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**Heritage Conservation District Work Plan and Prioritization  
K. Gonyou**

<b>TO:</b>	<b>CHAIR AND MEMBERS PLANNING &amp; ENVIRONMENT COMMITTEE</b>
<b>FROM:</b>	<b>JOHN M. FLEMING MANAGING DIRECTOR, PLANNING AND CITY PLANNER</b>
<b>SUBJECT:</b>	<b>HERITAGE CONSERVATION DISTRICT WORK PLAN AND PRIORITIZATION TUESDAY NOVEMBER 4, 2014</b>

<b>RECOMMENDATION</b>
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That, on the recommendation of the Managing Director, Planning and City Planner, with the advice of the Heritage Planner, that the following **BE RECEIVED** for information; **IT BEING NOTED** that staff intend to update the *Heritage Places* document to establish a list of areas to be considered for designation.

<b>PREVIOUS REPORTS PERTINENT TO THIS MATTER</b>
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1994: Guideline Document, *Heritage Places: A Description of Potential Heritage Conservation Areas in the City of London*.

2003, August 25: Report to Planning Committee – *Potential Heritage Conservation District Priority List*.

2014, August 26: Report to Planning & Environment Committee – *Heritage Conservation District Status Report*.

<b>BACKGROUND</b>
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This information report is in response to the direction provided by Municipal Council at its meeting on September 2, 2014 with respect to the prioritization of Heritage Conservation Districts (HCD). Staff was requested to prepare a detailed work plan, including the prioritization of potential HCDs, and to commence HCD studies for SoHo and Grosvenor-St. James areas.

**HERITAGE PLANNING PROGRAM**

The City of London’s Heritage Planning Program serves to identify, conserve, enhance, and educate on a variety of significant cultural heritage resources. This program involves for major area of work:

1. **Identification and Evaluation of Cultural Heritage Resources:**
  - List properties
    - Guideline Document: *Inventory of Heritage Resources* (2005)
  - Research to identify and evaluate cultural heritage resources that merit individual designation
  - Identify areas for potential HCD designation
    - Guideline Document: *Heritage Places* (1994)
  - Identify potential cultural heritage landscapes
  - Require archaeological assessments for areas of archaeological potential and known archaeological resources
    - Guideline Document: *Archaeological Master Plan* (1996)

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**2. Conservation and Management of Cultural Heritage Resources:**

- Development and implementation of conservation plans
- Undertake Heritage Conservation District Studies, Plans & Guidelines
- Administer and coordinate the Heritage Alteration Permits system
- Review of development applications for consideration of cultural heritage conservation, using the following tools:
  - Heritage Impact Assessments
  - Technical comments from a cultural heritage perspective
  - Consultation with LACH
- Review of archaeological assessments to ensure the conservation of archaeological resources
- Respond to demolition requests
  - *Required Clearances for Demolition Permit* form required for all properties in the City of London

**3. Municipally-owned Heritage Properties:**

- Eldon House, Grosvenor Lodge, Elsie Perrin Williams Estate, Springbank Pump House, Flint Cottage, Flint Shelter, Park Farm, 700 Pond Mills, 1 Dundas Street, London Normal School

**4. Engagement, Outreach, and Promotion:**

- Act as the staff resource for LACH and Municipal Council on cultural heritage conservation
- Respond to inquiries regarding cultural heritage resources in London
- Develop and distribute a “Homeowners’ Guide” to heritage properties; provide resources and support to property owners of heritage properties
- Lead walking tours, talks, and other educational opportunities
- Administer the City of London’s plaque program (blue designation plaques and HCD street signs)
- Contribute to the content and delivery of interpretive signage in the City

Our responsibility for the conservation of significant cultural heritage resources extends beyond the administration of their designation under the *Ontario Heritage Act*. Each of these areas requires administration over the long-term. Tools, such as the policy framework of the *Official Plan* or an applicable HCD Plan, guide the conservation of these resources. The consent or permission of Municipal Council, in consultation with the London Advisory Committee on Heritage, is required to alter all properties designated under the *Ontario Heritage Act*. The Heritage Alteration Permit system is administered by the Heritage Planners to achieve this requirement. Staff time and resources are required to develop and implement these tools to support the conservation of our cultural heritage resources.

