

**From:** Lorraine Tinsley

**Sent:** Thursday, April 21, 2022 5:48 PM

**To:** PEC <pec@london.ca>

**Subject:** [EXTERNAL] Designation, 183 Ann Street and 197 Ann Street under Part IV of the Ontario Heritage Act

To the Chair and Members of the Planning and Environment Committee:

As a heritage and sustainability risk professional, I am writing to support the designation of 183 Ann Street and 197 Ann Street under Part IV of the Ontario Heritage Act, and the rejection of the York Developments proposal for the subject properties. The York Developments proposal lacks merit for two reasons: i) it violates the City's policies for heritage conservation and sound planning, and ii) fails to demonstrate sustainable value in the context of a climate emergency. Quite apart from its incompatibility with the Provincial Policy Statement 2020, the London Plan and the Official Plan, the York Developments proposal is not aligned with the City's Climate Emergency Action Plan, in which the City states its commitment to "taking action to protect our natural, built and social environments." By contrast, the designation and protection of the subject properties adds considerable societal, economic and environmental value to our built heritage asset landscape, thus meeting the triple-bottom line for sustainability.

*The case for heritage conservation* — A very strong case has been made by the Deputy City Manager, Planning and Development for recognizing the cultural heritage value of the subject properties, in his report to PEC (<https://pub-london.escribemeetings.com/filestream.ashx?DocumentId=91711>). I fully support his recommendations to designate the subject property for all the reasons argued. The Statements of Cultural Heritage Value or Interest, based on impeccable in-depth research by Mark Tovey and members of LACH, lay out an unassailable argument for the protection of the historical or associative, physical or design, *and* contextual values of these properties, and their important heritage attributes. The arguments for their retention and preservation in the public interest could not be stronger. By contrast, the deliberate destruction of these properties for the personal profit of York Developments, or any other private interest, would represent a tragic and incalculable loss to our city, and must not be allowed to happen.

*The case for sustainability* — We are today facing a reckoning in the built asset landscape. Buildings account for nearly one-quarter of Canadian GHG emissions, and policymakers here in London and around the world have identified the reduction of GHGs from the construction sector as a major component in the global battle against climate change. In concert with these imperatives, green building proponents are fighting to decarbonise construction, and to prevent the environmental impacts that accompany demolition and unnecessary new builds. Some jurisdictions like Vancouver are even prohibiting construction waste in landfills, instead favouring deep energy retrofits and adaptive reuse of existing buildings. The current proposal, utterly lacking in such vision, appears to be oblivious to these imperatives, and blind to any opportunity for the sustainable conservation and adaptive re-use of the Kent Brewery complex.

We know that heritage buildings have "inherent sustainability" — and that it is demonstrably more energy-efficient to adapt and reuse existing buildings than to demolish and replace them. Their conservation prevents climate change impacts and avoids waste as a consequence of embodied carbon. What's more, as has been admirably argued by the Deputy City Manager, heritage buildings such as

those in the Kent Brewery complex and North Talbot District embody our living history. They hold stories of our past, and of the contributions to society of those who came before us. They provide identity and sense of place, and help people feel part of their community. In terms of economic value, their presence revitalizes communities, adds real estate value, and promotes investment and tourism. Imagine a thriving Kent Brewery District, comparable to Toronto's award-winning Distillery District, marrying commercial, industrial, and residential functions within a state-of-the-art historic complex which preserves and revitalizes the original 19th-century structures.\*

In this expanded understanding, the heritage buildings in the Kent Brewery District can be seen to hold significant *sustainable value* – that is, value for society, the economy, *and* the environment. As Carl Elefante has argued: *"The accumulated building stock is the elephant in the room: Ignoring it, we risk being trampled by it. We cannot build our way to sustainability; we must conserve our way to it."*

I appeal to the Chair and Members of the Planning and Environment Committee to think globally and act locally to make London a truly sustainable city. Adopt the Deputy City Manager's recommendations to designate 183 Ann Street and 197 Ann Street for the benefit of generations to come, and reject the short-sighted, self-interested proposal of York Developments as unworthy of a world-class city.

Sincerely,  
Lorraine Tinsley

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\* I would add that the Distillery District's success is in large part due to the preservation of the integrity of its historic buildings. In any future development proposals for the Kent Brewery district, facadomies must be prohibited, in accordance with Policy 568 of the London Plan. A case in point is 93-95 Dufferin Avenue, whose brutal facadomy for private gain has utterly destroyed its historical and architectural integrity and many of its heritage attributes — representing a clear and present violation of the public interest in this designated property. It is a terrible precedent for London.

\*\* Consent: I hereby consent to the placement of this email placed on the public agenda where it will become part of the public record and will be made available electronically through the City of London's website.

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