FRONTENAC HERITAGE FOUNDATION

PO Box 27
Kingston, Ontario
Canada K7L 4V6
+1 343-363-1901

Sept. 27, 2023 via email

Councillor McLaren, Chair, and Members of Planning Committee
City of Kingston
216 Ontario Street
Kingston, ON K7L2Z3

Re: 279 Wellington St. and 49 Place D'Armes (File No. D14-008-2023) and 64 Barrack Street and 235-237 Wellington Street (D14-009-2023), Community Meeting Report PC-23-039

Dear Councillors,

The Frontenac Heritage Foundation is a not-for-profit charitable organization dedicated to the preservation of structures and sites of cultural and historical interest across the Kingston region. Founded in 1972, we celebrated last year our fiftieth year of advocacy work, continuing to provide input on various projects and development applications proposed across the broader region. As noted with previous development applications in the historic core of Kingston, the Foundation supports densification in the historic core, but intensification that is human scale and compatible with the existing built fabric.

The staff report to be considered on September 28 deals with two development applications. Admittedly these two sites are located in close proximity in the Central Business District, but surely each development application deserves its own Community Meeting Report. The report as it stands is long enough to crash some home computers, so we ask in the future that Community Meeting Reports be developed for each development application. This review is based on Report PC-23-039 and the Heritage Impact Statements for each proposal.

The Foundation is of the view that the projects being entertained by the city are premature given the project which is underway - *Density by Design* - a project which appears to have been initiated to justify mid-rise and tall buildings across the city. The Foundation expressed concern about the early recommendations of that study which date back to consultations in 2019 and 2020. As the Foundation has noted in the past, Report PC-19-065 stated that the *Density by Design* report was brought forward "for information and public consultation", and no draft policies have been brought forward as yet for further consultation and approval. Therefore, in our view, the *Density by Design* project has no status in the downtown, and while staff can address the draft provisions, recommendations have not been proposed for the Central Business District, which as noted, includes both subject development sites. Specifically, then, there is no approved policy addressing tower separation, podia height, tower height, etc.

After reviewing the supporting documentation noted above, the Foundation's board members wish to comment o``n three topics: 1) lack of regard for protected built heritage in the broader

area; 2) the proposed height and massing of the proposed building, and 3) lack of conformity with Official Plan policies.

1. The City's core has a significant concentration of heritage protected properties, along with many others which are deserving of heritage protection. In recent years, much work was done on the North King's Town Secondary Plan, part of which resulted in a thorough review of the heritage rich Inner Harbour area, the boundaries of which extend mid block between Queen St. and Colborne Streets northward to John Counter Boulevard. This broad area extending from Old Sydenham Heritage Conservation District north to John Counter Boulevard is an extensive area of cultural heritage significance in our historic core.

   With respect to the 64 Barrack St. proposal, we note that the Parslow Heritage Consultancy Inc. Heritage Impact Statement (June 2023) is quite offhanded about the impact of the development on any cultural heritage in the immediate area. Any structure proposed to be 25 storeys or 83.1 metres in height will be a visual intrusion and therefore a detrimental impact on the downtown.

   With regard to 279 Wellington proposal, the LHC Planning and Archaeology Inc. Heritage Impact Statement for 279 Wellington (June 2023) recognizes the importance of the UNESCO World Heritage designation, the adjacency to the Rideau Canal (a World Heritage Site, National Historic Site and a Canadian Heritage River), as well as being adjacent to four OHA designated properties. This HIS makes recommendations on exterior cladding, lighting, reflective surfaces, and also undertaking an addendum to address these concerns as development progresses. In our view, the development should respect the 30-metre distance from the UNESCO Rideau Canal and should not be included in the proposed structure; allowing a 'minor negative impact' in this area as stated in the LHC Heritage Impact Statement would be a very negative precedent to set in this City where the Canal/River run through the entire municipality.

2. Height and Massing of the Proposed Developments: The Foundation is of the opinion that 14 and 25 storeys are heights which are excessive for properties which are located in our heritage rich downtown core. As one example which is used repeatedly, the 16 storey Princess Tower building is not in our view, an acceptable precedent in the context of newer Official Plan policies, as the construction of Princess Towers predated the 2010 Official Plan by several decades. The proposed massing on the two sites also appears to be excessive, especially on the small Goodlife Fitness site where the building appears to rise from a visual podium (visual because there is little stepback visible from the street frontage at the third storey). In the case of the 14-storey building proposed by Arcadis, it would appear that the mechanical, elevator and stairway building components would essentially constitute a 15 floor on this building.

3. Policies in the Official Plan call for the following, and in our view, have not been adequately addressed:
   - Conserving the cultural heritage resources in our core (2.3.8, 2.8.8, 7.1.10. etc.)

- The compatibility provisions of S. 2.7.1 to 2.7.4 – heights of 14 and 25 storeys are not compatible with the streetscape on the west side of Wellington Street.
- Multiple sets of such urban design policies were completed, endorsed by council and now referenced in the Official Plan; S. 3.4.A.8 specifically refers the reader to these documents, referenced in S. 8 and S. 10A of the Official Plan.
- S. 8 of the Plan deals with urban design matters, and under S. 8.2.g calls for integration of cultural heritage resources. Further, S. 8.5, calls for 'preserving human scale in locations that are pedestrian-oriented…' and so on, and S. 8.6 which states that "The City requires the design of new development to be visually compatible with surrounding neighbourhoods and areas of cultural heritage value or interest..." In our view, the heights of 14 and 25 storeys will not be visually compatible.
- S. 10.A.1, Strategic Intent and Function. S.10.A.1.1 and S. 10A.2 call for protecting 'human scale' in the Downtown and Harbour Special Policy Area. In our view the proposed heights do not constitute human scale development.
- S. 10.A.4.6.c recommends a maximum height of 25.5 metres, and S. 10.A.4.7 allows a potential exemption to the height limit of 25.5m subject to an urban design study showing that the proposed developments are compatible. How can any urban design study justify such proposed heights with the repeated references to 'human scale' in the Official Plan policies?

It is the Foundation's position that neither the 25-storey tower proposed to replace the Goodlife Fitness building, nor the 14 storey tower being proposed on floodplain/infill in proximity to a UNESCO World Heritage Site are of human scale. In our view, the intent of the urban design guidelines done for the historic core was that mid-rise development was recommended – thus, the Plan includes references to 'human scale' development.

In our view, Kingston still has a truly unique downtown, and the Foundation supports intensification that complements its built heritage; put simply, the proposals in their current forms do not complement their surroundings.

Thank you for this opportunity to comment on these draft proposals.

Sincerely,

Original signed by S. Bailey on behalf of the FHF board

Shirley Bailey, President
Frontenac Heritage Foundation

cc. Tim Park, Director, Planning Services