Some of the existing tools available within the Heritage Planning Program require review and update. *Archaeological Master Plan* was developed in 1995-1996. It recommended a regular five-year update, which has not yet been conducted. Legislative changes to the *Ontario Heritage Act*, revisions to the *Provincial Policy Statement*, and changes to Ministry of Tourism, Culture and Sport’s approach to archaeological resource management in Ontario further prompt reviewing the *Archaeological Master Plan* to ensure the protection and conservation of archaeological resources and to minimize the City’s exposure regarding the management of archaeological resources. Furthermore, updating the *Inventory of Heritage Resources* (last updated in 2005) is required. The dedication of staff time and resources is required to establish a solid foundation to enable the successful implementation of the obligations of the Heritage Planning Program.

**HERITAGE CONSERVATION DISTRICTS**

HCDs are an integral component of the City of London’s Heritage Planning Program. With the

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designation of Wortley Village-Old South HCD, there are seven HCDs in London totalling nearly 3,800 properties (Table 1). This is in addition to the over 300 individually-designated properties and hundreds of properties listed on the City’s *Inventory of Heritage Resources* as potentially worthy of designation.

Table 1: Properties within London’s Heritage Conservation Districts

Heritage Conservation District	Number of Properties
East Woodfield Heritage Conservation District	179
Bishop Hellmuth Heritage Conservation District	198
Old East Heritage Conservation District	963
West Woodfield Heritage Conservation District	471
Downtown Heritage Conservation District	369
Blackfriars-Petersville Heritage Conservation District*	588
Wortley Village-Old South Heritage Conservation District*	1,017
<b>Total</b>	<b>3,785</b>

\*Blackfriars-Petersville HCD is under appeal to the Ontario Municipal Board and is not yet in full force and effect. Wortley Village-Old South HCD has recently been adopted by Municipal Council.

The City has traditionally dealt with a request for an HCD designation in a sequential process, in part facilitated by an annual line item in the budget related to HCD implementation. Following Municipal Council’s direction in response to a request from the community, a request for proposals is issued to select consultants to undertake the formal study to determine whether an area meets the *Official Plan* and provincial requirements for protection as a HCD under Part V of the *Ontario Heritage Act* and to make recommendations regarding possible boundaries. As part of this phase, the consultants are required to conduct at least one public information meeting. Upon reporting back to Municipal Council, Municipal Council may then direct the preparation of a Plan & Guidelines for the proposed HCD. Again, at least one public information meeting is required as well as a statutory public meeting before Planning and Environment Committee prior to a recommendation that Municipal Council pass a by-law to designate the HCD pursuant to Part V of the *Ontario Heritage Act*. The passing of the by-law triggers a thirty day appeal period. If an appeal is launched, the HCD is not in force and effect until the appeal is resolved.

While consultants typically prepare the HCD Study, Plan & Guidelines, staff time and resources are required to facilitate the process. This includes providing access to necessary resources and information for the consultants, participating in the engagement process, and acting as a liaison with the community. Thereafter, staff review the consultants’ draft work and prepare recommendations for LACH, PEC, and Municipal Council.

Following the creation of an HCD, implementation creates additional demands on staff time and resources. Processes, such as Heritage Alteration Permit applications, are essential to manage change for cultural heritage resources located within an HCD. In addition to the long-term management of properties within HCDs, the City has made commitments to existing HCDs. This includes education, engagement, and outreach to property owners within HCDs. It has become evident to staff, LACH, and property owners that a more proactive educational outreach program is needed to ensure the success of the growing number of HCDs.

As a means of creating awareness HCD-specific street signs have been implemented pursuant to municipal policy within the Old East HCD, Bishop Hellmuth HCD, and East Woodfield HCD; signs have not yet been prepared for West Woodfield HCD or Downtown HCD and new street signage will also be required for Blackfriars-Petersville HCD and Wortley Village-Old South HCD when the designation is registered. The costs undertaking these municipal aspects of HCD implementation impact the funding available to undertaken additional HCDs projects as both come out of the same annual HCD budget.

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**POTENTIAL HERITAGE CONSERVATION DISTRICT – PRIORITY**

In 1995, a Guideline Document was added to the City’s *Official Plan*. *Heritage Places: A Description of Potential Heritage Conservation Areas in the City of London* (1994) identified fourteen potential HCDs following the designation of London’s first HCD – East Woodfield HCD. *Heritage Places* subsequently became the basis for the consideration of potential HCDs in London. For more information on the history and evolution of the HCD priority list, please refer to Appendix 1.

