, but a blunt change to “as of right” may unintentionally lead to destruction of urban fabric. CAHP believes there is a way to achieve a balance.

CAHP & OHAP are not opposed to gentle density in existing neighbourhoods as long as it continues to respect the existing properties. We are concerned that the “as of right” residential housing up to four units and up to four storeys on a single residential lot will lead to a huge economic incentive for developers to demolish existing two-story buildings and we would encourage avoidance of zoning tools that incentivize the removal of existing building stock, which would have a detrimental effect on mature neighbourhoods, the environment, and affordability.

We would support tools that encourage subdivision of single unit homes into multi-family buildings and give credits for the reuse of existing buildings and materials or incorporating established heritage buildings into new developments.

Finally, in response to Question 3, we are pleased to submit the attached examples of the successful reuse and conversion of existing buildings for housing, submitted to us by our membership, as innovative approaches to land use planning and community building. We would also reiterate that CAHP members are willing to provide their expertise and further insight on supporting gentle density within the heritage framework by participating in the Working Group.

Thank you for the opportunity to provide you with our input.

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Attachment: Examples of Heritage Buildings Supporting Affordable and New Housing

Examples of Heritage Buildings Supporting Affordable Housing

Dr. Hawkins Public School (The Pines of Port Hope), Port Hope, ON



Figure 1: The Pines of Port Hope, Formerly Dr. Hawkins Public School¹

The school board sold the property in 2001 to Eastwood Developments, who began the process of converting the building into eighteen condominium units of varying sizes and the construction of five single-family dwellings. The property is not designated under Part IV or Part V of the *Ontario Heritage Act*, nor is it listed under Section 27. It was the developer's desire to maintain the school building.²

Dr. Powers Public School, 64 Ward Street, Port Hope, ON



Figure 2: Dr. Powers Public School Before Conversion into Affordable Housing Units³

The municipality purchased the property from the Kawartha Pine Ridge District School Board for \$1 in exchange for municipal funding to repair and improve Port Hope High School's track and field facilities. The property was then sold to TVM Group Inc. for \$2 and converted into twenty-four affordable housing units. A section of land along Harcourt Street was sold to Habitat for Humanity for \$2 to construct additional affordable housing. The land along Hope Street was placed under a municipal easement as a public park. The property is not designated under Part IV or Part V of the *Ontario Heritage Act*, nor is it listed under Section 27.⁴

Cornerstone Housing, 332 Richmond Street, London, ON



Figure 3: Affordable and Transitional Housing by Youth Opportunities Unlimited⁵

Cornerstone Housing, located at 332 Richmond Street, is an affordable and supportive transitional housing building created by Youth Opportunities Unlimited. It is intended to help youth develop the skills and knowledge required to live independently by providing them with a place to live and a Housing Stability Worker that can help them achieve this goal. It is one of four housing focused initiatives operated by Youth Opportunities Unlimited.⁶

Cabbagetown Rooming Houses, 508 Parliament Street, Toronto, ON

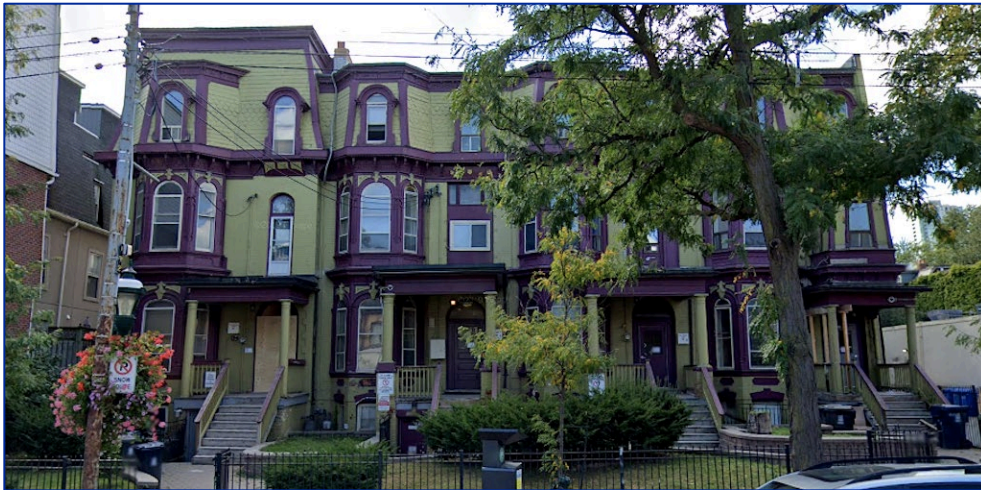


Figure 4: Affordable Housing Project by Dixon Hall and Toronto Community Housing⁷

The Cabbagetown Rooming Houses, located within the Cabbagetown Heritage Conservation District and designated under Part V of the *Ontario Heritage Act*, are an affordable housing initiative funded through a partnership between the City of Toronto, Dixon Hall, and Toronto Community Housing that will renovate the existing row houses at 508 Parliament Street and convert them into rooming houses. It is currently under development and will provide 44 multi-tenant units with shared kitchen space. This project will also restore heritage attributes and establish landscaped yards.

