Maggie Whalley, President, Architectural Conservancy Ontario London Region

Thank you for this opportunity to comment on The London Plan.

Let me say at the outset that we are very encouraged that our built heritage is being given proper consideration in its role of creating and keeping London as an attractive place to live, work and play. Noteworthy in the section on 'Neighbourhoods' is the statement: 'heritage buildings and distinctive historical elements will be conserved as focal points in the neighbourhood'. They are seen as assets which make our heritage neighbourhoods 'attractive to visit, live or invest in'. And, it should be noted, assets which cannot be replicated.

We are glad that our heritage is being regarded as an important 'tool', but it is obvious from the Plan that architectural conservation of our heritage resources actually underpins many of the declared goals and strategies of the Plan and contributes enormously to the overall aim of creating a 'high quality, distinctive and memorable city image'.

We feel that place type planning encourages the retention of heritage buildings. Heritage has huge influence on a place's 'character', sense of place and identity. Architecture from our past makes us different, special — unlike anywhere else, it helps to promote the stated ideal of 'beauty' (and we applaud you for including that rather old-fashioned value), and of course it has a very important role to play in urban regeneration. Heritage architecture already provides us with attractive, people-sized, people friendly, walkable and streetscapes and in addition contributes to residential and cultural diversity with its different sizes and forms.

In addition heritage declares cultural diversity, creativity, and contributes a 'spark' to what can be otherwise often be a seen as a blandscape. We contend that look-alike tower blocks, blank street faces and replicated condominium blocks cannot easily create, on their own, a 'culturally rich, creative and diverse' city. Conservation and a perceived 'mix' can.

However heritage is an aim in its own right and we note there is no definition for what are called 'important' heritage resources in The Plan. We hope that a broad definition will inform policy: heritage comprises not just elegant residences to be admired solely on aesthetic grounds for their design and craftsmanship, but are vital products of our cultural heritage, which is complex, sometimes everyday, and not always 'beautiful' by purely aesthetic standards. The factories, workshops, shops, institutional buildings of our past are significant cultural markers. Showing the bones and frameworks of our communities, how they have grown, changed, and developed provides not only a sense of place, belonging and pride, but also provides signposts for future development. Our 'cultural heritage' is defined as being, quite rightly, both tangible and intangible, but let us recognise that our built structures are in everyday view, they are markers for all of us in our daily lives of this complex cultural heritage. There has been some discussion around what constitutes a 'cultural heritage landscape'. These areas: their boundaries, overlooks and surroundings need good guidelines and better tools to protect them.

So we do hope that the rather lofty statements in the London Plan will translate into strong specific policy. For instance we have recently been confronted with plans to demolish an important cultural heritage 'marker' – the Victoria Hospital buildings. The remaining buildings on South St constitute not only a significant cultural landscape, but a very aesthetically pleasing historic streetscape and contribute greatly to the SoHo neighbourhood, its character, historical identity, and sense of place. Additionally they are ideal candidates for the Plan's stated goal of adaptive re-use to residential use.

The projection for a totally out of proportion tower block in the Woodfield neighbourhood would also seem to contravene all these goals. One of the first listed considerations for the 'Urban Design Brief' was the 'evaluation of context'. This context seemed to comprise mainly of physical elements such as: topography, public realm elements, existing development patterns, setbacks etc, with no mention there of historical or cultural context. Victoria Park is a very important historical cultural landscape over which this overly tall and modern building would loom so incongruously. Where is the cultural context evaluation here and where are the cultural heritage landscape's boundaries? In addition it would seem would not align with the goal of 'designed to be compatible with, and a good fit within, their surrounding context'. Woodfield is a low rise, designated Heritage Conservation District, filled with historic residences – how can this possibly comply with this context?

Our streetscapes are particularly vulnerable and an eye should always be kept on the future: one building goes, then another, and it's a 'death by a thousand cuts' – keep the big, as well as the small - picture in mind. A constant problem in retaining heritage properties is 'demolition by neglect'. There needs to be proper policies in place to deal with wilful – or any kind of – neglect of heritage properties and then accession to a plea for demolition.

The Downtown is vulnerable, but it is now a Heritage Conservation District and should be subject to a rigorous compatible planning policy. Our Downtown is our calling card, and fulfills all the criteria in the Plan: sense of place, identity, people-friendly, culturally diverse etc as recognised for a successful City looking to the future. Its historic buildings are already providing homes for quirky restaurants and clubs. More recently high-tech businesses are attracted by having premises that are not concrete block 'same as everywhere else' buildings. We are told in this plan that the 'millenials' – our up and coming youth love to live in the urban core, reject cars and are electronically 'connected'. What could be a better place for them? Let us protect our Downtown – let us be different, vibrant and creative in our solutions.

Development and heritage can, and should, exist side by side – let us have both. Heritage can also grow into the future. Adaptive re-use is a cornerstone of conservation. Remember: 'the greenest building is the one still standing'!