

February 19 2019

Mayor and Members of Council
City of Kingston
216 Ontario Street
Kingston, ON K7M3H6

Re: Strategic Planning – Term of Council – 2019 – 2022

Dear Mayor and Members of Council

The Frontenac Heritage Foundation, a non-profit corporation working to protect built heritage since 1972, operates with a volunteer board. On behalf of the board, I offer the following comments on the upcoming strategic planning exercise.

In the last Strategic Plan, the goal was set out to “**foster intensification in the city core**”. As you will be aware, the Foundation has fought to protect the historic downtown from incompatible high-rise development over the last term of council. This has been done at great expense. Two development proposals were considered to be incompatible, visually intrusive, and not of a human scale suitable for the city’s downtown. In short, the detailed heritage policies in the City’s Official Plan were ignored with respect to new tall building proposals in the city core. The Capitol decision to deny the application is being contested to Divisional Court, and the decision on two Homestead Holding towers will not be released for months.

Most initiatives in the past strategic plan were acceptable to the Foundation. One would think that ‘**protecting heritage**’ would be precisely what the Foundation would like to see. However, in the last term of council, the mandate of the Heritage Kingston (HK) Committee was changed, based on an interpretation of the *Ontario Heritage Act* (OHA) that virtually no other municipality in the Province shares – that the HK committee members are not allowed to revise recommendations that come to them for alterations in (Part V) heritage districts. This situation has also meant that applicants and agents have not been able to address the Heritage Kingston committee to present an alteration application or answer questions of the committee members. We hope that with the recent approval to review the HK Committee mandate that the process might be expedited to revamp this process which does not serve our heritage districts well at all.

Also, under the heading of ‘**protecting heritage**’, there are other concerns which the FHF wishes to propose. The City is to be commended for the review and designation of new Part IV or individual properties across the city in the past term. We note, however, that there are hundreds of properties in the city core which have old designation by-laws

which do not meet the requirements of the OHA legislation, which now calls for listing of the heritage attributes. Such reviews can be done individually; alternatively, they can be done collectively, in other words, reviewing the Lower Princess and the St. Lawrence Ward Heritage Character Areas for possible designation under the OHA legislation as heritage districts. One should note that the recent work for the North King's Town Secondary Plan has resulted in the review of hundreds of buildings which have merit for designation. The city really must consider how the historic core should be protected in the long term.

The Brosius map of 1875 which hangs in the foyer of City Hall shows the true historic core of the city – extending from Old Sydenham Heritage District in the south, north across the downtown, and north into the Inner Harbour. As referenced numerous times in the recent LPAT hearing, other municipalities protect their heritage areas with an overlay – perhaps this is something which the city needs to look at. The Foundation does not propose a single method over others but recommends that the matter be examined – whether an update of individual properties, a heritage district or an overlay – something needs to be done.

Many thanks for your dedication to the city, and your attention to strategic planning.

Sincerely,

S. Bailey, President
Frontenac Heritage Foundation

cc. City Clerk