The current priority listing of potential HCDs is:

1. SoHo and Grosvenor -St. George (Municipal Council Resolution on September 2, 2014)
3. Talbot North
4. Stanley-Becher-Riverforks
5. Pond Mills
6. Orchard Park-Sherwood Forest

In addition to revisions to the *Ontario Heritage Act*, our approach to cultural heritage conservation has evolved in the twenty years since *Heritage Places* was developed. The original (un-prioritized) list has been augmented over the years, with new additions and consolidations to proposed HCDs. Using the considerations for the prioritization of potential HCDs outlined in Appendix 2 as a guide, *Heritage Places* should be reviewed.

<b>ANALYSIS</b>
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**HERITAGE CONSERVATION DISTRICT WORK PLAN**

Time and cost considerations must be taken into account in developing a reasonable work plan for HCDs, while balancing the other obligations of the Heritage Planning Program. Ultimately, the goal of a HCD Work Plan is to comply with the policies of the *Official Plan* and requirements of the *Ontario Heritage Act* while conserving the cultural heritage values articulated by the community.

**Timing**

Given the steps outlined, our recent HCDs have been created, excluding appeal periods, over varying lengths of time. For example, both the Downtown HCD and the Blackfriars-Petersville HCD were created in approximately a one year period while Wortley Village-Old South HCD has taken more than three years. For larger neighbourhoods, two to two-and-a-half years are typical. This timing has often allowed the annual budget to keep pace with the HCD Study and HCD Plan & Guidelines phasing as payments for consulting fees for a project can be spread over two capital years.

While previous HCD projects have been compressed into a one year timeline, this is not the preferred approach for potential HCDs. It is expected that each HCD Study will take approximately one year to complete, with an additional year required to complete the HCD Plan & Guidelines for each HCD; the HCD designation process is anticipated to take approximately two years in total.

It is possible within the existing time constraints to facilitate the development of two concurrent HCD Studies, relying on outside consultants. Adding additional HCD projects beyond this would greatly strain resources with respect to other responsibilities of staff, such as the update to the *Archaeological Master Plan* which is also proposed for 2015.

**Costs**

Costs vary in relation to the size and possible complexity of the HCD study area. Size refers to the number of properties and geographic space within the study area. The City requires an evaluation of each property with respect to whether it demonstrates cultural heritage value or

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interest and its contribution to the broader study area. This information is important in both determining whether or not the potential HCD meets the criteria for designation and provides information for considering future Heritage Alteration Permit applications. Complexity may relate to the historic evolution of an area or the need to determine justifiable boundaries in consultation with the community, for example.

The consultant costs for our three most recent HCD projects were:

- Wortley Village-Old South HCD Study \$71,012; HCD Plan & Guidelines \$56,474 (2011-2014)
- Downtown HCD Study \$44,347; HCD Plan & Guidelines \$43,100 (2011-2012)
- Blackfriars-Petersville HCD Study \$41,055; HCD Plan & Guidelines \$57,777 (2013-2014)

The costs above related specifically to the consultant fees for both the preparation of the HCD Study and HCD Plan & Guidelines. In addition to these costs, the HCD implementation budget also provides funds for HCD-specific signs. Other related costs arise from mailing costs to notify property owners, title registration, rental of meeting space, production of homeowner’s guides and other print materials. These costs vary with the size of each HCD.

There are available financial resources within the existing HCD budget to support undertaking two concurrent HCD Studies by consultants in 2015. Should those HCD Studies recommend designation under Part V of the *Ontario Heritage Act* and Municipal Council agrees there will be funding available in 2016 to support the preparation of one HCD Plan & Guidelines. A review of available funding will be required in 2016 to consider the preparation of a second HCD Plan & Guidelines; additional funding will likely be required.

**Proposed Heritage Conservation District Work Plan**

Considering budget and staff limitations, there are available resources to undertake two concurrent HCD Studies in 2015. These studies will take approximately one year to complete following the selection of qualified consultants. If the HCD Studies recommend designation as an HCD, and Municipal Council agrees, there will be available funding to prepare one HCD Plan & Guidelines in 2016; additional funding will likely be required to support the preparation of a second HCD Plan & Guidelines in 2016.

