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December 16, 2024

Via Email

Ms. Sukriti Agarwal, Manager
Policy Planning, Planning Services
City of Kingston
Kingston, ON

Mr. Joel Konrad, Manager
Heritage Planning, Heritage Services
City of Kingston
Kingston, ON

Re: North King's Town: NKT Cultural Heritage Study, Reports PC-25-001
and HP-25-002

Dear Sukriti and Joel

The Frontenac Heritage Foundation has monitored this project since 2016, and provided detailed comments that year, and in 2018 and 2019. We wish to provide comments on PC-25-001 as well as the information report containing the North King's Town Cultural Heritage Study under report HP-25-002. The Foundation has yet to review the two remaining reports - the financial and implementation plans, which are to be released in 2025.

The FHF supports the recommendations from the Cultural Heritage Study report that require redevelopment in proximity to the enlarged St. Lawrence Ward Heritage Character Area to undertake heritage impact assessments to demonstrate that no negative impacts will affect adjacent heritage resources. The Foundation also supports the recommendation to undertake a study under the OHA to determine whether a heritage district is warranted under the Act.

We also support the requirement to submit urban design studies to demonstrate how development, particularly infill and intensification, will incorporate identified heritage characteristics from the surrounding area into new proposals to blend the old and the new. Both of these requirements support the Foundation's mandate to preserve and protect heritage structures and the proposed enlarged Heritage Character Area.

The FHF is pleased to see the Outer Station is recognized as the historic cultural and economic nexus of the NKT area as a key factor in the overall 19th and early 20th

century growth of the city. While the Outer Station site is shown within an intensification area, we believe due to the archaeological past, and the cultural/industrial history of the site, its redevelopment should not be diminished by excessive on-site intensification.

While the existing main structure is in poor condition, adaptive reuse and recognition of its potential should be foremost in the minds of any redevelopment of the site. We recommend that Stage 1 and 2 archaeological assessments of the property be completed in the short term to ensure that significant archaeological resources on site will be appropriately conserved. The archaeological assessment should inform the required Heritage Impact Statement on the property. We support a Conservation Plan (as defined in draft S. 10H.3.2) that conserves/protects the built and cultural heritage assets of the Outer Station property. As noted in the proposed policy, the Foundation does not support moving of any of the structures off the site, nor do we support the relocation of the structure elsewhere on the site as part of any adaptive reuse strategy. We note that the Rockwood Conservation Area is a good example of ruins being repurposed for special events, and such a possibility could act as a focus for development in the area. (Here is a link to a related article: <https://publichistoryinpractice.ca/2023/03/24/rockwoods-hidden-gem-harris-woolen-mill-ruins/>)

The FHF supports further review, analysis and assessment of the Division Street node at John Counter Blvd., and the proposed node at Montreal and Railway Streets. Comments made at the Planning Committee meeting on December 5, 2024 suggested that the nodes are too dense for these two locations, and that they might resemble the Williamsville area if they are developed as proposed. This would be unfortunate.

Thank you for your time and effort on this project.

Sincerely,

Original signed by Kristine Hebert

Kristine Hebert
President, Frontenac Heritage

Cc. Members of Kingston Heritage Properties Committee