13-15 and 17-19 Winchester Street, Toronto, ON



Figure 5: Supportive Housing Project by Margaret's Housing and Community Support Services⁸

The Winchester Street supportive housing project, located in the Cabbagetown Heritage Conservation District and designated under Part V of the *Ontario Heritage Act*, is funded through Ontario's Home for Good supportive housing program and is operated by Margaret's Housing and Community Support Services, an organization dedicated to helping women with mental illness and substance abuse. The land was transferred to Margaret's Housing and Community Support Services by the City of Toronto. This project will create 35 self-contained units including seven with barrier-free access, and five common areas on the ground floor (kitchen, dining room, and three lounging areas). Restoration of the buildings' heritage attributes as well as landscaping are also a part of the project.⁹

Fairground Lofts, Vaughan, ON



Figure 6: Concept Drawing of Fairground Lofts Including the Heritage Buildings¹⁰

Fairground Lofts is a loft townhouse project in Vaughan (located next to the Woodbridge Fairgrounds¹¹) that will be comprised of 65 loft townhouses in three- and four-storey blocks situated around a landscaped courtyard. The entrance to the site will be flanked by two Part IV designated houses (Thomas P. Wright house and McGillivray-Shore house) that will be relocated to these locations from elsewhere on the property and restored. The architecture of the townhouses will be inspired by the heritage houses and the industrial history of the area.¹²

Northern Rubber Company, 120 Huron Street, Guelph, ON



Figure 7: Northern Rubber Factory Before Restoration and Conversion¹³

Now known as the Alice Block Condos, the former Northern Rubber Company is being converted into residential units ranging from one to three bedrooms. The space is intended to accommodate 30 affordable housing units, with 103 units throughout the existing four floors of the building. This site is designated under Part IV of the *Ontario Heritage Act*. It is under development by Momentum Developments.¹⁴

Other examples of designated industrial and institutional buildings being converted into residential units include the Cannon Knitting Mills in Hamilton¹⁵ and the Peterborough Post Office.¹⁶

The Spire, 87 Mann Avenue, Ottawa, ON



Figure 8: The Spire After Development¹⁷

The Spire, located at 87 Mann Avenue, is a former church that was converted to residential uses after it was deconsecrated in 2011. It contains 56 units and is a sustainable residential building. The property is not designated under the *Ontario Heritage Act*.¹⁸

Connaught Public Elementary School, 400 Maple Street, Collingwood, ON



Figure 9: Connaught Public School Before Restoration¹⁹

Designated under Part IV of the *Ontario Heritage Act*²⁰, the Connaught Public School in Collingwood, which closed in 2001, was to be converted into four condominium units that would have been renamed Duke Lofts. Two of the condominiums would have been in the original school building and would have included the original wood staircases and tin ceilings. The other two units were to be constructed as an addition.²¹ In 2019, Georgian Communities purchased the property and changed the development plan. Now called the Victoria Annex, the development will consist of four single-detached dwellings, ten semi-detached dwellings, three townhouse units, a coach house with parking and three apartments, and the conversion of the schoolhouse into two semi-detached dwellings.²²

Other examples of designated schools and institutional buildings that have been converted into residences includes the Stinson School Lofts in Hamilton²³, and the YMCA Elm Centre.²⁴

Tyndale Green, 3377 Bayview Avenue, North York, ON



Figure 10: Rendering of a Streetscape within the Development²⁵

Tyndale Green is a project by Markee Developments in collaboration with Tyndale University and the community to develop affordable housing in a sustainable environment while taking into consideration heritage preservation and the ravine system. The property was originally developed in 1960 as a Catholic seminary for the Sisters of St. Joseph and was later expanded into a Catholic Secondary School. In 2013, Tyndale University acquired the property. The proposal is to retain the existing University buildings, which will remain in operation by the University, and develop the area around it to add 1,504 residential units (752 will be affordable rents), indoor and outdoor community amenity spaces and underground parking for 1,165 vehicles and 1,527 bicycles. Amenity areas, including the daycare, café, and flexible use spaces, will be accessible to the University. The design of the new buildings is intended to complement the existing University buildings. The University will retain land ownership.²⁶

¹ Royal Service Real Estate Inc., “305 72 Pine St., North, Port Hope, ON,” accessed 18 April 2022, <https://www.erinbrown.ca/Properties.php/Details/111>.

² Northumberland News, “Port Hope School is Foundation for New Condominiums,” accessed 6 November 2003, <https://www.northumberlandnews.com/news-story/3768991-port-hope-school-is-foundation-for-new-condominiums/>.; Royal Service Real Estate Inc., “305 72 Pine St., North, Port Hope, ON.”

³ Northumberland News, “New Affordable Housing Planned for Port Hope’s Dr. Powers School Site,” last updated 9 October 2009, accessed 18 April 2022, <https://www.northumberlandnews.com/news-story/3761157-new-affordable-housing-planned-for-port-hope-s-dr-powers-school-site/>.