<b>CONCLUSION</b>
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HCDs are an integral component of London’s Heritage Planning Program. With five HCDs designated under Part V of the *Ontario Heritage Act*, and an additional two HCDs in process, there is considerable uptake and community interest in this area. This interest must be balanced with the other obligations of the Heritage Planning Program.

Considering budget and staff limitations, there are available resources to undertake concurrent studies of the Grosvenor – St. James area and the SoHo area in 2015 for the purpose of designating one or more Heritage Conservation Districts. It is anticipated that these studies will be completed within one year following the selection of qualified consultants.

*Heritage Places* (1994) should be reviewed using the considerations for the prioritization of potential HCDs as a guide.

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<b>PREPARED BY:</b>	<b>SUBMITTED BY:</b>
<b>KYLE GONYOU HERITAGE PLANNER URBAN REGENERATION</b>	<b>JIM YANCHULA, MCIP, RPP MANAGER URBAN REGENERATION</b>
<b>RECOMMENDED BY:</b>	
<b>JOHN M. FLEMING, MCIP, RPP MANAGING DIRECTOR, PLANNING AND CITY PLANNER</b>	

October 27, 2014

KG/

Attach:

Appendix A: Priority Listing of Potential Heritage Conservation Districts

Appendix B: Considerations for Prioritization of Potential Heritage Conservation District

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**Appendix A: PRIORITY LISTING OF POTENTIAL HERITAGE CONSERVATION DISTRICTS**

**History & Evolution of Priority Listing**

In 1994, *Heritage Places: A Description of Potential Heritage Conservation Areas in the City of London* was approved as a Guideline Document to the *Official Plan* of the City of London. It states,

“The purpose of this guideline document is to highlight areas of outstanding historical, architectural and natural character areas in the City of London. The intent is to identify candidate areas for potential heritage conservation area or district status through the implementation of Parts IV and V of the *Ontario Heritage Act*.”

Fourteen areas were identified within *Heritage Places* based on ‘characterization studies’ which were completed during the development of the Guideline Document. The characterization studies are intended to act as an indicator of heritage significance and are not an exhaustive resume. Place name, location, and historic themes were identified for each of the fourteen areas identified. Consideration was given to the criteria for identification and evaluation of potential HCDs established in the *Official Plan*.

The original fourteen areas identified in *Heritage Places* were (in no specific order):

1. Richmond Streetscape
2. Ridout Restoration
3. Talbot North
4. East Woodfield
5. West Woodfield
6. Lorne Avenue
7. Wortley Village
8. Marley Place
9. Elmwood Avenue
10. Stanley-Becher
11. Hellmuth-St. James
12. Grosvenor-St. George
13. Petersville
14. Pond Mills

The list of potential HCDs in *Heritage Places* were in no way prioritized. “The list of locations was organized by geographic area, not by priority of designation” (Report to Planning Committee – *Potential Heritage Conservation District Priority List*, August 25, 2003).

A report for the London Advisory Committee on Heritage (LACH) in March 1999 was the first to prioritize potential Heritage Conservation Districts. The priority of potential HCDs established in 1999 is as follows:

1. East Woodfield
2. Hellmuth-St. James
3. West Woodfield
4. Wortley Village
5. Richmond Streetscape
6. Ridout Restoration
7. Talbot North
8. Lorne Avenue
9. Marley Place
10. Elmwood Avenue
11. Stanley-Becher
12. Grosvenor-St. George
13. Petersville
14. Pond Mills

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A variety of issues has the potential to impact this priority listing. For example, in 2003, Lorne Avenue was moved to the top of the priority listing for potential HCDs given the City’s focus on revitalization of the Old East Village, within which Lorne Avenue is situated. The priority listing was revised, following Municipal Council direction, leading to the designation of the Old East HCD in 2006.

Subsequently, London’s HCDs have expanded in size to encompass more than one of the locations included on the priority listing. For example, the Wortley Village-Old South HCD includes Wortley Village, Marley Place, and Elmwood Avenue which were identified in *Heritage Places*. The Downtown HCD includes the Richmond Streetscape and the Ridout Restoration areas.

