HARBORD VILLAGE RESIDENTS' ASSOCIATION

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To: Heritage Branch Ministry of Citizenship and Multiculturalism 400 University Avenue, 5th floor Toronto M7A 2R9

Re Proposed Changes to the Ontario Heritage Act and its regulations Bill 23 (Schedule 6)—the Proposed More Homes Built Faster Act

Attention: Paula Kulpa, Senior Policy Advisor December 7, 2022

Harbord Village Residents' Association opposes the changes that have been made to the handling of Heritage in the City of Toronto. In particular, we are concerned about the potential loss of our architectural and cultural history should listings have to be converted to designations within two years.

As you are aware, the City has amassed a list of close to 4,000 buildings to protect them against quick demolition. Listing has never stood in the way of development. Rather it has been a safeguard, to ensure against quick demolition, to allow a city pressured by development, a window of 60 days to decide whether to proceed with designation. And designation has not been a club to prevent building, but a tool to ensure good adaptive reuse. Should Bill 23 go forward as written when the City is without the staff resources to create designations, there is a certainty we will lose many precious heritage buildings.

The presumption that heritage protection is an obstacle to building is simply wrong. You need look no further than the Mirvish development on our western border, with its combination of rental, affordable, tall and midris, and heritage houseforms. We were full participants in that process and were quite aware that while the adoption of heritage was not a sticking point, its retention greatly enhanced the final design. Similarly, the University of Toronto residence at Sussex and Spadina benefitted from the retention of heritage in the podium. In neither case was housing lost.

The Harbord Village Area

Harbord Village is an 1885 Victorian era community, lying between Bloor and College, and Spadina and Bathurst in downtown Toronto. Within those boundaries, we have two Heritage Conservation Districts. We also have a number of individually listed heritage buildings. Three stand out as being at immediate risk. Two groupings emerged from multi-year avenue studies, while a third standalone building and its manse have been on the books for many years. To lose the protection of any of these buildings would be a significant degradation of a historic asset.

College St. Spadina to Bathurst





The north side of College could easily become a district. At present it is protected from unconditional demolition.

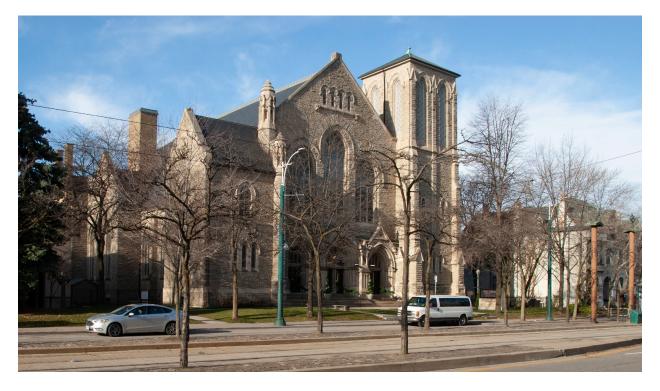
The 50 heritage listings along the north side of College Street arose out of a multi-year street study. It is a virtually intact long stretch of 19th century business addresses, with commercial at street level and residential above. Toronto has little of this characteristic streetscape remaining. Both the College St. OPA and TOCore allow for sympathetic increases in height above the three and four-storey historic street wall while respecting the fundamental mainstreet heritage character.

Historic infill including the loss of the buildings between Brunswick and Major, has not always been congenial. Should listings lapse, individual owners would be able to tear down their buildings on the issuance of a demolition order. There could be no 60-day pause to consider whether to designate to save heritage.

Bloor Bathurst Intersection Southeast Corner

The 13 wraparound buildings flanking the southeast corner of Bathurst and Bloor, north of B Street condominiums, across the street from Mirvish, and extending eastward along Bloor are prime for redevelopment. Without the protection of listings, we would lose the opportunity to marry extra density with heritage preservation and design features that would compliment the Mirvish development.

Knox Presbyterian Church, 1909, 644 Spadina at Harbord



Knox Church and the historic manse are an active development site. The buildings have both architectural and cultural value. The church and its stained glass windows capture the sensibilities of its congregants which included many major figures of turn-of-the-century Toronto. Both are presently listed, both could be lost or degraded without the protection under present heritage rules.

Balance Housing and Heritage

We urge the provincial government to stay the implementation of Bill 23, to allow a made-in-Toronto solution to the need for housing while preserving heritage. If it is permitted to go forward with no change, we will surely suffer a significant loss of heritage assets in the city.

Thank you for your consideration.

Anne Fleming

Chair

Harbord village Residents' Association

Sue Dexter

Planning and Development Committee Harbord Village Residents' Association

Som Wet

cc. Councillor Dianne Saxe

Mary Macdonald, Toronto Heritage Preservation Services

Tamara Anson-Cartwright, Toronto Heritage Preservation Services