⁴ Northumberland News, “New Affordable Housing Planned.”

⁵ Youth Opportunities Unlimited, “Housing Services,” accessed 18 April 2022, <https://www.you.ca/housing-services>.

⁶ Youth Opportunities Unlimited, “Housing Services.”

⁷ Nisean Lorde, “Toronto to Transform Historic Cabbagetown Building into Affordable Housing Project,” *Streets of Toronto*, last updated 4 August 2020, accessed 18 April 2022, <https://streetsoftoronto.com/le-swan-toronto-now-doing-bbq/>.

⁸ Vanessa Quon, “Mouldering Cabbagetown Heritage Homes Find a Higher Purpose,” *The Globe and Mail*, last updated 15 July 2020, accessed 18 April 2022, <https://www.theglobeandmail.com/real-estate/toronto/article-mouldering-cabbagetown-heritage-homes-find-a-higher-purpose/>.

⁹ Quon, “Mouldering Cabbagetown Heritage Homes.”

¹⁰ Tracy Hanes, “Fairground Lofts Wrap Hip Style Up in Victorian Heritage in Heart of Vaughan,” *Toronto Star*, last updated 17 August 2012, accessed 18 April 2022, https://www.thestar.com/life/homes/2012/08/17/fairground_lofts_wrap_hip_style_up_in_victorian_heritage_in_heart_of_vaughan.html.

¹¹ Wycliffe Homes, “Fairground Lofts in Old Woodbridge Village,” accessed 18 April 2022, <http://wycliffehomes.com/communities/fairground-lofts/>.

¹² Hanes, “Fairground Lofts Wrap Hip Style Up.”

¹³ Guelph Today Staff, “City Moves to Designate Former Factory in the Ward as a Heritage Building,” last updates 28 July 2020, accessed 18 April 2022, <https://www.guelphtoday.com/local-news/city-moves-to-designate-former-factory-in-the-ward-as-a-heritage-building-2597770>.

¹⁴ Council approves fifth storey,” accessed 24 April 2022, <https://www.guelphtoday.com/local-news/council-approves-fifth-storey-for-former-northern-rubber-building-3290886>; Guelph Today, Richard Vivian

¹⁵ Bobby Hristova, “Developer Pledges Condos at Cannon Knitting Mills will be Done in Next 3 Years,” last updated 18 January 2021, accessed 18 April 2022, <https://www.cbc.ca/news/canada/hamilton/developer-pledges-condos-at-cannon-knitting-mills-will-be-done-in-next-3-years-1.5869684>.

¹⁶ Erik Hanson, “Second Chances for Peterborough’s Priceless Heritage,” last updated 11 September 2008, accessed 18 April 2022, <https://www.heritage-matters.ca/articles/second-chances-for-peterboroughs-priceless-heritage>.

¹⁷ Gordon King, “The Spire,” *Robertson Martin*, accessed 18 April 2022, <https://robertsonmartin.com/project/the-spire-at-87-mann-avenue/>.

¹⁸ Robertson Martin, “The Spire,” accessed 18 April 2022, <https://robertsonmartin.com/project/the-spire-at-87-mann-avenue/>.; Smart Living Properties, “The Spire,” accessed 18 April 2022, <https://www.smartlivingproperties.ca/properties/the-spire>.

¹⁹ Angelswalk, “Connaught Public School,” *Ontario Abandoned Places*, last updated 3 September 2012, accessed 18 April 2022, <https://www.ontarioabandonedplaces.com/ontario/collingwood/connaught-public-school>.

²⁰ Ontario Heritage Trust, "East Ward/Connaught Public Elementary School," accessed 18 April 2022, https://www.heritagetrust.on.ca/en/oha/details?id=6733&backlinkslug=search-results&fields%5Bproperty_name%5D=connaught.

²¹ Roberta Avery, "Two Different Approaches to Four-Season Living," *Toronto Star*, last updated 11 January 2013, accessed 18 April 2022, https://www.thestar.com/life/homes/2013/01/11/two_different_approaches_to_fourseason_living.html.

²² Jessica Owen, "The Victoria Annex: Past, Present and Future (7 Photos)," *Collingwood Today*, last updated 14 January 2022, accessed 18 April 2022, <https://www.collingwoodtoday.ca/local-news/the-victoria-annex-past-present-and-future-7-photos-4946216>.

²³ Stinson Hospitality Real Estate, "Stinson School Lofts," accessed 18 April 2022, <https://stinsonproperties.com/past-projects/stinson-school-lofts/>.

²⁴ "YMCA Elm Centre," accessed 18 April 2022, <https://www.infrastructureontario.ca/YWCA-Toronto/>.

²⁵ Markee, "Welcome to Tyndale Green," accessed 25 April 2022, <https://www.tyndalegreen.com/>.

²⁶ Stephanie Calvet, "Markee Developments Launches with Tyndale Green," last updated 28 June 2021, accessed 25 April 2022, <https://urbantoronto.ca/news/2021/06/markee-developments-launches-tyndale-green>.