Additionally, the list of potential HCDs has been expanded, by the direction of Municipal Council in consultation with LACH. Direction was received from Municipal Council in May 2013 to make the SoHo area the next potential HCD studied following the completion of the Blackfriars-Petersville HCD project. The SoHo recommendation arose from community concern and a recommendation in the SoHo Community Improvement Plan prepared for the SoHo area. Orchard Park-Sherwood Forest was also added to the priority listing upon its request for consideration. Most recently, in September 2014, direction was received from Municipal Council to study both the SoHo and Grosvenor-St. James areas as potential HCDs.

**Current Priority of Potential Heritage Conservation Districts**

The current priority listing of potential Heritage Conservation Districts is:

1. SoHo
1. Grosvenor- St. George
3. Talbot North
4. Stanley-Becher-Riverforks
5. Pond Mills
6. Orchard Park-Sherwood Forest

It has been standard procedure for the City to move forward with a HCD Study for a potential HCD upon Municipal Council approval following a formal community request.



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**Appendix B: CONSIDERATIONS FOR PRIORITIZATION OF POTENTIAL HERITAGE CONSERVATION DISTRICTS**

**Considerations for Prioritization of Potential Heritage Conservation District**

The priority list of potential HCDs is a “living list.” It continues to evolve over time, as it should, and respond to a variety of influences and factors. In the means of transparency and fairness, a set of prioritization criteria are recommended to manage the priority listing and should be considered, in future, if alterations or additions are made to the priority list of potential HCDs.

The prioritization of potential HCDs is by no means a measure or reflection of the perceived cultural heritage value or interest or significance. It is critical to ensure that potential HCDs are included on the priority listing for valid, justifiable reasons related to an area’s perceived cultural heritage value or interest.

**Priority Considerations for Potential Heritage Conservation Districts**

The following should be considered in determining the appropriate priority position of a potential HCD within the context of the City of London (in no particular order):

- **Community Preparation:** An engaged community is essential to the successful development, designation, and implementation of an HCD. This also aims to ensure an equitable process. A potential HCD which is able to demonstrate substantial community preparation, such as research, community meetings, and a community organization, should be given higher priority.
- **Authenticity:** Authenticity is the ability of the heritage attributes to reflect the perceived cultural heritage value or interest of a potential Heritage Conservation District in a truthful, genuine, and credible expression. It is not an absolute measure or concept, and it is not a reflection of original material or content. Authenticity can be expressed in form and design; materials and substance; use and function; traditions, techniques, and management systems; location and setting; and other internal and external factors.

A potential HCD which demonstrates stronger authenticity in the ability of its heritage attributes to reflect the perceived cultural heritage value should be given higher priority than a potential HCD that is not able to do so. For example, a rural area which retains barns, silos and other visual and tangible markers of rural heritage demonstrates stronger authenticity as historic agricultural HCD than a rural area that does not retain those attributes.

- **Representation:** Underrepresented areas or themes of London’s cultural heritage should be given higher priority than areas or themes that are well represented in existing HCDs.
- **Planning Priorities:** Efforts should be made to coordinate City-initiated planning studies to consider potential HCDs. In these areas of overlap, there is an opportunity to complete studies concurrently to help ensure a higher level of compatibility and integration of heritage conservation within the planning process.
- **Threats to Integrity:** Integrity is the completeness or intactness of the heritage attributes of a particular area needed to maintain or sustain significance over time.

A potential HCD that is at a higher immediate risk of the loss of integrity should be given priority over areas with lower levels of threat. Loss of integrity can be the result of a variety of factors, not necessarily limited to development activity. For example, a potential HCD may be given higher priority if the area is subject to, or has recently been subject to, a high volume of development applications and/or requests for demolitions than another potential HCD that is subject to an occasional minor variance.

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- **Existing Level of Protection:** The general intent of an HCD designation is to recognize and conserve the cultural heritage value or interest of a whole area; existing levels of protection should be taken into consideration. While an area with few or no listed or designated properties may be given priority, a concentration of listed or designated properties may indicate broader cultural heritage values worthy of consideration as an HCD.
- **Additional Consideration:**
  - Staff resources must be considered in initiating an HCD Study, regardless of priority status.
  - Funding support must be considered, including resources to implement the HCD (e.g. signage and on-going engagement support).
  - Authorization from Municipal Council, in consultation with LACH, is required to commence a Heritage Conservation District Study.